Simmons, Carrie

From: Lizzy Martinez <emchambers@aol.com>
Sent: Thursday, February 27, 2020 4:25 PM
To: Curtis, Susan
Cc: General Plan Update
Subject: 2040 General Plan Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Ventura County Resource Management Agency, Planning Division

Attn: Susan Curtis, Manager, General Plan Update Section

800 South Victoria Avenue, L#1740

Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Laura McAvoy

I support this letter-
Elizabeth Chambers Martinez

Sent from my iPhone

Simmons, Carrie

From: Patrick de Nicola <patrickdenicola@gmail.com>
Sent: Thursday, February 27, 2020 4:28 PM
To: General Plan Update
Subject: Ventura County General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Curtis,

I am writing to express my concern over the flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great-great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my great grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, “unlike the Preble area, services are not readily available to the Olivas lands.” This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is “not included in the City’s sanitation district because of problems with water pressure.” This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district’s pipelines actually traverse our property.

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear In the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and

with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.

3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."

4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.

5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

Sincerely,

Patrick de Nicola

Simmons, Carrie

From: Trevor Zierhut <trevor@thezierhutgroup.com>
Sent: Thursday, February 27, 2020 4:32 PM
To: General Plan Update
Cc: Curtis, Susan
Subject: Draft EIR Comment Letter
Attachments: Labor Letter Comment on DEIR.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Please accept the attached letter below as part of the public comment on the 2020 General Plan Draft Economic Impact Report. The letter expresses the views of coalition partners named in the letter and I can share their contact information with you if needed for verification.

If possible, I would appreciate a response as confirmation of receipt of this comment for the public record.

Thank you,

--
Trevor Zierhut
Principal Consultant
The Zierhut Group
805-407-5014

February 27, 2020

Susan Curtis, Manager, General Plan Section Update
Ventura County Resource Management Agency, Planning Division
800 S. Victoria Ave., L #1740
Ventura, California 93009

Re: General Plan Update Draft Environmental Impact Report Comments

Dear Ms. Curtis,

We represent workers in Ventura County through the Tri-Counties Building & Construction Trade Unions, LiUNA Local 585, International Brotherhood of Electrical Workers (IBEW 952), and Southwest Carpenters.

Our organization advocates for local government policies that support the rights of workers, their families and communities. We advocate for policies that support a strong economy that provides robust opportunities for a skilled, well-trained workforce. We are committed to fight against policies that restrict the ability to work in the high-paying jobs that afford our members lifetime career opportunities.

The Draft Environmental Impact Review (DEIR) does not sufficiently evaluate the impacts that the General Plan policies will have on jobs and the economy. It falls short of addressing the housing crisis facing Ventura County. It does not do enough to address the need for increasing housing supply in the county.

The General Plan Update disproportionately targets the local oil and gas industry that have worked in Ventura County for decades. The DEIR underrepresents the number of workers who would be impacted by the oil and gas policies outlined in the General Plan.

We represent a diverse group of workers who depend on high-paying jobs with upward mobility and benefits for our families. The suggestion that our members should re-train from a specialized skill they have dedicated their career to is objectionable. The DEIR must address the salary differences and opportunities between the suggested green jobs of a carbon neutral economy and those currently held by the skilled workforce.

Our primary goal is to ensure our members' jobs and families are protected. Upon review of the General Plan Update it is clear that jobs will be impacted and in some cases eliminated and that is not reflected in this iteration of the DEIR.

We respectfully ask that the county revises and recirculates the DEIR and takes the time to thoughtfully analyze the impacts these policies will have on working families. The General Plan is a critical factor in the county's economic success. It should encourage economic growth and opportunity for working people.

Sincerely,

Martin Rodriguez
President
Tri-Counties Building & Construction Trades Council

Tony Skinner
Executive Secretary-Treasurer
Tri-Counties Building & Construction Trades Council

Jeff Bode
Business Manager
International Brotherhood of Electrical Workers Local 952

Anthony Mireles
Business Manager
LiUNA Laborers Local 585

Mercy Urrea
Southwest Regional Council of Carpenters

Simmons, Carrie

From: Douglas Spondello <DSpondello@MoorparkCA.gov>
Sent: Thursday, February 27, 2020 4:37 PM
To: General Plan Update; Curtis, Susan
Cc: Karen Vaughn; Brown, Troy; Sean Corrigan
Subject: Comments Regarding the VC2040 General Plan - Draft EIR
Attachments: VC2040 DEIR - City of Moorpark 2.27.20.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Evening Susan and Team,
Congratulations on your progress and release of the Draft EIR for VC2040! We are pleased to provide the attached comments and thank you for the opportunity to discuss.
Respectfully,
Doug

Douglas Spondello
Planning Manager
Community Development Department
City of Moorpark | 799 Moorpark Ave. | Moorpark, CA 93021
(805) 517-6251 | dspondello@moorparkca.gov
www.moorparkca.gov

CITY OF MOORPARK

COMMUNITY DEVELOPMENT DEPARTMENT | 799 Moorpark Avenue, Moorpark, California 93021
Main City Phone Number (805) 517-6200 | Fax (805) 532-2540 | www.moorparkca.gov

February 27, 2020

Ventura County Resource Management Agency, Planning Division
ATTN: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009

Subject: Comments Regarding the Draft Environmental Impact Report (EIR) for the County of Ventura Draft 2040 General Plan

Mrs. Curtis,

Thank you for providing the opportunity to provide comments regarding the Draft EIR for the County of Ventura Draft 2040 General Plan. The City of Moorpark requests that you consider the following:

Comment 1

The City of Moorpark had previously provided comments on July 3, 2015 and August 16, 2019 regarding a desire to have certain regional roadway improvements acknowledged as priorities in the Circulation Element and, by extension, the EIR. These items do not appear to be included, either directly or indirectly, in the current draft. Our City Council has identified traffic improvements as a strategic priority. We are therefore resubmitting our request that the following projects are identified within the goals and policies of the Circulation Element and EIR:

- Improvements to Grimes Canyon Road, including the realignment of Hitch Boulevard at Los Angeles Avenue; and
- Construction of the Broadway Road connection to the State Route 23 bypass, as outlined in the 2009 Ventura County Congestion Management Plan.

Additionally, the Draft Circulation Element (page 4-3) establishes a Level of Service (LOS) standard of "E" for State Route (SR) 118, immediately west of the City of Moorpark. This condition should be addressed and improved in the General Plan and can be mitigated with the construction of an additional lane of travel in each direction. The draft EIR and General Plan Circulation Element should consider mitigation the LOS E condition and circulation on this corridor of SR118.

Comment 2

Page 4.13-1 states the following (emphasis added):

> ENVIRONMENTAL SETTING
>
> In addition to the information provided in Section 11.6, "Noise and Vibration," of the Background Report (Appendix B), the following information is relevant to understanding and evaluating the potential noise and vibration impacts of the 2040 General Plan.
>
> The existing traffic noise evaluation included in the Background Report (Appendix B) analyzed a number of roadway segments that are located outside of the County's jurisdiction. In addition, the traffic noise assessment included in the Background Report (pages 11-88 to 11-97) was based on traffic data from 2014 and 2015. Since the preparation of the Background Report, more recent traffic data are available. **For the purposes of the analysis, the traffic noise modeling was updated to only evaluate roadway and highway segments within the unincorporated portions of the county that are regularly counted by the County's Public Works Agency and to include updated traffic counts conducted in 2017 and 2018.** Table 4.13-1 provides the modeled existing noise levels at 50 feet from the roadway, as well as distances to the 60, 65, and 70 A-weighted decibel (dBA) community noise equivalent level (CNEL) contour for all modeled roadways. Detailed noise modeling inputs are provided in Appendix E.

Pursuant to the requirements of the California Environmental Quality Act, the EIR must evaluate traffic noise modeling for <u>all</u> roadway and highway segments that are within the scope of the DEIR and Draft General Plan. The scope of analysis in the EIR should not be limited to roadways that may or may not be "counted" by the County Public Works Agency.

<u>Comment 3</u>

Table 4.13-1 Existing Noise Contour Distances and Table 4.13-6 Projected 2040 Noise Levels and Contours: Please update this section to include a map or exhibit that more clearly indicates the limits of each "corridor and segment". In many cases, the scope of each corridor and segment are not clearly identified. Additional comments may be provided when the limits of the corridors are fully understood.

<u>Comment 4</u>

Table 4.13-1 Existing Noise Contour Distances and Table 4.13-6 Projected 2040 Noise Levels and Contours: Corridor and Segment 105 references "Walnut Avenue north of Los Angeles Avenue (SR 118)". "Walnut Street" is not within the City of Moorpark; please clarify whether this is intended to reference Walnut Avenue or Walnut Canyon Road. As mentioned in Comment 3, a map or exhibit would also assist in identifying what this corridor includes.

<u>Comment 5</u>

Page 4.13-8 states the following:

> Generate new or additional transit uses or heavy vehicle (e.g., semi-truck or bus) trips **on uneven roadways** located within proximity to sensitive uses that has the

> potential to either individually or when combined with other recently approved, pending, and probable future projects, exceed the threshold criteria of the transit use thresholds shown in Table 4.13-3 below.

This section should be updated to identify the thresholds used to determine an uneven roadway or include a map or exhibit that identifies where these conditions exist.

Comment 6

Page 4.13-9 identifies Policy HAZ-9.2 for Noise Compatibility Standards and provides the following mitigation:

> **4. New noise generators**, proposed to be located near any noise sensitive use, shall incorporate noise control measures so that ongoing outdoor noise levels received by the noise sensitive receptor, measured at the exterior wall of the building, do not exceed any of the following standards:
>
> a. Leq1H of 55dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 6:00 a.m. to 7:00 p.m.;
>
> b. Leq1H of 50dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 7:00 p.m. to 10:00 p.m.; and
>
> c. Leq1H of 45dB(A) or ambient noise level plus 3dB(A), whichever is greater, during any hour from 10:00 p.m. to 6:00 a.m.

This mitigation measure may not be sufficient to address noise impacts presented by increased operations of *existing* noise generators. This language should be updated to clarify that the mitigation measure will apply to all new noise generators and also existing noise generators that may be modified to expand or intensify the noise generated.

Comment 7

Page 4.13-10 includes Policy HAZ-9.3:

> **Policy HAZ-9.3: Development Along Travel Routes.** The County shall evaluate discretionary development for noise generated by project-related traffic along the travel route to the nearest intersection which allows for movement of traffic in multiple directions. In all cases, the evaluation of project-related roadway noise shall be evaluated **along the travel route(s) within 1,600 feet of the project site**.

The use of a 1,600 foot boundary in order to determine whether or not a proposed development will impact roadway noise is not clearly explained and can appear arbitrary. The term “travel routes” is also not clearly defined and open to interpretation (i.e. private driveways, access easements, public rights-of-way). The noise impacts associated with major new development do not cease when trucks travel 1,600 feet beyond the project site. Accordingly, this policy should be developed further to evaluate and mitigate the noise impacts along the likely travel routes serving the project.

Comment 8

Page 4.13-14 includes the following:

> 15. Select truck routes for material delivery and spoils disposal so that noise from heavy-duty trucks will have a minimal impact on noise sensitive receptors. **Proposed truck haul routes are to be submitted to the County Transportation Division for approval**.
>
> a. Conduct truck loading, unloading, and hauling operations so noise and vibration are kept to a minimum.
>
> b. Route construction equipment and vehicles carrying soil, concrete or other materials over streets and routes that will cause the least disturbance to residents in the vicinity of construction sites and haul roads.
>
> c. Do not operate haul trucks on streets within 250 feet of school buildings during school hours or hospitals and nursing homes at any time, without a variance.
>
> **d. Submit haul routes and staging areas to the County Transportation Division for approval, at least 30 days before the required usage date.**
>
> If the above listed construction equipment noise control measures are not sufficient to reduce noise levels, the project would be required to install construction noise curtains, blankets, and barriers or receptor noise control barriers detailed in the *Construction Noise Threshold Criteria and Control Plan* to ensure noise levels are reduced below applicable County noise standards. The 2040 General Plan policies and measures listed in the *Construction Noise Threshold Criteria and Control Plan* would require individual development projects to include numerous noise-reducing techniques and minimize noise at receiving land uses. The effectiveness of these measures would be ensured through Policies HAZ-9.4 and HAZ-9.2, which require the implementation of mitigation developed through project-level acoustical analyses. Because noise levels generated from construction under the 2040 General Plan would be temporary and reduction measures would be implemented to ensure construction noise would not exceed applicable standards at nearby receptors, this impact would be less than significant.

Please update this item to identify the specific criteria upon which the County Transportation Division would be evaluating proposed truck haul routes, including items a. through d. As written, it appears as though the routes are submitted for summary approval, with no evaluation or discretion. It is also requested that language is included to require the County Transportation Division to notify the appropriate City counterparts within any jurisdictions that may be impacted by the proposed truck routes and provide an opportunity to receive feedback received prior to approving a truck haul route.

We sincerely appreciate your consideration of these items and look forward to continued collaboration on issues that cross jurisdictional boundaries. Please feel free to contact me at (805) 517-6251 or Dspondello@moorparkca.gov if you would like to discuss further.

Regards,

Douglas Spondello
Planning Manager

CC:

Troy Brown, City Manager
Karen Vaughn, AICP, Community Development Director
Sean Corrigan, City Engineer/Public Works Director

Simmons, Carrie

From: Maxwell, James
Sent: Thursday, February 27, 2020 4:39 PM
To: General Plan Update; Curtis, Susan
Cc: Loeb, Kim
Subject: RE: VC2040 | Notice of Availability of a Draft EIR for Public Review
Attachments: VC 2040 GPU DEIR GW Response Memo 20200227.pdf; Chapter 10 Water Resources_GW review_20200227.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Susan,

Please see the attached response memo from Groundwater Resources for the Ventura County 2040 General Plan Update Environmental Impact Report. Groundwater Resources also reviewed and updated relevant information in Chapter 10 (Water Resources) of the Background Report (Appendix B) from the DEIR. A word document of Chapter 10 with markup and comments is also attached.

Let us know if you have questions or comments.

Thanks,

James Maxwell, PG, CEG
Groundwater Specialist
Watershed Protection District
Water Resources Division
P: 805-654-5164
E: james.maxwell@ventura.org

From: Ventura County General Plan Update <generalplanupdate@ventura.org>
Sent: Monday, January 13, 2020 7:29 AM
To: Maxwell, James <James.Maxwell@ventura.org>
Subject: VC2040 | Notice of Availability of a Draft EIR for Public Review

Notice of Availability of a Draft EIR For Public Review

Notice is hereby given that a Draft Environmental Impact Report (EIR) has been prepared by the County of Ventura, State of California, and is available for public review pursuant to the California Environmental Quality Act (CEQA) Guidelines for the Ventura County 2040 General Plan (State Clearinghouse No. #2019011026).

PROJECT LOCATION: All unincorporated areas within Ventura County

PROJECT DESCRIPTION: The proposed project is a comprehensive update of the County of Ventura General Plan, also known as the 2040 General Plan. The 2040 General Plan will set forth the County's vision of its future and identify the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including but not limited to land use, climate change, agriculture, transportation, hazards, public facilities, health and safety, environmental justice, and resource conservation out to the year 2040. The County, as the lead agency, has prepared an EIR in accordance with CEQA. The purpose of the notice of availability is to call attention to this EIR and to request that interested persons review and provide comments on significant environmental issues, mitigation measures, and range of reasonable alternatives addressed in the EIR. The 2040 General Plan is anticipated to be adopted in 2020. With implementation of the 2040 General Plan, development may occur on or near site(s) identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5.

SIGNIFICANT ENVIRONMENTAL EFFECTS: The Draft EIR has identified significant and unavoidable environmental impacts in the following resource areas.

- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural, Tribal Cultural, and Paleontological Resources
- Greenhouse Gas Emissions
- Hazards, Hazardous Materials, and Wildfire
- Mineral and Petroleum Resources

- Noise and Vibration
- Public Services and Recreation
- Transportation and Traffic
- Utilities

WHERE THE DRAFT EIR IS AVAILABLE: The Draft EIR and supporting documents are available for public review at the following locations:

- 2040 General Plan Update webpage at https://vc2040.org/;
- The Planning Division website at http://vcrma.org/divisions/planning (select "CEQA Environmental Review"); and
- County of Ventura, Resource Management Agency, Planning Division Public Counter, 3d Floor, Hall of Administration, 800 S. Victoria Avenue, Ventura, CA, 93009, between the hours of 7:30 a.m. and 4:30 p.m., Monday through Friday.

Digital versions of the Draft EIR and supporting documents are available at the following libraries:

- Albert H. Soliz Library (2820 Jordan Street, Oxnard, CA 93036);
- Avenue Library (606 North Ventura Ave., Ventura, CA 93001);
- E.P. Foster Library (651 East Main St., Ventura, CA 93001);
- Fillmore Library (502 2nd St., Fillmore, CA 93015);
- Hill Road Library (1070 S. Hill Rd., Ventura, CA 93003);
- Meiners Oaks Library (114 North Padre Juan, Ojai, CA 93023);
- Oak Park Library (899 North Kanan Rd., Oak Park, CA 91377);
- Oak View Library (555 Mahoney Ave., Oak View, CA 93022);
- Ojai Library (111 East Ojai Ave., Ojai, CA 93023);
- Piru Library (3811 Center St., Piru, CA 93040);
- Ray D. Prueter Library (510 Park Ave., Port Hueneme, CA 93041); and
- Saticoy Library (1292 Los Angeles Ave., Ventura CA 93004).

PUBLIC REVIEW AND COMMENT PERIOD: The 45-day public review and comment period during which the County will receive comments on the Draft EIR begins Monday, January 13, 2020 and ends at 5:00 p.m. on Thursday, February 27, 2020.

SEND COMMENTS TO:

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

Or via email to: GeneralPlanUpdate@ventura.org

Please include your name or the name of a contact person, your agency or organization (if applicable), and U.S. mail and email addresses.

By: Dave Ward, Director
Ventura County Planning Division

County of Ventura
Resource Management Agency, Planning Division
800 South Victoria Avenue, L #1740
Ventura, CA 93009

For more information, contact Susan Curtis by email or at (805) 654-2497.

Para más información póngase en contacto con Susan Curtis por correo electrónico o al (805) 654-2497.

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PUBLIC WORKS
VENTURA COUNTY

WATERSHED PROTECTION

MEMORANDUM

DATE: February 27, 2020

TO: Susan Curtis, Manager, General Plan Update Section

FROM: James Maxwell, Groundwater Specialist

SUBJECT: Ventura County Public Works Agency, Water Resources Division (VCWRD) Response, Draft Environmental Impact Report (DEIR), Ventura County 2040 General Plan

VCWRD reviewed the DEIR and supporting documents (Appendix B, Ventura County 2040 General Plan Update Background Report, Revised Public Review Draft January 2020) submitted by the County of Ventura. VCWRD does not have any comments regarding the DEIR. Relevant updates and comments have been made to Chapter 10 (Water Resources) of the Background Report.

Ventura County 2040 GENERAL PLAN

Chapter 10
Water Resources

10 WATER RESOURCES

INTRODUCTION

This chapter summarizes the various water resources and water resource issues in Ventura County. It is organized into the following sections:

- Resources Assessment~~Major Findings~~ (Section 10.1)
- Legal and Regulatory Framework for Water Management (Section 10.2)
- Integrated Regional Water Management (10.3)
- Existing Conditions (by watershed) (Section 10.4)
- Trends and Future Conditions (Section 10.5)
- Key Terms (Section 10.6)
- References (Section 10.7)

The organization of this chapter differs from others in the Background Report because of the nature of its subject matter. First, because the overall legal and regulatory framework affecting water resources is key to understanding how such resources are managed, the framework is the first substantive discussion in this chapter. Second, because water resources are so integrally tied to geography, the existing conditions discussions are organized according to the C~~c~~ounty's watersheds, with each aspect of the resource addressed as it relates uniquely to each watershed.

SECTION 10.1 RESOURCES ASSESSMENT~~MAJOR FINDINGS~~

Sustainable~~Adequate~~ water supply is an ~~current and~~ ongoing concern in Ventura County due to~~to climate change and~~ drought conditions, associated~~the related~~ declines in surface~~river~~ flows and reservoir levels, ~~historic~~ overdraft of ~~several local~~ groundwater basins, curtailment of groundwater extraction~~supplies in southern Ventura County~~, prohibition of new groundwater wells ~~prohibitions~~, and reduced deliveries of imported water. More than 850,000 residents and 156 square miles (95,802 acres) of irrigated farmland in Ventura County experienced direct impacts from ~~the~~ drought conditions that began in 2012.

- **W~~The water supply challenges are great and~~ could potentially impact domestic~~residents~~, commercial/industrial, municipal~~businesses~~, agricultural~~e~~, and ~~the~~ environmental resources ~~of Ventura County~~ without goal-oriented planning and implementation~~concerted action~~.**
    - ~~**Climate change poses major challenges for water supply**. Climate change is causing warmer temperatures, altered patterns of precipitation, runoff, and rising sea levels. Climate change may compromise the ability to effectively manage water supplies, floods and other natural resources. It is anticipated that climate change will increase demand for water as temperatures rise, increase the need for water for firefighting purposes, change the timing and pattern of snowmelt and runoff, and sea level rise will threaten aging coastal water infrastructure. Planning for and adapting to these changes, particularly impacts to long-term water supply reliability, will be a significant challenge. Additional~~

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details on climate change are found in Chapter 12 of the General Plan Background Report.

- **Declines in surface water flow and reservoir levels in Western Ventura County.** Water supplies The water for more than 70,000 people in western Ventura County are strained byis at risk due to the drought conditions that began in 2012. Imported water delivered by Calleguas Municipal Water District (CMWD) is not availablecannot currently be delivered to western Ventura County and groundwater resources areis very limited. Water agencies that obtaintypically get all or part of their supplywater from wells have had to start supplementpurchasing water from Lake Casitas water, as their wells have run dry. During the drought conditions, purchases of Lake Casitas water increased by 1,000%. The lake is a diminishedn important, but dwindling, resource threatened by both water quality and water supply issuesconcerns. As of February 2020, Lake Casitas is over 40% capacity; however, fFor the first time since 1968, reservoir volumelevels in Lake Casitas areis expected to drop below 35% due to decreased inflow volume. Historic lLow water volumelevels in 1968 resulted in significant thermal stratification and anoxic (without dissolved oxygen) conditions. The lThisow oxygen levels created an environment where manganese and hydrogen sulfide, normally trapped in sediments, became soluble, causing unfavorable color and taste to the reservoir lake water to have a brown color and bitter metallic taste. There were alsoThese conditions encourage growth of large blue-green algae blooms. CNormally creek inflows typically provide supply and facilitate lake water mixing (which helps maintain good water quality).
  Inflows have significantly decreased since 2012, causing the lake to stratify and stagnate. Casitas Municipal Water District (Casitas) added has had to add aaeration facilities to combat the water quality effects from the drought.
- **Drought has significantly affected local water supplies.** More than 850,000 residents and 156 square miles (95,802 acres) of irrigated farmland in Ventura County experienced direct impacts from the drought that began in 2012.
- **There are inadequate water supplies to meet future demands in some areas of the county.** Developing new water supplies is costly and requires a significant amount of time for planning, identifying and securing funding, environmental review, permitting, and construction. Some of the new supplies being considered include advanced treatment of wastewater for use as potable water, stormwater capture and reuse, treatment of brackish groundwater, and ocean desalination. Facilities to import and deliver locally-held, State Water Project entitlements are being considered. In addition, significant water conservation efforts have begun, mainly in municipal and industrial uses. Agricultural practices are also increasing in efficiency. These efforts will need to continue and be sustained.
- **Overdrafted gGroundwater basins in the county are experiencing overdraft conditions**. Groundwater is the largest single source of water in the County, pumped by individual well owners and water purveyors.estimated to provide 67 percent of the local water supply. The California Department of Water Resources (DWR) has identified the following groundwater basins in Ventura County as being in critical overdraft[1]:
  - Cuyama Valley Basin (DWR Basin No. 3-013)
  - Oxnard Subbasin (DWR Basin No. 4-004.02)
  - Pleasant Valley Basin (DWR Basin No. 4-006).

  T(the Cuyama Valley Bbasin as a whole is considered to be in overdraft, however, the United States Geological Survey (USGS) estimates the portion in Ventura County not to be in overdraft.), Oxnard Plain, and Pleasant Valley.

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These basins serve both urban populations and agriculture. In April 2014, to protect groundwater supplies, the Fox Canyon Groundwater Management Agency, passed Emergency Ordinance E which mandated reduced extractions in many of the groundwater basins in southern Ventura County. In December 2014 the Ventura County Board of Supervisors approved and adopted Ordinance 4468 which prohibits new water

[1] As defined in the Sustainable Groundwater Management Act, a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts such as persistent lowering of groundwater levels, drying of wells, reductions in groundwater storage, sea water intrusion, degradation of water quality, land subsidence, and reduction of water in streams and lakes.

wells within a defined boundary~~in the unincorporated County in the majority of groundwater basins~~. These prohibitions will not be removed until Groundwater Sustainability Agencies (GSAs) are formed and have completed Ggroundwater Ssustainability Pplans (GSPs) per the Sustainable Groundwater Management Act (SGMA). Implementation of SGMA~~the Sustainable Groundwater Management Act will~~ requires an assessment of ~~the condition of groundwater~~ basin conditions~~s~~ and~~, managing~~ groundwater demand, and~~ undertaking~~ implementation of groundwater recharge projects to achieve long-term sustainability.

- **Variability in deliveries of imported water.** Approximately 75%~~three-quarters~~ of Ventura County residents receive imported water~~supply~~ from CMWD~~alleguas Municipal Water District~~. Imported water volume~~The amount of imported water~~ varies depending on seasonal ~~climatic~~ conditions~~,~~ regulatory restrictions on SWP exports,~~conditions~~ water costs and regional demands. ~~The~~ DWR~~California Department of Water Resources~~ prepares a biennial report to evaluate the reliability of imported water from the State Water Project. The most recent update, the 2017~~5~~ State Water Project Delivery Capability Report, ~~anticipates greater extremes in the imported water system with lower than historic water availability in dry years and greater than historic water availability in wet years, with the long-term average deliveries decreasing~~reported an increased average annual delivery of water since the 2015 Report.
- **Water resources dedicated to environmental purposes~~ may change~~**. State and federal agency regulations restrict~~requirements dictate~~ the amount of exported SWP water that must remain ~~be~~ available ~~for endangered species and this affects management of water resources~~. Water availability for municipal, agricultural and other uses will be potentially reduced by stricter management of inflow to upstream reservoirs to~~Potential requirements to provide increased instream flows could further reduce water available for municipal, agricultural, and other uses~~.
- **~~There are i~~Iinsufficient~~adequate~~ water supplyies to meet future County demands ~~in some areas of the county~~**. ~~Developing new water supplies is costly and requires a significant amount of time for planning, identifying and securing funding, environmental review, permitting, and construction. Some of the new supplies~~Alternative water sources being considered include advanced treatment of wastewater for use as potable water, stormwater capture and reuse, treatment of brackish groundwater, and ocean desalination. Facilities to import and deliver ~~locally held,~~ SWP~~State Water Project~~ entitlements are being considered. ~~In addition, significant w~~Water conservation measures are ~~efforts~~ have begun, mainly in municipal and industrial uses. Agricultural practices are also increasing in efficiency. These efforts will need to continue and be sustained.

- **Shift toward Iintegrated Regional Wwatershed Mmanagement (IRWM).** In the past, various~~different~~ elements of a~~the~~ water systems were managed independently~~separate~~l~~, y from other elements, i.e., g~~Groundwater was managed as a separate resource from stormwater and separate from recycled water. There has been a shift in water resources management and regulation toward watershed~~-~~ based approaches. This A shift in water resources management and regulation toward a watershed-based approach integrates on a regional level the many facets of water resources management, including water supply, water quality, flood management, ecosystem health, and recreation through enhanced collaboration across geographic and political boundaries and diverse stakeholder groups.

- ~~**Water supplies dedicated to environmental purposes may change**. State and federal requirements dictate the amount of water that must be available for endangered species and this affects management of water resources. Potential requirements to provide increased instream flows could~~

~~further reduce water available for municipal, agricultural, and other uses.~~

- ~~**There is great diversity in the size, source, and organization of w**~~**Variety of water ~~ater~~ supply~~iers~~ in Ventura County.** Many properties are served by private wells and surface water diversions. Other properties are served by mutual water companies, irrigation companies, special districts, cities, private utilities, and wholesale water agencies. There are more than 162 water suppliers in the county.

- ~~Land development~~ **Water supply and demand for land development**~~significantly affects demand and supply~~**.** ~~The type of l~~Land usagee and development ~~greatly drives the demand and~~ dictates the type and ~~ty~~ volume~~pe~~ of water needed. High-density residential development ~~will~~ requires drinking-quality water~~water treated to drinking water standards~~. ~~Water sent to users with~~ Water collected by sewer systems is collected and can be treated and used as a secondary recycled water supply. Agricultural users~~users may be able to~~ apply~~utilize~~ raw or recycled water and application of water in agricultural fields that assists with ~~may~~ recharge to groundwater.
- **Impacts from ~~U~~urban land development** ~~can impact water quality~~**resources**. Land development can impact water quality~~,~~ however, ~~but there are~~implementation of best management ~~practices~~ and conservation~~other~~ practices can be employed~~methods to~~ to avoid and lessen potential residual~~such~~ impacts. D~~Land d~~evelopment commonly ~~creates an~~ increases ~~in~~ impervious surfaces~~,~~ which increases the ~~amount of~~ runoff volume and stormwater pollutants ~~in stormwater~~. ~~As s~~Stormwater runoff~~s~~ over impervious surfaces such as rooftops, roadways, and parking lots, the runoff accumulates sediment, pollution~~pollution and sediment~~, nutrients, bacteria, and other impacts~~pollutants~~. ~~Pollutants in s~~Stormwater is~~are~~ typically conveyed~~transported~~ directly to drainage~~local~~ channels, tributaries, rivers~~,~~ and the ocean, prior to or without any treatment. Land development potentially impacts floodplains, increases the risk of flooding~~,~~ and decreases the ability to manage storm waters naturally. Developments in floodplains may impact ~~the ability to recharge~~ groundwater recharge ~~basins~~ through infiltration and may reduce~~move~~ percolation surface area~~potential sites with recharge capabilities~~. ~~In addition to altering stormwater runoff, l~~Land development introduces other point sources of pollution including discharges from sewage-treatment plants, individual septic tanks, community wastewater treatment systems~~,~~ and industrial facilities.
- **Impacts from a~~A~~griculture land development** ~~can impact water quality~~**resources**. Soil disturbance~~Tillage~~ and subsequent irrigation ~~of land~~ changes the runoff and infiltration characteristics of the ground surface~~land~~, potentially affecting percolation to the subsurface and recharge to groundwater. ~~,~~This also~~and~~ increases erosion and ~~resulting~~ sediment deposition into surface-water ~~bodies., while altering evapotranspiration. This in turn affects the interaction of groundwater and surface water.~~
- ~~Poor water~~ **Water qquality limitations to~~s~~ b~~b~~eneficial use~~s of water~~**. Decreased~~Poor~~ water quality can limit the availability of~~suitability of~~ a water ~~body~~ resource for beneficial uses such as agriculture, recreation~~, fisheries~~, and riverine habitat. Poor water quality ~~also can~~ limits the use of the water ~~for~~ as a water supply ~~or drastically increase the treatment cost~~.
- **Development impacts to~~can affect~~ natural hydrologic processes.** D~~Some d~~evelopment can potentially~~significantly~~ alter land topography and surface geography. Removal of natural vegetation and manmade structures such as levees, dams, and diversion structures disrupt ~~natural~~ hydrologic processes (i.e. sediment transport and deposition, groundwater recharge). These changes alter water velocity, river substrate, water shading, soil moisture, and other ecosystem characteristics needed by fish and wildlife.

SECTION 10.2 LEGAL AND REGULATORY FRAMEWORK FOR WATER MANAGEMENT

The ~~framework for~~ water management framework of~~in~~ Ventura County ~~is complex and~~ reflects the ~~network of~~ laws, policies~~,~~ and regulations governing California water. Many laws and many institutions influence water planning **(Table 10-1)**~~; Table 10 provides a broad regulatory overview~~. Additional details ~~on several of these laws,~~ and a discussion of regulations with land use linkages, are further summarized on the following pages.

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TABLE 10-1 FRAMEWORK FOR WATER MANAGEMENT	
Statute, Code, or Authority	**Relationship to Water Management**
State of California Constitution, Article X, Section 2	Requires that all entities in the State use water in a beneficial manner and prohibits unreasonable use and water waste.
State of California Riparian Water Rights	Allows owners of land on a stream to divert and use a portion of the flow.
State of California Appropriative Water Rights	The right to divert, store, and use water on any land, provided the use is reasonable and does not harm earlier appropriators. Appropriative rights are managed by the State Water Resources Control Board.
State of California Water Commission Act	Established a system of State-issued permits and licenses to appropriate water.
Federal Endangered Species Act	Designed to protect endangered and threatened species and promote species recovery. Requires that federal agencies consult with the US Fish and Wildlife Service and the National Marine Fisheries Service to ensure that federal actions do not jeopardize endangered or threatened species or their habitat.
National Environmental Policy Act	Requires federal agencies to conduct an environmental review for federal actions that may affect the environment; encourages implementation of mitigation measures to avoid impacts.
State of California Endangered Species Act	Designed to protect endangered and threatened species and promote species recovery. Requires that state and local agencies consult with the California Fish and Wildlife Service to ensure that their actions do not jeopardize endangered or threatened species or their habitat.
California Environmental Quality Act (CEQA)	Requires state and local governments to evaluate environmental effects and find ways to mitigate effects where feasible, prior to approving projects.
State of California Porter-Cologne Water Quality Control Act	This is a water quality control law and regulatory program to protect water quality and beneficial use of the State's water. This act allows regulation of discharges to water.
Federal Clean Water Act	Requires permits for the discharge of pollutants to waters of the United States from any point source. See additional detail below.
Federal and State Safe Drinking Water Act	Under this law, federal and state agencies set and enforce standards for drinking water quality.
State of California Regional and Local Water Agency Formation enabling acts	Guides the formation of districts for controlling, conserving, managing, and distributing water.
State of California Urban Water Management Planning (UWMP) Act	Requires urban water suppliers to conduct regular comparisons of supplies and demands. (See additional detail below.) Within the UWMP, water suppliers must include, to the extent practicable, information on the water quality of existing sources and the manner in which water

TABLE 10-1 FRAMEWORK FOR WATER MANAGEMENT	
Statute, Code, or Authority	**Relationship to Water Management**
	quality affects supply reliability. Based on the UWMP, water suppliers explore enhancing basic supplies from traditional sources such as the State Water Project (SWP) as well as other options. These include groundwater extraction, water exchanges and transfers, water conservation, recycling, brackish water desalination and water banking/conjunctive use. Each option will involve evaluations of how it would: (1) fit into the overall supply/demand framework; (2) impact the environment; and (3) affect customers. The objective of these more detailed evaluations would be to find the optimum mix of conservation and supply programs that ensure customers' needs are met.
State of California Agricultural Water Management Act	Senate Bill X7-7, the Water Conservation Act of 2009 (SB X7-7), requires agricultural water suppliers who provide water to more than 25,000 irrigated acres (excluding acreage irrigated by recycled water) to adopt and submit Agricultural Water Management Plans (AWMP) to DWR and to implement Efficient Water Management Practices, including the measurement and volumetric pricing of water deliveries. Within Ventura County, Casitas Municipal Water District, Camrosa Water District, and Ventura County Waterworks District No. 1 prepared AWMPs in 2015.
State of California Water Conservation in Landscaping Act	Requires specific water efficiencies for landscapes in new or redevelopment projects.
State of California Energy Commission Title 20	Sets standards for toilets, urinals, faucets, and showerheads. The appliance standards dictate what can be sold in California and impact new construction and replacement fixtures in existing homes.
State of California CAL Green Building Code	Requires residential and non-residential water efficiency and conservation measures for new structures that will reduce the overall potable water use by 20 percent. Water savings can be achieved by installing plumbing fixtures and fittings that meet the 20 percent reduced flow rate specified in the CAL Green Code, or by other measures that meet the reduction standard.
State of California Sustainable Groundwater Management Act	Requires entities using water from groundwater basins designated as high or medium priority by the Department of Water Resources to assess the condition of groundwater basins and to develop a framework for long-term sustainability through demand management and groundwater recharge activities. (See additional discussion on the Sustainable Groundwater Management Act further in this Section below .)
State of California Class II Underground Injection Control Program	Regulation of wells used to inject fluids associated with oil and natural gas production. The purpose of the regulation is to ensure fluids associated with oil and gas production are not introduced into drinking water sources. (See additional details below.)

TABLE 10-1 FRAMEWORK FOR WATER MANAGEMENT	
Statute, Code, or Authority	**Relationship to Water Management**
State of California Permitting of Water Systems	Regulates the formation of new public water systems by the State Water Resources Control Board. (See additional detail below.)
County of Ventura General Plan Goals, Policies and Programs	Complies with Section 65300 of the California Government Code which requires that, "Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning."
County of Ventura Subdivision Ordinance	Regulates and control subdivisions of land and in conjunction implements the County's General Plan. (See additional detail below.)
County of Ventura Coastal Zone Ordinance	Regulates all proposed development in the Coastal Zone of Ventura County. (See additional detail below.)
County of Ventura Non-Coastal Zone Ordinance	Regulates all proposed development in the Non-Coastal Zone of Ventura County. (See additional detail below.)
Ventura County Groundwater Conservation Ordinance	Regulates construction, maintenance, operation, use, repair, modification, and destruction of groundwater wells. (See additional detail below.)
County of Ventura Landscape Design Criteria	Requires approval of a landscape plan for new and modified developments. Limits the plant types and plant pallets so as to conserve water~~,~~ and requires minimum irrigation efficiency.
State of California Propositions 50, 84, and 1	Grant funding to encourage regional integrated planning of water resources. (See additional detail below.)
State of California Non-potable Water Reuse Systems-Chapter 15 of the California Plumbing Code (CPC) (as of 2017)	Allows for use of non-potable water (i.e., graywater), which includes wastewater from bathtubs, showers, bathroom washbasins, clothes washing machines and laundry tubs. Requires a plumbing permit from the County of Ventura Resource Management Agency, Building and Safety Division.

Urban Water Management Plan Act (State)

State law requires that urban water suppliers with more than 3,000 customers~~,~~ or who deliver more than 3,000 acre-feet per year (AFY), adopt water management and conservation plans that evaluate water supplies and water demands for a 20-year period. Urban Water Management Plans (UWMP) are to be updated every five years or when there are significant changes in available supplies or demands. An UWMP is a planning tool that generally guides the actions of water management agencies. It provides managers and the public with a broad perspective on a number of water supply issues. It is not a substitute for project-specific planning documents~~, nor was it~~ or intended to be when mandated by the State Legislature. For example, the Legislature mandated that the Plan include a Section that "describes the opportunities for exchanges or water transfers on a short-term or long-term basis." (California Urban

Water Management Planning Act, Article 2, Section 10630(d)). The identification and inclusion of such opportunities~~, and the inclusion of those opportunities~~ in a general water service reliability analysis~~,~~ neither commits a water management agency to pursue a particular water exchange/transfer opportunity, nor precludes a water management agency from exploring exchange/transfer opportunities not identified in the Plan. When specific projects are chosen to be implemented, detailed project plans are developed, environmental analysis, if required, is prepared, and financial and operational plans are detailed.

"A plan is intended to function as a planning tool to guide broad-perspective decision making by the management of water suppliers." (Sonoma County Water Coalition v. Sonoma County Water Agency (2010) 189 Cal. App. 4th 33, 39). It should not be viewed as an exact blueprint for supply and demand management. Water management in California is not a matter of certainty and planning projections may change in response to a number of factors. "[L]ong-term water planning involves expectations and not certainties. Our Supreme Court has recognized the uncertainties inherent in long-term land use and water planning and observed that the generalized information required . . . in the early stages of the planning process are replaced by firm assurances of water supplies at later stages." (Id., at 41). From this perspective, it is appropriate to look at the UWMP as a general planning framework, not a specific action plan. It is an effort to generally answer a series of planning questions including:

- What are the potential sources of supply and what is the reasonable probable yield from them?
- What is the probable demand, given a reasonable set of assumptions about growth and implementation of good water management practices?
- How well do supply and demand figures match up, assuming that the various probable supplies will be pursued by the implementing agency?

Using these "framework" questions and resulting answers~~,~~ the implementing agency will pursue feasible and cost-effective options and opportunities to meet demands.

Based on the UWMP, water suppliers explore enhancing ~~basic~~ supplies from traditional sources such as ~~the State Water Project (~~SWP water~~) as well as other options~~. These include groundwater extraction, water exchanges and transfers, water conservation, recycling, brackish water desalination and water banking/conjunctive use. ~~Specific planning efforts will be undertaken in regard to each option, involving detailed evaluations of how each~~ Ooption~~s~~ are evaluated regarding feasibility ~~would fit~~ into the overall supply/demand framework including~~, how each option would impact the~~ environmental impacts and how each option would affect customers. The objective of these ~~more detailed~~ evaluations is~~would be~~ to find the optimum mix of conservation and supply programs that balance water demand.~~ensure that the needs of customers are met~~.

The Urban Water Management Plan Act requires 60-days notice to any applicable city of county ~~coordination with local land use entities. A~~where the water agency supplies water that the plan is being updated.~~t least 60 days prior to the public hearing on the plan any applicable city or county where the water agency supplies water must be notified that the plan is being updated~~. The water supplier must ~~also~~ provide notice when the Draft UWMP is available for review and comment. Upon completion of the UWMP a copy of the plan must be provided to the applicable land use jurisdictions.

Sustainable Groundwater Management Act (State)

In September 2014, the California legislature enacted comprehensive legislation to manage California groundwater. Known as the Sustainable Groundwater Management Act (SGMA) ~~of 2014~~, the legislation provides a framework for sustainable management of groundwater supplies by local authorities~~, but~~ with

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the potential for state intervention, if necessary. ~~The first step in the process laid out by t~~The legislation requires~~is~~ the formation of local groundwater sustainability agencies (GSAs). ~~These~~ GSAs are established to~~must be formed to~~ address the basin~~groundwater basins determined by the~~ state prioritization ~~to be~~ state~~of high or medium priority,~~ (unless adjudicated). In Ventura County, one~~seven~~ basin~~s~~ is~~are~~ designated as medium priority, ~~Ojai Valley, Upper Ventura River, Cuyama Valley, Arroyo Santa Rosa Valley, Mound, Santa Paula (which is adjudicated), Fillmore~~ and eight~~four~~ are designated as high priority~~, Oxnard Plain, Pleasant Valley, Las Posas, and~~ ~~Piru~~. Three basins are listed as in "critical overdraft:" Oxnard Plain, Pleasant Valley, and Cuyama Valley. The Santa Paula Basin is adjudicated~~,~~ and is currently only subject to annual reporting requirements to DWR under SGMA.

GSAs are empowered to utilize a number of new management tools to achieve the sustainability goal. ~~For example,~~ GSAs may require registration of groundwater wells, mandate annual extraction reports ~~from individual wells~~, impose limits on extractions (allocations)~~,~~ and assess fees to support creation and adoption of a groundwater sustainability plan (GSP). GSAs also may request a revision of a groundwater basin boundary.

GSPs for critically ~~-~~overdrafted basins must be completed and adopted by January 31, 2020. GSPs for high- and medium-priority basins not in overdraft must be completed and adopted by the GSA by January 31, 2022. All high- and medium-priority groundwater basins must achieve sustainability within 20 years of GSP adoption.

The legislation aims ~~aim of the legislation is~~ to achieve~~have~~ groundwater basins manage~~d~~ment within the sustainable yield of each basin. The legislation defines "sustainable groundwater management" as the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results. This is~~, which are~~ defined as ~~any of the following effects~~ the~~:~~ chronic lowering of groundwater levels,~~;~~ significant and unreasonable reductions in groundwater storage,~~;~~ significant and unreasonable seawater intrusion,~~;~~ significant and unreasonable degradation of water quality,~~;~~ significant and unreasonable land subsidence,~~;~~ and surface water depletions that have significant and unreasonable adverse impacts on beneficial uses.

~~The~~ SGMA amends planning and zoning laws to require increased coordination among land use planning agencies and the GSAs, regarding groundwater plans and ~~any~~ updates or modifications of General Plans. Existing local government land use and groundwater authorities are not modified in the Act. Specific changes to California Government Code resulting from SGMA are detailed in Appendix 10.A at the end of this chapter.

Class II Underground Injection Control Program (State)

As discussed in Chapter 8, Section 8.1 (Energy Resources) there are currently 57 oil companies operating in Ventura County, under the authority of 135 conditional use permits granted by the County for~~to authorize~~ oil and gas activities. This~~,~~ includes~~ing~~ the underground injection of water. According to the California Department of Conservation, Division of Oil, Gas and Geothermal Resources' (DOGGR), there are 614 active Underground Injection Control (water injection) wells in Ventura County. The State of California was delegated primary responsibility for implementing the Class II Oil and Gas Underground Injection Control [UIC] program of the federal Safe Drinking Water Act [SDWA] in 1983.

To determine whether certain UIC wells were posing a threat to water supply wells, the State Water Resources Control Board (SWRCB) and its regional water quality control boards (RWQCBs)~~Water Boards~~) completed an

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evaluation of certain UIC wells in December 2016.[2] Staff from the Water Boards reviewed 6,157 UIC wells determined by ~~DOGGR~~ CalGEM to be injecting into non-exempt aquifers.[3] This evaluation included Class II UICs located in Ventura County. UIC wells were screened for proximity to water supply wells or any other indication of risk of impact to drinking water and other beneficial uses.

Based on this screening criteria, ~~DOGGR~~ CalGEM ordered the immediate shut-in of 23 UIC wells, none of which were in Ventura County. (A shut-in well is one which is capable of injection or production~~,~~ but is not in operation). Additionally, the Water Boards issued 71 Information Orders (IOs), requesting additional information from operators of 256 UIC wells. One operator in Ventura County received an IO for a UIC well, which has been abandoned.

In addition to the above UIC regulations, Public Resources Code Section 3106 et. seq. grants ~~DOGGR~~ CalGEM with the authority to supervise the drilling, operation, maintenance~~,~~ and abandonment of wells and the operation, maintenance, and removal or abandonment of tanks and facilities attendant to oil and gas production and designated pipelines, so as to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil and gas deposits from infiltrating water and other causes; loss of oil, gas, or reservoir energy, and damage to underground and surface waters suitable for irrigation or domestic purposes by the infiltration of, or the addition of, detrimental substances.

T~~Furthermore, t~~he California Code of Regulations, Title 14, Division 2, Chapter 4, Development, Regulation, and Conservation of Oil and Gas Resources includes several provisions which regulate injection projects (water injection wells). ~~DOGGR~~ CalGEM is the responsible agency for approving all underground injection and disposal projects before any subsurface injection or disposal project can begin. This includes all EPA Class II wells and air- and gas-injection wells. There are requirements for filing, notification, operating, and testing for underground injection projects (Sections 1724.10 1748.2, 1748.3), and standards for freshwater protection when plugging and abandoning wells (Section 1723.2). This includes CalGEM~~DOGGR~~'s authority to require testing as necessary to prevent damage to life, health, property, and natural resources (Section 1954).

Clean Water Act (Federal)

The Clean Water Act~~, as amended,~~ requires permits for the discharge of pollutants to waters of the United States. Implementation of the Clean Water Act and the Porter-Cologne Water Act is the responsibility of th~~e State Water Resources Control Board and the Regional Water Quality Control Boards~~e SWRCB. In the Ventura area the applicable Regional Board is the Los Angeles Regional Water Quality Control Board (L~~os Angeles~~A RWQCB). The L~~os Angeles~~A RWQCB lays out ~~the~~ water quality objectives, regulations~~,~~ and programs to implement the regulations in the Los Angeles Basin Plan (Los Angeles RWQCB 2014). The Basin Plan is reviewed and updated every three years and ~~, but~~ can be amended at any time. The L~~os Angeles~~A RWQCB manages water quality based on "beneficial uses". In Ventura County, there are twenty-four identified beneficial uses:

[2] The State evaluated "non-exempt" aquifers. The following federal and state criteria must be met for an aquifer to be considered exempt: (a) cannot be a current drinking water source; (b) unlikely to be a future source of drinking water; (c) injection must not impact current/potential future beneficial use; and (d) injection fluids must remain in the proposed exempted area.

[3] U.S. EPA, Region IX (Pacific Southwest Region) has approved six DOGGR aquifer exemption requests, none of which are in Ventura County.

1. **Municipal and Domestic Supply (MUN).** Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

2. **Agricultural Supply (AGR).** Uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

3. **Industrial Process Supply (PROC).** Uses of water for industrial activities that depend primarily on water quality.

4. **Industrial Service Supply (IND).** Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.

5. **Ground Water Recharge (GWR).** Uses of water for natural or artificial recharge of ground water for purposes of future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers.

6. **Freshwater Replenishment (FRSH).** Uses of water for natural or artificial maintenance of surface water quantity or quality (e.g., salinity).

7. **Navigation (NAV).** Uses of water for shipping, travel, or other transportation by private, military, or commercial vessels.

8. **Hydropower Generation (POW).** Uses of water for hydropower generation.

9. **Water Contact Recreation (REC-1).** Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.

10. **Non-contact Water Recreation (REC-2).** Uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

11. **Marine Habitat (MAR).** Uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).

12. **Wildlife Habitat (WILD).** Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

13. **Commercial and Sport Fishing (COMM).** Uses of water for commercial or recreational collection of fish, shellfish, or other organisms including, but not limited to, uses involving organisms intended for human consumption or bait purposes.

14. **Aquaculture (AQUA).** Uses of water for aquaculture or mariculture operations including, but not limited to, propagation, cultivation, maintenance, or harvesting of aquatic plants and animals for human consumption or bait purposes.

15. **Warm Freshwater Habitat (WARM).** Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic

habitats, vegetation, fish, or wildlife, including invertebrates.

16. **Cold Freshwater Habitat (COLD).** Uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

17. **Inland Saline Water Habitat (SAL)**. Uses of water that support inland saline water ecosystems including, but not limited to, preservation or enhancement of aquatic saline habitats, vegetation, fish, or wildlife, including invertebrates.

18. **Estuarine Habitat (EST).** Uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).

19. **Wetland Habitat (WET).** Uses of water that support wetland ecosystems, including, but not limited to, preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions which enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally.

20. **Preservation of Biological Habitats (BIOL)**. Uses of water that support designated areas or habitats, such as Areas of Special Biological Significance (ASBS), established refuges, parks, sanctuaries, ecological reserves, or other areas where the preservation or enhancement of natural resources requires special protection.

21. **Rare, Threatened, or Endangered Species (RARE).** Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.

22. **Migration of Aquatic Organisms (MIGR).** Uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.

23. **Spawning, Reproduction, and/or Early Development (SPWN).** Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.

24. **Shellfish Harvesting (SHELL).** Uses of water that support habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sports purposes.

To protect these beneficial uses, the LA~~os Angeles~~ RWQCB has many regulatory programs to reduce pollutants that originate in stormwater, wastewater, agricultural runoff~~,~~ and recycled water.

LA~~os Angeles~~ RWQCB regulates discharges from many classes of municipal stormwater systems through a permit program. The Ventura County Watershed Protection District, County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks are named as co-permittees under a countywide municipal National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges issued by the RWQCB~~egional Water Quality Control Board~~. The co-permittees are required to administer, implement, and enforce a Stormwater Quality Management Program. The goal is to minimize runoff pollution typically caused by land development and to protect the beneficial uses of receiving waters by limiting ~~effective~~ impervious area to no more than five percent of the project area and retaining stormwater on site. The co-permittees require

"Site Design Principles and Techniques," "Source Control Measures," "Retention Best Management Practices [BMPs]," "Biofiltration BMPs," and "Treatment Control Measures" be incorporated into new development and redevelopment projects.

Wastewater from wastewater treatment or industrial activities is typically regulated through waste discharge permits. (also referred to as Waste Discharge Requirements (WDRs)). Through this permit process the RWQCB regulates the place, volume, and specific constituents in discharges to California's coastal waters, surface waters, and groundwater.

In 2016, the LAos Angeles RWQCB readopted a Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region. Typically referred to as the "Conditional Waiver" program, it requires the owners of irrigated farmland to prepare and submit water quality management plans, conduct monitoring in agricultural drains and other sites influenced by agricultural runoff, and implement BMPs that address the quantity and quality of irrigation return flows and stormwater runoff. The purpose is to limit these discharges, thatwhich carry nutrients, pesticides, sediment, salts, and other pollutants from cultivated fields, from reaching surface waters. The Conditional Waiver
allows growers to comply as individuals or by working collectively as a "discharger group." In response to the Conditional Waiver, the Farm Bureau of Ventura County formed the Ventura County Agricultural Irrigated Lands Group (VCAILG), which serves as a unified discharger group for those agricultural landowners and growers who agree to join. The Farm Bureau of Ventura County administers the program on behalf of VCAILG members.

Both the State Water Resources Control Board (SWRCB) and RWQCBs regulate recycled water. Permits are required to operate recycled water facilities and these permits mandate the type of treatment and resultant water quality, mandate ongoing water quality monitoring, and regulate the place and manner of recycled water use. The State Water Resources Control Board's 2009 Recycled Water Policy, amended in 2013, requires groundwater basins receiving recycled water (e.g., effluent discharge in waterways, injection, recharge, or irrigation) to be managed by Salt and Nutrient Management Plans. The purpose of a Salt Nutrient Management Plan is to optimize recycled water use while ensuring the protection of groundwater supply and beneficial uses, agricultural beneficial uses, and human health. Salt and Nutrient Management Plans are submitted to the RWQCB, which incorporate the plans into the applicable Basin Plan. and Tthe RWQCB requires recycled water facilities and wastewater dischargers to operate in a manner consistent with applicable salt nutrient management plan.

The Clean Water Act also includes a regulatory mechanism called the Total Maximum Daily Load (TMDL) program. A TMDL is specific to a given impairment (chloride, nutrients) and a specific waterbody. A TMDL is a kind of "pollution budget" and includes a calculation of the maximum amount of a pollutant that can occur in a waterbody and still meet water quality standards so as to protect beneficial uses. The TMDL also allocates the necessary reductions to one or more pollutant sources. TMDLs can force the implementation of BMPs, infrastructure improvements, and other actions to limit pollution. Within Ventura County the following TMDLs are in place:

- Ventura River Watershed
  - Algae, Eutrophic Conditions, and Nutrients
  - Trash
- Santa Clara River Watershed
  - Bacteria
  - Chloride
- Calleguas Creek Watershed

- Metals
- Salts
- Trash
- Toxicity
- Toxins/Historic Pesticides
- Nitrogen/Nutrients

Under section 303(d) of the Clean Water Act, states, territories, and tribes are to develop lists of waterbodies that are polluted or otherwise degraded and not meeting water quality standards. The 303(d) List is used to develop TMDLs and/or are used to identify other mechanisms to improve water quality. Several waterbodies in Ventura County are on the current 303(d) List for California (SWRCB 2016).

Permitting of Public Water Systems

The ~~State Water Resources Control Board (~~SWRCB~~)~~, Division of Drinking Water (DDW) oversees the permitting of Public Water Systems. On September 29, 2016, Governor Jerry Brown approved Senate Bill 1263 to prevent the formation of small unsustainable water systems. This bill requires a person submitting a permit application for a proposed new public water system to first submit a preliminary technical report to the SWRCB. The bill directs the applicant to undertake additional discussion and negotiation with existing public water systems with the technical, managerial, and financial capacity to provide an adequate and reliable supply of domestic water to the service area of the proposed new public water system. If the SWRCB determines that it is feasible for the service area of the proposed public water system to be served by one or more currently permitted public water systems and if it is reasonably foreseeable that the proposed new public water system will be unable to provide affordable, safe drinking water in the reasonably foreseeable future, the permit will be denied.

County of Ventura Role in Water Management

~~The County of Ventura has a large role to play in water management.~~ Through the General Plan Goals, Policies and Programs, Subdivision and Zoning Ordinances and Building Code, the County of Ventura conditions development to ensure adequate water supply, availability of wastewater disposal, and protection of groundwater and surface water quality. Through its Landscape Design Criteria, Ventura County requires water budget and project use calculations, use of reclaimed water ~~if feasible~~, and water-efficient model home requirements. Per the authority of the Floodplain Management Ordinance, the County restricts and prohibits land uses or land alteration which may be dangerous to health, safety, and property due to modification or obstruction of flood waters or alteration of a water course.

T~~In addition to the regulatory setting, t~~he County of Ventura ~~actively undertakes projects to~~ manages water resources~~, which include but are not limited to,~~through well permitting, groundwater recharge, stormwater treatment and infiltration, and~~s well as~~ levees and flood control channels. Ventura County ~~also~~ is responsible for the operation and maintenance of several water and sanitation~~ewer~~ utilities ~~within the county~~. VCWPD~~arious county departments also~~ collects and maintains data on countywide water resources. ~~For example, the~~ VCWPD maintains a network of rainfall and streamflow gauges, inventories and inspects groundwater wells, collects water quality data~~,~~ and groundwater level information.

County of Ventura General Plan Goals, Policies and Programs

The General Plan (2005) Goals Policies and Programs (GPP) include~~d~~s goals, policies~~,~~ and programs related to water resources in Chapter 1, Resources, Section 1.3. In addition to policies in the GPP, the following Area Plans ~~also~~ contain ~~applicable~~ water resource ~~goals and~~ policies ~~related to water resources~~:

- El Rio/Del Norte Area Plan;
- North Ventura Avenue Area Plan;
- Oak Park Area Plan;
- Ojai Valley Area Plan;
- Piru Area Plan;
- Saticoy Area Plan;
- Thousand Oaks Area Plan; and
- Lake Sherwood/Hidden Valley Area Plan.

County of Ventura Ordinances

Subdivision Ordinance

The ~~intent of the~~ County of Ventura Subdivision Ordinance ~~is to~~ regulate~~s and control~~ subdivisions of land and~~, in conjunction,~~ implement~~s~~ the County's General Plan. The ~~Subdivision~~ Ordinance applies to "all divisions, reversions to acreage, lot line adjustments, and mergers respecting real property located wholly or partially within the unincorporated areas of Ventura County" and "governs the filing, processing, approval, conditional approval, or disapproval of tentative, final and parcel maps, map waivers, and any modifications thereto." The ~~Subdivision~~ Ordinance ~~includes the following provisions meant to~~ ensure~~s~~ adequate provision of water, ~~to~~ protect~~s~~ water supply, and ~~to~~ protect~~s~~ surface and groundwater quality.

Provisions to ensure adequate provision of water:

- Section 8203-3, Section 8206-3.8, and Section 8206-3.9. At the tentative tract stage, requires a description of the method and plan for providing a permanent domestic water supply. If the water supply is to be provided by a public water system the tentative tract map must be accompanied by a "water availability letter."[4] In areas where groundwater supplies have been determined to be questionable or inadequate, a report must also be submitted demonstrating the availability of a permanent domestic water supply to each lot for a period of at least 60 years. At the final map phase, developments not being served water by individual wells, must provide a "water supply certificate" documenting that a binding agreement has been entered into between the owner of the land and water supplier. Also at the final map stage a registered civil engineer must determine (a)

[4] A water availability letter pursuant to the §8203-3 (l) of the Ventura County Subdivision Ordinance, which requires that the proposed water system of a subdivision provide a letter stating that they will supply permanent domestic water supply to each lot, is not synonymous with the requirement for a water purveyor to supply a "water availability letter" as defined in §1.3.6 of the Ventura County Waterworks Manual, which shall demonstrate that the water purveyor has the necessary water capacity for their entire service area.

that the water suppliers' system complies with the quality and quantity standards of Title 22 of the California Code of Regulations and that the new development will not impact the water supplier in a way such that the water system will not comply with Title 22 and (b) the facilities of the
water supplier's system, including the portion to serve the proposed subdivision, meet or exceed the requirements of the County of Ventura Improvement Standards and Specifications.

- Section 8204-7. Requires that whenever a proposed subdivision is located within the boundaries of a public water agency willing and able to provide water service to the lots, the public water agency shall be chosen as the water purveyor for the proposed subdivision.
- Section 8205-5.1. Requires notification to water, sewage and other service providers prior to Planning Commission hearing on a subdivision (when a tentative map and final map are required).
- Section 8207-2. Prior to recordation of a final map or parcel map, or at such earlier time as may be specified in this Article, the subdivider shall complete or shall enter into an improvement agreement to complete specific improvements including permanent domestic water supply.

Provisions to protect surface and groundwater quality:

- Section 8203-2. Requires water courses and existing or abandoned water wells be identified on tentative maps.
- Section 8203-3. Requires a hydrologic and hydraulic study be submitted with the tentative map indicating the following conditions before and after proposed development of the subdivision: drainage areas, major watercourses, quantity and pattern of storm water, and diversion and collection systems.
- Section 8203-3. Requires a description of the proposed method and plan for sewage disposal for each proposed lot.
- Section 8204-5. Design of a subdivision shall conform to the County of Ventura Flood Plain Management Ordinance and shall provide for the proper drainage of all lots and improvements based on the runoff that can be anticipated from ultimate development of the watershed in accordance with the General Plan. All public facilities including water and sewer, must be located and constructed in a manner to minimize potential flood damage. Any concentrations or increases of surface water resulting from the development of the subdivision must be conveyed by means of adequate facilities to a suitable natural watercourse in the area.
- Section 8207-2. Prior to recordation of a final map or parcel map, or at such earlier time as may be specified in this Article, the subdivider shall complete or shall enter into an improvement agreement to complete specific improvements including: (a) all improvements for drainage and erosion control required for the proposed subdivision, regardless of location, including improvements necessary to prevent sedimentation or damage to off-site property, (b) sewage and permanent domestic water supply systems shall be installed in each proposed subdivision and connections thereto made from each lot within the subdivision, (c) all abandoned water wells within the proposed subdivision shall either be destroyed or be retained subject to a Certificate of Exemption in compliance County of Ventura Code.
- Section 8209-5. As a condition of approval of any subdivision, the tentative map for which is filed no sooner than 30 days after the adoption of any applicable drainage or sanitary sewer plan

for a particular drainage or sanitary sewer area, the subdivider may be required to pay fees or consideration in lieu thereof for the purpose of defraying the actual or estimated costs of constructing planned drainage facilities for the removal of surface and storm waters from local or neighborhood drainage areas and of constructing planned sanitary sewer facilities.

Commented [MJ4]: We don't need to list these, they are already summarized.

Coastal Zone and Non-Coastal Zone Ordinances

The County of Ventura Coastal Zoning Ordinance (CZO) regulates all proposed development in the Coastal Zone of Ventura County; areas outside of this zone are regulated by the Non-Coastal Zoning Ordinance (NCZO). Many of the provisions of the Coastal Zone and Non-Coastal Ordinance are similar to those in the Subdivision Map Act. In relation to water quality, ~~Though provisions differ given the proposed land use, generally~~ these ordinances require:

- Obtaining a permit or zoning clearance prior to: (a) constructing or expanding a septic system; (b) constructing, destroying or rehabilitating~~expanding a~~ water wells, and (c) constructing private water storage and distribution system~~facilities~~.
- ~~A~~ 100- to 300-foot setbacks from water channels and prohibition of~~s~~ obstructions to~~of~~ drainage courses.
- Development to be undertaken in accordance with conditions and requirements established by the Ventura Countywide Stormwater Quality Management Program, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS063339 and the Ventura Stormwater Quality Management Ordinance No. 4142 and as these permits and regulations may be amended.
  - Construction activity including clearing, grading or excavation that requires a grading permit shall be undertaken in accordance with any conditions and requirements established by the NPDES Permit or other permits which are reasonably related to the reduction or elimination of Pollutants in Stormwater from the construction site.
  - Preparation of a Stormwater Pollution Control Plan or Stormwater Pollution Prevention Plan for construction activities.
  - ~~Generally new development or redevelopment projects affecting 5,000 square feet or greater must I~~incorporation of~~e~~ post-construction stormwater quality design principals for new development or projects affecting 5,00-square feet or greater, details are provided in the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures.
- ~~A unique provision in the NCZO is the definition of the Arroyo Santa Rosa/Tierra Rejada Groundwater Quality Impact Area. In this area, the ratio of developed floor area relative to the parcel size for a second dwelling unit is r~~Regulationed of developed floor area relative to parcel size to limit the amount of septic discharge to groundwater in the Arroyo Santa Rosa/Tierra Rejada Area.

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Ventura County Watershed Protection Act

This act established the Ventura County Watershed Protection District~~, its general purpose, and authorities~~. ~~Pursuant to the Act, the~~ The Watershed Protection District ~~is to:~~

- ~~provide~~s for ~~the~~ flood ~~control of flood~~ and storm water controls~~, ;~~
- ~~conserve~~s ~~such~~ water~~s~~ for beneficial ~~and useful purposes~~ by ~~spreading,~~ storing,

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retaining and recharging,~~causing to percolate into the soil;~~

conserve in any manner all or any of such waters and protecting from such flood or storm waters the watercourses, watersheds, public right-of-waysic highways, life and and County property, in the District;

- preventing waste of water or diminution of the water supplyy in, or exportation of water from groundwater basins within the County, the District;
- obtain, retain and reclaim drainage, storm, flood and other waters for beneficial use; and
- provide for the protecting on from erosion of beaches and shorelines and to providinge for the restoration of such beaches and shorelines.

Under the Act, Tthe Watershed Protection District has the power to undertakes projects consistent with its goalspurpose and to adopts and enforces corresponding regulations consistent with its purpose. The District has the power to prescribe, revise, and collect fees as a condition of development of land. A permit from the Watershed Protection District must be obtained for most activities in, on, over, under, or across the bed, banks, and overbank areas of local streams and channels.

County of Ventura Flood Plain Management Ordinance

This ordinance restricts and prohibits land uses or land alteration which may be dangerous to health, safety, and property due fromto modification or obstruction of flood waters or alteration of a water course. ItFurther, this ordinance requires that landuses vulnerable to floods be protected against flood damage at the time of initial construction. The Watershed Protection District implements the Flood Plain Management Ordinance through its encroachment and watercourse permit programs.

County of Ventura Building Code

Submittal of grading plans during thePermitted grading projects permitting process requires an applicant to evaluate site soils and geology and site drainage conditionspatterns prior to grading. ProjectSite design must include measures to detain or retain surface runoff.stormflows so that runoff is not appreciably different post-development and. Design must include measures to prevent erosion of slopes, such as vegetation, soil stabilizers, and rip rap. The County of Ventura requires (Building Code Section J112) that best management practices be used to prevent erosion and stormwater flows from discharging offsite.

County of Ventura Groundwater Conservation Ordinance

The purpose of Ordinance No. 4468, division 4, Chapter 8, Article 1 is to protect groundwater quality, supply and quantity by regulating the construction, maintenance, operation, use, repair, modification, and destruction of wells and engineering test holes in Ventura County. Such work requires obtaining a permit and approval from Ventura County Watershed Protection Districtthe respective agency authorized to regulate new well construction. Permits shall require compliance with all applicable standards set forth in the Ordinance, and in accordance with DWR California Well Standards Bulletins Nos. 74-81 and 74-90, and County of Ventura Water Well Standards Bulletin No. 74-9.

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SECTION 10.3 INTEGRATED REGIONAL WATER MANAGEMENT

After the passage of Proposition 50 in 2002, Integrated Regional Water Management (IRWM) became a new toolparadigm for managing water resources with the passage of Proposition 50 in 2002. Theis approach integrates the many facets of water resources management on a regional level, including water supply, water quality, flood management, ecosystem health, and recreation through enhanced collaboration with various stakeholder groups.across geographic and political boundaries and diverse stakeholder groups. The Watersheds Coalition of Ventura County (WCVC) was formed as the IRWM group to develop and implement a plan to identify water management challenges, resolve conflicts over the best use of resources, bridge gaps in data, find common ground, and seek innovative solutions among stakeholders. A primary goal is implementation of projects and programs that efficiently address water management priorities.

The 2014 WCVC Integrated Regional Water Management Plan Goals are outlined as follows:

- Reduce dependence on imported water and protect, conserve and augment water supplies
- Protect and improve water quality
- Protect people, property and the environment from adverse flooding impacts
- Protect and restore habitat and ecosystems in watersheds
- Provide water-related recreational, public access, stewardship, engagement and educational opportunities
- Prepare for and adapt to climate change

Commented [MJ6]: We can leave this here, since that was a section in the IRWM Plan and 2019 update.

Grant funds made available through Proposition 50 (2002), Proposition 84 (2006), and Proposition 1 (2014), have leveraged local funds for project implementation. These funds helped communities, including disadvantaged communities, throughout Ventura County to enhance the availability of clean water supplies for the benefit of people and the environment, to protect communities from flood damage, and to provide access to water-related recreation opportunities. WCVC participants benefit from the cost-sharing, collaboration, and effective problem-solving opportunities made possible by working together. The WCVC completed a 2019 amendment to the 2014 IRWM Plan, which was deemed compliant by the DWR with Proposition 1 IRWM Plan standards.

One example of an ongoing project partially funded through the IRWM Program with Proposition 84 grant funds is the Natural Floodplain Protection Program (NFPP), which is focused on preserving a critical section of the remaining floodplain in the Santa Clara River Watershed. A Floodplain Working Group was formed to develop the project and is comprised of the County's Watershed Protection District, the Ventura County Farm Bureau, The Nature Conservancy, and the Ventura County Resource Conservation District.

The Working Group developed the concept of incentivizing farmers to continue to farm in the floodplain, thus leaving their land undeveloped. This is done by offering to purchase flood (inundation) easements over private land within the floodplain. These easements cover working farmland, a use that is encouraged to continue under the easement. The farmers are financially compensated for keeping their property in the floodplain and giving up rights they may have to develop the land. The value of easements is established through negotiations with individual land owners and verified by an appraisal.

To date, almost 500 acres of flood plain within the Santa Clara River Watershed have been acquired through the Natural Floodplain Protection Program.

SECTION 10.4 EXISTING CONDITIONS

Ventura County covers approximately 1,873 square miles, a large proportion of which (860 square miles, over half a million acres) lies within the Los Padres National Forest. The coastal areas have a generally mild climate, with an average high temperature of 73 degrees Fahrenheit (ºF) in July and an average January low temperature of 45 ºF (Western Regional Climate Center web site at www.wrcc.dri.edu for Station 049285 Ventura, January 1900 to August 2013). Average rainfall in the coastal areas is 14.67 inches per year (Western Regional Climate Center web site at www.wrcc.dri.edu for Station 049285 Ventura, January 1900 to August 2013). Interior valleys without coastal influence have hotter summers (average high temperature of 93.20 ºF in July) and cooler winters (average low temperature of 44.35 ºF) but also modest average rainfall of 14.37 inches per year (California Irrigation Management Information System data provided from Station No. 219, Los Angeles region, September 2011 to November 2015 and Station No. 204, Los Angeles Region, January 2007 to August 2011).

The Region contains three~~four~~ major watersheds (and part of the Cuyama River Watershed), smaller coastal watersheds, and 24 DWR-designated~~3~~ basins (see **Figure 10-1** and **Figure 10-2**). This background report has organized information according to the major watersheds: Ventura River, Cuyama, Santa Clara River, and Calleguas Creek. A small portion of the Malibu Creek Watershed falls in Ventura County.; F~~f~~or the purposes of this document, this area is included with information on the Calleguas Creek Watershed. The Oxnard Plain, while not a watershed is an important ~~water~~ feature in the county and is given its own discussion in the text.

Ventura River Watershed

The Ventura River Watershed is located in the northwestern portion of Ventura County and drains an approximately 228 square mile (145,920 acres) area. The watershed extends 33.5 miles from the steep Transverse Ranges of the Matilija Wilderness to the Pacific Ocean. The Matilija, North Fork Matilija, San Antonio, and Cañada Larga are the major tributaries. The watershed is unique in that developed land makes up only 13 percent of the watershed area (Ventura River Watershed Council 2015). Approximately half of the Ventura River Watershed is Forest Service land. This means the upper portion of the Ventura River Watershed is minimally developed and has large areas with good water quality and excellent aquatic habitat. A 30-mile portion of the upper fork of Matilija Creek and its tributaries are designated as Wild and Scenic Rivers. Most of the southern half of the watershed lies within unincorporated Ventura County.

Precipitation in the Ventura River Watershed varies greatly between seasons and across years. There are notable cycles of drought and flood. Most of the precipitation is in the form of rain, but a small portion of the upper watershed experiences snow. Most precipitation occurs during just a few storms between November and March; summer and fall months are typically dry. Many parts of the Ventura River and its tributaries are dry during the summer and fall months (Ventura River Watershed Council 2015).

The cities of Ojai and Ventura are located in the Ventura River Watershed as are the unincorporated communities of Meiners Oaks, Mira Monte, Oak View, and Casitas Springs. Land uses in the watershed are as follows:

- Federal land/National Forest 47.7%
- Undeveloped land 29.8%
- Agriculture 18.5%
- Urban uses 4% (3.1% in cities, 0.9% in unincorporated County)

Commented [MJ7]: Should update with recent general averages. Since drought conditions have been in effect since 2012.

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Surface Water

The major surface water features in the watershed are the Matilija Reservoir, Lake Casitas, and Ventura River.

Matilija Reservoir. Matilija Creek originates in the steep mountains in the northwest corner of the watershed and is considered the headwaters of the Ventura River. Matilija Dam captures the creek to create the Matilija Reservoir, which is owned by the Ventura County Watershed Protection District. Matilija Dam was built in the late 1940s for the purpose of providing irrigation water to the western Ojai Valley. Matilija Reservoir originally provided for 7,018 acre-feet (AF) of water storage. However, the storage capacity of the reservoir has been significantly reduced by sedimentation and is now estimated to be only about 6500 AF (Tetra Tech 2009). The majority of the sediment was deposited during a few big storm years (USACE 2004). Matilija Reservoir no longer provides any water supply benefit. TIn fact, the dam is now considered an environmental liability. The dam prevents the natural flow of sand and sediment from the mountains to the beaches and it also blocks the endangered steelhead trout from upstream habitat. Since 1999, the Ventura County Watershed Protection District, in partnership with the US Bureau of Reclamation and the US Army Corps of Engineers, have evaluated means to remove the dam. The US Congress approved removal of the dam in 2007. However, dam removal efforts have been stalled by the complicated process of removing the sediment in the reservoir, while protecting fish and wildlife and by significant cost. Efforts to remove the dam are ongoing. In March 2016 the Dam Oversight Group completed an evaluation of three different dam removal concepts, including features to handle the estimated eight million cubic yards of sediment and mitigations for water supply, water quality, and fisheries. The next step is to develop a funding plan.

Lake Casitas. Lake Casitas, also called Casitas Reservoir, is the largest reservoir in the Ventura River Watershed, with a capacity of 254,000 AF. The approximate safe yield is 20,000 AFY. When full, the reservoir covers a surface area of 4.3 square miles and has 32 miles of shoreline. Source water for Lake Casitas is direct rainfall on the lake surface, local watershed runoff from Coyote and Santa Ana Creeks, and diversions of the Ventura River made through the Robles Diversion Facility. The lake is operated by the Casitas Municipal Water District (Casitas). The primary purpose of Lake Casitas is to supplement local groundwater. Local groundwater comes from mostly unconfined aquifers whose available supply varies greatly based on rainfall and streamflow conditions. In dry periods, local wells can go dry and water demands are then met using water from Lake Casitas. Casitas Municipal Water District is the primary and/or backup water supply for nine retail water purveyors and for some individual agricultural customers with groundwater wells (Casitas Municipal Water District 2016). Casitas Municipal Water District estimates that there are 70,288 persons within its service area and 8.4 square miles (~5,400 acres) of irrigated crops (Casitas Municipal Water District 2016).

Ventura River. The Ventura River gives its name to the watershed. The condition of the river varies widely over its journey from the mountains to the ocean. The river is typically categorized in five segments:

- The segment above Robles Diversion. Here the river is in steep and narrow terrain.
- The segment below Robles Diversion and above San Antonio Creek. This segment is less mountainous and has a gentle gradient. The Robles Diversion diverts from the west bank of the River. Below the diversion the river widens and becomes a braided channel. Until the confluence with San Antonio Creek, the river is commonly dry – about 80 percent of the time there is no significant flow in the section (Cardno-Entrix 2012).

Figure 10-1:
Ventura County Watersheds

Map Date: December 02, 2016

Source: Kennedy/Jenks Consultants, 2016.

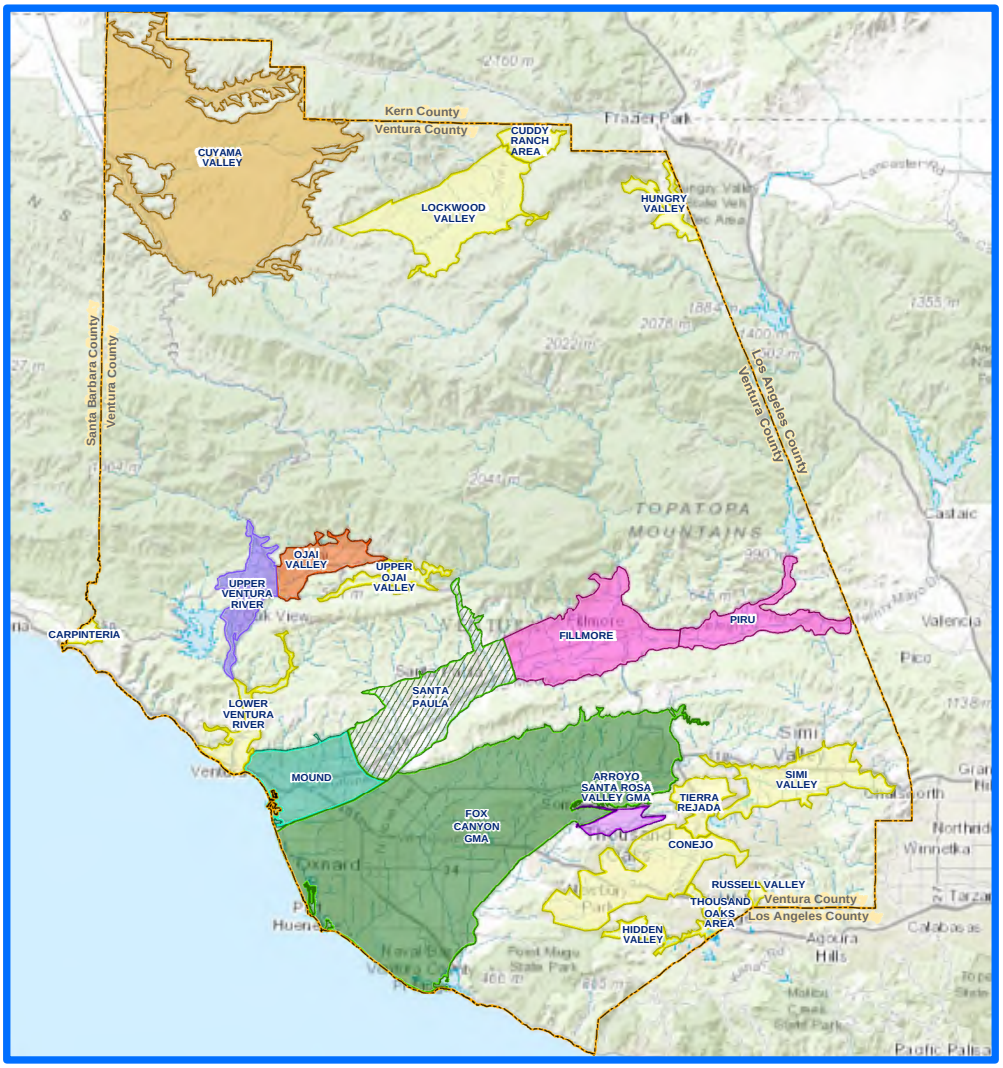
0 7.5 15 Miles

N

- Ventura County Boundary
- Rivers/Streams
- Water Bodies

Subwatersheds

- Calleguas Creek Watershed
- Cuyama River Watershed
- Santa Clara River Watershed
- Santa Monica Bay Watershed
- Ventura River Watershed



Ventura County 2040 General Plan

Figure 10-2:
Groundwater Basin Oversight

Map Date: December 2017
Source: Kennedy/Jenks Consultants, 2017

0 7.5 15 Miles

Ventura County
Rivers/Streams
Water Bodies

Groundwater Management Agency

- Arroyo Santa Rosa Valley GMA
- Cuyama Valley Groundwater GSA
- Fillmore and Piru Basins GSA
- Fox Canyon GMA
- Mound Basin GSA
- No Agency
- Ojai Basin GMA
- Upper Ventura River GSA
- Adjudicated Basin

- San Antonio Creek Confluence to Foster Park. Here the river again narrows. San Antonio Creek enters in this segment. In wet periods this portion of the river can also receive water from "daylighting" groundwater, where groundwater is forced to the surface as a result of geologic constriction near the downstream margin of the upper Ventura River basin. This reach typically flows year-round except in multiyear dry periods (Ventura River Watershed Council 2015).
- Foster Park to Ventura River Estuary. In this reach, the river receives treated effluent from the Ojai Valley Sanitation District wastewater treatment plant. The effluent is a significant input to river flow. Cañada Larga Creek, and several minor drainages (Manuel Canyon Creek, Cañada de San Joaquin, and Dent Drain) also enter in this segment (Ventura River Watershed Council 2015). In this portion of the river, the City of Ventura can divert surface water via subsurface collectors and shallow wells. The wells are located at Foster Park, upstream of the Ojai Valley Sanitation District point of discharge. Between 2010 and 2014, annual production by the City of Ventura from the Ventura River averaged 3,051 AFY.
- The Ventura River Estuary. The estuary is a shallow body of water where the Ventura River mixes with salt water. During the dry season a sandbar typically separates the estuary from the ocean; when storms breach the sandbar, the flow of the river directly enters the Pacific Ocean (Ventura River Watershed Council 2015).

Groundwater

There are four major groundwater basins in the Ventura River Watershed: ~~the~~ Upper Ojai (DWR Basin 4-00~~-~~1), Ojai Valley (DWR Basin 4-002), Upper Ventura River (DWR Basin 4-003.01), and Lower Ventura River (DWR Basin 4-003.02) (see **Figure 10-2**). These are unconfined groundwater basins and fluctuate greatly depending on seasonal conditions~~precipitation~~.

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In 2014, DWR ranked California's groundwater basins as "high-," "medium-," "low-," or "very low-" priority. This ranking was based on the following:

- Overlying population
- Projected growth of overlying population
- Public supply wells
- Total number of wells
- Irrigated acreage overlying the basin
- Reliance on groundwater as the primary source of water
- Impacts on the groundwater; including overdraft, subsidence, saline intrusion, and other water quality degradation
- Other information determined to be relevant by Department of Water Resources

~~In this ranking process the~~ Ojai Valley ~~groundwater basin~~ and Upper Ventura River ~~groundwater~~ basins were deemed high- and medium- priority, respectively ~~basins~~. Dependency on groundwater in these basins is a primary ranking factor.~~The great dependency on groundwater in this area was a primary factor in the ranking.~~

The Ojai Valley ~~Groundwater~~ Basin is currently managed by the Ojai Basin Groundwater Management Agency (O~~Bjai Basin~~ GMA) and this agency will be the GSA~~groundwater sustainability agency~~ under SGMA. The O~~Bjai Basin~~ GMA has submitted an Alternative to the GSP which demonstrates that the Ojai Basin is already being sustainably managed, in-lieu of preparing a GSP.

Casitas Municipal Water District, Meiners Oaks Water District, Ventura River Water District, the City of Ventura and the County of Ventura are~~have started the process of~~ forming the~~a new groundwater sustainability agency~~Upper Ventura River Groundwater Sustainability Agency for the Upper Ventura River ~~Groundwater~~ Basin.

Important Recharge Areas

In the Ventura River Watershed, groundwater basins are typically surrounded by steep, impermeable bedrock ~~mountainous areas of impermeable bedrock~~. Recharge ~~primarily~~ occurs within the permeable unconsolidated deposits of gravels and sands underlying~~within~~ stream channels and tributaries.

In order to increase groundwater storage and recharge in the Ojai Valley ~~Groundwater~~ Basin, the San Antonio Spreading Grounds Rehabilitation Project was completed by the Ventura County Watershed Protection District in 2014 and final approval given in 2017 to divert creek flow. ~~It is anticipated the project will increase recharge to the basin by an average of 126 AFY.~~

Other Water Supplies

The Ventura River Watershed relies entirely on local water. No imported water is used ~~in the watershed~~ or is readily accessible. Both Casitas ~~Municipal Water District~~ and the City of Ventura hold entitlements to State Water Project water (5,000- and 10,000-AFY ~~acre-feet per year [~~AFY~~]~~ respectively). ~~, however t~~There are~~is currently~~ no means of~~to~~ delivery of imported water to the watershed. However, t~~T~~he City of Ventura is ~~currently~~ evaluating options for delivery of those entitlements~~, a report is due at the end of 2017~~.

Water Quality

~~As described in **Section 10.2**, the Los Angeles RWQCB has identified beneficial uses for the Ventura River Watershed.~~ **Table 10-2** is taken from the *Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties* and provides detail on beneficial uses for specific Ventura River reaches. The ~~Los Angeles~~ LARWQCB has developed permit programs and the TMDLs to protect these beneficial uses. The following TMDLs are in place for portions of the Ventura River Watershed:

- Algae, Eutrophic Conditions, and Nutrients in the Ventura River including the Estuary and its Tributaries – TMDL effective June 28, 2013
- Ventura River Estuary Trash – TMDL effective March 6, 2008

In addition to the existing TMDLs, other TMDLs may be developed as several Ventura River Watershed areas are included in California's 303(d) List (list of impaired waters). Identified impairments in the Ventura River and its tributaries include fish barriers and pumping/water diversion, total dissolved solids, aluminum, and mercury. Rincon Beach and the Ventura Harbor are listed for impairments due to bacteria. The Ventura Marina jetties are listed as impaired with DDT and PCBs.

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TABLE 10-2
DESIGNATED BENEFICIAL USES IN THE VENTURA RIVER WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
VENTURA COUNTY COASTAL STREAMS																						
Los Sauces Creek	P*	I	I	I	I						I	I				E			I	I		
PovertyCanyon	P*	I	I	I	I						I	I				E			I	I		
MadranioCanyon	P*	I	I	I	I						I	I				E			I	I		
JavonCanyon	P*	I	I	I	I						I	I				E			I	I		E
Padre Juan Canyon	P*	I	I	I	I						I	I				E			I	I		
McGrathLake									P					E		E		Ee				E
Big Sycamore Canyon Creek	P*				I						I	E				E			P	P		E
Little Sycamore Canyon Creek	P*										I					E		E		P		
VENTURA RIVER WATERSHED																						
Ventura River Estuary [c]							E		E		E			E	E	E		Ee	Ef	Ef	E	E
Ventura River Reach 1 (Ventura River Estuary to Main St.)	P*	E		E	E	E					E	E				E		E	E	E		E
Ventura River Reach 2 (Main St. to Weldon Canyon)	P*	E		E	E	E					E	E				E		E	E	E		E
Cañada Larga	P*		I	I	I	I					I	I				E			I	I		
LakeCasitas	E	E	E	E	P	P		P			E	E				E		E				
Lake Casitas tributaries	E*			P	E						E	E				E		P	E	E		E
Ventura River Reach 3 (Weldon Canyon to Casitas Vista Rd.)	P*	E		E	E	E					E	E				E		E	E	E		E
Ventura River Reach 4 (Casitas Vista Rd. to San Antonio Creek)	P*	E		E	E	E					E	E				E		E	E	E		E
Ventura River Reach 4 (San Antonio Creek to Camino Cielo Rd.)	E	E	E	E	E	E					E	E				E		Eg	E	E		E
CoyoteCreek	P*				E						E	E				E			E	E		E
San Antonio Creek (Ventura River Reach 4 to Lion Creek)	E	E	E	E	E						E	E				E			E	E		E
San Antonio Creek (above Lion Creek)	E	E	E	E	E	E					E	E				E			E	E		E
Lion Creek	I*	I	I	I							I	I				E						
Reeves Creek	I*	I	I	I	I						I	I				E			I	I		
Mirror Lake	P*				E						E					E						E
Ojai Wetland	P*										E					E						E

TABLE 10-2
DESIGNATED BENEFICIAL USES IN THE VENTURA RIVER WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
VENTURA COUNTY COASTAL STREAMS																						
Ventura River Reach 5 (above Camino Cielo Rd.)	E	E	E	E	E	E					E	E				E		Eg	E	E		E
Matilija Creek Reach 1 (Ventura River Reach 5 to Matilija Reservoir)	P*				E							E				E			E	E		E
MatilijaCreek Reach 2 (above Matilija Reservoir)	P*				E							E				E			E	E		E
Murietta Canyon Creek	P*				E							E				E			E	E		E
North Fork Matilija Creek	E*	E	E	E	E						E	E				E		E	E	E		E
MatilijaReservoir	E			E	E	E					E	E				E			E	E		E

E: Existing beneficial use
P: Potential beneficial use
I: Intermittent beneficial use
E,P, and I: shall be protected as required
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some destinations may be considered for exemption at a later date.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
c: Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).
e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
g: Condor refuge.

Source: Table 2-1. Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (electronic copy accessed December 27, 2016).

Available Water Supplies

~~The sources of water supply in the Ventura River watershed include surface water from Lake Casitas, Ventura River, and groundwater.~~ Available surface water supplies ~~(~~from Lake Casitas~~)~~ are reported~~have been quantified~~ by Casitas Municipal Water District (2020~~16~~) as 99,836-AF~~20,000 acre-feet (~~AF~~)~~. The City of Ventura draws approximately 20% of its water resources~~produced an average of 3,051 AFY from 2010 to 2014~~ from the Ventura River. ~~It is estimated that private landowners may divert as much as 1,100 AFY from the Ventura River, but records are not available to confirm the long-term Ventura River surface water supply available to private users (SWRCB eWRIMS database).~~

~~Estimating groundwater supply is quite a bit more difficult.~~ To understand long-term yield of a groundwater basin, recharge from precipitation must be estimated, recharge from irrigation and other return flows must be calculated, and underflow and outflows to and from adjacent groundwater basins must be a~~nalyzed~~ssessed. There is not an accepted long-term yield for any of the groundwater basins in the Ventura River Watershed. However, the DWR~~epartment of Water Resources~~ has made rough estimates of groundwater "budgets" by evaluating available groundwater studies and ~~by evaluating~~ past ~~groundwater~~ extractions. The VCWPD~~entura County Watershed Protection District has also~~ prepare~~d~~s estimates of groundwater use in various~~different~~ basins. ~~Groundwater use is only a rough estimate of supply. Groundwater extractions may include water recharged in the distant past and may not be representative of the long-term yield.~~ **Table 10-3** provides an estimate of supply by groundwater basi~~n.n in the Ventura River Watershed~~.

~~The difference in the high and low supply estimates document the lack of data on groundwater supply.~~

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Commented [MJ8]: Present the data we have.

TABLE 10-3
GROUNDWATER SUPPLY ESTIMATES
VENTURA RIVER WATERSHED

Basin	DWR Estimate of Groundwater Budget (AFY)	Past Groundwater Extractions (AFY)	Notes
Upper Ojai	1,320	700	1
Ojai Valley	3,150 to 3,300	8,404	2, 3
Upper Ventura	None	10,392	4, 5
Lower Ventura	1,200	400	6
Low Estimate Groundwater Supply Ventura River Watershed		*14,600*	7
High Estimate Groundwater Supply Ventura River Watershed		*21,300*	7

Notes:
1. DWR 2003, Basin 4-1
2. DWR 2003, Basin 4-2
3. Ventura County Watershed Protection District 2015a
4. DWR 2003, Basin 4-3.01
5. Ventura County Watershed Protection District 2015a
6. DWR 2003, Basin 4-3.02
7. Rounded to nearest 100 AF

A total estimate of supply in the Ventura River Watershed is provided in **Table 10-4**.

TABLE 10-4
CURRENT (2016) TOTAL WATER SUPPLY ESTIMATES
VENTURA RIVER WATERSHED

Supply Source	Annual Volume (AF)
Surface Water, Lake Casitas	20,000
Surface Water, Ventura River	3,051
Groundwater (see Table 10-3)	14,600 to 21,300
Low Estimate (rounded to nearest 100 AF)	*37,700*
High Estimate (rounded to nearest 100 AF)	*44,400*

Water Suppliers

There are five major water suppliers (entities serving more than 1,000 persons) in the Ventura River Watershed as well as 11 mutual water companies. ~~Persons or businesses in the~~Water is~~Ventura River Watershed are~~ also supplied by private wells and surface water diversions.

M~~The m~~ajor urban suppliers, documented in **Table 10-5** provide water to the cities of Ojai and Ventura~~,~~ and ~~also~~ to the unincorporated County. These are also mapped in **Figure 10-3**.

The 11 mutual water companies provide water to their stockholders and members. These mutual water companies ~~can~~ serve as few as 10 people and up to 800 persons. M~~The m~~utual water companies, documented in **Table 10-6** provide water almost exclusively to residents and businesses in the unincorporated County (see ~~also~~ **Figure 10-3**).

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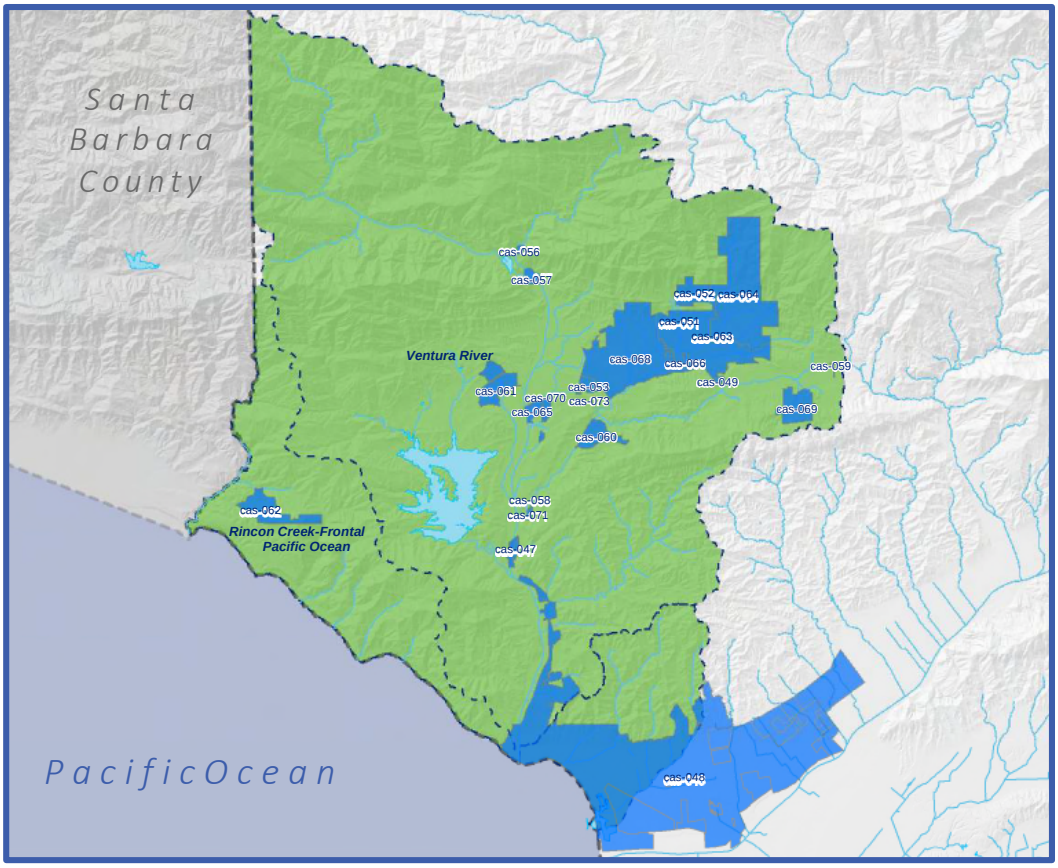
TABLE 10-5
MAJOR WATER SUPPLIERS - VENTURA RIVER WATERSHED

Supplier/Primary Source(s)	Type	Area Served	Estimated Population Served	Annual Water Supplied*
Casitas Municipal Water District Surface water from Lake Casitas	Special District	City of Ojai, portion of the City of Ventura, coastal Rincon, Upper Ojai, and Ventura River Valley.	~70,300	~16,700 AF, includes ag sales and sales to other agencies
Ventura Water Lake Casitas water, Ventura River, groundwater (Oxnard Plain, Mound, Santa Paula Basins), recycled water	City	City of Ventura and 1.5 square miles (~960 acres) within City's sphere of influence. City falls within both the Ventura and Santa Clara Watersheds.	~112,400	~16,700 AF, a portion of this supply is provided by Casitas Municipal Water District (5-year average 2011 to 2015 City of Ventura 2016a)
Golden State Water Company Ojai Valley groundwater and Lake Casitas	Investor Owned Utility	City of Ojai and adjacent unincorporated County.	~8,200	~2,300 AF, a portion of this supply is provided by Casitas Municipal Water District.
Ventura River Water District Upper Ventura River groundwater and Lake Casitas	Special District	Part of Casitas Springs, Burnham Road area west of the Ventura River, northern portion of Oak View	~6,000	~1,400 AF, a portion of this supply is provided by Casitas Municipal Water District
Meiners Oaks Water District Upper Ventura River groundwater and Lake Casitas water	Special District	Portion of the Meiners Oaks Community east of the Ventura River.	~4,000	~1,100 AF, a portion of this supply is provided by Casitas Municipal Water District

*Estimated based on records of water supplied 2010 to 2015, rounded to nearest 100 AF. Does not account for planned future expansion of demands and supplies.

Source: Ventura River Watershed Council 2015 Table 3.4.1.2.1, Casitas Municipal Water District 2016, City of Ventura 2016a, City of Ventura 2016b, Meiners Oaks Water District 2014, Ventura River Water District http://venturariverwd.com/about-2/ accessed December 29, 2016.



WATER PURVEYOR

CASITAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
Casitas (cas-047)	Casitas MWC
Casitas (cas-048)	City of San Buenaventura
Casitas (cas-048)	City of Buenaventura
Casitas (cas-049)	Matilija Canyon Park Water System
Casitas (cas-068)	Golden State Water Company - Ojai
Casitas (cas-051)	Gridley Road Water Group
Casitas (cas-052)	Hermitage MWC
Casitas (cas-053)	Krotona Institute of Theosophy
Casitas (cas-056)	North Fork Springs MWC
Casitas (cas-063)	Ojai Water Conservation District
Casitas (cas-057)	Ojala
Casitas (cas-058)	Old Creek Road MWC
Casitas (cas-059)	Oviatt Water Association
Casitas (cas-060)	Rancho del Cielo MWC
Casitas (cas-061)	Rancho Matilija MWC
Casitas (cas-062)	Rincon Water and Roadworks
Casitas (cas-064)	Senior Canyon MWC
Casitas (cas-065)	Sheriff's Honor Farm
Casitas (cas-066)	Siete Robles MWC
Casitas (cas-069)	Sulphur Mountain Road Water Association
Casitas (cas-070)	Tico MWC
Casitas (cas-071)	Tres Condados
Casitas (cas-073)	Villanova Road Water Well Association

Figure 10-3:
Water Purveyors in
Ventura River Watershed

Ventura County Boundary
Rivers Streams
Water Bodies
Subwatersheds
Ventura River Watershed

Water Purveyor

Casitas Wholesale District

0 4 8 Miles

N

Map Date: December 02, 2016
Source: Kennedy/Jenks Consultants, 2016.

TABLE 10-6
MUTUAL WATER COMPANIES VENTURA RIVER WATERSHED

Supplier	Type	Area Served	Estimated Population Served
Casitas Mutual Water Company	Mutual	Residents in Casitas Springs, west of Highway 33.	~250
Gridley Road Water Group	Mutual	Agriculture in the Gridley Road and Grand Avenue area in eastern Ojai Valley.	~44
Hermitage Mutual Water Company	Mutual	Agriculture and several large residential estates in the area of Gridley and Senior canyons north of the Ojai Valley.	~35
North Fork Springs Mutual Water Company	Mutual	Residential users located along Highway 33 north of the City of Ojai and east of the Matilija Reservoir, in Los Padres National Forest.	~10
Old Creek Road Mutual Water Company	Mutual	Residential users along East Old Creek Road.	~12
Rancho Matilija Mutual Water Company	Mutual	Agricultural parcels in the Rancho Matilija subdivision, north of Baldwin Road and west of Meiners Oaks.	0
Rancho del Cielo Mutual Water Company	Mutual	Residential and agricultural users along Creek Road along San Antonio Creek.	~18
Senior Canyon Mutual Water Company	Mutual	Northeast end of the Ojai Valley, north of Reeves Creek, east of Carne Road.	~800
Siete Robles Mutual Water Company	Mutual	Housing tract east of the City of Ojai	~245
Sisar Mutual Water Company	Mutual	Summit area of the Upper Ojai Valley	~325
Tico Mutual Water Company	Mutual	Residential are in Mira Monte, west of Highway 33	~77

Source: Ventura River Watershed Council 2015 Table 3.4.1.3.1

Private wells and water diversions serve the remaining agricultural and domestic water users ~~in the watershed~~. Twenty-one different entities are registered with the SWRCB~~tate Water Resources Control Boards~~ as having rights to withdraw surface water from the Ventura River Watershed (SWRCB 2014 cited in Ventura River Watershed Council 2015). There are 442 active wells in the Ventura River watershed (Ventura River Watershed Council 2015). It is estimated that these private users extract as much as 2,100 AF (Hydrometrics 2015).

Commented [MJ9]: At the time.

Estimates of Water Demand

In 2014, the Ventura County Watershed Protection District undertook an estimate of countywide water demand. This effort used data from water agencies and groundwater reporting (where available). However large geographic areas of Ventura County are served by~~not served by a water agency, but rather~~ private wells or surface water diversions. Also, not all groundwater production is reported. Further, the agricultural groundwater extractions~~production~~ that are~~is~~ reported are~~is~~ not metered in many areas and~~but rather~~ estimated from electrical use or crop type. ~~To fill in data gaps a~~A demand calculator was used to fill in data gaps. In this case the Integrated Water Flow Model (IWFM) Demand Calculator developed by the DWR~~California Department of Water Resources~~ was used. This is a non-proprietary model that computes water demands for crop~~ped~~ areas using ~~specified~~ climatic and irrigation information. The IWFM calculator also estimates urban water requirements and return flows based on population and per-capita water usage. The resulting report, *County of Ventura 2013 Water* Supply and Demand, estimates current demands for each of the major watersheds, including the Ventura River Watershed. Results of the study are provided in **Table 10-7**.

TABLE 10-7
ESTIMATED VENTURA RIVER WATERSHED DEMAND

Watershed/Sub-watershed	Total Agricultural Demand (AF)	Total Municipal Demand (AF)	Total Demand (AF)
Rincon	5,727	1,848	7,575
Ventura River	11,745	13,351	25,096
Subtotal (rounded to nearest 100 AF)	*17,500*	*15,200*	**32,700**

Source: Hydrometrics 2015. Table 6.

~~Notable in~~ **Table 10-7** is the distribution of demands. Agricultural demand is estimated to be slightly higher than municipal demand.

Demand Management

Table 10-8 summarizes the various water conservation actions ~~undertaken~~ in the Ventura River Watershed. **Table 10-8** summarizes demand management measures ~~undertaken~~ under normal conditions as well as ~~those extra ordinary~~ efforts taken during drought periods. Conservation actions intensify during drought. ~~Most a~~Agencies ~~continuously~~ provide public information on how to conserve water, however these efforts increase~~expand exponentially~~ during dry periods. ~~During normal conditions a water provider may just provide public information on their website or billing inserts; during drought, the water provider is likely to take out radio advertisements, place roadway signs, and run conservation contests to bring attention to the drought. Many agencies offer water use surveys to customers upon customer request; during drought the water agencies contact high water users and offer water efficiency incentives.~~ The demand management measures undertaken during drought depend on the severity and length of drought. ~~In the beginning of a drought outdoor irrigation may be limited to 3 days a week, as drought continues outdoor watering may be restricted to one day a week or even prohibited all together.~~

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TABLE 10-8
DEMAND MANAGEMENT MEASURES IN VENTURA RIVER WATERSHED

Agency	Conservation Measures in Effect at All Times							Conservation Measures that May Be Implemented in Drought				
	Public Information and Outreach	Water Waste Prohibitions	Metering	Volume-Based Pricing	Water Efficiency Surveys Offered to Customers	Rebates for High Efficiency Plumbing Fixtures	Turf Removal Incentives	Drought Surcharge	Limitations on Irrigation/ Outdoor Watering	Mandatory Reductions/ Allocation	Fines	Suspension of new water connections
Casitas Municipal Water District	X	X	X	X	X	X	X		X	X	X	X
Ventura Water	X	X	X	X	X	X	X	X	X	X	X	X
Golden State Water Company	X	X	X	X	X	X		X	X			
Ventura River Water District	X		X	X	X*	X*	X*	X	X		X	
Meiners Oaks Water District	X		X	X	X*	X*	X*	X		X	X	X
Ojai Basin Groundwater Management Agency	X		X	X								

*Offered by Casitas Municipal Water District

Sources: Casitas Municipal Water District 2016; City of Ventura 2016b; Golden State Water Company 2011; Ventura River Water District 2016; Meiners Oaks Water District 2016.

Comparison of Supply and Demand

~~While it is difficult to quantify, i~~It is estimated that there is between 157,436~~37,700 AF to 44,400~~ AF of annual water supply in the Ventura River Watershed. This supply will vary given drought and operational conditions. Estimated demand is approximately 14,508~~32,700~~ AF ~~and is only about 13 percent greater than demand~~.

~~There are concerns about long-term supplies. SGMA could result in a need to reduce groundwater pumping.~~ Some water agencies in the Ventura River Watershed are evaluating projects to increase supply~~. Several mutual water agencies that receive water from Casitas Municipal Water District have sent letters to Casitas Municipal Water District urging them to pursue options to bring imported water into the watershed~~. The City of Ventura is pursuing additional use of recycled water, including indirect and direct potable reuse and is studying ocean desalination (City of Ventura 2016b).

Water-Related Challenges

Below are the water related challenges for the Ventura River Watershed as of early 2020~~late 2016~~:

Drought and Supply Variability

The 70,000 people in western Ventura County have been impacted by ~~the~~ drought conditions that began in 2012. Due to lack of distribution infrastructure and required agreements, imported water cannot be delivered to western Ventura County and groundwater supply is very limited. Recharge to groundwater is primarily from Ventura River flow and smaller amounts from direct precipitation, percolation from lesser creeks and channels, and mountain~~front~~ recharge. The groundwater in the area is relatively shallow and responds quickly to rainfall ~~or lack thereof~~. Wells operated by Meiners Oaks Water District have gone dry due to low water levels in the Ventura River and ~~they~~ are now entirely dependent on purchases of Lake Casitas water. Ventura River Water District ~~has only one of its four wells still in operation;~~operates six wells and customer needs are ~~being~~ served through purchases of Lake Casitas water supplies. ~~Since 2011, purchases of Lake Casitas water have increased by 1,000 percent. The lake is an important, but dwindling, resource with both water quality and water supply concerns.~~

As of early 2020, t~~T~~he ~~water level~~water volume in Lake Casitas is slightly above~~has dropped below~~ 40 percent of its "full" volume ~~since the onset of the drought in 2012~~. Low water levels in 1968 resulted in significant thermal stratification and anoxic (without dissolved oxygen) conditions, rendering the lake generally unsuitable for aquatic life. The low oxygen levels also created an environment where manganese and hydrogen sulfide, normally trapped in sediments, became soluble, causing the lake water to have color and odor issues~~a brown color and bitter metallic taste~~. There were also large blue-green algae blooms (Casitas Municipal Water District 2013). Casitas Municipal Water District ~~has had to~~ installed a second lake aeration system to avoid anoxic conditions.

Mandatory drought reductions are in place for customers in the Ventura Watershed. Depending on the water supplier, customers need to reduce water use by up to 30 percent.

Water for Environmental Purposes

As water agencies plan to rehabilitate infrastructure or develop more supply there are potential~~can be~~ conflicts with protecting environmental resources ~~and demonstrates the influence laws and regulations, such as the Endangered Species Act, have on water resources.~~

The Robles Diversion is the facility that diverts Ventura River water to Lake Casitas. A "Biological Opinion," (BO) written by the National Marine Fisheries Service includes requirements to provide flow for the migration and passage of the steelhead up and down the main stem of the Ventura River and past the diversion during the steelhead migration season (January 1 to June 30). Implementation of the flow release requirements of the BO started in 2005. The Robles Fish Passage Facility became operational in 2006. There is concern by Casitas Municipal Water District that future changes to the BO could require costly infrastructure and impact diversions to, and the water supply within, Lake Casitas.

In 2008, the City of Ventura began conducting studies of Ventura River flow conditions in order to operate its Foster Park facilities in a more sustainable manner. The City is working towards developing a pumping regime that will balance production demands with environmental concerns. Presently, the City has voluntarily adopted a production schedule that limits its pumping based on annual rainfall conditions. ~~Ventura Water intends to work with experts to ascertain a pumping regime that will balance production with environmental concerns and is presently studying the relationship between groundwater production and surface flows.~~

Quality

W~~In the Ventura River Watershed w~~ater quality is generally not an impairment for domestic water supply~~to using water for domestic water supply~~. ~~However, o~~Other beneficial uses such as fisheries~~habitat~~, wildlife habitat~~,~~ and recreation are negatively affected by water quality in the Ventura River. W~~The majority of w~~ater quality problems involve eutrophication (excessive nutrients, nitrogen, and the resulting algae blooms) and affect the portion of the river from Foster Park to the Estuary. M~~The m~~ajor nitrogen contributors to the Ventura River are~~were~~ identified by the L~~os Angeles~~ ARWQCB as~~:~~ ~~wet-weather~~ runoff from urban areas, ~~wet-weather~~ runoff from horse/livestock land uses, ~~wet-weather~~ runoff from open space~~,~~ and discharges from the Ojai Valley Sanitary District Wastewater Treatment Plant. The Algae TMDL ~~was~~ adopted by the LARWQCB~~os Angeles Regional Water Board in December 2012. The TMDL~~ sets limits on the amount of nutrients that can be discharged from various sources~~,~~ ~~and~~ requires upgrades to the sewage treatment plant~~,~~ ~~and~~ and requires~~widespread~~ implementation of BMPs to limit fertilizer and animal waste and other sources of nitrogen ~~from the river~~.

Cuyama Watershed

~~Only l~~Limited data is available on the portion of the Cuyama Watershed within Ventura County. The Cuyama Watershed originates in a remote mountainous area of Ventura County within the Los Padres National Forest~~,~~ but also falls within Kern, Santa Barbara, and San Luis Obispo counties. DWR~~The California Department of Water Resources~~ has categorized the Cuyama ~~Groundwater~~ Basin as being in "critical overdraft" and a GSA~~groundwater sustainability agency~~ is being formed. Based on information from the United States Geological Survey (USGS), the critical overdraft conditions of the Cuyama Groundwater Basin reflect extractions and uses outside of Ventura County. The portion inside Ventura County is referred to as the Ventucopa Uplands (USGS 2014). The area is lightly populated~~,~~ but is used for irrigated agriculture. The USGS estimates the groundwater supply in the Ventucopa Uplands to be approximately 22,000 AFY with domestic demands of only 8 AFY and agricultural demands of approximately 10,000 AFY. ~~Nevertheless, as a whole, the basin is in a condition of overdraft.~~

Oxnard Plain

The Oxnard Plain is an important geographic area for water resources (see **Figure 10-2**) and. The Oxnard Plain supplies large amounts of groundwater for municipal users including the county's largest city, Oxnard. It's estimated that the Oxnard Plain also supplies the water for more than half of the Ceounty's

$2.2 billion agricultural industry (Ventura County Agricultural Commissioner 2016). The Oxnard Plain Groundwater Basin is a Ssubbasin of the Santa Clara River Valley Groundwater Basin (DWR Groundwater Basin Number 4-004.02) . The Oxnard Plain Groundwater Basin is an alluvial basin containing a collection of interconnected aquifers separated by layers of clay strata. The Oxnard Plain Groundwater Basin can be generallysubbasin is categorized into three parts: the Oxnard Forebay, the Upper Aquifer System (UAS) and the Lower Aquifer System (LAS).

The Oxnard Forebay is the unconfined portion of the subbasinOxnard Plain Basin generally located along the Santa Claraita River northeast of where the Pacific Coast Highway joins U.S. Highway 101 in the City of Oxnard. The Oxnard Forebay is the primary means by which the Oxnard Plain Groundwater Basin is recharged. The subbasinForebay Basin is recharged by infiltration from the riverbed of the Santa Clara River and spreading basins constructed for that purpose. From the Oxnard Forebay, located in the upper most portion of the Oxnard Plain Basin, gGroundwater moves into the Upper and Lower Aquifer Systems because the clay layers which separate the aquifers are not continuous at this location.

The Upper Aquifer System (UAS) comprises of the upper 500 feet of the confined portions of the Oxnard SubbasinPlain Basin andwhich includes a semi-perched zone and the Oxnard and Mugu aquifers. The UAS is hydraulically connected to the Pacific Ocean through the Oxnard and Mugu aquifers and is the route by which seawater intrusion enters the subbasinOxnard Plain Basin. The Lower Aquifer System (LAS) includes the deeper confined aquifers includesing the Hueneme, Fox Canyon, and Grimes Canyon aquifers. The LAS is separated by an approximately 80-foot thick layer of silty clay which is continuous except near the Oxnard Forebay.

Because of its importance as a water source, there is great concern about the health of the Oxnard SubbasinPlain basin. The FCGMAIn fact, the Fox Canyon Groundwater Management Agency (Fox Canyon GMA) was formed in 1982 to control groundwater overdraft and to minimize the threat of seawater intrusion in the Oxnard Plain. A major goal of the FCox Canyon GMA is to regulates groundwater from the Oxnard Ssubbasin and operate the basin at a safe yield. However, today DWR has characterized the basin as being in "critical
overdraft". Evidence suggests that groundwater underlyingin the Oxnard Plain dropped below sea level as early as the 1940s. The annual overdraft is estimated to be 20,000 to 25,000 AFY (UWCD 2017b). This continued overdraft allows seawater intrusion and puts the area at risk of land subsidence.

Santa Clara River Watershed

The Santa Clara River headwater is at Pacifico Mountain in the San Gabriel Mountains and it flows in a generally western direction for approximately 84 miles through Tie Canyon, Aliso Canyon, Soledad Canyon, the Santa Clarita Valley, the Santa Clara River Valley, and the Oxnard Plain before discharging to the Pacific Ocean near the Ventura Harbor. The Santa Clara River and tributariesy system haves a watershed area of about 1,634 square miles (~1,000,000 acres). Approximately 40 percent of the watershed is in Los Angeles County, with the remaining 60 percent in Ventura County. The Santa Clara River is unique in that it is the largest river system in Southern California remaining in a relatively natural state.

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The climate of the Santa Clara River watershed is characterized by long, dry periods and ~~a~~ relatively short wet winters. Near the coast, cool moist ocean winds produce moderate temperature; summer highs average 74ºF, winter lows average 44 ºF, and frost is rare (Western Regional Climate Center Station 0492852 Ventura). Inland temperatures can exceed 110 ºF in the summer and drop below freezing in the winter (Western Regional Climate Center Station 047957 Santa Paula). Precipitation is generally in the form of winter storms, thunderstorms~~,~~ and tropical cyclones. Approximately 75 percent of the annual precipitation occurs from December through March. The mean seasonal precipitation varies from about 40 inches in the mountainous areas~~portions~~ of the watershed~~,~~ to about 18 inches in the Piru and Fillmore areas (Western Regional Climate Center Stations 046940 Piru ESE and Station 043050 Fillmore WNW) and under 15 inches at the coast (Western Regional Climate Center Station 049285 Ventura).

The cities of Fillmore, Santa Paula, Oxnard ~~(portion),~~ and Ventura ~~(portion)~~ are located in the watershed as are the County areas~~communities~~ of Piru, Bardsdale, Saticoy~~,~~ and El Rio. Land use~~s~~ in the ~~Ventura~~ County areas~~portion~~ of the watershed are as follows:

- Agriculture 42%
- Open Space 27%
- Urban Uses 26%
- Other (urban reserve, open space reserve, harbor) 5%

Surface Water

The major surface water features in the watershed are the Lake Piru Reservoir and the Santa Clara River.

Lake Piru Reservoir. The construction of Santa Felicia Dam on Piru Creek in 1955 created the Lake Piru Reservoir for the ~~specific~~ purpose of recharging groundwater. The reservoir can store approximately 82,000 AF (UWCD 2016). The reservoir receives winter runoff from ~~local~~ drainages and can receive imported SWP water from Pyramid Lake. Water from Lake Piru is released into Piru Creek and flows to the Santa Clara River where it is joined by runoff from Sespe and Santa Paula Creeks. The releases are used to replenish underground aquifers, and water is made available to municipalities, industry~~,~~ and agriculture (UWCD 2016). Lake Piru is operated by United Water Conservation District (UWCD). Generally, UWCD schedules a fall conservation release from Lake Piru ~~(water stored/conserved in the Lake is released)~~ to recharge both the Piru and Fillmore Subbasins~~groundwater basins~~. The remaining portion of the flows are diverted at the Freeman Diversion for recharge in the Oxnard Foreb~~a~~ay area~~ay~~ and distribution to agricultural users.

D~~However, d~~rought and low inflow into Lake Piru ~~will~~ prevents UWCD from performing conservation releases in some years. Operation of the Santa Felicia Dam is regulated by the Federal Energy Regulatory Commission (FERC). ~~The FERC license to operate Santa Felicia Dam has many requirements for structural safety, public safety, water quality, recreational opportunities and protection of biological resources. Specifi~~Thee FERC license requirements include releasing water to allow migration of steelhead in Piru Creek and portions of the Santa Clara River ~~(dependent on river conditions)~~, as~~based on the~~ applicable to the National Marine Fisheries Service biological opinion.

Santa Clara River. ~~Due to climatic and geologic factors s~~Streamflow in the Santa Clara River can be described as interrupted perennial~~,~~ with alternating ~~perennial reaches~~ and intermittent (summer dry) reaches influenced by surface and~~water~~ groundwater interactions (SFEI 2011). Flow is supplemented by releases from ~~Lake~~ Piru Reservoir and tributary inflow~~s from tributaries~~. About 10 miles from the River mouth~~,~~ UWCD can divert water at the Freeman Diversion for recharge of the Oxnard Subgroundwater basin. Several mutual water companies operate small diversions located on Piru Creek, Sespe Creek~~,~~

Santa Paula Creek.

and the Santa Clara River for agricultural irrigation.; the amount of water diverted at these locations are unknown (Ventura County Watershed Protection District 2015b). In the past, several wastewater treatment plants discharged to the Santa Clara River. With the exception of the City of Ventura, most wastewater treatment facilities have been upgraded and now percolate treated effluent to groundwater rather than releasing water to the Santa Clara River (Ventura County Watershed Protection District 2015b). The wastewater treatment facilities are permitted to discharge effluent via WDR from the LARWQCB. The City of Ventura currently discharges to the Santa Clara River Estuary but is actively studying ways to increase recycled water use in a manner protective of the Santa Clara River Estuary (City of Ventura 2016b).

Groundwater

The Santa Clara River Valley Basin is the primary basin underlying the Ventura County portion of the Santa Clara River Watershed. This basin is subdivided into sub-basins: Piru (DWR Basin No. 4-004.06), Fillmore (DWR Basin No. 4-004.05), Santa Paula (DWR Basin No. 4-004.04), Mound (DWR Basin No. 4-004.03), and Oxnard (DWR Basin No. 4-004.02). All groundwater basins/subbasins in the Ventura County portion of the Santa Clara River, with the exception of the Santa Paula SubbBasin (which is adjudicated) are subject to SGMA. As described earlier, in 2014, theCalifornia Department of Water Resources ranked California's groundwater basins as "high," "medium," "low," or "very low" priority. In this ranking process tThe Oxnard and Piru groundwater subbasins were deemed "high" priority and the Fillmore, Santa Paula, and Mound subbasins deemed "medium" priority basins. The heavygreat dependency on groundwater in theseis areas iswas a primary factor in the ranking. The Oxnard basin was also listed as being in "critical overdraft."

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Stakeholders have met to discuss forming the necessary groundwater sustainability agency for the Piru, Fillmore, and Mound basins. As of the preparation of this background report, no formal notification of groundwater sustainability agency formation has been filed with the Department of Water Resources for those basins.

The FCox Canyon GMA iselected to be the GSAgroundwater sustainability agency under SGMA for the basins within its Fox Canyon GMA boundariesy which, includesding the Oxnard Ssubbasin.

Important Recharge Areas

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The Oxnard Forebay was described above.

Imported Supplies

In 1964, the Ventura County Flood Control District (currently the Ventura County Watershed Protection DistrictVCWPD) contracted with the DWRState of California Department of Water Resources for a SWP allocation of 20,000 AF. TCurrently, the City of Ventura has an allocation of 10,000 AF, Casitas Municipal Water District has an allocation of 5,000 AF, and UWCD has an allocation of 5,000 AF. Port Hueneme Water Agency uses 1,850 AF of UWCD's entitlement andbut receives the water through Calleguas Municipal Water District. The SWP contract expires in 2035 but negotiations are underway to extend the contract. Up to 3,150 AF of SWP water is permitted to be released from Pyramid Lake and sent to Lake Piru.

From 1991 to 2013 the total SWP delivery has been 34,212 AF and SWP has not been purchased or delivered in every year (Ventura County Watershed Protection District 2015b). The amount of SWP water allocated in each year depends on availability, and delivery is only allowed from November 1

through the end of February (Ventura County Watershed Protection District 2015b). In addition, UWCD has periodically entered into annual agreements with Casitas Municipal Water District and the City of

Ventura to purchase a portion of their unused SWP allocation. According to UWCD "The purchase of SWP water will be considered by United annually on an as-need basis" (UWCD 2016).

In addition to the SWP supplies delivered to Lake Piru Reservoir, the City of Oxnard purchases imported water from Calleguas Municipal Water District. During the period from 1991-2013 direct deliveries of SWP water to the Oxnard area were 316,000 AF – nearly 10 times the amount of water delivered to Lake Piru. These supplies are in turn provided to the Channel Islands Beach Community Services District, the City of Port Hueneme, and Naval Base Ventura County, via the Port Hueneme Water Agency.

TAt this time the City of Ventura does not have the infrastructurefacilities needed to deliver SWP water into its distribution system. However, Ventura is currently working with Calleguas Municipal Water District and others on a potential plansroject to bring SWP allocation to the City's system.

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Other Supplies

Several water agencies in the Santa Clara River Watershed produce and deliver recycled water, including the following:

- tThe City of Fillmore,
- City of Oxnard, and
- City of Ventura

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Water Quality

The e Los Angeles LARWQCB has identified beneficial uses for the Santa Clara River Watershed as detailed in **Table 10-9**. Permit programs and TMDLs have been developed to protect these beneficial uses. The following TMDLs are in place for portions of the Santa Clara Watershed:

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- Bacteria in the Santa Clara River Estuary and Reaches 3 (area between Fillmore and Saticoy), 5 (Los Angeles County and eastern 4,500 feet of Santa Clara River within Ventura County), 6 (Los Angeles County), and 7 (Los Angeles County) – TMDL effective March 21, 2012
- Chloride in the Santa Clara River Reach 3 (area between Fillmore and Saticoy) – TMDL effective June 18, 2003
- Chloride in the Upper Santa Clara River (only a small portion lies within the county) – TMDL effective April 28, 2015

In addition to the existing TMDLs, other TMDLs may be developed as several Santa Clara Watershed areas are included in California's 303(d) List. Identified impairments in the Santa Clara River and its tributaries include chloride, pH, boron, sulfates, total dissolved solids, toxicity, as well as multiple chemicals generally referred to as "Chem A". The McGrath Beach area is considered to be impaired by coliform bacteria and toxic sediments.

TABLE 10-9
DESIGNATED BENEFICIAL USES IN THE SANTA CLARA RIVER WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
SANTACLARARIVER WATERSHED																						
Santa Clara River Estuary (Ends at Harbor Blvd.) [c]							E		E					E	E	E		Ee	Ef	Ef		E
Santa Clara River Reach 1																						
Santa Clara River (Estuary to Highway 101 bridge)	P*	E	E	E	E	E					E	E				E		E	E			E
Santa Clara River Reach 2																						
Santa Clara River (Highway 101 bridge to Ellsworth Barranca)	P*	E	E	E	E	E					E	E				E		E	E			E
Santa Clara River (Ellsworth Barranca to Freeman Diversion)	P*	E	E	E	E	E					E	E				E		E	E			E
Santa Clara River Reach 3																						
Santa Clara River (Freeman Diversion Dam to Santa Paula Creek)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River (Santa Paula Creek to Sespe Creek)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River (Sespe Creek to A Street, Fillmore)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River Reach 4A																						
Santa Clara River (A Street Fillmore to Piru Creek)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River Reach 4B																						
Santa Clara River (Piru Creek to Blue Cut gaging station)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River Reach 5																						
Santa Clara River (Blue Cut gaging station to West Pier Highway 99)	P*	E	E	E	E	E					E					E		E				E
Santa Clara River Reach 9																						
Santa Paula Creek (above Santa Paula Water Works Diversion Dam)	P*	E	E	E	E	E					E	E				E		E	E	E		
Santa Clara River Reach 10																						
Sespe Creek (gaging stn below Little Sespe Creek to Potrero John Creek)	P	E	P	E	E						E	E				E	E	Eg	E	E		E
Santa Clara River Reach 11																						
Piru Creek (gaging stn below Santa Felicia Dam to Agua Blanca Creek)	P	E	E	E	E	E					E	E				E		Eg				
Santa Paula Creek (Santa Clara River R4A to Santa Paula Water Works Diversion)	P	E	E	E	E	E					E	E				E		E	E	E		
Sisar Creek	P	E	P	E	E						E	E				E		Eg		E		E

TABLE 10-9
DESIGNATED BENEFICIAL USES IN THE SANTA CLARA RIVER WATERSHED

	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
SANTACLARARIVER WATERSHED																						
Sespe Creek (Santa Clara River R3 to gaging station below Little Sespe)	P	E	E	E	E						E	E				E	E	E	E	E		E
Timber Creek	P*				E							E				E	E	E	E	E		E
Bear Canyon	P*				E						E	P				E	E	E	E	E		E
Trout Creek	P*				E						E	E				E		E	E	E		E
Piedra Blanca Creek	P*				E							E				E		E	E	E		E
Lion Canyon	P*				E						E	E				E			E	E		E
Rose Valley Creek	P*				E						E	E				E				E		E
Howard Creek	P*				E							E				E	E	E	E	E		E
Tule Creek	P*				E							P				E	E	E	E	E		E
Potrero John Creek	P*				E							P				E		E	E	E		E
Hopper Creek	P*	E		E	E	E					E	E				E		Eg				E
Piru Creek (Santa Clara River R4A to Santa Paula Water Works Diversion	P	E	E	E	E	E					E	E				E		Eg	E	E		E
Lake Piru	P	E	E	E	E	P					E	E				E		E		E		

E: Existing beneficial use
P: Potential beneficial use
I: Intermittent beneficial use
E,P, and I: shall be protected as required
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some destinations may be considered for exemption at a later date.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
g: Condor refuge.
j: Out of service.

Source: Table 2-1. Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (electronic copy accessed December 27, 2016).

Available Supplies

Water sources~~The sources of water supply~~ in the Santa Clara River Watershed include surface water, imported water, groundwater~~,~~ and recycled water. A total estimate of supply in the Santa Clara Watershed is provided in **Table 10-11**.

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Surface Water

UWCD collects and releases surface water at Santa Felicia Dam/Lake Piru. The purpose of this water and subsequent~~the~~ releases ~~from the dam~~ are to replenish the Piru, Fillmore~~,~~ and Santa Paula Subbasins~~,~~ and to provide flows to ~~benefit~~ facilities receiving water from the Freeman Diversion. Releases since 1999 averaged 28,369 AFY with an annual minimum of zero and a maximum of 47,400 AF, dependent on ~~rainfall that year~~seasonal conditions and environmental bypass flow requirements (UWCD 2014). UWCD estimates that approximately ten percent of the water released from Santa Felicia Dam is delivered to agricultural users in the Calleguas Creek Watershed via the Pumping Trough Pipeline (PTP) and Pleasant Valley Pipeline. UWCD also has a right to divert Santa Clara River flows at the Freeman Diversion. In recent years UCWD has diverted between 2,500 AF (in 2015) and 94,000 AF (in 2011) at this location (UWCD 2017b). Water diverted in this location is used for both artificial recharge – the primary source of recharge to the Oxnard coastal plain – and direct delivery to agricultural users. ~~To avoid over counting supplies, surface water used for recharge is not counted as a supply in this report.~~

It is estimated that private landowners may divert as much as 880 AFY from the Santa Clara River ~~, but records are not available to confirm the long-term Santa Clara River surface water supply available to private users~~ (SWRCB eWRIMS database).

Imported Water

Since 1991, UWCD has received ~~from 0~~ up to 4,047 AF of imported SWP water in any given year ~~with~~, an average of 1,487 AFY.

DWR prepares a biennial report to assist SWP users and local planners in assessing the near- and long-term availability of supplies ~~from the SWP~~. DWR issued its most recent update, the 2017~~5 DWR~~ State Water Project Delivery Capability Report (DCR), in March~~July~~ 2018~~5~~. In the 2017~~5~~ update, DWR provides SWP supply estimates for SWP contractors to use in their planning efforts. ~~The 2015 DCR~~It includes DWR's estimates of SWP water supply availability under both current and future conditions. ~~The DCR estimates that UWCD on average, will receive between 45 and 70 percent of its allocation, depending on implementation of California WaterFix (SWP Delivery Capability Report, Existing Conveyance High Outflow Scenario Table D.31 and Alternative 4 H3Scenario Table F.31).~~

~~The i~~Imported water acquired by UWCD is intermingled with surface water at Lake Piru and released for groundwater recharge. It is not possible to track UWCD's imported water separate from surface water. ~~; any discussion on~~ Ddirect surface water deliveries and groundwater recharge by UWCD may include a ~~small~~ component of SWP water.

T~~Besides UCWD, t~~he City of Oxnard receives imported water within the Santa Clara River Watershed. The City of Oxnard receives imported water from Calleguas Municipal Water District (Calleguas), who is a member agency of the Metropolitan Water District of Southern California (MWD), a wholesale supplier of SWP~~tate Water Project~~ water. In 2018~~5~~ the City of Oxnard purchased 45%~~12,187~~ of total supply~~AF~~ from Callegua ands~~; in the~~

~~future (2020-2040) the City~~ anticipates receiving ~~11,826 AF~~47% of imported water from Calleguas in 2020 (Oxnard 2016).

Groundwater

~~Estimating groundwater supply is a difficult and time-consuming process and must take into account not only basin configuration, underflow, and weather, but other management practices such as volume of applied water and recharge operations.~~ There is not an accepted long-term-yield for groundwater in the Santa Clara Watershed. As part of the SGMA process stakeholders will evaluate long-term sustainable yield. **Table 10-10** presents a high-level estimate of available supply~~groundwater~~ based on available data. ~~The difference in the high and low supply estimate documents the lack of data or consensus on groundwater supply.~~

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TABLE 10-10
GROUNDWATER SUPPLY ESTIMATES
SANTA CLARA RIVER WATERSHED

Basin	Estimate of Groundwater Budget (AFY)	Past Groundwater Extractions (AFY)	Notes
Piru	9,050	12,403	1, 2
Fillmore	22,625	44,598	3, 4
Santa Paula	26,000	25,699	5, 6
Oxnard Subbasin	71,000	78,000	7, 8
Mound	8,000	10,000	9, 10
Low Estimate Groundwater Supply Santa Clara River Watershed		136,400	11
High Estimate Groundwater Supply Santa Clara River Watershed		171,000	11

Notes:
1. DWR 2003, Basin 4-4.06. Assumes low estimate of 5,900 AFY outflow to Fillmore Basin.
2. UWCD 2016. 2014 and 2015 Piru and Fillmore Basins AB 3030 Biennial Groundwater Conditions Report. Average annual extractions 1980-2015.
3. DWR 2003, Basin 4-4.05. Assumes low estimate of 2,400 AFY outflow to Santa Paula Basin.
4. UWCD 2016. 2014 and 2015 Piru and Fillmore Basins AB 3030 Biennial Groundwater Conditions Report. Average annual extractions 1980-2015.
5. Information from the Santa Paula Basins Expert Group estimates annual yield at no less than 26,000 AFY (UWCD 2015). DWR 2003, Basin 4-4.04 budget is 5,593 AFY. Data from the Santa Paula Basins Expert Group is shown in the table.
6. UWCD 2015. 2012 Santa Paula Basin Annual Report. Average annual extractions 1980-2012.
7. USGS 2003.
8. UWCD 2017b.
9. Fugro West, Inc. 1997. Mound Groundwater Basin Annual Report. June.
10. City of Ventura 2011. City of San Buenaventura Water Master Plan and personnel communication D. Detmer of United Water Conservation District.
11. Rounded to the nearest 100 AF

Recycled Water

Ventura County Waterworks District No. 16 (VCWWD 16) plans to construct a tertiary treatment upgrade for the existing Piru Wastewater Treatment Plant to mitigate high chloride and comply with LARWQCB WDRs. After tertiary treatment, effluent from the Piru Wastewater Treatment Plant will meet California Code of Regulations, Title 22 requirements for unrestricted recycled

wWater.,~~ A~~and approximately 500-- AFY will be available for use as a new, lower cost irrigation supply for up to 1 square mile (640 acres) of nearby agricultural property. This supply is anticipated in~~before year~~ 2020. In the meantime, treated effluent is discharged to percolation basins.

The City of Fillmore completed a recycled water plant in 2009 and distributes approximately 2,000-- AFY of reclaimed water to parks and school fields and for groundwater percolation ~~basins~~ (Hydrometrics 2015, Fillmore 2016).

The City of Santa Paula utilizes its recycled water for groundwater recharge. To avoid over counting~~,~~ Santa Paula's recycled water supply is categorized as a groundwater supply.

The City of Oxnard has been pursuing a recycled water program for more than 10 years. The City has constructed an Advanced Water Purification Facility (AWPF) as well as extensive transmission pipelines for the recycled water system. As of 2015 the AWPF has the capacity to produce 7,000-- AFY and~~; but in 2015~~ delivered only 605-- AF in 2015. The City is actively pursuing users for its recycled water including landscape irrigation of parks, schools, golf courses and residential common areas. The City has entered into an agreement with agricultural users in the Oxnard Plain to provide recycled water ~~when available~~. ~~The pipeline to serve the Oxnard Plain is planned for completion in the future.~~ Oxnard anticipates putting between 7,000 up to 14,000 AFY of recycled water to beneficial use starting in 2020~~in the next 10 years~~.

The City of Ventura has access to recycled water supply through the Ventura Water Reclamation Facility. The ~~Currently, the Ventura Water~~ Reclamation Facility discharges most of its tertiary treated effluent to the Santa Clara River Estuary with approximately 700-- AFY diverted as recycled water for landscape irrigation by several users along the City's recycled water pipeline alignment. In the next ten years the City of Ventura intends to increase the amount of recycled water delivered to irrigation customers and is examining direct potable use of recycled water. The City of Ventura service area includes areas~~portions~~ in both the Ventura and Santa Clara watersheds~~,~~ but the recycled water supply is being accounted for in the Santa Clara watershed.

TABLE 10-11
CURRENT (2016) ESTIMATE OF SUPPLY
SANTA CLARA RIVER WATERSHED

Supply Source	Annual Volume (AF)
Surface Water, Santa Clara River[1]	0
Imported Water, City of Oxnard from Calleguas [1]	12,000
Recycled Water	10,200 to 19,700
Groundwater (see Table 10-10)	136,400 to 171,000
Low Estimate (rounded to nearest 100 AF)	*158,400*
High Estimate (rounded to nearest 100 AF)	*202,700*

1. UWCD directly delivers approximately 12,000 AFY to agricultural users in the Calleguas Creek Watershed. This water is diverted in the Santa Clara Watershed but is a supply in the Calleguas Creek Watershed.

Water Suppliers

There are six major water suppliers (entities serving more than 1000 persons) in the Ventura County portion of the Santa Clara River Watershed as well as 74 smaller water systems and irrigation companies. Persons or businesses in the Watershed are also supplied by private wells and surface water diversions. The major urban suppliers~~,~~ documented in **Table 10-12** provide water to the cities but also to the unincorporated County. These are also mapped in **Figure 10-4**.

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TABLE 10-12
MAJOR WATER SUPPLIERS
SANTA CLARA RIVER WATERSHED

Supplier/Primary Source(s)	Type	Area Served	Estimated Population Served	Annual Water Supplied*
Castaic Lake Water Agency Imported water and local groundwater	Special District	The Castaic Lake Water Agency service area extends into Ventura County but at the current time Castaic Lake Water Agency does not supply any water to Ventura County.	NA	NA
City of Fillmore Groundwater	City	City of Fillmore north of Santa Clara River, east of Sespe Creek.	18,600	~ 3,400 AF
City of Oxnard Imported water, groundwater, recycled water	City	City of Oxnard and County unincorporated area along Hueneme Road to Naval Base Ventura County. Excludes Channel Islands Beach.	193,654	~28,600 AF
City of Santa Paula Groundwater	City	Approximately 4.5 square miles (~2,880 acres) within the City of Santa Paula.	29,000	~4,400 AF
United Water Conservation District Surface water, imported water, groundwater	Special District	333 square miles (~ 213,120 acres) in Santa Clara River Valley (portion within Ventura County) and the Oxnard Plain.	**	**
Ventura Water Lake Casitas water, Ventura River, groundwater (Oxnard Plain, Mound, Santa Paula Basins), recycled water	City	City of Ventura and 1.5 square miles (960 acres) within City's sphere of influence. City falls within both the Ventura and Santa Clara Watersheds.	***	***

*Estimated based on records of water supplied 2010 to 2015, rounded to nearest 100 AF. Does not account for planned future expansion of demands and supplies.
**United Water Conservation District provides groundwater recharge and water to retail water agencies, to avoid double counting, information is only listed for retail water agencies.
*** City of Ventura information is described under Ventura River Watershed, to avoid double counting no population or water supply is provided in this table.
Source: UWCD 2016, City of Ventura 2016a and 2016b, City of Fillmore 2005 and 2016, City of Oxnard 2016, City of Santa Paula 2011.

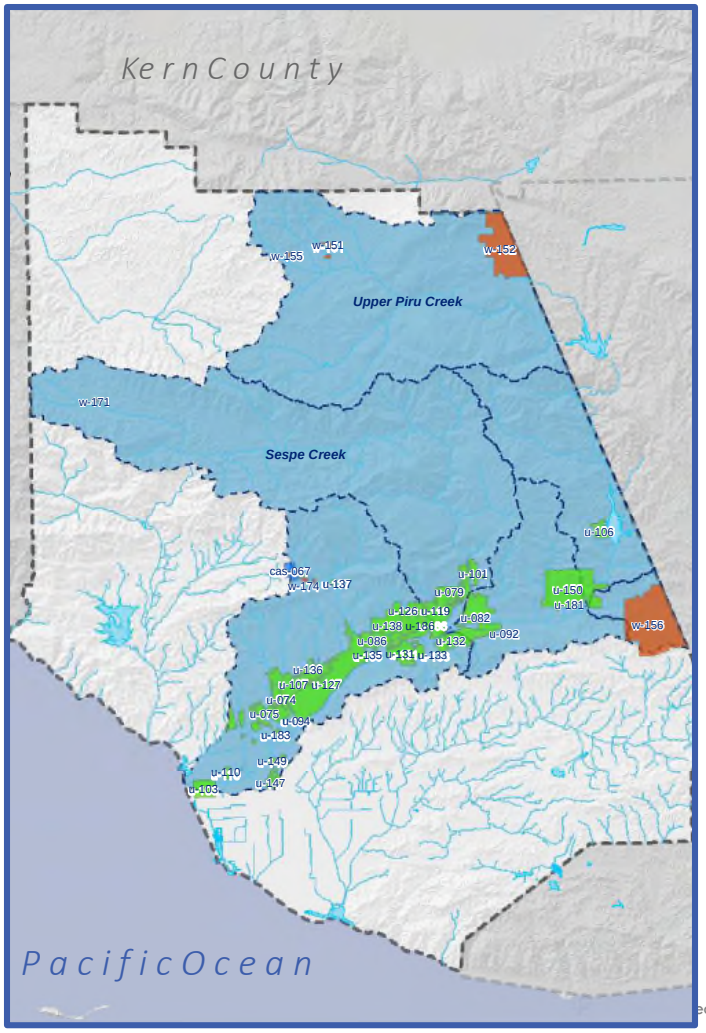
WATER PURVEYORS

UNITED WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
United (u-074)	Aliso MWC
United (u-075)	Alta MWC
United (u-076)	Beedy Street Well
United (u-079)	Brownstone MWC
United (u-082)	City of Fillmore
United (u-082)	City of Fillmore
United (u-084)	Cloverdale MWC
United (u-086)	Community MWC
United (u-091)	El Rio Processing
United (u-092)	Elkins Ranch Company
United (u-094)	Farmers Irrigation Company
United (u-095)	Fillmore Irrigation Company
United (u-096)	Fillmore West Mobile Home Park
United (u-101)	Goodenough MWC
United (u-103)	Coastal Berry
United (u-104)	Alger Family Trust
United (u-106)	Lake Piru Recreation Area
United (u-107)	Limoneira Associates
United (u-108)	Linda Vista Junior Academy
United (u-109)	Middle Road MWC
United (u-110)	Montalvo MWC
United (u-119)	Rancho Sespe
United (u-122)	Rio Plaza Water Company
United (u-123)	Rio Real/Rio del Valle Schools
United (u-126)	San Cayetano MWC
United (u-127)	City of Santa Paula
United (u-129)	Sherwin Acres MWC
United (u-131)	South Mountain MWC
United (u-132)	Southside Improvement Company
United (u-133)	Storke MWC
United (u-134)	Strictland MWC
United (u-135)	Teague-McKevett Company-Limoneira
United (u-136)	Thermal Belt MWC
United (u-137)	Thomas Aquinas College
United (u-138)	Timber Canyon MWC
United (u-139)	Tobock Ranch MWC
United (u-145)	G.P. Resources
United (u-147)	Vineyard Ave Acres MWC
United (u-148)	Vineyard Ave Estates
United (u-149)	Vineyard MWC
United (u-150)	Warring Water Service
United (u-181)	Piru MWC
United (u-183)	Ventura County Property Administrator
United (u-185)	Hardscrabble MWC
United (u-186)	Sespe Agricultural Water
United (u-192)	Citrus MWC
United (u-202)	Rancho Sespe Workers Improvement Association
United (u-203)	Toland Road Water System

CALLEGUAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
Casitas (cas-067) Si	ar MWC

SUPPLIERS WITHOUT WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
None (w-151)	Greeleaf Springs Water System
None (w-152)	Antelope Valley East Kern Water Agency
None (w-152)	East Kern Water Agency
None (w-155)	Camp Three Falls
None (w-156)	Castaic Lake Water Agency
None (w-168)	New Camp Barlett
None (w-171)	Pine Mountain Inn

CASITAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
None (w-174)	Sweetwater Spring Ranch



Ventura County Boundary
Rivers Streams
Water Bodies
Subwatersheds
Santa Clara River Watershed

Water Purveyor

Casitas Wholesale District
United Wholesale District
Suppliers Without Wholesale District

Figure 10-4:
Water Purveyors in
Santa Clara River Watershed

Map Date: December 02, 2016
Source: Kennedy/Jenks Consultants, 2016.

N

0 9 18 Miles

Estimate of Demand

TAs described previously, in 2014, the VCWPDentura County Watershed Protection District undertook an estimate of Countywide water demand, documented in the County of Ventura 2013 Water Supply and Demand (January 2015). Results of the study for the Santa Clara Watershed are provided **Table 10**.

TABLE 10-13
ESTIMATED SANTA CLARA RIVER WATERSHED DEMAND

Watershed/Sub-watershed	Total Agricultural Demand (AF)	Total Municipal Demand (AF)	Total Demand (AF)
Hall Canyon/Arundel	815	9,924	10,739
Ormond Beach	2,797	22,913	25,710
Santa Clara River	114,919	31,284	146,203
Subtotal (Rounded to nearest 100 AF)	*118,500*	*64,100*	**182,600**

Source: Hydrometrics 2015. Table 6.

Notable in Table 10 is the distribution of demands. Agricultural demand is estimated to be significantly higher than municipal demand.

Demand Management

Table 10 summarizes the various water conservation effortsactions undertaken in the Santa Clara River Watershed. It Table 10 summarizes demand management measures undertaken under normal conditions and those extra ordinary additional efforts taken during drought periods.

Comparison of Supply and Demand

While it is difficult to quantify, iIt is estimated that there is an annual supply of 158,400 AF to 202,700 AF in the Santa Clara Watershed. This supply of course will vary given drought and operational conditions. Estimated demand is approximately 182,600 AF and is outpacing the low-end estimate of annual supply. The high-end estimate of supplies assumes increased recycled water use, the timing of which is uncertain. If the higher supply is achieved, supply could be a little less than 10 percent greater than demand.

Water-Related Challenges

Below are the water related challenges for the Santa Clara River Watershed as of late 2016:

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TABLE 10-14
DEMAND MANAGEMENT MEASURES IN SANTA CLARA RIVER WATERSHED

Agency	Conservation Measures in Effect at All Times							Conservation Measures that May Be Implemented in Drought				
	Public Information and Outreach	Water Waste Prohibitions	Metering	Volume-Based Pricing	Water Efficiency Surveys Offered to Customers	Rebates for High Efficiency Plumbing Fixtures	Turf Removal Incentives	Drought Surcharge	Limitations on Irrigation/ Outdoor Watering	Mandatory Reductions/ Allocation	Fines	Suspension of new water connections
City of Fillmore		X	X	X				X	X			
City of Oxnard	X	X	X	X		X	X		X	X	X	X
City of Santa Paula	X	X	X	X					X			
Ventura Water	X	X	X	X	X	X	X	X	X	X	X	X
United Water Conservation District	X		X	X						X*	X	

*UWCD's groundwater allocation is subject to the Fox Canyon GMA. In the event of reductions from FCGMA, UWCD informs their retail agencies of the reductions.
Sources: City of Oxnard 2016; City of Ventura 2016b; United Water Conservation District 2016.

Coastal Groundwater Overdraft

GAs described earlier, groundwater underlyingin the Oxnard Plain dropped below sea level as early as the 1940s. Overdraft conditions now persist in the southern and eastern portions of the Oxnard Plain and, the annual overdraft is estimated to be 20,000 to 25,000 AFY (UWCD 2017b). The is continued ooverdraft allows for seawater intrusion and puts the area at risk of land subsidence.

Sea Water Intrusion

The lLow water levels underlyingin the Oxnard Plain allow for seawater (chloride) intrusionto enter into freshwater aquifers. The USGS and UWCD have documented the inland movement of seawater adjacent to the Hueneme and Mugu submarine canyons.

Water for Environmental Purposes

UWCD diverts Santa Clara River water at the Freeman Diversion to recharge groundwater basins and for direct delivery to agricultural users. UWCD provides bypass flows at the Freeman Diversion for the upstream and downstream migration of Ssouthern California Steelhead. In July 2008, the National Marine Fisheries Service (NMFS) issued a final Biological Opinion (BO) that concluded that operations at the Freeman Diversion were likely to jeopardize the continued existence of Ssouthern California Steelhead in the Santa Clara River. UWCD is currently developing a multi-species habitat conservation plan and is in consultation with NMFS. The resulting bypass flows are unknown, but it is estimated that the current bypass flow regime has decreased diversions (and hence water supply) by up to 22,500 AFY, though this is highly variable from year to year (personnel communication, Robert Richardson, United Water Conservation District).

Quality

The Los AngelesA-RWQCB has identified the Santa Clara River, downstream of Piru Creek, as having water quality impairments related to bacteria. The Los Angeles RWQCB has identified rRunoff from residential, industrial, and commercial areas is identified as the source of the bacteria. This includes fertilizer used for lawns and landscaping, organic debris from gardens, landscaping, and parks; trash such as food wastes; domestic animal waste; and human waste from areas inhabited by the homeless. The indicator bacteria point to the potential contamination of the Santa Clara River by pathogens or disease producing bacteria or viruses. Some waterborne pathogenic diseases include ear infections, dysentery, typhoid fever, viral and bacterial gastroenteritis, and hepatitis A. Elevated bacteria levels are an indicator that a potential health risk exists for individuals exposed to this water and therefore limit the recreational uses of the Santa Clara River.

Calleguas Creek Watershed

The Calleguas Creek Watershed is located in the southeastern portion of Ventura County and drains an area of approximately 343 square mile (219,520 acres) area. The Santa Susana and Oak Ridge Mountains form the northern boundary and, the southern boundary is delineated by the Simi Hills and Santa Monica Mountains. Major creeks and rivers include the Conejo Creek, Arroyo Simi, Arroyo Las Posas, Arroyo Santa Rosa, Calleguas Creek, Revolon Slough, and Mugu Lagoon.

Long-term monitoring by the VCWPDentura County Watershed Protection District shows that the Calleguas
Creek Watershed cycles through wet and dry periods and does not have a common “normal” seasonperiod.

~~Precipitation is in the form of rain and a~~About 85 percent of the rainfall occurs from November to March (Calleguas Creek Steering Committee 2004). Near the coast, cool moist ocean winds moderate temperature with a~~;~~ summer high~~s~~ average of 64ºF and winter low~~s~~ average of 53 ºF (Calleguas Creek Steering Committee 2004). Inland temperatures can exceed 106 ºF in the summer and drop below freezing in the winter (Western Regional Climate Center Station 048904 Thousand Oaks 1 SW).

The watershed includes the cities of Oxnard (portion), Port Hueneme, Camarillo, Moorpark, Simi Valley, Thousand Oaks~~,~~ and unincorporated areas of Ventura County. According to the WCVC~~atersheds Coalition of Ventura County~~ (2014), land uses in the watershed are as follows:

- Undeveloped land 50%
- Agriculture 25%
- Urban uses 25%

Surface Water

The major surface water features ~~in the watershed~~ are Lake Bard, the Arroyo Simi/Arroyo Las Posas/Calleguas Creek system, Conejo Creek system~~,~~ and Honda Barranca/Beardsley Wash/Revolon Slough system.

Lake Bard. Lake Bard is an approximately 10,500~~ -~~ AF surface water reservoir constructed to store treated water from the Metropolitan Water District of Southern California. This water is used to meet emergency demands. Lake Bard is operated by Calleguas Municipal Water District (Calleguas Municipal Water District 2016).

Arroyo Simi/Arroyo Las Posas/Calleguas Creek. The~~is series of c~~ creeks drain precipitation and urban runoff from the Simi Valley, the eastern Las Posas Valley, much of Pleasant Valley, and the eastern portion of the Oxnard Plain. In addition to precipitation and urban runoff, the Arroyo Simi also carries discharges from a series of dewatering wells operated by the City of Simi Valley and~~as well as~~ treated effluent from the Simi Valley Water Quality Control Plant. Under certain conditions the Ventura County Waterworks District #1 Moorpark Wastewater Treatment and the Camrosa Water District Water Reclamation Facility may discharge effluent into Calleguas Creek (Calleguas Creek Steering Committee 2004).

Conejo Creek System. The Arroyo Santa Rosa, Arroyo Conejo~~,~~ and Conejo Creek make up this drainage system. The Santa Rosa Valley, a portion of Pleasant Valley, Tierra Rejada Valley and the City of Thousand Oaks are drained by this system. This system caries precipitation, agricultural runoff, and effluent from the Hill Canyon Wastewater Treatment Plant and Camarillo Sanitary District Wastewater Reclamation Plant.

The Honda Barranca/Beardsley Wash/Revolon Slough. The western portion of the Las Posas valley, a portion of Pleasant Valley and a portion of the Oxnard Plain are drained by the Honda Barranca/ Beardsley Wash/Revolon Slough. ~~The majority of f~~Flow comes primarily from agricultural and storm water drainage (Calleguas Creek Steering Committee 2004).

Groundwater

There are multiple groundwater basins within the Calleguas Creek Watershed. These include the, Pleasant Valley ~~Basin~~ (DWR Basin 004-06), Arroyo Santa Rosa (DWR Basin 004-07), Las Posas Valley

(DWR Basin 4-008), Simi Valley (DWR Basin 4-009), Tapo/Gillibrand (a portion of DWR Basin 4-09), and Tierra Rejada (DWR Basin 4-015). Several smaller basins also exist in the watershed but provide only a minor amount of supply due to low production or poor water quality (less than 500 AFY each basin). As part of SGMA, the Pleasant Valley and Las Posas groundwater basins were deemed "high" priority and the Arroyo Santa Rosa Valley deemed a "medium" priority basin. The great dependency on groundwater in this area was a primary factor in the ranking. The Pleasant Valley basin was also listed as being in "critical overdraft."

As described earlier, tThe Fox CanyonC-GMA was created by state legislation in 1982 to manage local groundwater basins and resources in an effort manner to reduce overdraft of the Oxnard Ssubbasin and to stop seawater intrusion. Besides the Oxnard subbasin, the Fox Canyon The FCGMA has also elected to be the GSAgroundwater sustainability agency under SGMA for the Pleasant Valley and Las Posas Valley Bbasins, as well as the portion of the Arroyo Santa Rosa Basin within Fox Canyon GMA boundaries.

The Arroyo Santa Rosa Basin GSA, organized in 2016 under a Joint Powers Agreement between the Camrosa Water District and the County of Ventura, with participation from the City of Camarillo, has elected to become the GSAgroundwater sustainability agency for the portion of the Arroyo Santa Rosa Groundwater Basin east of the Bailey Fault, outside of the FCox Canyon GMA jurisdiction.

Important Recharge Areas

Important recharge areas for the groundwater basins in the Calleguas Watershed include the Oxnard Forebay area of the Oxnard Plainn (described earlier), Calleguas Creek, small tributary stream channels and drainages from the surrounding mountain fronts, and areas of bedrock outcrops (USGS 2003). In addition, Calleguas Municipal Water District conducts artificial recharge through injection of imported water in the East Las Posas Basin, as part of the Las Posas Aquifer Storage and Recovery (ASR) Project.

Imported Supplies

Calleguas Municipal Water District is a wholesale water provider for the Calleguas Creek Watershed and portions of the Santa Clara River Watershed on the Oxnard Plain. Calleguas distributes the water supplies to its 19 retail purveyors through 140 miles of pipeline operated and maintained by Calleguas. Calleguas is a member agency of the MWD. Calleguas anticipates receiving approximately 122,000 AF imported water from MWD each year, starting in 2020, but this will vary depending on climatic conditions, regulatory conditions and regional demands. 86,971-AF of imported water was supplied in 2015.

Other Supplies

Within the Calleguas Creek Watershed, Camrosa Water District produces and delivers recycled water in conjunction with the City of Thousand Oaks, the City of Camarillo, Ventura County Waterworks District 8 (City of Simi Valley), Ventura County Waterworks District 1 (Moorpark), produce and deliver recycled water. In addition, recycled water produced by the Tapia Water Reclamation Facility in the Malibu Creek Watershed is delivered to users within the Conejo Valley.

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Water Quality

The L[A]~~os Angeles~~ RWQCB has identified beneficial uses for the Calleguas Creek Watershed as well as its tributaries~~,~~ and industrial channels in the area as documented in **Table 10-15**. The following TMDLs are in place for portions of the Calleguas Creek Watershed:

- Calleguas Creek, Its Tributaries and Mugu Lagoon Metals and Selenium – approval of TMDL by SWRCB and US EPA pending.
- Calleguas Creek Salts – TMDL effective December 2, 2008
- Revolon Slough and Beardsley Wash Trash – TMDL effective March 6, 2008
- Calleguas Creek Toxicity – TMDL effective March 24, 2006
- Calleguas Creek Organochlorine Pesticides and PCBs - TMDL effective March 24, 2006
- Oxnard Drain 3 Pesticides, PCBs, and Sediment Toxicity – approved by EPA approval October 6, 2011
- Calleguas Creek Nitrogen Compounds and Related Effects – TMDL effective October 15, 2009

In addition to the existing TMDLs, other TMDLs may be developed. Identified impairments in the Calleguas Creek and its tributaries include ammonia, boron, copper, bacteria, nitrogen, nitrate, selenium, and sulfate, as well as insecticides and pesticides such as DDT, Dieldrin, and Toxaphene. The Channel Islands Harbor area is limited by lead and zinc in sediments [and]~~;~~ several Oxnard area beaches are limited by bacteria.

Available Supplies

The water supplies for the Calleguas Creek Watershed consist of imported water from Calleguas, groundwater, a minor amount of potable surface water, non-potable surface water provided by UWCD from the Freeman Diversion delivered to agricultural users in the Pleasant Valley Basin~~,~~ and recycled water. A total estimate of supply in the Calleguas Creek Watershed is provided in **Table 10-17**.

Imported Water

Calleguas anticipates receiving approximately 122,000 AF imported water from MWD in each year [starting in 2020]~~,~~ but this will vary depending on climatic conditions, regulatory conditions and regional demands (CMWD 2016). The City of Oxnard receives approximately 12,000 AFY of water from Callegua [buts]~~;~~ this volume is included in the imported supplies in the Santa Clara Watershed and is not reflected in supplies for the Calleguas Creek Watershed.

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TABLE 10-15
DESIGNATED BENEFICIAL USES CALLEGUAS CREEK WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
CALLEGUAS-CONEJOCREEK WATERSHED																						
Calleguas Creek Estuary [c]							P		E					E		E		Ee,p	Ef	Ef		E
Calleguas Creek Reach 1																						
Mugu Lagoon [c]							E		Ed					E	E	Eo	E	Ee,p	Ef	Ef	Ed	E
Calleguas Creek Reach 2																						
Calleguas Creek (Estuary to Potrero Rd.)	P*			E	E	E					E	E				E		Ep				E
Calleguas Creek Reach 3																						
Calleguas Creek (Potrero Rd. to Conejo Creek)	P*	E	E	E	E						E					E						
Calleguas Creek Reach 4																						
Revolon Slough (Calleguas Creek Rch 2 to Pleasant Valley Rd.)	P*	P		E	E						E					E						E
Revolon Slough (Pleasant Valley Rd. to Central Ave.)	P*	P		E	E						E					E						E
Calleguas Creek Reach 5																						
Beardsley Channel (above Central Ave.)	P*					E					E					E						
Calleguas Creek Reach 6																						
Arroyo Las Posas (Calleguas Creek Rch 3 to Long Canyon)	P*	P	P	P	E						E	P				E						
Arroyo Las Posas (Long Canyon to Hitch Rd.)	P*	P	P	P	E	E					E	P				E						
Calleguas Creek Reach 7																						
Arroyo Simi (Hitch Rd. to Happy Camp Canyon)	P*	I			I	I					I					E		E				
Arroyo Simi (Happy Camp Canyon to Alamos Canyon)	P*	I			I	I					I					E		E				
Arroyo Simi (Alamos Canyon to Tapo Canyon Creek)	I*	I			I	I					I					E						
Arroyo Simi (above Tapo Canyon Creek)	I*	I			I	I					I					E						
Calleguas Creek Reach 8																						
Tapo Canyon Creek (above Arroyo Simi)	I*		P	P	I						I					E						
Calleguas Creek Reach 9A																						
Conejo Creek (Camrosa Diversion to Camarillo Rd.)	P*	E	E	E	E						E					E						
Conejo Creek (Camarillo Rd. to Arroyo Santa Rosa)	P*				I	I					I					E				E		

TABLE 10-15
DESIGNATED BENEFICIAL USES CALLEGUAS CREEK WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
CALLEGUAS-CONEJOCREEK WATERSHED																						
Calleguas Creek Reach 9B																						
Conejo Creek (Calleguas Creek Rch 3 to Camrosa Diversion)	P*	E	E	E	E						E					E						
Calleguas Creek Reach 10																						
Arroyo Conejo (Conejo Creek to North Fork Arroyo Conejo)	P*				I	I					I					E		E				
Calleguas Creek Reach 11 (Arroyo Santa Rosa)																						
Arroyo Santa Rosa (above confl. with Conejo Creek)	P*				I	I					I					E						
Calleguas Creek Reach 12																						
North Fork Arroyo Conejo (above confl. with Arroyo Conejo)	P*		<del>	E	E						E					E				E		
Calleguas Creek Reach 13																						
Arroyo Conejo (above confl. with North Fork Arroyo Conejo)	P*				I	I					I					E						
Gillibrand Canyon Creek (Tapo Canyon Creek to Windmill Canyon)	P*				I	I					I					E						
Gillibrand Canyon Creek (above Windmill Canyon)	P*				I						I					E						
Lake Bard (Wood Ranch Reservoir)	E	E	E	E	P						E					E						

E: Existing beneficial use
P: Potential beneficial use
I: Intermittent beneficial use
E,P, and I: shall be protected as required
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some destinations may be considered for exemption at a later date.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
c: Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).
d: Limited public access precludes full utilization.
e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
o: Marine habitats of the Channel Islands and Mugu Lagoon serve as pinniped haul-out areas for one or more species (i.e. sea lions).
p: Habitat of the Clapper Rail.

Source: Table 2-1. Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (electronic copy accessed December 27, 2016).

Groundwater

There is not an accepted groundwater supply estimate for the Calleguas Creek Watershed. As part of the SGMA process stakeholders will evaluate long-term sustainable yield. Table 10-16 presents a high-level estimate of available groundwater based on available data. The difference in the high and low supply estimate documents the lack of data and consensus on groundwater supply. Table 10- does not include the approximately 3,500 AFY of groundwater that the City of Thousand Oaks is planning on developing from the Conejo Groundwater Basin.

Surface Water

The Conejo Creek system, owned and operated by Camrosa Water District, does supply some surface water. The average supply from this creek system is estimated to be 7,920 AF (FCGMA 2016). It is estimated that small private water users may divert and use as much as 3,400 AFY from local surface water (SWRCB eWRIMS database).

TABLE 10-16
GROUNDWATER SUPPLY ESTIMATES
CALLEGUAS CREEK WATERSHED

Basin	Estimate of Groundwater Budget (AFY)	Past Groundwater Extractions (AFY)	Notes
Pleasant Valley Basin	11,418	18,500	1
Arroyo Santa Rosa	3,325 to 8,410	5,000	2
Las Posas Valley	29,280	30,560	3
Simi Valley	5,400	5,500	4
Tapo/Gillibrand	1,350	550	5, 6
Tierra Rejada	1,300	1,500	7
Low Estimate Groundwater Supplies		51,300	8
High Estimate Groundwater Supplies		82,300	8

1. DWR 2003, Basin 4-006.
2. DWR 2003, Basin 4-007.
3. DWR 2003, Basin 4-008.
4. DWR 2003, Basin 4-009.
5. City of Simi Valley, Geohydrologic Evaluation of Maximum Perennial Yield, Tapo Canyon Tributary SubArea (September 2006)
6. Waterworks District 8. 2016. 2015 Urban Water Management Plan. June.
7. DWR 2003, Basin 4-015.
8. Rounded to nearest 100 AF.

Recycled Water

Based on recently completed urban water management plans by water purveyors in the Calleguas Creek Watershed, an estimate of recycled water in the Calleguas Creek area has been prepared. This estimate ~~uses supplies planned~~incorporates usage for~~in~~ the next 10 years (by 2025).

TABLE 10-17
CURRENT (2016) ESTIMATE OF SUPPLY
CALLEGUAS CREEK WATERSHED

Supply Source	Annual Volume (AF)
Surface Water, Conejo Creek Diversion [1]	11,324
Imported Water Calleguas and UWCD Deliveries from Santa Clara Watershed [2]	119,417
Recycled Water [3]	13,931
Groundwater (see Table 10-16)	51,300 to 82,300
Low Estimate (rounded to nearest 100 AF)	*196,000*
High Estimate (rounded to nearest 100 AF)	*227,000*

1. FCGMA 2016. Preliminary Draft Pleasant Valley Groundwater Sustainability Plan Tasks 6 – 10 Report. May.
2. Supplies from Calleguas are anticipated imported water supplies less 12,000 AF expected to go to Oxnard in the Santa Clara Watershed (CMWD 2016, Oxnard 2016). Supplies from UWCD are on average 9,417 AF to the Calleguas Creek Area from the Santa Clara Watershed (FCGMA 2016).
3. Camrosa 2016; Camarillo 2016, VCWWD8 2016, and VCWWD1 2016.

Suppliers

There are nine major water suppliers (entities serving more than 1,000 persons) in the Calleguas Creek Watershed and~~as well as~~ 52 smaller water systems and irrigation companies. Persons or businesses in the Watershed are also supplied by private wells and surface water diversions. The major urban suppliers~~,~~ documented in **Table 10-18** provide water to cities and the unincorporated County. These are also mapped in **Figure 10-5**.

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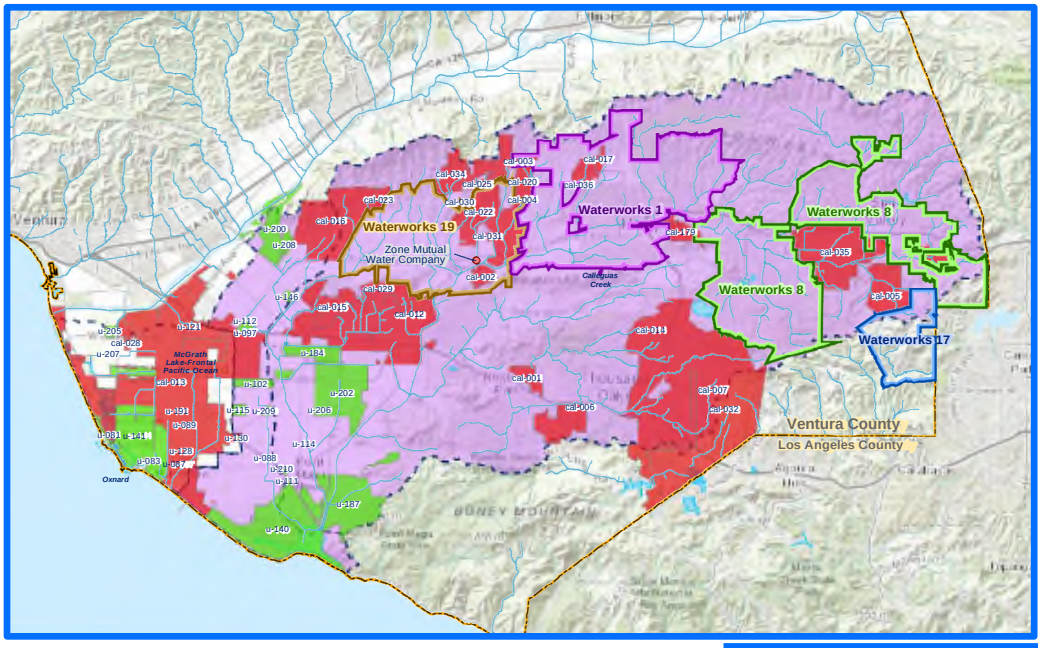
TABLE 10-18
MAJOR WATER SUPPLIERS - CALLEGUAS CREEK WATERSHED

Supplier/Primary Source(s)	Type	Area Served	Estimated Population Served	Annual Water Supplied*
Calleguas Municipal Water District Imported water	Special District	Calleguas Creek Watershed	**	**
City of Simi Valley/Ventura Co. Waterworks District 1 Imported water, groundwater, recycled water	City	Approximately 68 percent of the developed portion of the City of Simi Valley and unincorporated areas located southeast and north of the City boundary.	~97,300	~ 23,800 AF
City of Oxnard Imported water, groundwater, recycled water	City	City of Oxnard, but excluding Channel Islands Beach and County unincorporated area along Hueneme Road to Naval Base Ventura County.	***	***
City of Thousand Oaks Imported water	City	Approximately 36 percent of the City of Thousand Oaks	~53,300	~12,600 AF
City of Camarillo Imported water, groundwater, recycled water	City	14 square miles (8,960 acres) within the western portion of the City, about 75 percent of the City of Camarillo	~42,900	~8,600 AF
Port Hueneme Water Agency Groundwater, imported water	City	Generally, the City of Port Hueneme	~22,000	~5,000 AF
Camrosa Water District Imported water, groundwater, surface water, recycled water	Special District	31 square miles (19,840 acres) within the eastern portion of the City of Camarillo and Santa Rosa Valley.	~30,000	~14,400 AF
Ventura County Waterworks District No. 1 Imported water, groundwater, recycled water	Special District	Generally, the City of Moorpark and ag lands between Camarillo and Thousand Oaks (33.7 square miles / 21,568 acres).	~36,000	~11,800 AF
Ventura County Waterworks District No. 19 Imported water, groundwater	Special District	23 square miles (14,720 acres) of the Somis community and surrounding rural areas.	~3,300	~3,000 AF
Oak Park Water Service Imported water	Special District	Oak Park community, encompassing 4.1 square miles (2,624 acres).	~12,200	~2,200 AF
California American Water Company – Ventura District Imported water	Private Company	Approximately half of Thousand Oaks (25 sq. mi.) and a small portion of unincorporated county in the Las Posas Country Club area.	~63,400	~15,200 AF
California Water Service Company – Westlake District Imported water, recycled water	Private Company	13 square miles (8,320) in south east City of Thousand Oaks	~19,500	~8,100 AF
Golden State Water Company – Simi Valley Imported water, groundwater	Private Company	A portion of the City of Simi Valley and a portion of unincorporated Ventura County including Runkle Canyon	~45,200	~6,500 AF
Pleasant Valley Mutual Water Company Imported water, groundwater	Private Company	Northwestern portion of the City of Camarillo	~7,500	~900 AF
Crestview Mutual Water Company Imported water, groundwater	Private Company	Western portion of the City of Camarillo	Unknown	~900 AF
Zone Mutual Water Company Groundwater, imported water	Private Company	A private agricultural water supplier serving the unincorporated area around Somis.	Ag water supplier	~5,000-6,000 AF

**Estimated based on records of water supplied 2010 to 2015, rounded to nearest 100 AF. Does not account for planned future expansion of demands and supplies.*
***Calleguas Municipal Water District is a wholesale supplier, to avoid double counting information is only provided for retail water agencies.*
****Oxnard falls across two watersheds. Oxnard population and supply provided as part of the Santa Clara River Watershed discussion.*
Source: Calleguas Municipal Water District 2016, City of Simi Valley 2016, City of Thousand Oaks 2016, Ventura County Waterworks District No. 1 2011 and 2016, City of Camarillo 2011 and 2016, Port Hueneme Water Agency 2011 and 2016, California American Water Company 2012 and 2016, California Water Service Company 2011 and 2016, Golden State Water Company 2011 and 2016.



WATER PURVEYORS

UNITED WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
United (u-016)	Del Norte MWC
United (u-080)*	Camarillo Airport Utility Enterprise
United (u-081)*	Channel Islands Beach Community Services District
United (u-083)*	City of Port Hueneme
United (u-087)	Cypress MWC
United (u-088)	Sunshine Trailer Park
United (u-089)	Dempsey Road MWC
United (u-093)	Evergreen Trailer Park
United (u-097)	Garden Acres MWC
United (u-099)	Glennview Mobile Home Park
United (u-102)	Hailwood, Inc.
United (u-111)	Navalair Mobilehome Court
United (u-112)	Nyeland Acres NWC
United (u-114)	Ocean View School District
United (u-115)	Oxnard Lemon MWC
United (u-121)	Rio Manor MWC
United (u-128)	Saviers Road MWC
United (u-130)	Silver Wheel Ranch Mobile Home Park
United (u-140)*	U.S.N.A.S. - Point Mugu
United (u-141)*	U.S.N.C.B.C. - Port Hueneme
United (u-146)	Ventura School
United (u-184)	Ventura County Dept of Airports
United (u-187)	Guadalasca MWC
United (u-191)	Santa Clara High School
United (u-200)	Lloyd-Butler MWC
United (u-202)	Rancho Sespe Workers Improvement Association
United (u-204)	Thornhill MWC
United (u-205)	Santa Clara Resources
United (u-206)	Houweling's Nursery
United (u-207)	Pyramid Flowers
United (u-208)	Saticoy Country Club
United (u-209)	Vujovich Ranch
United (u-210)	Bouquet Multimedia

* Denotes agencies within the wholesale area of both United and Calleguas

CALLEGUAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
Calleguas (cal-001)	Academy MWC
Calleguas (cal-002)	Arroyo Las Posas MWC
Calleguas (cal-003)	Balcom Bixby MWA
Calleguas (cal-004)	Berylwood Heights MWC
Calleguas (cal-005)	Brandeis-Bardin MWC
Calleguas (cal-006)	Conejo Trailer Park
Calleguas (cal-007)	California Water Service Company
Calleguas (cal-012)	City Camarillo Water District
Calleguas (cal-013)*	City of Oxnard
Calleguas (cal-014)	City of Thousand Oaks
Calleguas (cal-015)	Crestview MWC
Calleguas (cal-017)	Epworth MWC
Calleguas (cal-020)	Fuller Falls MWC
Calleguas (cal-022)	Sunshine Ranch
Calleguas (cal-023)	La Loma Ranch MWC
Calleguas (cal-025)	Las Lomas Water Systems
Calleguas (cal-028)	Oxnard Union High School District
Calleguas (cal-029)	Pleasant Valley MWC
Calleguas (cal-030)	Rancho Canada Water Company
Calleguas (cal-031)	Tom Grether Farms, Inc.
Calleguas (cal-032)	Russell Valley MWD
Calleguas (cal-034)	Solano Verde MWC
Calleguas (cal-035)	Golden State Water Co. - Simi Valley
Calleguas (cal-036)	Thermic MWC
Calleguas (cal-042)	Waters Road Users Group
Calleguas (cal-179)	Butler Ranch MWC
Calleguas (cal-190)	Water Canyon Water Well
	Zone Mutual Water Company

* Denotes agencies within the wholesale area of both United and Calleguas

Ventura County 2040 GENERAL PLAN

Figure 10-5:
Water Purveyors in Calleguas Creek Watershed

- Ventura County
- Subwatersheds
- Calleguas Creek Watershed
- Rivers Streams
- Water Bodies

Water Purveyor

- Calleguas Wholesale District
- United Wholesale District

Map Date: December 2017
Source: Kennedy/Jenks Consultants, 2017

8 Miles

Estimate of Demand

~~As described previously, i~~In 2014, the VCWPD~~County of Ventura Watershed Protection District~~ undertook an estimate of Countywide water demand, documented in the *County of Ventura 2013 Water Supply and Demand* (January 2015). Results of the study for the Calleguas Creek Watershed are provided in **Table 10-19**.

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TABLE 10-19
ESTIMATED CALLEGUAS CREEK WATERSHED DEMAND

Watershed/Sub-watershed	Total Agricultural Demand (AF)	Total Municipal Demand (AF)	Total Demand (AF)
Calleguas Creek	112,701	89,335	202,036
Malibu Creek	1,083	19,291	20,374
South Coast	86	2,035	2,121
Subtotal (rounded to nearest 100 AF)	*113,900*	*110,700*	**224,600**

Source: Hydrometrics 2015. Table 6.

Comparison of Supply and Demand

Estimated supply in the Calleguas Creek Watershed ranges from 196,000 AF to 227,000 AF in any given year. This supply of course will vary given drought and operational conditions. Estimated demand is approximately 224,600 AF. If the low-end estimate of supply is correct, demand is outpacing supply. If the high-end supply estimate is correct, supply is only slightly greater (1%) than demand.

Water-Related Challenges

Below are the water related challenges for the Calleguas Creek Watershed as of late 2016.

Long-Term Groundwater Overdraft and Increased Salinity

The Pleasant Valley Basin is in long-term overdraft (UWCD 2017a). Declining groundwater levels and over-pumping in the southern portion of the basin has led to upwelling of brines from high chloride zones (UWCD 2017b). In the northern Pleasant Valley Basin, streambed recharge with treated wastewater has caused increased salinity in the vicinity of the Arroyo Las Posas.

Localize Pumping Depressions

Within the w~~W~~est Las Posas B~~subb~~asin, groundwater levels have dropped by 325 feet between 1950 and the early 1990s (LPUG 2012). Th~~e~~ere is~~is is raising~~ concern~~s~~ regarding~~about~~ subsidence, increased pumping lifts, decreased production and~~,~~ eventually~~,~~ dry wells (LPUG 2012). D~~In addition, d~~epressed groundwater levels may induce inflows of poor-quality groundwater from surrounding areas.

Heavy Dependence on Imported Water by Urban Users

~~Imported water makes up roughly 20 percent of Ventura County water supply~~Approximately 75 percent of the County population receives water imported by Calleguas. Drought, earthquakes, and environmental demands on the SWP system could limit or even interrupt this water supply. Calleguas Municipal Water District, the primary imported water wholesaler in the region, has taken proactive steps to mitigate supply disruptions, including the construction of a local surface water storage reservoir (Lake Bard), construction of facilities to store surface water in local groundwater basins as well as facilities to

extract this water if needed, obtaining and storing spare pipe for emergencies, and building multiple interconnections with other water suppliers.

SECTION 10.5 TRENDS AND FUTURE CONDITIONS

~~As documented above, t~~Traditional water supplies are limited in the Ventura County area and it is necessary to develop different supplies for Ventura County. Trends going forward include:

- Increased use of brackish groundwater. Ventura County has abundant sources of groundwater in parts of the county, but particularly in the Calleguas Creek Watershed, much of it is too high in salts for municipal and agricultural use. Two brackish groundwater treatment plans are currently in operation in the county (Port Hueneme Water Authority's Brackish Water Reclamation Demonstration Facility, Camrosa Round Mountain Desalter). Other additional desalters are proposed. Use of this brackish groundwater would require connection to salinity management pipeline such as that operated by the Calleguas Municipal Water District.
- Delivery of SWP water to western Ventura County. The City of Ventura, UWCD, Casitas Municipal Water District, and Calleguas are coordinating a study to build a connection to the SWP.
- Increased use of recycled water. The City of Oxnard has constructed the Advanced Water Purification Facility (AWPF)~~, sometimes called the AWPF,~~ which intensively treats wastewater to produce water suitable for irrigation, industrial processes, groundwater recharge and potable~~, and could be used for~~ use~~potable water in the future.~~ ~~Many o~~Other water agencies in Ventura County are proposing increased use of recycled water and ~~many are~~ building infrastructure to deliver recycled water to agriculture and other irrigation users. In June 2016, the City of Ventura launched the Recycled Water Mobile Reuse Program whereby business, residents and other property owners in the City can use the City's recycled water fill station, fill their own containers, then haul the water for use within the City. Agencies are also actively pursuing groundwater recharge with recycled water and direct potable reuse of recycled water.
- Expanded conjunctive use. Conjunctive use is the coordinated and planned use and management of both surface water and groundwater resources to maximize the availability and reliability of water supplies. Conjunctive use involves planned and managed operation of a groundwater basin and a surface water storage system using coordinated conveyance infrastructure. When surface water is available it is recharged and stored in a groundwater basin for later use.
- Increased use of stormwater and dry weather runoff. Currently these are underutilized sources of supplies that could augment groundwater supplies. This will include stormwater detention in medians and along curbs, permeable pavement, and other means to retain and recharge runoff. Various agencies within Ventura County are planning and coordinating increased use of stormwater as documented in the Ventura Countywide Municipal Storm Water Resource Plan (September 2016).
- Ocean desalination. The City of Ventura, Channel Islands Beach Community Services District and Calleguas are exploring the feasibility of ocean desalination (City of Ventura 2016b; Citizens Journal 2015; Calleguas 2016).
- Increased call for urban water use efficiency. In May ~~9,~~ 2016, Governor Brown issued Executive Order B-37-16, which called for the establishment of long-term water conservation measures. DWR and the SWRCB ~~are to publicly release~~realeased a draft long-term conservation framework in April 2017~~by January 2017~~. This framework ~~will~~ included new water use targets based on strengthened

standards for indoor residential water use, outdoor irrigation, commercial/institutional/industrial water use, and distribution system water loss.

- Increased call for agricultural water use efficiency. Grant-funded efforts are being developed and implemented to provide financial incentives for equipment upgrades and similar efforts willlikely continue, dependent upon funding availability.
- Changes in the operation of surface water supplies to protect endangered species. Water users are likely to pay more to build and maintain habitat protection measures. There will likely be less water available for agriculture and urban users because more flow will need to be left in waterways to protect habitat.

SECTION 10.6 KEY TERMS

The following key terms used in this report are defined as follows:

303(d) List. References section 303(d) of the Clean Water Act whereby states, territories, and tribes are to develop lists of waterbodies that are polluted or otherwise degraded and not meeting water quality standards. The 303(d) List is used to develop Total Maximum Daily Loads and or identify other mechanisms to improve water quality.

Acre-feet (AF). The amount of water necessary to cover an acre (43,560 square feet) to a depth of one foot, or 43,560 cubic feet, which is equivalent to 325,828 gallons.

Adjudication: With regard to water rights, a legal decision that allocates water to parties in proceedings and is overseen by a court-appointed watermaster.

Aquifer. A subsurface geological formation sufficiently permeable to conduct groundwater and capable of yielding usable quantities of water to a well or surface water spring.

Beneficial Uses. The various purposes for which water or aquatic ecosystems may be used. Examples include municipal and domestic water supply, agricultural water supplies, preservation and protection of areas of special biological significance resources, freshwater habitat, commercial and sport fishing, estuarine habitat, freshwater replenishment, groundwater recharge, industrial supply, marine habitat, fish migration, navigation, preservation of rare and endangered species, recreation, shellfish harvesting, and wildlife habitat.

Best Management Practice (BMP). Any program, technology, process, siting criteria, operational methods or measures, or engineered systems, which when implemented prevent, control, remove, or reduce pollution.

Conjunctive Use. The practice of storing surface water in a groundwater basin (typically in wet years) and withdrawing it from the basin in later (typically dry) years.

Critical Overdraft. As defined in the Sustainable Groundwater Management Act a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts.

Coastal Zone. That portion of the land and water area of Ventura County as shown on the "Coastal Zone" maps adopted by the California Coastal Commission.

Groundwater Basin. An aquifer or system of aquifers that has reasonably well-defined boundaries and more or less definite areas of recharge and discharge. Refers to subsurface deposits and geologic formations that are capable of yielding usable quantities of water to a well or spring. The Sustainable Groundwater Management Act defines "basin" as a groundwater basin or subbasin identified and defined in Department of Water Resources Bulletin 118 or as modified pursuant to Section 10722 of the Act.

Integrated Regional Water Management. A comprehensive and collaborative approach for managing water to concurrently achieve social, environmental and economic objectives. This integrated approach delivers higher value for investments by considering all interests, providing multiple benefits, and working across jurisdictional boundaries at the appropriate geographic scale. Examples of multiple benefits include improved water quality, better flood management, restored and enhanced ecosystems, and more reliable water supplies" (Department of Water Resources 2014, California Water Plan Update 2013).

Mutual Water Company. A private corporation or association organized for the purposes of delivering water to its stockholders and/or members.

Permanent domestic water supply. A supply or supplies of potable water to be provided by a system or systems approved by a public health agency of the State of California or the Environmental Health Division of the Ventura County Resource Management Agency and the Ventura County Public Works Agency in a quantity sufficient to supply adequately and continuously the total domestic requirements of all consumers under maximum demand conditions.

Retail Water Supplier. A water agency that provides water to individual customers and end users such as homes and businesses.

Safe Yield. Commonly defined as the maximum quantity of water that can be continuously withdrawn from a reservoir or groundwater basin without causing adverse effects.

State Water Project. The SWP is the largest state-built, multi-purpose water project in the country. It was authorized by the California State Legislature in 1959, with the construction of most initial facilities completed by 1973. Today, the SWP includes 28 dams and reservoirs, 26 pumping and generating plants and approximately 660 miles of aqueducts. The primary water source for the SWP is the Feather River, a tributary of the Sacramento River. Storage released from Oroville Dam on the Feather River flows down natural river channels to the Sacramento-San Joaquin River Delta (Delta). While some SWP supplies are pumped from the northern Delta into the North Bay Aqueduct, the vast majority of SWP supplies are pumped from the southern Delta into the 444-mile-long California Aqueduct. The California Aqueduct conveys water along the west side of the San Joaquin Valley to Edmonston Pumping Plant, where water is pumped over the Tehachapi Mountains into Southern California.

Stormwater Pollution Control Plan. A plan identifying potential pollutant sources from a construction site and describing proposed design, placement and implementation of Best Management Practices to effectively prevent non-stormwater discharges and reduce pollutants in stormwater discharges to the storm drain system, to the maximum extent practicable during construction activities.

Stormwater Pollution Prevention Plan. A plan, as required by a State General Permit for Stormwater Discharges, identifying potential pollutant sources and describing the design, placement and implementation of Best Management Practices, to effectively prevent non-stormwater discharges and reduce pollutants in stormwater discharges during activities covered by the General Permit.

Stormwater Quality Master Plan. A plan that defines the strategy and describes the design, placement and implementation of Best Management Practices to effectively prevent non-stormwater discharges and reduce pollutants in stormwater discharges to the maximum extent practicable, for post-construction discharges to the stormdrain system.

Total Maximum Daily Load. A regulatory "pollution budget" based on a calculation of the maximum amount of a pollutant that can occur in a waterbody and still meet water quality standards so as to protect beneficial uses. The TMDL also allocates the necessary reductions to one or more pollutant sources. TMDLs can force the implementation of BMPs, infrastructure improvements, and other actions to limit pollution.

Watershed. A geographic region within which all water drains into a particular river, stream, or other waterbody. Also referred to as a catchment area.

Wholesale Water Supplier. A water agency that provides water to retail water agencies rather than directly providing water to the end user (homes, businesses, etc.).

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APPENDIX 10.A: SGMA/CALIFORNIA GOVERNMENT CODE

65350.5. REVIEW AND CONSIDERATION OF GROUNDWATER REQUIREMENTS

Before the adoption or any substantial amendment of a city's or county's general plan, the planning agency shall review and consider all of the following:

(a) An adoption of, or update to, a groundwater sustainability plan or groundwater management plan pursuant to Part 2.74 (commencing with Section 10720) or Part 2.75 (commencing with Section 10750) of Division 6 of the Water Code or groundwater management court order, judgment, or decree.

(b) An adjudication of water rights.

(c) An order or interim plan by the State Water Resources Control Board pursuant to Chapter 11 (commencing with Section 10735) of Part 2.74 of Division 6 of the Water Code.

65352. REFERRAL OF PROPOSED GENERAL PLAN UPDATES TO OTHER AGENCIES

(a) Before a legislative body takes action to adopt or substantially amend a general plan, the planning agency shall refer the proposed action to all of the following entities:

(1) A city or county, within or abutting the area covered by the proposal, and any special district that may be significantly affected by the proposed action, as determined by the planning agency.

(2) An elementary, high school, or unified school district within the area covered by the proposed action.

(3) The local agency formation commission.

(4) An areawide planning agency whose operations may be significantly affected by the proposed action, as determined by the planning agency.

(5) A federal agency, if its operations or lands within its jurisdiction may be significantly affected by the proposed action, as determined by the planning agency.

(6) (A) The branches of the United States Armed Forces that have provided the Office of Planning and Research with a California mailing address pursuant to subdivision (d) of Section 65944, if the proposed action is within 1,000 feet of a military installation, or lies within special use airspace, or beneath a low-level flight path, as defined in Section 21098 of the Public Resources Code, and if the United States Department of Defense provides electronic maps of low-level flight paths, special use airspace, and military installations at a scale and in an electronic format that is acceptable to the Office of Planning and Research.

(B) Within 30 days of a determination by the Office of Planning and Research that the information provided by the Department of Defense is sufficient and in an acceptable scale and format, the office shall notify cities, counties, and cities and counties of the availability of the information on the Internet. Cities, counties, and cities and counties shall comply with subparagraph (A) within 30 days of receiving this notice from the office.

(7) A public water system, as defined in Section 116275 of the Health and Safety Code, with 3,000 or more service connections, that serves water to customers within the area covered by the proposal. The public water system shall have at least 45 days to comment on the proposed plan, in accordance with subdivision (b), and to provide the planning agency with the information set forth in Section 65352.5.

(8) Any groundwater sustainability agency that has adopted a groundwater sustainability plan pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code or local agency that otherwise manages groundwater pursuant to other provisions of law or a court order, judgment, or decree within the planning area of the proposed general plan.

(9) The State Water Resources Control Board, if it has adopted an interim plan pursuant to Chapter 11 (commencing with Section 10735) of Part 2.74 of Division 6 of the Water Code that includes territory within the planning area of the proposed general plan.

(10) The Bay Area Air Quality Management District for a proposed action within the boundaries of the district.

(11) A California Native American tribe that is on the contact list maintained by the Native American Heritage Commission and that has traditional lands located within the city's or county's jurisdiction.

(12) The Central Valley Flood Protection Board for a proposed action within the boundaries of the Sacramento and San Joaquin Drainage District, as set forth in Section 8501 of the Water Code.

(b) An entity receiving a proposed general plan or amendment of a general plan pursuant to this section shall have 45 days from the date the referring agency mails it or delivers it to comment unless a longer period is specified by the planning agency.

(c) (1) This section is directory, not mandatory, and the failure to refer a proposed action to the entities specified in this section does not affect the validity of the action, if adopted.

(2) To the extent that the requirements of this section conflict with the requirements of Chapter 4.4 (commencing with Section 65919), the requirements of Chapter 4.4 shall prevail.

65352.5. REQUIREMENT TO PROVIDE WATER-RELATED DOCUMENTS TO GENERAL PLAN AGENCY

(a) The Legislature finds and declares that it is vital that there be close coordination and consultation between California's water supply or management agencies and California's land use approval agencies to ensure that proper water supply and management planning occurs to accommodate projects that will result in increased demands on water supplies or impact water resource management.

(b) It is, therefore, the intent of the Legislature to provide a standardized process for determining the adequacy of existing and planned future water supplies to meet existing and planned future demands on these water supplies and the impact of land use decisions on the management of California's water supply resources.

(c) Upon receiving, pursuant to Section 65352, notification of a city's or a county's proposed action to adopt or substantially amend a general plan, a public water system, as defined in Section 116275 of the Health and Safety Code, with 3,000 or more service connections, shall provide the planning agency with the following information, as is appropriate and relevant:

(1) The current version of its urban water management plan, adopted pursuant to Part 2.6 (commencing with Section 10610) of Division 6 of the Water Code.

(2) The current version of its capital improvement program or plan, as reported pursuant to Section 31144.73 of the Water Code.

(3) A description of the source or sources of the total water supply currently available to the water supplier by water right or contract, taking into account historical data concerning wet, normal, and dry runoff years.

(4) A description of the quantity of surface water that was purveyed by the water supplier in each of the previous five years.

(5) A description of the quantity of groundwater that was purveyed by the water supplier in each of the previous five years.

(6) A description of all proposed additional sources of water supplies for the water supplier, including the estimated dates by which these additional sources should be available and the quantities of additional water supplies that are being proposed.

(7) A description of the total number of customers currently served by the water supplier, as identified by the following categories and by the amount of water served to each category:

(A) Agricultural users.

(B) Commercial users.

(C) Industrial users.

(D) Residential users.

(8) Quantification of the expected reduction in total water demand, identified by each customer category set forth in paragraph (7), associated with future implementation of water use reduction measures identified in the water supplier's urban water management plan.

(9) Any additional information that is relevant to determining the adequacy of existing and planned future water supplies to meet existing and planned future demands on these water supplies.

(d) Upon receiving, pursuant to Section 65352, notification of a city's or a county's proposed action to adopt or substantially amend a general plan, a groundwater sustainability agency, as defined in Section 10721 of the Water Code, or an entity that submits an alternative under Section 10733.6 shall provide the planning agency with the following information, as is appropriate and relevant:

(1) The current version of its groundwater sustainability plan or alternative adopted pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code.

(2) If the groundwater sustainability agency manages groundwater pursuant to a court order, judgment, decree, or agreement among affected water rights holders, or if the State Water Resources Control Board has adopted an interim plan pursuant to Chapter 11 (commencing with Section 10735) of Part 2.74 of Division 6 of the Water Code, the groundwater sustainability agency shall provide the planning agency with maps of recharge basins and percolation ponds, extraction limitations, and other relevant information, or the court order, judgment, or decree. Sustainable Groundwater Management Act, and related provisions (as chaptered) Page 6 As Effective January 1, 2016 [rev. 1/15/2016]

(3) A report on the anticipated effect of proposed action to adopt or substantially amend a general plan on implementation of a groundwater sustainability plan pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code.

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Michael Diacos

c/o Hoffman, Vance & Worthington

1000 S. Seaward Avenue

Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

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Sincerely,

Michael Diacos

Michael Diacos

Ann C. Cooluris

c/o Hoffman, Vance & Worthington

1000 S. Seaward Avenue

Ventura, CA 93001

February 24, 2020

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Attn: RMA Planning Division
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Timothy Shaw McGrath

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 7:58 AM
To: Simmons, Carrie
Subject: FW: General Plan/EIR Comments
Attachments: page3image3743440.png; page4image1774048.jpeg; page2image1668752.png; page3image3766736.png; page3image3744272.png; page1image1665632.png; page3image3766944.png

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at **vcrma.org/planning**
Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Dave Chambers <davechambers911@gmail.com>
Sent: Thursday, February 27, 2020 7:42 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: General Plan/EIR Comments

Sanger Hedrick, Chair
Agricultural Policy Advisory Committee (APAC) County of Ventura
800 S. Victoria Blvd.
Ventura, CA 93003

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on the 2040 General Plan EIR.

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local agriculture.

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contrary to statements made by County Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation proposed in an EIR be feasible. CEQA Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time,

" (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation

   easement for each farmland category;

2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each

   category of farmland;

4. 4) The anticipated cost associated with managing each category of farmland

   under a conservation easement;

5. 5) The anticipated cost associated with monitoring these mitigation parcels

   scattered throughout the County and who will bear that cost;

6. 6) Any information that could constitute a "plan" for management of farmland

   in conservation easements;

February 19, 2020

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated with LU compatibility conflicts and increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of agriculture on the parcel; and
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's Zoning Ordinance and the County's minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Formation Commission (LAFCo) hearing, Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval process. The mitigation measure would have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace farmland that would be

impacted by any proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the proposed mitigation measure did not meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's proposed mitigation measure. He referenced a 2015 legal decision, City of Irvine v. County of Orange, in which the Court stated, "the sheer astronomical expense of land supports the finding of the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural land, as it does not address the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts
The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than significant."

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflicts with non-agricultural uses, as well as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur as the natural result of living in or near agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims...This protects the farming community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their ability to continue agricultural production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use conflicts. Residential land uses are generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land uses. The placement of sensitive land uses, such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor nuisances and noise from agriculture machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts attributed to residential development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (*emphasis added*).

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create new restrictions and ordinances that have a significant impact on existing agricultural

and farming operations because of conflicts attributed to residential development. The recent interim

urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as "programmatic" or "project", must analyze all reasonably foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the implementation of all policies and programs within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be analyzed. For example, the 2040 General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It is reasonably foreseeable that more houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflicts must be addressed in the EIR.

In 2014, the California Court of Appeal stated in a ruling that "[T]he fact that this EIR is labeled a 'project' rather than a 'program' EIR matters little....Designating an EIR as a program EIR ... does not by itself decrease the level of analysis

otherwise required in the EIR. All EIRs must cover the same general content. The level of specificity of an EIR is determined by the nature of the project and the "rule of reason," rather than any semantic label accorded to the EIR."

It is CoLAB's opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed in the EIR.

Direct and indirect impacts of increased costs
The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the most effective way to minimize conversion of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the County admits that reducing the cost of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of normal farming operations, such as:

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and support the transition to electric- or renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when feasible.
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to convert fossil fuel-powered irrigation pumps to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilities to eliminate or reduce standby charges.

  Direct and indirect impacts of increased competition for water resources
  The County fails to evaluate the impact of increased competition for water resources caused by development allowed in the 2040 General Plan on either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

  The EIR states on page 4.2-3 that "...a reduction in available water resources for irrigation" is an example of indirect impacts on agricultural land due to loss of topsoil from increased wind and water erosion.
  But the County fails to analyze or propose mitigation measures to address this significant impact.

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the County should be seeking guidance from APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory demands on agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent the conversion of agricultural land to non-agricultural uses. These may include:

1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify the creation or expansion of setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are engaged in farming (including grazing); and

3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by establishing setbacks on NON-AE-zoned land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000’ of any land zoned A/E.

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and leadership at this time.

Sincerely,

Louise Lampara Executive Director

In support of this letter-

In support of this letter-
Dave Holroyd Chambers

Kevin McAtee

c/o Hoffman, Vance & Worthington

1000 S. Seaward Avenue

Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,

Kevin McAtee

Beverly Gutierrez

c/o Hoffman, Vance & Worthington

1000 S. Seaward Avenue

Ventura, CA 93001

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Beverly Gutierrez

Dominick McCormick

c/o Hoffman, Vance & Worthington

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Ventura, CA 93001

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Sincerely,

Dominick McCormick

Downing, Clay

From: Downing, Clay
Sent: Thursday, February 27, 2020 5:11 PM
To: Simmons, Carrie; General Plan Update
Cc: Curtis, Susan
Subject: Fw: NBVC Comments on DEIR Ventura County 2040 General Plan
Attachments: NBVC Comments on VC2040 PPRD 07.30.2019 HighRes.pdf; smime.p7s; ATT00001.txt; ATT00002.htm

Follow Up Flag: Follow up
Flag Status: Flagged

From: Lousen, Kendall P CIV USN NAVB VCTY PT MUGU CA (USA) <kendall.p.lousen@navy.mil>
Sent: Thursday, February 27, 2020 4:55 PM
To: Downing, Clay <clay.downing@ventura.org>
Cc: Knoll, Michele A CIV (USA) <michele.knoll@navy.mil>
Subject: NBVC Comments on DEIR Ventura County 2040 General Plan

Dear Clay,

Thank you for the opportunity to review and comment on the Public Draft Environmental Impact Report (PDEIR) for the Ventura County 2040 General Plan. Please see attached letter and enclosure from Naval Base Ventura County (NBVC) submitted on 7/30/2019 to the County of Ventura.

The Ventura County 2040 General Plan PDEIR presents an important opportunity to evaluate Naval Base Ventura County (NBVC) military influence areas and incorporating the Joint Land Use (JLUS) Study Recommendations (Sep 2015) and Recommendations from the NBVC-Point Mugu Air Installations Compatible Use Zone (AICUZ) Study (Dec. 2016). Thank you for incorporating the military-compatibility areas (MCAs) and military operational airspace and restricted use airspace areas for policies and land use evaluations for the short- and long-range planning goals of Ventura County. While Naval Base Ventura County does not wish to enter any new comments into the record, we kindly request the County to carefully consider CMAs and reinforce the comments previously submitted by NBVC in July 2019. We also encourage strategic references to the JLUS (Sep. 2015) and 2016 NBVC-Point Mugu AICUZ Study throughout the General Plan Update, which provides more current data on adverse effects from aircraft noise than the ALUCUP, which is currently referenced in the Plan.

Again, thank you for the opportunity to review and comment on the Public Draft EIR for Ventura County 2040 General Plan.

--
V/r,

Kendall P. Lousen ("Kenny")
Acting Community Liaison Planning Officer

NAVAL BASE VENTURA COUNTY
Public Works Department (AM Branch)

311 Main Road, Bldg. #66
Point Mugu, CA 93042-5033
Phone: 805-989-9746
Email: Kendall.p.lousen@navy.mil

DEPARTMENT OF THE NAVY
NAVAL BASE VENTURA COUNTY
311 MAIN ROAD, SUITE 1
POINT MUGU, CA 93042-5033

IN REPLY REFER TO:
11010
Ser N46VCS/0572
30 Jul 19

Mr. Steve Bennett
Chair, Board of Supervisors
County of Ventura
800 S. Victoria Ave.
Ventura, CA 93009

Dear Chairman Bennett,

Subj: NAVAL BASE VENTURA COUNTY COMMENTS ON THE COUNTY OF VENTURA 2040 GENERAL PLAN PRELIMINARY PUBLIC REVIEW DRAFT

The County of Ventura 2040 General Plan presents an important opportunity to implement the strategies of the Naval Base Ventura County (NBVC) Joint Land Use Study (JLUS) and recommendations of the Air Installations Compatible Use Zone (AICUZ) Study, to incorporate key military-community compatibility components, such as noise contours, accident potential zones, military training routes, and special use airspace.

Since the 1940s, the U.S. Navy has had an important presence in Ventura County. Today, Naval Base Ventura County has an annual economic impact within Ventura County of more than $2 billion and supports more than 20,000 direct, indirect, and induced jobs. Ventura County residents hold over 18,000 of those jobs.

We are pleased to see that the General Plan Preliminary Public Review Draft incorporates many JLUS and AICUZ strategies, particularly in Chapter 2-Land Use, Chapter 4-Circulation, Transportation, and Mobility, and Chapter 7-Hazards and Safety. For example, Goal LU-21 seeks to ensure that County plans and policies are consistent with state laws concerning military compatibility and the recommendations contained in the Naval Base Ventura County Joint Land Use Study as they relate to land use and communications. Corresponding policies include participation in a JLUS Coordination Committee, using the JLUS to guide land use and resource management decisions and plan updates, establishing Military Compatibility Areas, enhancing communications, and coordinating with NBVC on infrastructure expansions, stormwater infrastructure improvements, and capital improvements.

In particular, Policy LU-21.1 states that the County shall participate in the NBVC JLUS Coordination Committee responsible for coordination among JLUS partners and implementation of JLUS recommendations to enhance long-term coordination on military compatibility issues. Given the County's leadership and facilitation roles across jurisdictions and stakeholders, we suggest that the County consider taking a leadership role to convene and facilitate the Coordination Committee.

Naval Base Ventura County appreciates the many goals, policies, and programs related to military-community compatibility included throughout the General Plan Preliminary Public

Review Draft. As the County finalizes the Draft General Plan for environmental review and adoption, please consider the comments and suggested edits provided in Enclosure 1.

Thank you for your efforts to incorporate and foster military-community compatibility within the Draft General Plan, and thank you for the continued strong partnership between the County of Ventura and Naval Base Ventura County.

For additional information and coordination, please contact Ms. Amanda Fagan, Community Planning Liaison Officer at COMM: (805) 989-9752 or by email: amanda.fagan@navy.mil.

Sincerely,

J. E. CHISM
Captain, U.S. Navy
Commanding Officer

Encl (1): Comments Regarding Selected Military Compatibility Policies and References to Naval Base Ventura County, Ventura County 2040 General Plan Preliminary Public Review Draft – May 2019

County of Ventura 2040 General Plan
Preliminary Public Review Draft - May 2019

Selected Military Compatibility Policies and References to Naval Base Ventura County
Assembled by Amanda Fagan, NBVC CPLO

Page 1-4
Guiding Principles:
Economic Vitality
Foster economic and job growth that is responsive to the evolving needs and opportunities of the County's economy and preserves land use compatibility with Naval Base Ventura County and the Port of Hueneme, while enhancing our quality of life and promoting environmental sustainability.

Commented [FALCNSM1]: Concur.

Page 1-11
Inter-governmental Coordination (IGC)
The County must coordinate with numerous local, regional, state, and federal agencies to implement the General Plan. These agencies provide services, facilities, or funding and administer regulations that directly or indirectly affect many issues addressed in the General Plan. The following is a partial list of public agencies that may play a role in implementing the General Plan:

- Local agencies such as cities, special districts, and school districts;
- Regional agencies such as Ventura Local Agency Formation Commission, Ventura County Air Pollution Control District, Ventura Council of Governments, and Ventura County Transportation Commission;
- State agencies such as Caltrans, General Services, California State University, California Environmental Protection Agency, California Coastal Commission, and Native American Heritage Commission; and
- Federal agencies such as U.S. Coast Guard, Naval Base Ventura County (NBVC), U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and Federal Emergency Management Agency.

Commented [FALCNSM2]: Concur

Page 2-56
2.8 Military Compatibility
Ventura County is home to several significant military installations and operations areas. These facilities are not only critical to the nation's defense, but also provide significant economic benefits and land use challenges. Naval Base Ventura County (NBVC) consists of three operating facilities – Point Mugu, Port Hueneme, and San Nicolas Island – that encompass a diverse set of specialties, including three warfare centers (Naval Air Warfare Center – Weapons Division, Naval Surface Water Center – Port Hueneme Division, and Naval Facilities Engineering and Expeditionary Warfare Center). NBVC is also home to deployable units, including the Pacific Seabees and the West Coast E-~~2-G~~ Hawkeyes. ~~Adjacent to Naval Base Ventura County, Point Mugu is t~~The 204-acre Channel Islands Air National Guard ~~Base~~Station is located adjacent to Naval Base Ventura County Point Mugu. Additionally, the Instrument Route-200 (IR-200) ~~missile corridor~~ military training route passes through Ventura County connecting the Point Mugu Sea Range and the Naval Air Weapons Station (NAWS) China Lake. Compatibility between military installations, adjacent land uses, and local communities is essential to protect military missions, the health of local economies and industries, and the quality of life for county residents. In order to achieve compatibility, the military and local

Commented [FALCNSM3]: Concur, with minor edits suggested

Commented [FALCNSM4]: The Hawkeye community is currently in the process of converting its fleet of E-2C to the E-2D. The document will be more timeless without a model designator (C or D).

Enclosure (1)

improvement projects on Victoria Avenue. (MPSP, IGC) *[Source: New Policy, NBVC JLUS Strategy LU-5B]*

Page 2-61

Program H: Develop ~~Memorandum of Understanding~~JLUS Coordination Committee Guidance Document

The County should collaborate through the Naval Base Ventura County (NBVC) ~~and~~ Joint Land Use Study (JLUS) Coordination Committee to facilitate the development of a ~~formal Memorandum of Understanding (MOU)~~ guidance document that delineates the roles and responsibilities for each partner agency in the JLUS Study Area, including the County, NBVC, and incorporated cities. ~~This document should~~Each agency representative should acknowledge this document, which should contain information such as:

- Point of contact and contact information for each agency,
- Role in addressing compatibility issues with the base,
- Responsibility in addressing compatibility issues,
- Community and military response times, and
- Triggers for coordination and communication, e.g., infrastructure planning, water resources planning, economic development.

[Source: New Program, NBVC JLUS Strategy COM-1B]

Commented [FALCNSM13]: An MOU may not be the right vehicle to meet the intent of this Program and associated Policy. There will likely be changes necessary to the document, such as POCs changing or newly devised triggers for coordination. As such, a more flexible instrument may work better, such as a "guidance" document developed by the Coordination Committee and acknowledged by each agency representative.

Page 2-63

Program I: Develop a JLUS Resource Management Reference Guide

The County shall cooperate with Naval Base Ventura County (NBVC) Joint Land Use Study (JLUS) partners in the development of a reference guide providing information about the various agencies in the JLUS Study Area with their respective responsibilities. It shall be tailored to existing JLUS issues and contain:

- Map(s) identifying the important resources in the area, and
- County and JLUS partner contact information for the agency representative that will help in cases of community-military compatibility.

[Source: New Program, NBVC JLUS Strategy COM-1D]

Commented [FALCNSM14]: Concur

Page 2-63

Program J: Update Plans and Amend Regulations with AICUZ Recommended Land Uses

The County should amend the Zoning Ordinance and/or Initial Study Assessment Guidelines, if necessary to incorporate the Air Installations Compatible Use Zones (AICUZ) recommended land use limitations and standards in the safety and noise zones. (MPSP)

[Source: New Policy, NBVC JLUS Strategy LU-8A]

Commented [FALCNSM15]: Concur

Program K: Amend Zoning Ordinance

The County should amend the Zoning Ordinances, if necessary, to comply with the Federal Aviation Administration (FAA) vertical obstruction guidelines, more specifically with the Navy's Airfield Imaginary Surfaces of the airfields located in the area. These surfaces are more restrictive and provide for greater safety of the public, pilots, and aircraft. The Navy's Airfield Imaginary Surfaces include slopes and heights that are allowable from various distances from the airfield.

[Source: New Program, NBVC JLUS Strategy LU-3B, LSA-5A, LG-1D, and VO-2A]

Commented [FALCNSM16]: Concur

Program L: Military Compatibility Areas (MCA)

The County shall update the Non-Coastal Zoning Ordinance and the Coastal Zoning Ordinance, if necessary, to delineate and establish the Military Compatibility Areas and Subzones illustrated

Commented [FALCNSM17]: Concur, with suggested edits

Enclosure (1)

Page 4-23
Goal CTM-5: To ensure that air transportation systems provide safe, efficient, and reliable movements of people and goods. [*Source: New Goal*]

Commented [FALCNSM24]: Concur

Page 4-23
CTM-5.3 Private Airstrips and Agricultural Landing Fields
The County shall require private airstrips and agricultural landing fields to be sited to minimize conflicts with the flight paths of existing airports and other areas that would present significant hazards or nuisances.

Commented [FALCNSM25]: Concur. While military compatibility is not directly cited in this policy, it has benefit to military compatibility and NBVC.

Page 4-23
CTM-5.5 Airport Land Use Compatibility
Discretionary development that would endanger the efficient, safe operation of an airport or would result in significant land use incompatibility impact with an airport shall be prohibited. (RDR, SO)
[Source: Existing GPP Policy 4.2.2.10, modified]

Commented [FALCNSM26]: Concur. While military compatibility is not directly cited in this policy, it has benefit to military compatibility and NBVC.

Page 5-3
PFS-1.5 Infrastructure Expansion Coordination with Naval Base Ventura County
The County shall coordinate with Naval Base Ventura County (NBVC) when planning for infrastructure expansions, improvements, and maintenance that may impact any NBVC facility or operation. (IGC)
[Source: New Policy, NBVC JLUS Strategy IE-1A, IE-2A]

Commented [FALCNSM27]: Concur

Page 6-2 – 6-6
Section 6.1 Biological Resources
Section 6.2 Coastal Resources

Commented [FALCNSM28]: The goals and policies included in **Sections 6.1 Biological Resources** and **6.2 Coastal Resources** do not directly address military compatibility. However, these goals and policies have a benefit to military compatibility by protecting special status species and habitat outside of Naval Base Ventura County, which reduces pressure on land, habitat, and species within the Naval Base and reduces impacts to military mission.

Commented [FALCNSM29]: Concur

Page 7-12
HAZ-2.4 Low Impact Development Upstream of Military Installations
The County shall encourage discretionary development upstream of military installations to incorporate low impact designs that reduce the risk of flooding downstream.
(RDR) *[Source: New Policy, NBVC JLUS Strategy BIO-1A, modified]*

Page 7-18
Section 7.6 Transportation Related Hazards
Hazards associated with movement of goods and people or conveyance of hazardous materials have been grouped together and are addressed below. These include incidents related to aviation, vehicles, and railroad operations.

Although airplane crashes can occur anywhere, crashes that affect life and property on the ground occur most frequently in airport approach and departure zones. Residences, schools, and other buildings occupied by people that are located in such zones are subject to an ever-present risk from airplane accidents. Hazard zones have been identified for the four airports within the county: 1) Ventura County Airport at Oxnard; 2) Ventura County Airport at Camarillo; 3) Santa Paula Airport; and 4) Naval Base Ventura County, Point Mugu.

Page 7-19
HAZ-6: To minimize the loss of life, injury, damage to structures, and economic and social dislocations resulting from hazards created by proximity to airports, railroads and truck routes.

Commented [FALCNSM30]: Concur

Enclosure (1)

HAZ-8.3 Military Compatibility and Renewable Energy Development
The County shall require that new larger-scale commercial renewable energy development is consistent with Joint Land Use Study (JLUS) policies and regulations and that Naval Base Ventura County (NBVC) and the Department of Defense (DOD) Siting Clearinghouse are included in the development review process. (MPSP)
[Source: New Policy, NBVC JLUS Strategy ED-1A, ED-1C, modified]

Commented [FALCNSM39]: Concur

HAZ-8.4 Frequency Spectrum Encroachment Review
For discretionary development within 10 miles of Naval Base Ventura County (NBVC), Point Mugu that includes transmission facilities operating near military spectrum, the County shall submit project applications to NBVC for review and comment to determine appropriate coordination and review. (SO, IGC)
[Source: New Policy, NBVC JLUS Strategy FRQ-2C, FRQ-2B, modified]

Commented [FALCNSM40]: Concur

HAZ-8.5 Light and Glare Control
The County shall coordinate and consult with Naval Base Ventura County (NBVC) when reviewing applications for commercial alternative energy facilities (e.g., wind, solar, tidal) to ensure the systems do not impact flight or test operations. (RDR)
[Source: New Policy]

Commented [FALCNSM41]: Concur

Page 7-23
Section 7.9 Noise

HAZ-9: To protect the health, safety, and general welfare of county residents by striving to eliminate or avoid the adverse noise impacts on existing and future noise sensitive uses. *[Source: Existing GPP Goal 2.16.1.1]*

Commented [FALCNSM42]: Concur

HAZ-9.2 Noise Compatibility Standards
The County shall review discretionary development for noise compatibility with surrounding uses. The County shall determine noise based on the following standards:

Commented [FALCNSM43]: Concur, with minor edit suggested (delete extra comma in 3a)

1. New noise sensitive uses proposed to be located near highways, truck routes, heavy industrial activities and other relatively continuous noise sources shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed CNEL 60 or Leq1H of 65 dB(A) during any hour.

2. New noise sensitive uses proposed to be located near railroads shall incorporate noise control measures so that indoor noise levels in habitable rooms do not exceed Community Noise Equivalent Level (CNEL) 45 and outdoor noise levels do not exceed L10 of 60 dB(A)

3. New noise sensitive uses proposed to be located near airports:
   a. Shall be prohibited if they are in a Community Noise Equivalent Level (CNEL) 65 or greater, noise contour; or
   b. Shall be permitted in the Community Noise Equivalent Level (CNEL) 60 to CNEL 65 noise contour area only if means will be taken to ensure interior noise levels of CNEL 45 or less.

Page 7-24
HAZ-9.6 Airport Noise Compatibility
The County shall use the aircraft noise analysis prepared for local airports or the noise contours

Commented [FALCNSM44]: Concur, with minor edit suggested

Enclosure (1)

keep the base in the Navy's long-term plans, recognizing, however, that defense priorities can change. NBVC projects significant growth in coming years as an emerging hub for unmanned systems. Overall, NBVC generates about $2 billion in total economic benefit to Ventura County each year.

EV-3: To facilitate the retention, expansion, and attraction of key industries and business clusters in the county.
[Source: New Goal]

Page 10-6
EV-3.1 Existing Business Retention
The County shall proactively focus on retention of existing businesses in key industry clusters. In the unincorporated areas, this would include prioritizing Naval Base Ventura County and agricultural activities. (MPSP, JP)
[Source: EVSP Policy C.2]

Commented [FALCNSM50]: Concur

Page 10-6
EV-3.4 Expansion of Naval Base Ventura County and Port of Hueneme Support Businesses
The County shall encourage expansion and attraction of businesses that can further support existing activities at Naval Base Ventura County and the Port of Hueneme including the strengthening of existing business relationships and establishing spin-off businesses that can transfer technologies used for military applications into other markets. (IGC, JP)
[Source: EVSP Policies A.7 and A.8, modified]

Commented [FALCNSM51]: Concur

Page 10-10
Program C: Business Retention and Expansion
The County shall coordinate with the Economic Development Collaborative - Ventura County to focus on retention and expansion of existing businesses in key industry clusters, including Naval Base Ventura County and Port of Hueneme support businesses.
[Source: New Program]

Commented [FALCNSM52]: Concur

Enclosure (1)

Downing, Clay

From: Leslie Purcell <lesliepurcell@gmail.com>
Sent: Thursday, February 27, 2020 5:02 PM
To: General Plan Update
Subject: Comments on VC 2040 GPU DEIR
Attachments: VC GPU DEIR Comments.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Please see attached comments.

Leslie Purcell

Attn: Susan Curtis

Re: Comments on VC 2040, GPU DEIR 2-27-2020

- Program H: County Tree Planting Program. The County shall plant at least one thousand trees annually on County property.

Comment: Priority should be given to planting appropriate native tree species, for their habitat value. County Administration and Court site at Victoria provides opportunity to create public awareness and education through the planting of native trees (and other native plants) with explanatory signage.

- Policy-- Countywide Tree Planting: The County shall establish and support a countywide target for the County, cities in Ventura County, agencies, organizations and citizens to plant two million trees throughout the county by 2040.

Comment: County should encourage the planting of appropriate native trees.

- Air Quality Impacts:

Comment: Need for best management practices for dust control and/or mitigation along the dirt shoulders of some agricultural fields; particularly when such dust contains remnants of chemicals from fertilizers, herbicides, pesticides.

- Water Quality impacts:

Comment: Need for best management practices and/or mitigation to control rain and or run-off, to prevent dirt from agricultural fields and/or shoulders of roadways, from washing into culverts/barrancas/streams/rivers/coastal waters/ocean, particularly when such dust contains remnants of chemicals from fertilizers, herbicides, pesticides.

Leslie Purcell

lesliepurcell@gmail.com

Downing, Clay

From: Ali Ghasemi <aghasemi@vcapcd.org>
Sent: Thursday, February 27, 2020 4:50 PM
To: General Plan Update
Cc: Nicole Collazo; aghasemi; Laki Tisopulos
Subject: VCAPCD Comment Letter
Attachments: VCAPCD Comments on DEIR for VCGPU 2040.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

I would like to thank you for the opportunity to provide the attached VCAPCD comments on the GPU's DEIR. Please let me know if you have any questions/comments. Thanks

Ali Reza Ghasemi, PE
Division Manager
Ventura County APCD
Planning/Rules/Incentives Division
Phone: (805) 645-1427
Fax: (805) 645-1444
aghasemi@vcapcd.org

Ventura County
Air Pollution
Control District

669 County Square Dr
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

Dr. Laki Tisopulos, P.E.
Air Pollution Control Officer

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Susan Curtis, County Planning

DATE: February 27, 2020

FROM: Dr. Laki Tisopulos, APCO

SUBJECT: Public Comment for Draft Environmental Impact Report (DEIR) for the County of Ventura General Plan Update 2040 (GPU)

Thank you for the opportunity to provide comments on the GPU's DEIR. The GPU is proposed to set forth the County's vision of its future and express the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including land use, health and safety, and resource conservation out to the year 2040. The project is not expected to identify any increase in overall development relative to the existing General Plan. However, the project will address topics and issues pursuant to state requirements adopted since the existing General Plan was approved in 2005. The Project Location includes all unincorporated areas within Ventura County. The Lead Agency for the project is the County of Ventura.

District staff provides the following comments and suggestions to further clarify and improve the document relative to the air quality and greenhouse gas emissions reduction benefits:

Section 4.3- Air Quality

Item 1- Page 4.3-16. The significance after mitigation discussion states that "implementation of Mitigation Measures AQ-1a, AQ-2a, and AQ-2b would reduce impacts to air quality to the extent feasible because construction-related emissions of criteria air pollutants and precursors would be minimized through the use of the highest rate diesel engines available for heavy duty". This mitigation reduction is also quantified and included as part of mitigation construction emissions in Table 4.3-3 and the CalEEMod report found in Appendix C- AQ Modeling displays Tier 4 equipment as the mitigation selected. However, the mitigation measures listed do not explicitly require cleaner diesel EPA off-road construction equipment (Tier 3 and Tier 4). We recommend including specific language such as "minimum use of Tier 3 or Tier 4 off-road construction diesel equipment. The use of cleaner diesel engines will dramatically reduce NOx and Diesel Particulate Matter, a toxic air contaminant, emissions during construction and may reduce short-term health impacts to sensitive receptors, particularly for prolonged extended construction periods of individual development projects.

Item 2- Page 4.3-19. The heading of Impact 4.3-4 should read "...would not result in..." or "...that does not exceed..." since the CO discussion concluded a less than significant localized

impact in relation to CO emissions. Furthermore, the District's Air Quality Assessment Guidelines have not been updated to reflect more recent information regarding CO attainment status and monitoring in Ventura County. For informational purposes, the following language reflects what is currently being recommended for determining local air quality impacts in relation to CO:

"*Some localized areas, such as traffic-congested intersections, can have elevated levels of CO concentrations (CO hotspots). CO hotspots are defined as locations where ambient CO concentrations exceed the State Ambient Air Quality Standards (20 ppm for 1-hr standard, 9 ppm for 8-hr standard). The Federal Ambient Air Quality Standard for CO is 35 ppm for 1-hr standard and 9 ppm for the 8-hr standard. In Ventura County, ambient air monitoring for CO stopped in 2004, with the approval of the U.S. Environmental Protection Agency- Region 9, because CO background concentrations in El Rio, Simi Valley, and Ojai were much lower than the State Ambient Air Quality Standard (highest recorded CO background concentration in Ventura County was in Simi Valley at 6.2 ppm for 1-hr, 1.6 ppm for 8-hr (AQAG, Table 6-2). Therefore, no CO hotspots are expected to occur in the Growth and Non-Growth Areas where and additional CO modeling analysis is not warranted. In addition, with over 80% of the CO in urban areas emitted by motor vehicles, and with stricter, cleaner emission standards to the mobile fleet since 2003, CO ambient concentrations should remain at or lower than the most recent CO monitoring data available for Ventura County.*"

Item 3- Page 4.3-21. Policy LU-17.2 referenced on the last paragraph could not be found in DEIR Section 4.11 "Land Use and Planning" list of Land Use Proposed Policies.

Item 4- Page 4.3-23. When reviewing discretionary projects from other jurisdictions, it has been the practice of the District to recommend certain mitigation measures if local toxic exposure is considered significant (HRA cancer risk exceeds OEHHA thresholds). Please consider incorporating the following measures that may help reduce toxic exposure from heavily travelled transportation corridors into Policy HAZ-10.X or as a separate item under Mitigation Measure AQ-3:

- install location of air intakes furthest away from toxic source (such as a heavily traveled transportation corridor)

- limit window opening height or permanently seal windows so that they don't open on side of sensitive-receptor buildings (hospitals, retirement homes, schools, libraries, residential)

- install a vegetative barrier, considering height and cover thickness, to create a natural buffer between sensitive receptors and toxic source (freeway or heavily traveled transportation corridor)

Section 4.8- Greenhouse Gas Emissions

Item 5- Page 4.8-1. In addition to the CARB GHG Regulations for Crude Oil and Natural Gas, please include the CARB GHG Methane Municipal Waste Landfill Regulation with background information. Much like the CARB GHG Crude Oil and Natural Gas Regulation, the District

came into a Memorandum of Understanding with CARB in 2015 to be able to implement and enforce the regulation for landfills inside the District's jurisdiction.

Item 6- Page 4.8-5. The chemical abbreviation used for carbon dioxide should be CO_2, not CO (carbon monoxide). This is found throughout the text in the first paragraph.

We look forward to working with the County of Ventura to make sure the 2040 General Plan Update is consistent with recently adopted air quality regulations and the state's plans to reduce greenhouse gas emissions.

If you have any questions regarding the contents of this memo, you may contact Mr. Ali Ghasemi, Planning, Rules, and Incentives Manager at aghasemi@vcapcd.org or Mrs. Nicole Collazo, Air Quality Specialist, at nicole@vcapcd.org.

Downing, Clay

From: Maxwell, James
Sent: Thursday, February 27, 2020 4:39 PM
To: General Plan Update; Curtis, Susan
Cc: Loeb, Kim
Subject: RE: VC2040 | Notice of Availability of a Draft EIR for Public Review
Attachments: VC 2040 GPU DEIR GW Response Memo 20200227.pdf; Chapter 10 Water Resources_GW review_20200227.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Susan,

Please see the attached response memo from Groundwater Resources for the Ventura County 2040 General Plan Update Environmental Impact Report. Groundwater Resources also reviewed and updated relevant information in Chapter 10 (Water Resources) of the Background Report (Appendix B) from the DEIR. A word document of Chapter 10 with markup and comments is also attached.

Let us know if you have questions or comments.

Thanks,

James Maxwell, PG, CEG
Groundwater Specialist
Watershed Protection District
Water Resources Division
P: 805-654-5164
E: james.maxwell@ventura.org

From: Ventura County General Plan Update <generalplanupdate@ventura.org>
Sent: Monday, January 13, 2020 7:29 AM
To: Maxwell, James <James.Maxwell@ventura.org>
Subject: VC2040 | Notice of Availability of a Draft EIR for Public Review

Notice of Availability of a Draft EIR For Public Review

Notice is hereby given that a Draft Environmental Impact Report (EIR) has been prepared by the County of Ventura, State of California, and is available for public review pursuant to the California Environmental Quality Act (CEQA) Guidelines for the Ventura County 2040 General Plan (State Clearinghouse No. #2019011026).

PROJECT LOCATION: All unincorporated areas within Ventura County

PROJECT DESCRIPTION: The proposed project is a comprehensive update of the County of Ventura General Plan, also known as the 2040 General Plan. The 2040 General Plan will set forth the County's vision of its future and identify the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including but not limited to land use, climate change, agriculture, transportation, hazards, public facilities, health and safety, environmental justice, and resource conservation out to the year 2040. The County, as the lead agency, has prepared an EIR in accordance with CEQA. The purpose of the notice of availability is to call attention to this EIR and to request that interested persons review and provide comments on significant environmental issues, mitigation measures, and range of reasonable alternatives addressed in the EIR. The 2040 General Plan is anticipated to be adopted in 2020. With implementation of the 2040 General Plan, development may occur on or near site(s) identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5.

SIGNIFICANT ENVIRONMENTAL EFFECTS: The Draft EIR has identified significant and unavoidable environmental impacts in the following resource areas.

- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural, Tribal Cultural, and Paleontological Resources
- Greenhouse Gas Emissions
- Hazards, Hazardous Materials, and Wildfire
- Mineral and Petroleum Resources

- Noise and Vibration
- Public Services and Recreation
- Transportation and Traffic
- Utilities

WHERE THE DRAFT EIR IS AVAILABLE: The Draft EIR and supporting documents are available for public review at the following locations:

- 2040 General Plan Update webpage at https://vc2040.org/;
- The Planning Division website at http://vcrma.org/divisions/planning (select "CEQA Environmental Review"); and
- County of Ventura, Resource Management Agency, Planning Division Public Counter, 3d Floor, Hall of Administration, 800 S. Victoria Avenue, Ventura, CA, 93009, between the hours of 7:30 a.m. and 4:30 p.m., Monday through Friday.

Digital versions of the Draft EIR and supporting documents are available at the following libraries:

- Albert H. Soliz Library (2820 Jordan Street, Oxnard, CA 93036);
- Avenue Library (606 North Ventura Ave., Ventura, CA 93001);
- E.P. Foster Library (651 East Main St., Ventura, CA 93001);
- Fillmore Library (502 2nd St., Fillmore, CA 93015);
- Hill Road Library (1070 S. Hill Rd., Ventura, CA 93003);
- Meiners Oaks Library (114 North Padre Juan, Ojai, CA 93023);
- Oak Park Library (899 North Kanan Rd., Oak Park, CA 91377);
- Oak View Library (555 Mahoney Ave., Oak View, CA 93022);
- Ojai Library (111 East Ojai Ave., Ojai, CA 93023);
- Piru Library (3811 Center St., Piru, CA 93040);
- Ray D. Prueter Library (510 Park Ave., Port Hueneme, CA 93041); and
- Saticoy Library (1292 Los Angeles Ave., Ventura CA 93004).

PUBLIC REVIEW AND COMMENT PERIOD: The 45-day public review and comment period during which the County will receive comments on the Draft EIR begins Monday, January 13, 2020 and ends at 5:00 p.m. on Thursday, February 27, 2020.

SEND COMMENTS TO:

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

Or via email to: GeneralPlanUpdate@ventura.org

Please include your name or the name of a contact person, your agency or organization (if applicable), and U.S. mail and email addresses.

By: Dave Ward, Director
Ventura County Planning Division

County of Ventura
Resource Management Agency, Planning Division
800 South Victoria Avenue, L #1740
Ventura, CA 93009

For more information, contact Susan Curtis by email or at (805) 654-2497.

Para más información póngase en contacto con Susan Curtis por correo electrónico o al (805) 654-2497.

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PUBLIC WORKS
VENTURA COUNTY

WATERSHED PROTECTION

MEMORANDUM

DATE: February 27, 2020

TO: Susan Curtis, Manager, General Plan Update Section

FROM: James Maxwell, Groundwater Specialist

SUBJECT: Ventura County Public Works Agency, Water Resources Division (VCWRD) Response, Draft Environmental Impact Report (DEIR), Ventura County 2040 General Plan

VCWRD reviewed the DEIR and supporting documents (Appendix B, Ventura County 2040 General Plan Update Background Report, Revised Public Review Draft January 2020) submitted by the County of Ventura. VCWRD does not have any comments regarding the DEIR. Relevant updates and comments have been made to Chapter 10 (Water Resources) of the Background Report.

Ventura County 2040 GENERAL PLAN

Chapter 10
Water Resources

10 WATER RESOURCES

INTRODUCTION

This chapter summarizes the various water resources and water resource issues in Ventura County. It is organized into the following sections:

- Resources Assessment~~Major Findings~~ (Section 10.1)
- Legal and Regulatory Framework for Water Management (Section 10.2)
- Integrated Regional Water Management (10.3)
- Existing Conditions (by watershed) (Section 10.4)
- Trends and Future Conditions (Section 10.5)
- Key Terms (Section 10.6)
- References (Section 10.7)

The organization of this chapter differs from others in the Background Report because of the nature of its subject matter. First, because the overall legal and regulatory framework affecting water resources is key to understanding how such resources are managed, the framework is the first substantive discussion in this chapter. Second, because water resources are so integrally tied to geography, the existing conditions discussions are organized according to the C~~c~~ounty's watersheds, with each aspect of the resource addressed as it relates uniquely to each watershed.

SECTION 10.1 RESOURCES ASSESSMENT~~MAJOR FINDINGS~~

Sustainable~~Adequate~~ water supply is an ~~current and~~ ongoing concern in Ventura County due to~~to climate change and~~ drought conditions, associated~~the related~~ declines in surface~~river~~ flows and reservoir levels, ~~historic~~ overdraft of ~~several local~~ groundwater basins, curtailment of groundwater extraction~~supplies in southern Ventura County~~, prohibition of new groundwater wells ~~prohibitions~~, and reduced deliveries of imported water. More than 850,000 residents and 156 square miles (95,802 acres) of irrigated farmland in Ventura County experienced direct impacts from ~~the~~ drought conditions that began in 2012.

- **W~~The water supply challenges are great and~~ could potentially impact domestic~~residents~~, commercial/industrial, municipal~~businesses~~, agricultural~~e~~, and ~~the~~ environmental resources ~~of Ventura County~~ without goal-oriented planning and implementation~~concerted action~~.**
    - ~~**Climate change poses major challenges for water supply.** Climate change is causing warmer temperatures, altered patterns of precipitation, runoff, and rising sea levels. Climate change may compromise the ability to effectively manage water supplies, floods and other natural resources. It is anticipated that climate change will increase demand for water as temperatures rise, increase the need for water for firefighting purposes, change the timing and pattern of snowmelt and runoff, and sea level rise will threaten aging coastal water infrastructure. Planning for and adapting to these changes, particularly impacts to long-term water supply reliability, will be a significant challenge. Additional~~

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details on climate change are found in Chapter 12 of the General Plan Background Report.

- **Declines in surface water flow and reservoir levels in Western Ventura County.** Water supplies The water for more than 70,000 people in western Ventura County are strained byis at risk due to the drought conditions that began in 2012. Imported water delivered by Calleguas Municipal Water District (CMWD) is not availablecannot currently be delivered to western Ventura County and groundwater resources areis very limited. Water agencies that obtaintypically get all or part of their supplywater from wells have had to start supplementpurchasing water from Lake Casitas water, as their wells have run dry. During the drought conditions, purchases of Lake Casitas water increased by 1,000%. The lake is a diminishedn important, but dwindling, resource threatened by both water quality and water supply issuesconcerns. As of February 2020, Lake Casitas is over 40% capacity; however, fFor the first time since 1968, reservoir volumelevels in Lake Casitas areis expected to drop below 35% due to decreased inflow volume. Historic lLow water volumelevels in 1968 resulted in significant thermal stratification and anoxic (without dissolved oxygen) conditions. The lThisow oxygen levels created an environment where manganese and hydrogen sulfide, normally trapped in sediments, became soluble, causing unfavorable color and taste to the reservoir lake water to have a brown color and bitter metallic taste. There were alsoThese conditions encourage growth of large blue-green algae blooms. CNormally creek inflows typically provide supply and facilitate lake water mixing (which helps maintain good water quality). Inflows have significantly decreased since 2012, causing the lake to stratify and stagnate. Casitas Municipal Water District (Casitas) added has had to add aeration facilities to combat the water quality effects from the drought.
- **Drought has significantly affected local water supplies.** More than 850,000 residents and 156 square miles (95,802 acres) of irrigated farmland in Ventura County experienced direct impacts from the drought that began in 2012.
- **There are inadequate water supplies to meet future demands in some areas of the county.** Developing new water supplies is costly and requires a significant amount of time for planning, identifying and securing funding, environmental review, permitting, and construction. Some of the new supplies being considered include advanced treatment of wastewater for use as potable water, stormwater capture and reuse, treatment of brackish groundwater, and ocean desalination. Facilities to import and deliver locally held, State Water Project entitlements are being considered. In addition, significant water conservation efforts have begun, mainly in municipal and industrial uses. Agricultural practices are also increasing in efficiency. These efforts will need to continue and be sustained.
- **Overdrafted gGroundwater basins in the county** are experiencing overdraft conditions. Groundwater is the largest single source of water in the County, pumped by individual well owners and water purveyors.estimated to provide 67 percent of the local water supply. The California Department of Water Resources (DWR) has identified the following groundwater basins in Ventura County as being in critical overdraft[1]:
  - Cuyama Valley Basin (DWR Basin No. 3-013)
  - Oxnard Subbasin (DWR Basin No. 4-004.02)
  - Pleasant Valley Basin (DWR Basin No. 4-006).

  T(the Cuyama Valley Bbasin as a whole is considered to be in overdraft, however, the United States Geological Survey (USGS) estimates the portion in Ventura County not to be in overdraft.), Oxnard Plain, and Pleasant Valley.

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Commented [MJ1]: Keep climate change discussion in the Climate Change chapter.

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These basins serve both urban populations and agriculture. In April 2014, to protect groundwater supplies, the Fox Canyon Groundwater Management Agency, passed Emergency Ordinance E which mandated reduced extractions in many of the groundwater basins in southern Ventura County. In December 2014 the Ventura County Board of Supervisors approved and adopted Ordinance 4468 which prohibits new water

[1] As defined in the Sustainable Groundwater Management Act, a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts such as persistent lowering of groundwater levels, drying of wells, reductions in groundwater storage, sea water intrusion, degradation of water quality, land subsidence, and reduction of water in streams and lakes.

wells within a defined boundary~~in the unincorporated County in the majority of groundwater basins~~. These prohibitions will not be removed until Groundwater Sustainability Agencies (GSAs) are formed and have completed G~~g~~roundwater S~~s~~ustainability P~~p~~lans (GSPs) per the Sustainable Groundwater Management Act (SGMA). Implementation of SGMA~~the Sustainable Groundwater Management Act will~~ require~~s~~ an assessment of ~~the condition of groundwater~~ basin conditions~~s~~ and~~, managing~~ groundwater demand, and ~~undertaking~~ implementation of groundwater recharge projects to achieve long-term sustainability.

- **Variability in deliveries of imported water.** Approximately 75%~~three-quarters~~ of Ventura County residents receive imported water~~supply~~ from CMWD~~alleguas Municipal Water District~~. Imported water volume~~The amount of imported water~~ varies depending on seasonal ~~climatic~~ conditions~~,~~ regulatory restrictions on SWP exports,~~conditions~~ water costs and regional demands. ~~The~~ DWR~~California Department of Water Resources~~ prepares a biennial report to evaluate the reliability of imported water from the State Water Project. The most recent update, the 2017~~5~~ State Water Project Delivery Capability Report, ~~anticipates greater extremes in the imported water system with lower than historic water availability in dry years and greater than historic water availability in wet years, with the long-term average deliveries decreasing~~reported an increased average annual delivery of water since the 2015 Report.
- **Water resources dedicated to environmental purposes ~~may change~~**. State and federal agency regulations restrict~~requirements dictate~~ the amount of exported SWP water that must remain ~~be~~ available ~~for endangered species and this affects management of water resources~~. Water availability for municipal, agricultural and other uses will be potentially reduced by stricter management of inflow to upstream reservoirs to~~Potential requirements to provide increased instream flows could further reduce water available for municipal, agricultural, and other uses.~~
- **~~There are i~~Iⁿsufficient~~adequate~~ water supply~~ies~~ to meet future County demands ~~in some areas of the county~~**. ~~Developing new water supplies is costly and requires a significant amount of time for planning, identifying and securing funding, environmental review, permitting, and construction. Some of the new supplies~~Alternative water sources being considered include advanced treatment of wastewater for use as potable water, stormwater capture and reuse, treatment of brackish groundwater, and ocean desalination. Facilities to import and deliver ~~locally held,~~ SWP~~State Water Project~~ entitlements are being considered. ~~In addition, significant w~~Water conservation measures are ~~efforts~~ have begun, mainly in municipal and industrial uses. Agricultural practices are also increasing in efficiency. These efforts will need to continue and be sustained.

- **Shift toward I~~i~~ntegrated Regional W~~w~~atershed M~~m~~anagement (IRWM).** In the past, various~~different~~ elements of a~~the~~ water system~~s~~ were managed independently~~separatel~~. ~~y from other elements, i.e.,~~ gGroundwater was managed as a separate resource from stormwater and separate from recycled water. There has been a shift in water resources management and regulation toward watershed~~-~~-based approaches. This A shift in water resources management and regulation toward a watershed-based approach integrates on a regional level the many facets of water resources management, including water supply, water quality, flood management, ecosystem health, and recreation through enhanced collaboration across geographic and political boundaries and diverse stakeholder groups.
- ~~**Water supplies dedicated to environmental purposes may change.** State and federal requirements dictate the amount of water that must be available for endangered species and this affects management of water resources. Potential requirements to provide increased instream flows could~~

~~further reduce water available for municipal, agricultural, and other uses.~~

- ~~**There is great diversity in the size, source, and organization of w**~~**Variety of water** ~~**ater**~~ **supply**~~**iers**~~ **in Ventura County.** Many properties are served by private wells and surface water diversions. Other properties are served by mutual water companies, irrigation companies, special districts, cities, private utilities, and wholesale water agencies. There are more than 162 water suppliers in the county.

- **~~Land development~~ Water supply and demand for land development~~significantly affects demand and supply~~.** ~~The type of l~~Land use~~age~~ and development ~~greatly drives the demand and~~ dictates the type and ~~ty~~ volume~~pe~~ of water needed. High-density residential development ~~will~~ requires drinking-quality water~~water treated to drinking water standards~~. ~~Water sent to users with~~ Water collected by sewer systems is collected and can be treated and used as a secondary recycled water supply. Agricultural users~~users may be able to~~ apply~~utilize~~ raw or recycled water and application of water in agricultural fields that assists with ~~may~~ recharge to groundwater.

- **Impacts from ~~U~~urban land development~~ can impact water quality~~~~resources~~**. Land development can impact water quality~~,~~ however, ~~but there are~~implementation of best management ~~practices~~ and conservation~~other~~ practices can be employed~~methods to~~ to avoid and lessen potential residual~~such~~ impacts. D~~Land d~~evelopment commonly ~~creates an~~ increases ~~in~~ impervious surfaces~~,~~ which increases the ~~amount of~~ runoff volume and stormwater pollutants ~~in stormwater~~. ~~As s~~Stormwater runoff~~s~~ over impervious surfaces such as rooftops, roadways, and parking lots, the runoff accumulates sediment, pollution~~pollution and sediment~~, nutrients, bacteria, and other impacts~~pollutants~~. ~~Pollutants in s~~Stormwater is~~are~~ typically conveyed~~transported~~ directly to drainage~~local~~ channels, tributaries, rivers~~,~~ and the ocean, prior to or without any treatment. Land development potentially impacts floodplains, increases the risk of flooding~~,~~ and decreases the ability to manage storm waters naturally. Developments in floodplains may impact ~~the ability to recharge~~ groundwater recharge ~~basins~~ through infiltration and may reduce~~move~~ percolation surface area~~potential sites with recharge capabilities~~. ~~In addition to altering stormwater runoff, l~~Land development introduces other point sources of pollution including discharges from sewage-treatment plants, individual septic tanks, community wastewater treatment systems~~,~~ and industrial facilities.

- **Impacts from a~~A~~griculture land development~~ can impact water quality~~~~resources~~**. Soil disturbance~~Tillage~~ and subsequent irrigation ~~of land~~ changes the runoff and infiltration characteristics of the ground surface~~land~~, potentially affecting percolation to the subsurface and recharge to groundwater. ~~,~~This also~~and~~ increases erosion and ~~resulting~~ sediment deposition into surface-water ~~bodies, while altering evapotranspiration. This in turn affects the interaction of groundwater and surface water.~~

- ~~**Poor water** **Water qq**~~**uality limitations to~~s~~ ~~bb~~eneficial use~~s of water~~**. Decreased~~Poor~~ water quality can limit the availability of~~suitability of~~ a water ~~body~~ resource for beneficial uses such as agriculture~~e~~, recreation~~, fisheries~~, and riverine habitat. Poor water quality ~~also can~~ limits the use of the water ~~for~~ as a water supply ~~or drastically increase the treatment cost~~.

- **Development impacts to~~can affect~~ natural hydrologic processes.** D~~Some d~~evelopment can potentially~~significantly~~ alter land topography and surface geography. Removal of natural vegetation and manmade structures such as levees, dams, and diversion structures disrupt ~~natural~~ hydrologic processes (i.e. sediment transport and deposition, groundwater recharge). These changes alter water velocity, river substrate, water shading, soil moisture, and other ecosystem characteristics needed by fish and wildlife.

SECTION 10.2 LEGAL AND REGULATORY FRAMEWORK FOR WATER MANAGEMENT

The ~~framework for~~ water management framework of~~in~~ Ventura County ~~is complex and~~ reflects the ~~network of~~ laws, policies~~,~~ and regulations governing California water. Many laws and many institutions influence water planning (**Table 10-1**)~~; Table 10 provides a broad regulatory overview~~. Additional details ~~on several of these laws,~~ and a discussion of regulations with land use linkages, are further summarized on the following pages.

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TABLE 10-1 FRAMEWORK FOR WATER MANAGEMENT	
Statute, Code, or Authority	**Relationship to Water Management**
State of California Constitution, Article X, Section 2	Requires that all entities in the State use water in a beneficial manner and prohibits unreasonable use and water waste.
State of California Riparian Water Rights	Allows owners of land on a stream to divert and use a portion of the flow.
State of California Appropriative Water Rights	The right to divert, store, and use water on any land, provided the use is reasonable and does not harm earlier appropriators. Appropriative rights are managed by the State Water Resources Control Board.
State of California Water Commission Act	Established a system of State-issued permits and licenses to appropriate water.
Federal Endangered Species Act	Designed to protect endangered and threatened species and promote species recovery. Requires that federal agencies consult with the US Fish and Wildlife Service and the National Marine Fisheries Service to ensure that federal actions do not jeopardize endangered or threatened species or their habitat.
National Environmental Policy Act	Requires federal agencies to conduct an environmental review for federal actions that may affect the environment; encourages implementation of mitigation measures to avoid impacts.
State of California Endangered Species Act	Designed to protect endangered and threatened species and promote species recovery. Requires that state and local agencies consult with the California Fish and Wildlife Service to ensure that their actions do not jeopardize endangered or threatened species or their habitat.
California Environmental Quality Act (CEQA)	Requires state and local governments to evaluate environmental effects and find ways to mitigate effects where feasible, prior to approving projects.
State of California Porter-Cologne Water Quality Control Act	This is a water quality control law and regulatory program to protect water quality and beneficial use of the State's water. This act allows regulation of discharges to water.
Federal Clean Water Act	Requires permits for the discharge of pollutants to waters of the United States from any point source. See additional detail below.
Federal and State Safe Drinking Water Act	Under this law, federal and state agencies set and enforce standards for drinking water quality.
State of California Regional and Local Water Agency Formation enabling acts	Guides the formation of districts for controlling, conserving, managing, and distributing water.
State of California Urban Water Management Planning (UWMP) Act	Requires urban water suppliers to conduct regular comparisons of supplies and demands. (See additional detail below.) Within the UWMP, water suppliers must include, to the extent practicable, information on the water quality of existing sources and the manner in which water

TABLE 10-1 FRAMEWORK FOR WATER MANAGEMENT	
Statute, Code, or Authority	**Relationship to Water Management**
	quality affects supply reliability. Based on the UWMP, water suppliers explore enhancing basic supplies from traditional sources such as the State Water Project (SWP) as well as other options. These include groundwater extraction, water exchanges and transfers, water conservation, recycling, brackish water desalination and water banking/conjunctive use. Each option will involve evaluations of how it would: (1) fit into the overall supply/demand framework; (2) impact the environment; and (3) affect customers. The objective of these more detailed evaluations would be to find the optimum mix of conservation and supply programs that ensure customers' needs are met.
State of California Agricultural Water Management Act	Senate Bill X7-7, the Water Conservation Act of 2009 (SB X7-7), requires agricultural water suppliers who provide water to more than 25,000 irrigated acres (excluding acreage irrigated by recycled water) to adopt and submit Agricultural Water Management Plans (AWMP) to DWR and to implement Efficient Water Management Practices, including the measurement and volumetric pricing of water deliveries. Within Ventura County, Casitas Municipal Water District, Camrosa Water District, and Ventura County Waterworks District No. 1 prepared AWMPs in 2015.
State of California Water Conservation in Landscaping Act	Requires specific water efficiencies for landscapes in new or redevelopment projects.
State of California Energy Commission Title 20	Sets standards for toilets, urinals, faucets, and showerheads. The appliance standards dictate what can be sold in California and impact new construction and replacement fixtures in existing homes.
State of California CAL Green Building Code	Requires residential and non-residential water efficiency and conservation measures for new structures that will reduce the overall potable water use by 20 percent. Water savings can be achieved by installing plumbing fixtures and fittings that meet the 20 percent reduced flow rate specified in the CAL Green Code, or by other measures that meet the reduction standard.
State of California Sustainable Groundwater Management Act	Requires entities using water from groundwater basins designated as high or medium priority by the Department of Water Resources to assess the condition of groundwater basins and to develop a framework for long-term sustainability through demand management and groundwater recharge activities. (See additional discussion on the Sustainable Groundwater Management Act further in this Section below .)
State of California Class II Underground Injection Control Program	Regulation of wells used to inject fluids associated with oil and natural gas production. The purpose of the regulation is to ensure fluids associated with oil and gas production are not introduced into drinking water sources. (See additional details below.)

TABLE 10-1 FRAMEWORK FOR WATER MANAGEMENT	
Statute, Code, or Authority	**Relationship to Water Management**
State of California Permitting of Water Systems	Regulates the formation of new public water systems by the State Water Resources Control Board. (See additional detail below.)
County of Ventura General Plan Goals, Policies and Programs	Complies with Section 65300 of the California Government Code which requires that, "Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning."
County of Ventura Subdivision Ordinance	Regulates and control subdivisions of land and in conjunction implements the County's General Plan. (See additional detail below.)
County of Ventura Coastal Zone Ordinance	Regulates all proposed development in the Coastal Zone of Ventura County. (See additional detail below.)
County of Ventura Non-Coastal Zone Ordinance	Regulates all proposed development in the Non-Coastal Zone of Ventura County. (See additional detail below.)
Ventura County Groundwater Conservation Ordinance	Regulates construction, maintenance, operation, use, repair, modification, and destruction of groundwater wells. (See additional detail below.)
County of Ventura Landscape Design Criteria	Requires approval of a landscape plan for new and modified developments. Limits the plant types and plant pallets so as to conserve water, and requires minimum irrigation efficiency.
State of California Propositions 50, 84, and 1	Grant funding to encourage regional integrated planning of water resources. (See additional detail below.)
State of California Non-potable Water Reuse Systems-Chapter 15 of the California Plumbing Code (CPC) (as of 2017)	Allows for use of non-potable water (i.e., graywater), which includes wastewater from bathtubs, showers, bathroom washbasins, clothes washing machines and laundry tubs. Requires a plumbing permit from the County of Ventura Resource Management Agency, Building and Safety Division.

Urban Water Management Plan Act (State)

State law requires that urban water suppliers with more than 3,000 customers, or who deliver more than 3,000 acre-feet per year (AFY), adopt water management and conservation plans that evaluate water supplies and water demands for a 20-year period. Urban Water Management Plans (UWMP) are to be updated every five years or when there are significant changes in available supplies or demands. An UWMP is a planning tool that generally guides the actions of water management agencies. It provides managers and the public with a broad perspective on a number of water supply issues. It is not a substitute for project-specific planning documents, ~~nor was it~~ or intended to be when mandated by the State Legislature. For example, the Legislature mandated that the Plan include a Section that "describes the opportunities for exchanges or water transfers on a short-term or long-term basis." (California Urban

Water Management Planning Act, Article 2, Section 10630(d)). The identification and inclusion of such opportunities~~, and the inclusion of those opportunities~~ in a general water service reliability analysis~~,~~ neither commits a water management agency to pursue a particular water exchange/transfer opportunity, nor precludes a water management agency from exploring exchange/transfer opportunities not identified in the Plan. When specific projects are chosen to be implemented, detailed project plans are developed, environmental analysis, if required, is prepared, and financial and operational plans are detailed.

"A plan is intended to function as a planning tool to guide broad-perspective decision making by the management of water suppliers." (Sonoma County Water Coalition v. Sonoma County Water Agency (2010) 189 Cal. App. 4th 33, 39). It should not be viewed as an exact blueprint for supply and demand management. Water management in California is not a matter of certainty and planning projections may change in response to a number of factors. "[L]ong-term water planning involves expectations and not certainties. Our Supreme Court has recognized the uncertainties inherent in long-term land use and water planning and observed that the generalized information required . . . in the early stages of the planning process are replaced by firm assurances of water supplies at later stages." (Id., at 41). From this perspective, it is appropriate to look at the UWMP as a general planning framework, not a specific action plan. It is an effort to generally answer a series of planning questions including:

- What are the potential sources of supply and what is the reasonable probable yield from them?
- What is the probable demand, given a reasonable set of assumptions about growth and implementation of good water management practices?
- How well do supply and demand figures match up, assuming that the various probable supplies will be pursued by the implementing agency?

Using these "framework" questions and resulting answers~~,~~ the implementing agency will pursue feasible and cost-effective options and opportunities to meet demands.

Based on the UWMP, water suppliers explore enhancing ~~basic~~ supplies from traditional sources such as ~~the State Water Project (~~SWP water~~) as well as other options~~. These include groundwater extraction, water exchanges and transfers, water conservation, recycling, brackish water desalination and water banking/conjunctive use. ~~Specific planning efforts will be undertaken in regard to each option, involving detailed evaluations of how each~~ Ooptions are evaluated regarding feasibility ~~would fit~~ into the overall supply/demand framework including~~, how each option would impact the~~ environmental impacts and how each option would affect customers. The objective of these ~~more detailed~~ evaluations is~~would be~~ to find the optimum mix of conservation and supply programs that balance water demand.~~ensure that the needs of customers are met~~.

The Urban Water Management Plan Act requires 60-days notice to any applicable city of county ~~coordination with local land use entities. A~~where the water agency supplies water that the plan is being updated.~~t least 60 days prior to the public hearing on the plan any applicable city or county where the water agency supplies water must be notified that the plan is being updated~~. The water supplier must ~~also~~ provide notice when the Draft UWMP is available for review and comment. Upon completion of the UWMP a copy of the plan must be provided to the applicable land use jurisdictions.

Sustainable Groundwater Management Act (State)

In September 2014, the California legislature enacted comprehensive legislation to manage California groundwater. Known as the Sustainable Groundwater Management Act (SGMA) ~~of 2014~~, the legislation provides a framework for sustainable management of groundwater supplies by local authorities~~, but~~ with

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the potential for state intervention, if necessary. ~~The first step in the process laid out by t~~The legislation requires~~is~~ the formation of local groundwater sustainability agencies (GSAs). ~~These~~ GSAs are established to~~must be formed to~~ address the basin~~groundwater basins determined by the~~ state prioritization ~~to be~~ state~~of high or medium priority,~~ (unless adjudicated). In Ventura County, one~~seven~~ basin~~s~~ is~~are~~ designated as medium priority, ~~Ojai Valley, Upper Ventura River, Cuyama Valley, Arroyo Santa Rosa Valley, Mound, Santa Paula (which is adjudicated), Fillmore~~ and eight~~four~~ are designated as high priority~~, Oxnard Plain, Pleasant Valley, Las Posas, and Piru~~. Three basins are listed as in "critical overdraft:" Oxnard Plain, Pleasant Valley, and Cuyama Valley. The Santa Paula Basin is adjudicated~~,~~ and is currently only subject to annual reporting requirements to DWR under SGMA.

GSAs are empowered to utilize a number of new management tools to achieve the sustainability goal. ~~For example,~~ GSAs may require registration of groundwater wells, mandate annual extraction reports ~~from individual wells~~, impose limits on extractions (allocations)~~,~~ and assess fees to support creation and adoption of a groundwater sustainability plan (GSP). GSAs also may request a revision of a groundwater basin boundary.

GSPs for critically ~~–~~overdrafted basins must be completed and adopted by January 31, 2020. GSPs for high- and medium-priority basins not in overdraft must be completed and adopted by the GSA by January 31, 2022. All high- and medium-priority groundwater basins must achieve sustainability within 20 years of GSP adoption.

The legislation aims ~~aim of the legislation is~~ to achieve~~have~~ groundwater basins management~~d~~ within the sustainable yield of each basin. The legislation defines "sustainable groundwater management" as the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results. This is~~, which are~~ defined as ~~any of the following effects~~ the~~:~~ chronic lowering of groundwater levels,~~;~~ significant and unreasonable reductions in groundwater storage,~~;~~ significant and unreasonable seawater intrusion,~~;~~ significant and unreasonable degradation of water quality,~~;~~ significant and unreasonable land subsidence,~~;~~ and surface water depletions that have significant and unreasonable adverse impacts on beneficial uses.

~~The~~ SGMA amends planning and zoning laws to require increased coordination among land use planning agencies and the GSAs, regarding groundwater plans and ~~any~~ updates or modifications of General Plans. Existing local government land use and groundwater authorities are not modified in the Act. Specific changes to California Government Code resulting from SGMA are detailed in Appendix 10.A at the end of this chapter.

Class II Underground Injection Control Program (State)

As discussed in Chapter 8, Section 8.1 (Energy Resources) there are currently 57 oil companies operating in Ventura County, under the authority of 135 conditional use permits granted by the County for~~to authorize~~ oil and gas activities. This~~,~~ includes~~ing~~ the underground injection of water. According to the California Department of Conservation, Division of Oil, Gas and Geothermal Resources' (DOGGR), there are 614 active Underground Injection Control (water injection) wells in Ventura County. The State of California was delegated primary responsibility for implementing the Class II Oil and Gas Underground Injection Control [UIC] program of the federal Safe Drinking Water Act [SDWA] in 1983.

To determine whether certain UIC wells were posing a threat to water supply wells, the State Water Resources Control Board (SWRCB) and its regional water quality control boards (RWQCBs)~~Water Boards~~) completed an

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evaluation of certain UIC wells in December 2016.[2] Staff from the Water Boards reviewed 6,157 UIC wells determined by ~~DOGGR~~ CalGEM to be injecting into non-exempt aquifers.[3] This evaluation included Class II UICs located in Ventura County. UIC wells were screened for proximity to water supply wells or any other indication of risk of impact to drinking water and other beneficial uses.

Based on this screening criteria, ~~DOGGR~~ CalGEM ordered the immediate shut-in of 23 UIC wells, none of which were in Ventura County. (A shut-in well is one which is capable of injection or production~~,~~ but is not in operation). Additionally, the Water Boards issued 71 Information Orders (IOs), requesting additional information from operators of 256 UIC wells. One operator in Ventura County received an IO for a UIC well, which has been abandoned.

In addition to the above UIC regulations, Public Resources Code Section 3106 et. seq. grants ~~DOGGR~~ CalGEM with the authority to supervise the drilling, operation, maintenance~~,~~ and abandonment of wells and the operation, maintenance, and removal or abandonment of tanks and facilities attendant to oil and gas production and designated pipelines, so as to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil and gas deposits from infiltrating water and other causes; loss of oil, gas, or reservoir energy, and damage to underground and surface waters suitable for irrigation or domestic purposes by the infiltration of, or the addition of, detrimental substances.

T~~Furthermore, t~~he California Code of Regulations, Title 14, Division 2, Chapter 4, Development, Regulation, and Conservation of Oil and Gas Resources includes several provisions which regulate injection projects (water injection wells). ~~DOGGR~~ CalGEM is the responsible agency for approving all underground injection and disposal projects before any subsurface injection or disposal project can begin. This includes all EPA Class II wells and air- and gas-injection wells. There are requirements for filing, notification, operating, and testing for underground injection projects (Sections 1724.10 1748.2, 1748.3), and standards for freshwater protection when plugging and abandoning wells (Section 1723.2). This includes CalGEM~~DOGGR~~'s authority to require testing as necessary to prevent damage to life, health, property, and natural resources (Section 1954).

Clean Water Act (Federal)

The Clean Water Act~~, as amended,~~ requires permits for the discharge of pollutants to waters of the United States. Implementation of the Clean Water Act and the Porter-Cologne Water Act is the responsibility of the SWRCB~~e State Water Resources Control Board and the Regional Water Quality Control Boards~~. In the Ventura area the applicable Regional Board is the Los Angeles Regional Water Quality Control Board (L~~os Angeles~~ RWQCB). The L~~os Angeles~~ RWQCB lays out ~~the~~ water quality objectives, regulations~~,~~ and programs to implement the regulations in the Los Angeles Basin Plan (Los Angeles RWQCB 2014). The Basin Plan is reviewed and updated every three years and ~~, but~~ can be amended at any time. The L~~os Angeles~~ RWQCB manages water quality based on "beneficial uses". In Ventura County, there are twenty-four identified beneficial uses:

[2] The State evaluated "non-exempt" aquifers. The following federal and state criteria must be met for an aquifer to be considered exempt: (a) cannot be a current drinking water source; (b) unlikely to be a future source of drinking water; (c) injection must not impact current/potential future beneficial use; and (d) injection fluids must remain in the proposed exempted area.

[3] U.S. EPA, Region IX (Pacific Southwest Region) has approved six DOGGR aquifer exemption requests, none of which are in Ventura County.

1. **Municipal and Domestic Supply (MUN).** Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.

2. **Agricultural Supply (AGR).** Uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

3. **Industrial Process Supply (PROC).** Uses of water for industrial activities that depend primarily on water quality.

4. **Industrial Service Supply (IND).** Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.

5. **Ground Water Recharge (GWR).** Uses of water for natural or artificial recharge of ground water for purposes of future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers.

6. **Freshwater Replenishment (FRSH).** Uses of water for natural or artificial maintenance of surface water quantity or quality (e.g., salinity).

7. **Navigation (NAV).** Uses of water for shipping, travel, or other transportation by private, military, or commercial vessels.

8. **Hydropower Generation (POW).** Uses of water for hydropower generation.

9. **Water Contact Recreation (REC-1).** Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.

10. **Non-contact Water Recreation (REC-2).** Uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

11. **Marine Habitat (MAR).** Uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).

12. **Wildlife Habitat (WILD).** Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

13. **Commercial and Sport Fishing (COMM).** Uses of water for commercial or recreational collection of fish, shellfish, or other organisms including, but not limited to, uses involving organisms intended for human consumption or bait purposes.

14. **Aquaculture (AQUA).** Uses of water for aquaculture or mariculture operations including, but not limited to, propagation, cultivation, maintenance, or harvesting of aquatic plants and animals for human consumption or bait purposes.

15. **Warm Freshwater Habitat (WARM).** Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic

habitats, vegetation, fish, or wildlife, including invertebrates.

16. **Cold Freshwater Habitat (COLD).** Uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.

17. **Inland Saline Water Habitat (SAL)**. Uses of water that support inland saline water ecosystems including, but not limited to, preservation or enhancement of aquatic saline habitats, vegetation, fish, or wildlife, including invertebrates.

18. **Estuarine Habitat (EST).** Uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).

19. **Wetland Habitat (WET).** Uses of water that support wetland ecosystems, including, but not limited to, preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions which enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally.

20. **Preservation of Biological Habitats (BIOL)**. Uses of water that support designated areas or habitats, such as Areas of Special Biological Significance (ASBS), established refuges, parks, sanctuaries, ecological reserves, or other areas where the preservation or enhancement of natural resources requires special protection.

21. **Rare, Threatened, or Endangered Species (RARE).** Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.

22. **Migration of Aquatic Organisms (MIGR).** Uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.

23. **Spawning, Reproduction, and/or Early Development (SPWN).** Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.

24. **Shellfish Harvesting (SHELL).** Uses of water that support habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sports purposes.

To protect these beneficial uses, the LA~~os Angeles~~ RWQCB has many regulatory programs to reduce pollutants that originate in stormwater, wastewater, agricultural runoff~~,~~ and recycled water.

LA~~os Angeles~~ RWQCB regulates discharges from many classes of municipal stormwater systems through a permit program. The Ventura County Watershed Protection District, County of Ventura, and the cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks are named as co-permittees under a countywide municipal National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharges issued by the RWQCB~~egional Water Quality Control Board~~. The co-permittees are required to administer, implement, and enforce a Stormwater Quality Management Program. The goal is to minimize runoff pollution typically caused by land development and to protect the beneficial uses of receiving waters by limiting ~~effective~~ impervious area to no more than five percent of the project area and retaining stormwater on site. The co-permittees require

"Site Design Principles and Techniques," "Source Control Measures," "Retention Best Management Practices [BMPs]," "Biofiltration BMPs," and "Treatment Control Measures" be incorporated into new development and redevelopment projects.

Wastewater from wastewater treatment or industrial activities is typically regulated through waste discharge permits. (also referred to as Waste Discharge Requirements (WDRs)). Through this permit process the RWQCB regulates the place, volume, and specific constituents in discharges to California's coastal waters, surface waters, and groundwater.

In 2016, the LA~~os Angeles~~ RWQCB readopted a Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region. Typically referred to as the "Conditional Waiver" program, it requires the owners of irrigated farmland to prepare and submit water quality management plans, conduct monitoring in agricultural drains and other sites influenced by agricultural runoff, and implement BMPs that address the quantity and quality of irrigation return flows and stormwater runoff. The purpose is to limit ~~these~~ discharges, that~~which~~ carry nutrients, pesticides, sediment, salts, and other pollutants ~~from cultivated fields,~~ from reaching surface waters. The Conditional Waiver
allows growers to comply as individuals or ~~by~~ work~~ing~~ collectively as a "discharger group." In response to the Conditional Waiver, the Farm Bureau of Ventura County formed the Ventura County Agricultural Irrigated Lands Group (VCAILG), which serves as a unified discharger group for those agricultural landowners and growers who agree to join. The Farm Bureau of Ventura County administers the program on behalf of VCAILG members.

Both the ~~State Water Resources Control Board (~~SWRCB~~)~~ and RWQCBs regulate recycled water. Permits are required to operate recycled water facilities and these permits mandate the type of treatment and resultant water quality, mandate ongoing water quality monitoring, and regulate the place and manner of recycled water use. The State Water Resources Control Board's 2009 Recycled Water Policy, amended in 2013, requires groundwater basins receiving recycled water (e.g., effluent discharge in waterways, injection, recharge, or irrigation) to be managed by Salt and Nutrient Management Plans. The purpose of a Salt Nutrient Management Plan is to optimize recycled water use while ensuring the protection of groundwater supply and beneficial uses, agricultural beneficial uses, and human health. Salt and Nutrient Management Plans are submitted to the RWQCB, which incorporate the plans into the applicable Basin Plan. ~~and T~~the RWQCB requires recycled water facilities and wastewater dischargers to operate in a manner consistent with applicable salt nutrient management plan.

The Clean Water Act also includes a regulatory mechanism called the Total Maximum Daily Load (TMDL) program. A TMDL is specific to a given impairment (chloride, nutrients) and a specific waterbody. A TMDL is a kind of "pollution budget" and includes a calculation of the maximum amount of a pollutant that can occur in a waterbody and still meet water quality standards so as to protect beneficial uses. The TMDL also allocates the necessary reductions to one or more pollutant sources. TMDLs can force the implementation of BMPs, infrastructure improvements, and other actions to limit pollution. Within Ventura County the following TMDLs are in place:

- Ventura River Watershed
  - Algae, Eutrophic Conditions, and Nutrients
  - Trash
- Santa Clara River Watershed
  - Bacteria
  - Chloride
- Calleguas Creek Watershed

- Metals
- Salts
- Trash
- Toxicity
- Toxins/Historic Pesticides
- Nitrogen/Nutrients

Under section 303(d) of the Clean Water Act, states, territories, and tribes are to develop lists of waterbodies that are polluted or otherwise degraded and not meeting water quality standards. The 303(d) List is used to develop TMDLs and/or are used to identify other mechanisms to improve water quality. Several waterbodies in Ventura County are on the current 303(d) List for California (SWRCB 2016).

Permitting of Public Water Systems

The ~~State Water Resources Control Board (~~SWRCB~~)~~, Division of Drinking Water (DDW) oversees the permitting of Public Water Systems. On September 29, 2016, Governor Jerry Brown approved Senate Bill 1263 to prevent the formation of small unsustainable water systems. This bill requires a person submitting a permit application for a proposed new public water system to first submit a preliminary technical report to the SWRCB. The bill directs the applicant to undertake additional discussion and negotiation with existing public water systems with the technical, managerial, and financial capacity to provide an adequate and reliable supply of domestic water to the service area of the proposed new public water system. If the SWRCB determines that it is feasible for the service area of the proposed public water system to be served by one or more currently permitted public water systems and if it is reasonably foreseeable that the proposed new public water system will be unable to provide affordable, safe drinking water in the reasonably foreseeable future, the permit will be denied.

County of Ventura Role in Water Management

~~The County of Ventura has a large role to play in water management.~~ Through the General Plan Goals, Policies and Programs, Subdivision and Zoning Ordinances and Building Code, the County of Ventura conditions development to ensure adequate water supply, availability of wastewater disposal, and protection of groundwater and surface water quality. Through its Landscape Design Criteria, Ventura County requires water budget and project use calculations, use of reclaimed water ~~if feasible~~, and water-efficient model home requirements. Per the authority of the Floodplain Management Ordinance, the County restricts and prohibits land uses or land alteration which may be dangerous to health, safety, and property due to modification or obstruction of flood waters or alteration of a water course.

T~~In addition to the regulatory setting, t~~he County of Ventura ~~actively undertakes projects to~~ manages water resources~~, which include but are not limited to,~~through well permitting, groundwater recharge, stormwater treatment and infiltration, and~~s well as~~ levees and flood control channels. Ventura County ~~also~~ is responsible for the operation and maintenance of several water and sanitation~~ewer~~ utilities ~~within the county~~. VCWPD~~arious county departments also~~ collects and maintains data on countywide water resources. ~~For example, the~~ VCWPD maintains a network of rainfall and streamflow gauges, inventories and inspects groundwater wells, collects water quality data~~,~~ and groundwater level information.

County of Ventura General Plan Goals, Policies and Programs

The General Plan (2005) Goals Policies and Programs (GPP) include~~d~~s goals, policies~~,~~ and programs related to water resources in Chapter 1, Resources, Section 1.3. In addition to policies in the GPP, the following Area Plans ~~also~~ contain ~~applicable~~ water resource ~~goals and~~ policies ~~related to water resources~~:

- El Rio/Del Norte Area Plan;
- North Ventura Avenue Area Plan;
- Oak Park Area Plan;
- Ojai Valley Area Plan;
- Piru Area Plan;
- Saticoy Area Plan;
- Thousand Oaks Area Plan; and
- Lake Sherwood/Hidden Valley Area Plan.

County of Ventura Ordinances

Subdivision Ordinance

The ~~intent of the~~ County of Ventura Subdivision Ordinance ~~is to~~ regulate~~s and control~~ subdivisions of land and~~, in conjunction,~~ implement~~s~~ the County's General Plan. The ~~Subdivision~~ Ordinance applies to "all divisions, reversions to acreage, lot line adjustments, and mergers respecting real property located wholly or partially within the unincorporated areas of Ventura County" and "governs the filing, processing, approval, conditional approval, or disapproval of tentative, final and parcel maps, map waivers, and any modifications thereto." The ~~Subdivision~~ Ordinance ~~includes the following provisions meant to~~ ensure~~s~~ adequate provision of water, ~~to~~ protect~~s~~ water supply, and ~~to~~ protect~~s~~ surface and groundwater quality.

Provisions to ensure adequate provision of water:

- Section 8203-3, Section 8206-3.8, and Section 8206-3.9. At the tentative tract stage, requires a description of the method and plan for providing a permanent domestic water supply. If the water supply is to be provided by a public water system the tentative tract map must be accompanied by a "water availability letter."[4] In areas where groundwater supplies have been determined to be questionable or inadequate, a report must also be submitted demonstrating the availability of a permanent domestic water supply to each lot for a period of at least 60 years. At the final map phase, developments not being served water by individual wells, must provide a "water supply certificate" documenting that a binding agreement has been entered into between the owner of the land and water supplier. Also at the final map stage a registered civil engineer must determine (a)

[4] A water availability letter pursuant to the §8203-3 (l) of the Ventura County Subdivision Ordinance, which requires that the proposed water system of a subdivision provide a letter stating that they will supply permanent domestic water supply to each lot, is not synonymous with the requirement for a water purveyor to supply a "water availability letter" as defined in §1.3.6 of the Ventura County Waterworks Manual, which shall demonstrate that the water purveyor has the necessary water capacity for their entire service area.

that the water suppliers' system complies with the quality and quantity standards of Title 22 of the California Code of Regulations and that the new development will not impact the water supplier in a way such that the water system will not comply with Title 22 and (b) the facilities of the water supplier's system, including the portion to serve the proposed subdivision, meet or exceed the requirements of the County of Ventura Improvement Standards and Specifications.

- Section 8204-7. Requires that whenever a proposed subdivision is located within the boundaries of a public water agency willing and able to provide water service to the lots, the public water agency shall be chosen as the water purveyor for the proposed subdivision.
- Section 8205-5.1. Requires notification to water, sewage and other service providers prior to Planning Commission hearing on a subdivision (when a tentative map and final map are required).
- Section 8207-2. Prior to recordation of a final map or parcel map, or at such earlier time as may be specified in this Article, the subdivider shall complete or shall enter into an improvement agreement to complete specific improvements including permanent domestic water supply.

Provisions to protect surface and groundwater quality:

- Section 8203-2. Requires water courses and existing or abandoned water wells be identified on tentative maps.
- Section 8203-3. Requires a hydrologic and hydraulic study be submitted with the tentative map indicating the following conditions before and after proposed development of the subdivision: drainage areas, major watercourses, quantity and pattern of storm water, and diversion and collection systems.
- Section 8203-3. Requires a description of the proposed method and plan for sewage disposal for each proposed lot.
- Section 8204-5. Design of a subdivision shall conform to the County of Ventura Flood Plain Management Ordinance and shall provide for the proper drainage of all lots and improvements based on the runoff that can be anticipated from ultimate development of the watershed in accordance with the General Plan. All public facilities including water and sewer, must be located and constructed in a manner to minimize potential flood damage. Any concentrations or increases of surface water resulting from the development of the subdivision must be conveyed by means of adequate facilities to a suitable natural watercourse in the area.
- Section 8207-2. Prior to recordation of a final map or parcel map, or at such earlier time as may be specified in this Article, the subdivider shall complete or shall enter into an improvement agreement to complete specific improvements including: (a) all improvements for drainage and erosion control required for the proposed subdivision, regardless of location, including improvements necessary to prevent sedimentation or damage to off-site property, (b) sewage and permanent domestic water supply systems shall be installed in each proposed subdivision and connections thereto made from each lot within the subdivision, (c) all abandoned water wells within the proposed subdivision shall either be destroyed or be retained subject to a Certificate of Exemption in compliance County of Ventura Code.
- Section 8209-5. As a condition of approval of any subdivision, the tentative map for which is filed no sooner than 30 days after the adoption of any applicable drainage or sanitary sewer plan

for a particular drainage or sanitary sewer area, the subdivider may be required to pay fees or consideration in lieu thereof for the purpose of defraying the actual or estimated costs of constructing planned drainage facilities for the removal of surface and storm waters from local or neighborhood drainage areas and of constructing planned sanitary sewer facilities.

Commented [MJ4]: We don't need to list these, they are already summarized.

Coastal Zone and Non-Coastal Zone Ordinances

The County of Ventura Coastal Zoning Ordinance (CZO) regulates all proposed development in the Coastal Zone of Ventura County; areas outside of this zone are regulated by the Non-Coastal Zoning Ordinance (NCZO). Many of the provisions of the Coastal Zone and Non-Coastal Ordinance are similar to those in the Subdivision Map Act. In relation to water quality, T~~hough provisions differ given the proposed land use, generally t~~hese ordinances require:

- Obtaining a permit or zoning clearance prior to: (a) constructing or expanding a septic system; (b) constructing, destroying or rehabilitating~~expanding a~~ water well~~s~~, and (c) constructing private water storage and distribution system~~facilities~~.
- ~~A~~ 100- to 300-foot setback~~s~~ from water channels and prohibition of~~s~~ obstruction~~s~~ to~~of~~ drainage courses.
- Development to be undertaken in accordance with conditions and requirements established by the Ventura Countywide Stormwater Quality Management Program, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS063339 and the Ventura Stormwater Quality Management Ordinance No. 4142 and as these permits and regulations may be amended.
  - Construction activity including clearing, grading or excavation that requires a grading permit shall be undertaken in accordance with any conditions and requirements established by the NPDES Permit or other permits which are reasonably related to the reduction or elimination of Pollutants in Stormwater from the construction site.
  - Preparation of a Stormwater Pollution Control Plan or Stormwater Pollution Prevention Plan for construction activities.
  - ~~Generally new development or redevelopment projects affecting 5,000 square feet or greater must I~~incorporation of~~e~~ post-construction stormwater quality design principals for new development or projects affecting 5,00-square feet or greater, details are provided in the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures.
- ~~A unique provision in the NCZO is the definition of the Arroyo Santa Rosa/Tierra Rejada Groundwater Quality Impact Area. In this area, the ratio of developed floor area relative to the parcel size for a second dwelling unit is r~~Regulation~~ed~~ of developed floor area relative to parcel size to limit the amount of septic discharge to groundwater in the Arroyo Santa Rosa/Tierra Rejada Area.

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Ventura County Watershed Protection Act

This act established the Ventura County Watershed Protection District~~, its general purpose, and authorities~~. ~~Pursuant to the Act, the~~ The Watershed Protection District ~~is to:~~

- ~~provide~~s for ~~the~~ flood ~~control of flood~~ and storm water control~~s~~, ;
- ~~conserve~~s ~~such~~ water~~s~~ for beneficial ~~and~~ use~~ful purposes~~ by ~~spreading,~~ storing,

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retaining and recharging.~~causing to percolate into the soil;~~

conserve in any manner all or any of such waters and protecting from such flood or storm waters the watercourses, watersheds, public right-of-ways ic highways, life and and County property, in the District;

- preventing waste of water or diminution of the water supply y in, or exportation of water from groundwater basins within the County, the District;
- obtain, retain and reclaim drainage, storm, flood and other waters for beneficial use; and
- provide for the protecting on from erosion of beaches and shorelines and to providinge for the restoration of such beaches and shorelines.

Under the Act, Tthe Watershed Protection District has the power to undertakes projects consistent with its goalspurpose and to adopts and enforces corresponding regulations consistent with its purpose. The District has the power to prescribe, revise, and collect fees as a condition of development of land. A permit from the Watershed Protection District must be obtained for most activities in, on, over, under, or across the bed, banks, and overbank areas of local streams and channels.

County of Ventura Flood Plain Management Ordinance

This ordinance restricts and prohibits land uses or land alteration which may be dangerous to health, safety, and property due fromto modification or obstruction of flood waters or alteration of a water course. ItFurther, this ordinance requires that landuses vulnerable to floods be protected against flood damage at the time of initial construction. The Watershed Protection District implements the Flood Plain Management Ordinance through its encroachment and watercourse permit programs.

County of Ventura Building Code

Submittal of grading plans during thePermitted grading projects permitting process requires an applicant to evaluate site soils and geology and site drainage conditionspatterns prior to grading. ProjectSite design must include measures to detain or retain surface runoff.stormflows so that runoff is not appreciably different post-development and. Design must include measures to prevent erosion of slopes, such as vegetation, soil stabilizers, and rip rap. The County of Ventura requires (Building Code Section J112) that best management practices be used to prevent erosion and stormwater flows from discharging offsite.

County of Ventura Groundwater Conservation Ordinance

The purpose of Ordinance No. 4468, division 4, Chapter 8, Article 1 is to protect groundwater quality, supply and quantity by regulating the construction, maintenance, operation, use, repair, modification, and destruction of wells and engineering test holes in Ventura County. Such work requires obtaining a permit and approval from Ventura County Watershed Protection Districtthe respective agency authorized to regulate new well construction. Permits shall require compliance with all applicable standards set forth in the Ordinance, and in accordance with DWR California Well Standards Bulletins Nos. 74-81 and 74-90, and County of Ventura Water Well Standards Bulletin No. 74-9.

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SECTION 10.3 INTEGRATED REGIONAL WATER MANAGEMENT

After the passage of Proposition 50 in 2002, Integrated Regional Water Management (IRWM) became a new tool~~paradigm~~ for managing water resources ~~with the passage of Proposition 50 in 2002~~. The~~is~~ approach integrates ~~the many facets of~~ water resources management on a regional level, including water supply, water quality, flood management, ecosystem health~~,~~ and recreation through enhanced collaboration with various stakeholder groups.~~across geographic and political boundaries and diverse stakeholder groups~~. The Watersheds Coalition of Ventura County (WCVC) was formed as the IRWM group to develop and implement a plan to identify water management challenges, resolve conflicts over the best use of resources, bridge gaps in data, ~~find common ground,~~ and seek innovative solutions among stakeholders. A primary goal is implementation of projects and programs that efficiently address water management priorities.

The 2014 WCVC Integrated Regional Water Management Plan Goals are outlined as follows:

- Reduce dependence on imported water and protect, conserve and augment water supplies
- Protect and improve water quality
- Protect people, property and the environment from adverse flooding impacts
- Protect and restore habitat and ecosystems in watersheds
- Provide water-related recreational, public access, stewardship, engagement and educational opportunities
- Prepare for and adapt to climate change

Commented [MJ6]: We can leave this here, since that was a section in the IRWM Plan and 2019 update.

Grant funds made available through Proposition 50 (2002), Proposition 84 (2006), and Proposition 1 (2014)~~,~~ have leveraged local funds for project implementation. These funds helped communities, including disadvantaged communities, throughout Ventura County to enhance the availability of clean water supplies for the ~~benefit of~~ people and the environment, to protect ~~communities~~ from flood damage~~,~~ and to provide access to water-related recreation opportunities. WCVC participants benefit from the cost-sharing, collaboration~~,~~ and ~~effective~~ problem-solving opportunities ~~made possible by working together~~. The WCVC completed a 2019 amendment to the 2014 IRWM Plan, which was deemed compliant by the DWR with Proposition 1 IRWM Plan standards.

One example of an ongoing project partially funded through the IRWM Program with Proposition 84 grant funds is the Natural Floodplain Protection Program (NFPP), which is focused on preserving a critical section of the remaining floodplain in the Santa Clara River Watershed. A Floodplain Working Group was formed to develop the project and is comprised of the County's Watershed Protection District, the Ventura County Farm Bureau, The Nature Conservancy, and the Ventura County Resource Conservation District.

The Working Group developed the concept of incentivizing farmers to continue to farm in the floodplain, thus leaving their land undeveloped. This is done by offering to purchase flood (inundation) easements over private land within the floodplain. These easements cover working farmland, a use that is encouraged to continue under the easement. The farmers are financially compensated for keeping their property in the floodplain and giving up rights they may have to develop the land. The value of easements is established through negotiations with individual land owners and verified by an appraisal.

To date, almost 500 acres of flood plain within the Santa Clara River Watershed have been acquired through the Natural Floodplain Protection Program.

SECTION 10.4 EXISTING CONDITIONS

Ventura County covers approximately 1,873 square miles, a large proportion of which (860 square miles, over half a million acres) lies within the Los Padres National Forest. The coastal areas have a generally mild climate, with an average high temperature of 73 degrees Fahrenheit (ºF) in July and an average January low temperature of 45 ºF (Western Regional Climate Center web site at www.wrcc.dri.edu for Station 049285 Ventura, January 1900 to August 2013). Average rainfall in the coastal areas is 14.67 inches per year (Western Regional Climate Center web site at www.wrcc.dri.edu for Station 049285 Ventura, January 1900 to August 2013). Interior valleys without coastal influence have hotter summers (average high temperature of 93.20 ºF in July) and cooler winters (average low temperature of 44.35 ºF) but also modest average rainfall of 14.37 inches per year (California Irrigation Management Information System data provided from Station No. 219, Los Angeles region, September 2011 to November 2015 and Station No. 204, Los Angeles Region, January 2007 to August 2011).

The Region contains three~~four~~ major watersheds (and part of the Cuyama River Watershed), smaller coastal watersheds, and 24 DWR-designated~~3~~ basins (see **Figure 10-1** and **Figure 10-2**). This background report has organized information according to the major watersheds: Ventura River, Cuyama, Santa Clara River, and Calleguas Creek. A small portion of the Malibu Creek Watershed falls in Ventura County.~~;~~ F~~f~~or the purposes of this document, this area is included with information on the Calleguas Creek Watershed. The Oxnard Plain, while not a watershed is an important ~~water~~ feature in the county and is given its own discussion in the text.

Ventura River Watershed

The Ventura River Watershed is located in the northwestern portion of Ventura County and drains an approximately 228 ~~-~~square mile (145,920 acres) area. The watershed extends 33.5 miles from the steep Transverse Ranges of the Matilija Wilderness to the Pacific Ocean. The Matilija, North Fork Matilija, San Antonio, and Cañada Larga are the major tributaries. The watershed is unique in that developed land makes up only 13 percent of the watershed area (Ventura River Watershed Council 2015). Approximately half of the Ventura River Watershed is Forest Service land. This means the upper portion of the Ventura River Watershed is minimally developed and has large areas with good water quality and excellent aquatic habitat. A 30-mile portion of the upper fork of Matilija Creek and its tributaries are designated as Wild and Scenic Rivers. Most of the southern half of the watershed lies within unincorporated Ventura County.

Precipitation in the Ventura River Watershed varies greatly between seasons and across years. There are notable cycles of drought and flood. Most of the precipitation is in the form of rain, but a small portion of the upper watershed experiences snow. Most precipitation occurs during just a few storms between November and March; summer and fall months are typically dry. Many parts of the Ventura River and its tributaries are dry during the summer and fall months (Ventura River Watershed Council 2015).

The cities of Ojai and Ventura are located in the Ventura River Watershed as are the unincorporated communities of Meiners Oaks, Mira Monte, Oak View, and Casitas Springs. Land uses in the watershed are as follows:

- Federal land/National Forest 47.7%
- Undeveloped land 29.8%
- Agriculture 18.5%
- Urban uses 4% (3.1% in cities, 0.9% in unincorporated County)

Commented [MJ7]: Should update with recent general averages. Since drought conditions have been in effect since 2012.

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Surface Water

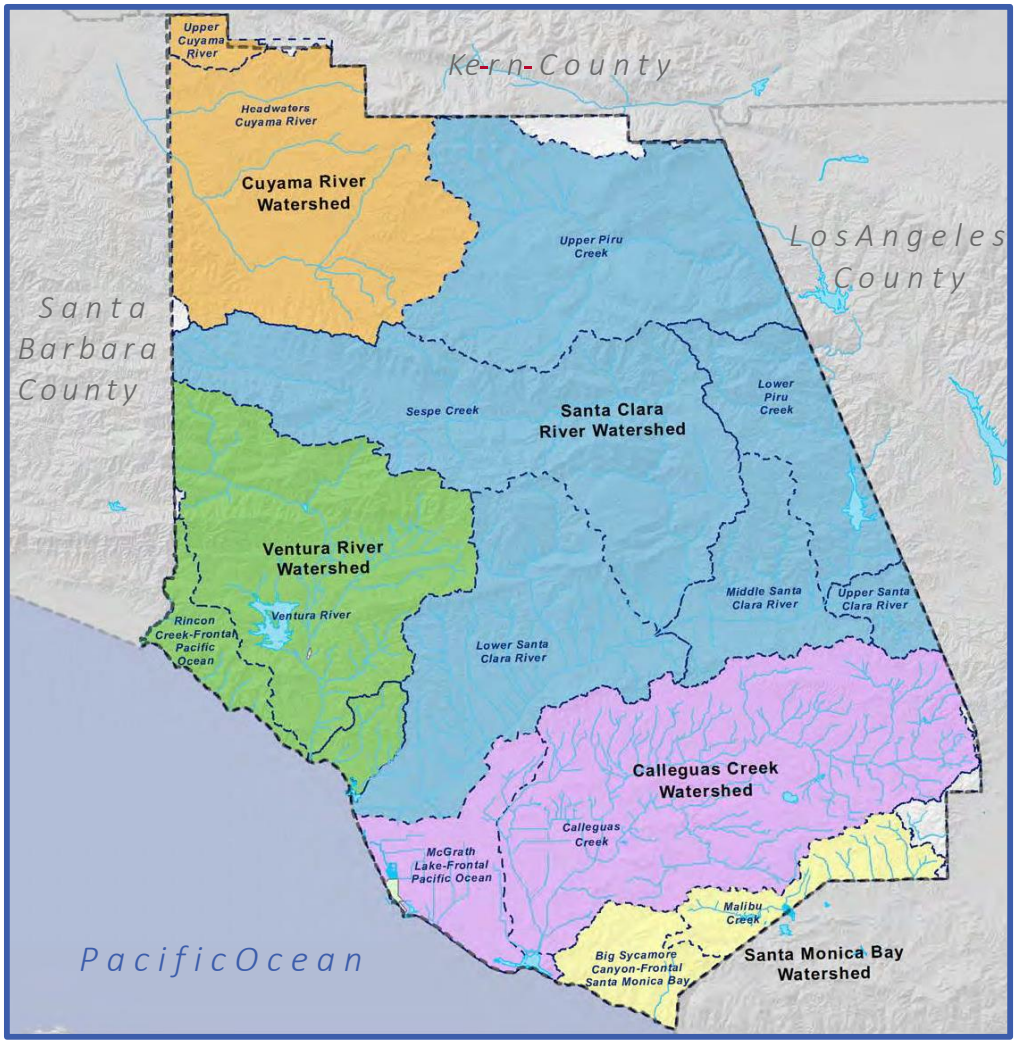
The major surface water features in the watershed are the Matilija Reservoir, Lake Casitas, and Ventura River.

Matilija Reservoir. Matilija Creek originates in the steep mountains in the northwest corner of the watershed and is considered the headwaters of the Ventura River. Matilija Dam captures the creek to create the Matilija Reservoir, which is owned by the Ventura County Watershed Protection District. Matilija Dam was built in the late 1940s for the purpose of providing irrigation water to the western Ojai Valley. Matilija Reservoir originally provided for 7,018 acre-feet (AF) of water storage. However, the storage capacity of the reservoir has been significantly reduced by sedimentation and is now estimated to be only about 6500 AF (Tetra Tech 2009). The majority of the sediment was deposited during a few big storm years (USACE 2004). Matilija Reservoir no longer provides any water supply benefit. T~~In fact, t~~he dam is now considered an environmental liability. The dam prevents the natural flow of sand and sediment from the mountains to the beaches and it also blocks the endangered steelhead trout from upstream habitat. Since 1999, the Ventura County Watershed Protection District, in partnership with the US Bureau of Reclamation and the US Army Corps of Engineers, have evaluated means to remove the dam. The US Congress approved removal of the dam in 2007. However, dam removal efforts have been stalled by the complicated process of removing the sediment in the reservoir, while protecting fish and wildlife and by significant cost. Efforts to remove the dam are ongoing. In March 2016 the Dam Oversight Group completed an evaluation of three different dam removal concepts, including features to handle the estimated eight million cubic yards of sediment and mitigations for water supply, water quality, and fisheries~~. The next step is to develop a funding plan.~~

Lake Casitas. Lake Casitas, also called Casitas Reservoir, is the largest reservoir in the Ventura River Watershed, with a capacity of 254,000 AF. The approximate safe yield is 20,000 AFY. When full, the reservoir covers a surface area of 4.3 square miles and has 32 miles of shoreline. Source water for Lake Casitas is direct rainfall on the lake surface, local watershed runoff from Coyote and Santa Ana Creeks, and diversions of the Ventura River made through the Robles Diversion Facility. The lake is operated by the Casitas Municipal Water District (Casitas). The primary purpose of Lake Casitas is to supplement local groundwater. Local groundwater comes from mostly unconfined aquifers whose available supply varies greatly based on rainfall and streamflow conditions. In dry periods, local wells can go dry and water demands are then met using water from Lake Casitas. Casitas ~~Municipal Water District~~ is the primary and/or backup water supply for nine retail water purveyors and for some individual agricultural customers with groundwater wells (Casitas Municipal Water District 2016). Casitas Municipal Water District estimates that there are 70,288 persons within its service area and 8.4 square miles (~5,400 acres) of irrigated crops (Casitas Municipal Water District 2016).

Ventura River. The Ventura River gives its name to the watershed. The condition of the river varies widely over its journey from the mountains to the ocean. The river is typically categorized in five segments:

- The segment above Robles Diversion. Here the river is in steep and narrow terrain.
- The segment below Robles Diversion and above San Antonio Creek. This segment is less mountainous and has a gentle gradient. The Robles Diversion diverts from the west bank of the River. Below the diversion the river widens and becomes a braided channel. Until the confluence with San Antonio Creek, the river is commonly dry – about 80 percent of the time there is no significant flow in the section (Cardno-Entrix 2012).



Ventura County 2040 General Plan

Figure 10-1:
Ventura County Watersheds

Map Date: December 02, 2016

Source: Kennedy/Jenks Consultants, 2016.

0 7.5 15 Miles

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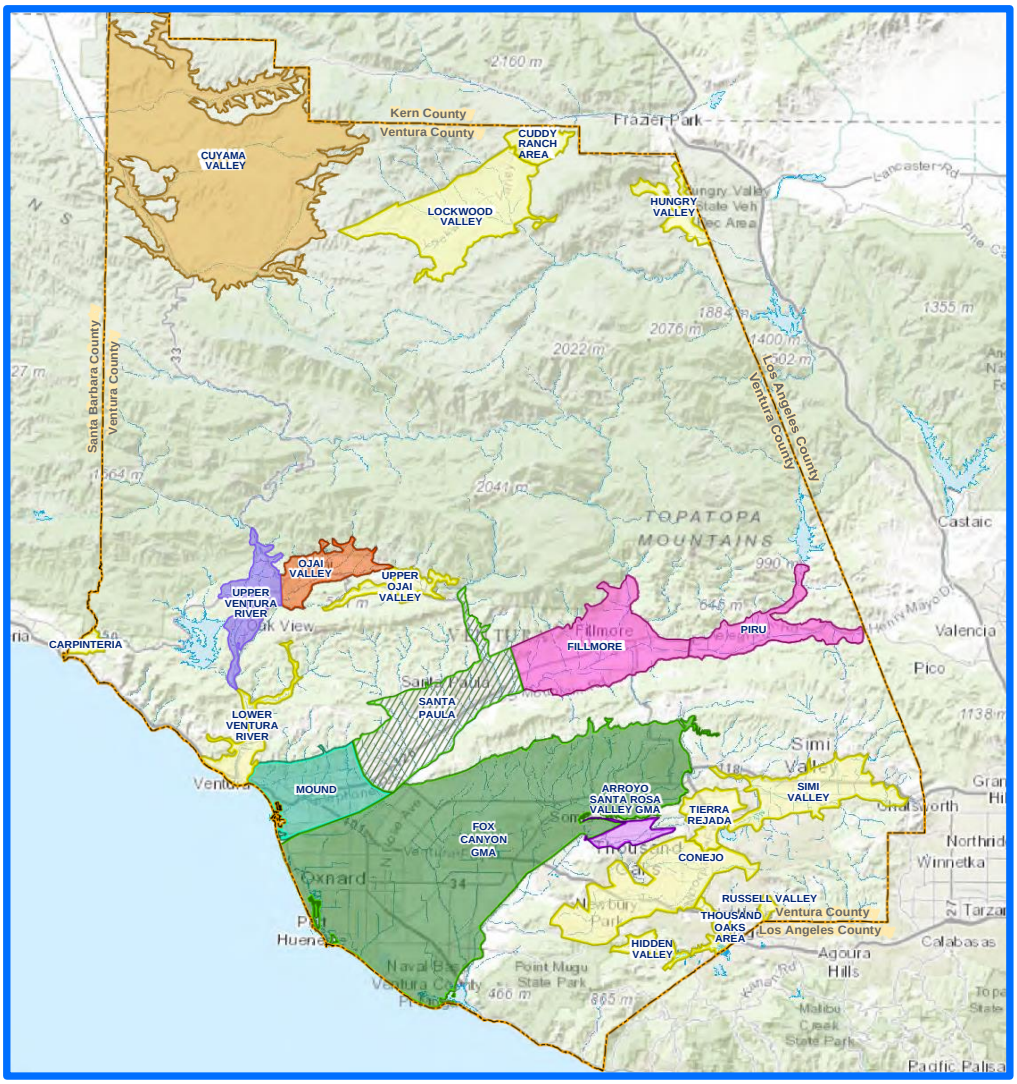
Ventura County Boundary
Rivers/Streams
Water Bodies

Subwatersheds
Calleguas Creek Watershed
Cuyama River Watershed
Santa Clara River Watershed
Santa Monica Bay Watershed
Ventura River Watershed



Ventura County 2040 GENERAL PLAN

Figure 10-2:
Groundwater Basin Oversight

Map Date: December 2017
Source: Kennedy/Jenks Consultants, 2017

0 7.5 15 Miles

Ventura County
Rivers/Streams
Water Bodies

Groundwater Management Agency

- Arroyo Santa Rosa Valley GMA
- Cuyama Valley Groundwater GSA
- Fillmore and Piru Basins GSA
- Fox Canyon GMA
- Mound Basin GSA
- No Agency
- Ojai Basin GMA
- Upper Ventura River GSA
- Adjudicated Basin

- San Antonio Creek Confluence to Foster Park. Here the river again narrows. San Antonio Creek enters in this segment. In wet periods this portion of the river can also receive water from "daylighting" groundwater, where groundwater is forced to the surface as a result of geologic constriction near the downstream margin of the upper Ventura River basin. This reach typically flows year-round except in multiyear dry periods (Ventura River Watershed Council 2015).
- Foster Park to Ventura River Estuary. In this reach, the river receives treated effluent from the Ojai Valley Sanitation District wastewater treatment plant. The effluent is a significant input to river flow. Cañada Larga Creek, and several minor drainages (Manuel Canyon Creek, Cañada de San Joaquin, and Dent Drain) also enter in this segment (Ventura River Watershed Council 2015). In this portion of the river, the City of Ventura can divert surface water via subsurface collectors and shallow wells. The wells are located at Foster Park, upstream of the Ojai Valley Sanitation District point of discharge. Between 2010 and 2014, annual production by the City of Ventura from the Ventura River averaged 3,051 AFY.
- The Ventura River Estuary. The estuary is a shallow body of water where the Ventura River mixes with salt water. During the dry season a sandbar typically separates the estuary from the ocean; when storms breach the sandbar, the flow of the river directly enters the Pacific Ocean (Ventura River Watershed Council 2015).

Groundwater

There are four major groundwater basins in the Ventura River Watershed: ~~the~~ Upper Ojai (DWR Basin 4-00-1), Ojai Valley (DWR Basin 4-002), Upper Ventura River (DWR Basin 4-003.01), and Lower Ventura River (DWR Basin 4-003.02) (see **Figure 10-2**). These are unconfined groundwater basins and fluctuate greatly depending on seasonal conditions~~precipitation~~.

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In 2014, DWR ranked California's groundwater basins as "high-," "medium-," "low-," or "very low-" priority. This ranking was based on the following:

- Overlying population
- Projected growth of overlying population
- Public supply wells
- Total number of wells
- Irrigated acreage overlying the basin
- Reliance on groundwater as the primary source of water
- Impacts on the groundwater; including overdraft, subsidence, saline intrusion, and other water quality degradation
- Other information determined to be relevant by Department of Water Resources

~~In this ranking process the~~ Ojai Valley ~~groundwater basin~~ and Upper Ventura River ~~groundwater~~ basins were deemed high- and medium- ~~-~~priority, respectively ~~basins~~. Dependency on groundwater in these basins is a primary ranking factor.~~The great dependency on groundwater in this area was a primary factor in the ranking.~~

The Ojai Valley ~~Groundwater~~ Basin is currently managed by the Ojai Basin Groundwater Management Agency (O~~Bjai Basin~~GMA) and this agency will be the GSA~~groundwater sustainability agency~~ under SGMA. The O~~Bjai Basin~~GMA has submitted an Alternative to the GSP which demonstrates that the Ojai Basin is already being sustainably managed, in-lieu of preparing a GSP.

Casitas Municipal Water District, Meiners Oaks Water District, Ventura River Water District, the City of Ventura and the County of Ventura arehave started the process of forming thea new groundwater sustainability agencyUpper Ventura River Groundwater Sustainability Agency for the Upper Ventura River Groundwater Basin.

Important Recharge Areas

In the Ventura River Watershed, groundwater basins are typically surrounded by steep, impermeable bedrock mountainous areas of impermeable bedrock. Recharge primarily occurs within the permeable unconsolidated deposits of gravels and sands underlyingwithin stream channels and tributaries.

In order to increase groundwater storage and recharge in the Ojai Valley Groundwater Basin, the San Antonio Spreading Grounds Rehabilitation Project was completed by the Ventura County Watershed Protection District in 2014 and final approval given in 2017 to divert creek flow. It is anticipated the project will increase recharge to the basin by an average of 126 AFY.

Other Water Supplies

The Ventura River Watershed relies entirely on local water. No imported water is used in the watershed or is readily accessible. Both Casitas Municipal Water District and the City of Ventura hold entitlements to State Water Project water (5,000- and 10,000-AFY-acre-feet per year [AFY] respectively). , however tThere areis currently no means ofto delivery of imported water to the watershed. However, tThe City of Ventura is currently evaluating options for delivery of those entitlements, a report is due at the end of 2017.

Water Quality

As described in **Section 10.2**, the Los Angeles RWQCB has identified beneficial uses for the Ventura River Watershed. **Table 10-2** is taken from the *Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties* and provides detail on beneficial uses for specific Ventura River reaches. The Los Angeles LARWQCB has developed permit programs and the TMDLs to protect these beneficial uses. The following TMDLs are in place for portions of the Ventura River Watershed:

- Algae, Eutrophic Conditions, and Nutrients in the Ventura River including the Estuary and its Tributaries – TMDL effective June 28, 2013
- Ventura River Estuary Trash – TMDL effective March 6, 2008

In addition to the existing TMDLs, other TMDLs may be developed as several Ventura River Watershed areas are included in California's 303(d) List (list of impaired waters). Identified impairments in the Ventura River and its tributaries include fish barriers and pumping/water diversion, total dissolved solids, aluminum, and mercury. Rincon Beach and the Ventura Harbor are listed for impairments due to bacteria. The Ventura Marina jetties are listed as impaired with DDT and PCBs.

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TABLE 10-2
DESIGNATED BENEFICIAL USES IN THE VENTURA RIVER WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
VENTURA COUNTY COASTAL STREAMS																						
Los Sauces Creek	P*	I	I	I	I						I	I				E			I	I		
PovertyCanyon	P*	I	I	I	I						I	I				E			I	I		
MadranioCanyon	P*	I	I	I	I						I	I				E			I	I		
JavonCanyon	P*	I	I	I	I						I	I				E			I	I		E
Padre Juan Canyon	P*	I	I	I	I						I	I				E			I	I		
McGrathLake									P					E		E		Ee				E
Big Sycamore Canyon Creek	P*				I						I	E				E			P	P		E
Little Sycamore Canyon Creek	P*										I					E		E		P		
VENTURA RIVER WATERSHED																						
Ventura River Estuary [c]							E		E		E			E	E	E		Ee	Ef	Ef	E	E
Ventura River Reach 1 (Ventura River Estuary to Main St.)	P*	E		E	E	E					E	E				E		E	E	E		E
Ventura River Reach 2 (Main St. to Weldon Canyon)	P*	E		E	E	E					E	E				E		E	E	E		E
Cañada Larga	P*		I	I	I	I					I	I				E			I	I		
LakeCasitas	E	E	E	E	P	P		P			E	E				E		E				
Lake Casitas tributaries	E*			P	E						E	E				E		P	E	E		E
Ventura River Reach 3 (Weldon Canyon to Casitas Vista Rd.)	P*	E		E	E	E					E	E				E		E	E	E		E
Ventura River Reach 4 (Casitas Vista Rd. to San Antonio Creek)	P*	E		E	E	E					E	E				E		E	E	E		E
Ventura River Reach 4 (San Antonio Creek to Camino Cielo Rd.)	E	E	E	E	E	E					E	E				E		Eg	E	E		E
CoyoteCreek	P*				E						E	E				E			E	E		E
San Antonio Creek (Ventura River Reach 4 to Lion Creek)	E	E	E	E	E						E	E				E			E	E		E
San Antonio Creek (above Lion Creek)	E	E	E	E	E	E					E	E				E			E	E		E
Lion Creek	I*	I	I	I							I	I				E						
Reeves Creek	I*	I	I	I	I						I	I				E			I	I		
Mirror Lake	P*				E						E					E						E
Ojai Wetland	P*										E					E						E

TABLE 10-2
DESIGNATED BENEFICIAL USES IN THE VENTURA RIVER WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
VENTURA COUNTY COASTAL STREAMS																						
Ventura River Reach 5 (above Camino Cielo Rd.)	E	E	E	E	E	E					E	E				E		Eg	E	E		E
Matilija Creek Reach 1 (Ventura River Reach 5 to Matilija Reservoir)	P*				E							E				E			E	E		E
MatilijaCreek Reach 2 (above Matilija Reservoir)	P*				E							E				E			E	E		E
Murietta Canyon Creek	P*				E							E				E			E	E		E
North Fork Matilija Creek	E*	E	E	E	E						E	E				E		E	E	E		E
MatilijaReservoir	E			E	E	E					E	E				E			E	E		E

E: Existing beneficial use
P: Potential beneficial use
I: Intermittent beneficial use
E,P, and I: shall be protected as required
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some destinations may be considered for exemption at a later date.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
c: Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).
e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
g: Condor refuge.

Source: Table 2-1. Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (electronic copy accessed December 27, 2016).

Available Water Supplies

~~The sources of water supply in the Ventura River watershed include surface water from Lake Casitas, Ventura River, and groundwater.~~ Available surface water supplies ~~(~~from Lake Casitas~~)~~ are reported~~have been quantified~~ by Casitas Municipal Water District (20~~20~~16) as 99,836-AF~~20,000 acre-feet (~~AF~~)~~. The City of Ventura draws approximately 20% of its water resources~~produced an average of 3,051 AFY from 2010 to 2014~~ from the Ventura River. ~~It is estimated that private landowners may divert as much as 1,100 AFY from the Ventura River, but records are not available to confirm the long-term Ventura River surface water supply available to private users (SWRCB eWRIMS database).~~

~~Estimating groundwater supply is quite a bit more difficult.~~ To understand long-term yield of a groundwater basin, recharge from precipitation must be estimated, recharge from irrigation and other return flows must be calculated, and underflow and outflows to and from adjacent groundwater basins must be assessed~~nalyzed~~. There is not an accepted long-term yield for any of the groundwater basins in the Ventura River Watershed. However, the DWR~~epartment of Water Resources~~ has made rough estimates of groundwater "budgets" by evaluating available groundwater studies and ~~by evaluating~~ past ~~groundwater~~ extractions. The VCWPD~~entura County Watershed Protection District has also~~ prepare~~d~~ estimates of groundwater use in various~~different~~ basins. ~~Groundwater use is only a rough estimate of supply. Groundwater extractions may include water recharged in the distant past and may not be representative of the long-term yield.~~ **Table 10-3** provides an estimate of supply by groundwater basi~~n.n~~ in the Ventura River Watershed.

~~The difference in the high and low supply estimates document the lack of data on groundwater supply.~~

TABLE 10-3
GROUNDWATER SUPPLY ESTIMATES
VENTURA RIVER WATERSHED

Basin	DWR Estimate of Groundwater Budget (AFY)	Past Groundwater Extractions (AFY)	Notes
Upper Ojai	1,320	700	1
Ojai Valley	3,150 to 3,300	8,404	2, 3
Upper Ventura	None	10,392	4, 5
Lower Ventura	1,200	400	6
Low Estimate Groundwater Supply Ventura River Watershed		*14,600*	7
High Estimate Groundwater Supply Ventura River Watershed		*21,300*	7

Notes:
1. DWR 2003, Basin 4-1
2. DWR 2003, Basin 4-2
3. Ventura County Watershed Protection District 2015a
4. DWR 2003, Basin 4-3.01
5. Ventura County Watershed Protection District 2015a
6. DWR 2003, Basin 4-3.02
7. Rounded to nearest 100 AF

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A total estimate of supply in the Ventura River Watershed is provided in **Table 10-4**.

TABLE 10-4
CURRENT (2016) TOTAL WATER SUPPLY ESTIMATES
VENTURA RIVER WATERSHED

Supply Source	Annual Volume (AF)
Surface Water, Lake Casitas	20,000
Surface Water, Ventura River	3,051
Groundwater (see Table 10-3)	14,600 to 21,300
Low Estimate (rounded to nearest 100 AF)	*37,700*
High Estimate (rounded to nearest 100 AF)	*44,400*

Water Suppliers

There are five major water suppliers (entities serving more than 1,000 persons) in the Ventura River Watershed as well as 11 mutual water companies. ~~Persons or businesses in the~~Water is~~Ventura River Watershed are~~ also supplied by private wells and surface water diversions.

M~~The m~~ajor urban suppliers, documented in **Table 10-5** provide water to the cities of Ojai and Ventura~~,~~ and ~~also~~ to the unincorporated County. These are also mapped in **Figure 10-3**.

The 11 mutual water companies provide water to their stockholders and members. These mutual water companies ~~can~~ serve as few as 10 people and up to 800 persons. M~~The m~~utual water companies, documented in **Table 10-6** provide water almost exclusively to residents and businesses in the unincorporated County (see ~~also~~ **Figure 10-3**).

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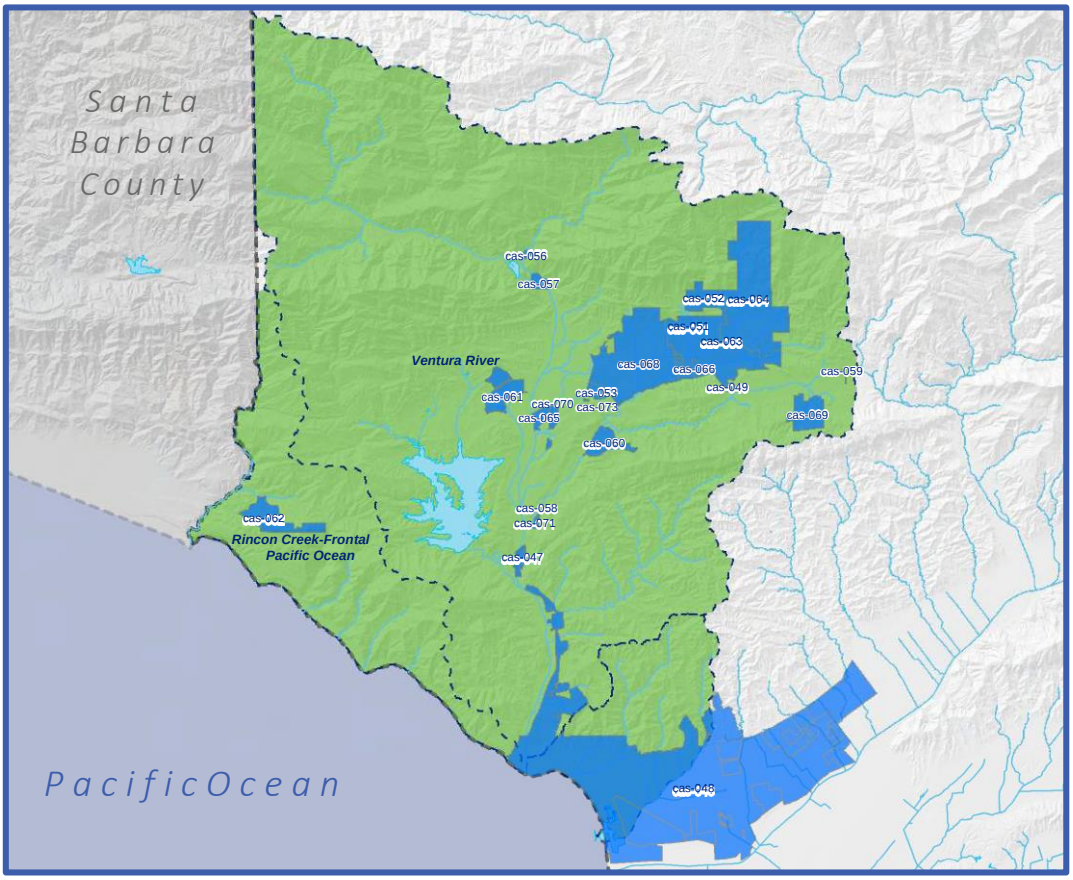
TABLE 10-5
MAJOR WATER SUPPLIERS - VENTURA RIVER WATERSHED

Supplier/Primary Source(s)	Type	Area Served	Estimated Population Served	Annual Water Supplied*
Casitas Municipal Water District Surface water from Lake Casitas	Special District	City of Ojai, portion of the City of Ventura, coastal Rincon, Upper Ojai, and Ventura River Valley.	~70,300	~16,700 AF, includes ag sales and sales to other agencies
Ventura Water Lake Casitas water, Ventura River, groundwater (Oxnard Plain, Mound, Santa Paula Basins), recycled water	City	City of Ventura and 1.5 square miles (~960 acres) within City's sphere of influence. City falls within both the Ventura and Santa Clara Watersheds.	~112,400	~16,700 AF, a portion of this supply is provided by Casitas Municipal Water District (5-year average 2011 to 2015 City of Ventura 2016a)
Golden State Water Company Ojai Valley groundwater and Lake Casitas	Investor Owned Utility	City of Ojai and adjacent unincorporated County.	~8,200	~2,300 AF, a portion of this supply is provided by Casitas Municipal Water District.
Ventura River Water District Upper Ventura River groundwater and Lake Casitas	Special District	Part of Casitas Springs, Burnham Road area west of the Ventura River, northern portion of Oak View	~6,000	~1,400 AF, a portion of this supply is provided by Casitas Municipal Water District
Meiners Oaks Water District Upper Ventura River groundwater and Lake Casitas water	Special District	Portion of the Meiners Oaks Community east of the Ventura River.	~4,000	~1,100 AF, a portion of this supply is provided by Casitas Municipal Water District

*Estimated based on records of water supplied 2010 to 2015, rounded to nearest 100 AF. Does not account for planned future expansion of demands and supplies.

Source: Ventura River Watershed Council 2015 Table 3.4.1.2.1, Casitas Municipal Water District 2016, City of Ventura 2016a, City of Ventura 2016b, Meiners Oaks Water District 2014, Ventura River Water District http://venturariverwd.com/about-2/ accessed December 29, 2016.



WATER PURVEYOR

CASITAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
Casitas (cas-047)	Casitas MWC
Casitas (cas-048)	City of San Buenaventura
Casitas (cas-048)	City of Buenaventura
Casitas (cas-049)	Matilija Canyon Park Water System
Casitas (cas-068)	Golden State Water Company - Ojai
Casitas (cas-051)	Gridley Road Water Group
Casitas (cas-052)	Hermitage MWC
Casitas (cas-053)	Krotona Institute of Theosophy
Casitas (cas-056)	North Fork Springs MWC
Casitas (cas-063)	Ojai Water Conservation District
Casitas (cas-057)	Ojala
Casitas (cas-058)	Old Creek Road MWC
Casitas (cas-059)	Oviatt Water Association
Casitas (cas-060)	Rancho del Cielo MWC
Casitas (cas-061)	Rancho Matilija MWC
Casitas (cas-062)	Rincon Water and Roadworks
Casitas (cas-064)	Senior Canyon MWC
Casitas (cas-065)	Sheriff's Honor Farm
Casitas (cas-066)	Siete Robles MWC
Casitas (cas-069)	Sulphur Mountain Road Water Association
Casitas (cas-070)	Tico MWC
Casitas (cas-071)	Tres Condados
Casitas (cas-073)	Villanova Road Water Well Association

Figure 10-3:
Water Purveyors in
Ventura River Watershed

Ventura County Boundary
Rivers Streams
Water Bodies
Subwatersheds
Ventura River Watershed

Water Purveyor
Casitas Wholesale District

0 4 8 Miles

N

Map Date: December 02, 2016
Source: Kennedy/Jenks Consultants, 2016.

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TABLE 10-6
MUTUAL WATER COMPANIES VENTURA RIVER WATERSHED

Supplier	Type	Area Served	Estimated Population Served
Casitas Mutual Water Company	Mutual	Residents in Casitas Springs, west of Highway 33.	~250
Gridley Road Water Group	Mutual	Agriculture in the Gridley Road and Grand Avenue area in eastern Ojai Valley.	~44
Hermitage Mutual Water Company	Mutual	Agriculture and several large residential estates in the area of Gridley and Senior canyons north of the Ojai Valley.	~35
North Fork Springs Mutual Water Company	Mutual	Residential users located along Highway 33 north of the City of Ojai and east of the Matilija Reservoir, in Los Padres National Forest.	~10
Old Creek Road Mutual Water Company	Mutual	Residential users along East Old Creek Road.	~12
Rancho Matilija Mutual Water Company	Mutual	Agricultural parcels in the Rancho Matilija subdivision, north of Baldwin Road and west of Meiners Oaks.	0
Rancho del Cielo Mutual Water Company	Mutual	Residential and agricultural users along Creek Road along San Antonio Creek.	~18
Senior Canyon Mutual Water Company	Mutual	Northeast end of the Ojai Valley, north of Reeves Creek, east of Carne Road.	~800
Siete Robles Mutual Water Company	Mutual	Housing tract east of the City of Ojai	~245
Sisar Mutual Water Company	Mutual	Summit area of the Upper Ojai Valley	~325
Tico Mutual Water Company	Mutual	Residential are in Mira Monte, west of Highway 33	~77

Source: Ventura River Watershed Council 2015 Table 3.4.1.3.1

Private wells and water diversions serve the remaining agricultural and domestic water users ~~in the watershed~~. Twenty-one different entities are registered with the SWRCB~~tate Water Resources Control Boards~~ as having rights to withdraw surface water from the Ventura River Watershed (SWRCB 2014 cited in Ventura River Watershed Council 2015). There are 442 active wells in the Ventura River watershed (Ventura River Watershed Council 2015). It is estimated that these private users extract as much as 2,100 AF (Hydrometrics 2015).

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Estimates of Water Demand

In 2014, the Ventura County Watershed Protection District undertook an estimate of countywide water demand. This effort used data from water agencies and groundwater reporting (where available). However large geographic areas of Ventura County are served by~~not served by a water agency, but rather~~ private wells or surface water diversions. Also, not all groundwater production is reported. Further, the agricultural groundwater extractions~~production~~ that are~~is~~ reported are~~is~~ not metered in many areas and~~but rather~~ estimated from electrical use or crop type. ~~To fill in data gaps a~~A demand calculator was used to fill in data gaps. In this case the Integrated Water Flow Model (IWFM) Demand Calculator developed by the DWR~~California Department of Water Resources~~ was used. This is a non-proprietary model that computes water demands for crop~~ped~~ areas using ~~specified~~ climatic and irrigation information. The IWFM calculator also estimates urban water requirements and return flows based on population and per-capita water usage. The resulting report, *County of Ventura 2013 Water* Supply and Demand, estimates current demands for each of the major watersheds, including the Ventura River Watershed. Results of the study are provided in **Table 10-7**.

TABLE 10-7
ESTIMATED VENTURA RIVER WATERSHED DEMAND

Watershed/Sub-watershed	Total Agricultural Demand (AF)	Total Municipal Demand (AF)	Total Demand (AF)
Rincon	5,727	1,848	7,575
Ventura River	11,745	13,351	25,096
Subtotal (rounded to nearest 100 AF)	*17,500*	*15,200*	**32,700**

Source: Hydrometrics 2015. Table 6.

~~Notable in~~ **Table 10-7** is the distribution of demands. Agricultural demand is estimated to be slightly higher than municipal demand.

Demand Management

Table 10-8 summarizes the various water conservation actions ~~undertaken~~ in the Ventura River Watershed. **Table 10-8** summarizes demand management measures ~~undertaken~~ under normal conditions as well as ~~those extra ordinary~~ efforts taken during drought periods. Conservation actions intensify during drought. ~~Most a~~Agencies ~~continuously~~ provide public information on how to conserve water, however these efforts increase~~expand exponentially~~ during dry periods. ~~During normal conditions a water provider may just provide public information on their website or billing inserts; during drought, the water provider is likely to take out radio advertisements, place roadway signs, and run conservation contests to bring attention to the drought. Many agencies offer water use surveys to customers upon customer request; during drought the water agencies contact high water users and offer water efficiency incentives.~~ The demand management measures undertaken during drought depend on the severity and length of drought. ~~In the beginning of a drought outdoor irrigation may be limited to 3 days a week, as drought continues outdoor watering may be restricted to one day a week or even prohibited all together.~~

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TABLE 10-8
DEMAND MANAGEMENT MEASURES IN VENTURA RIVER WATERSHED

Agency	Conservation Measures in Effect at All Times							Conservation Measures that May Be Implemented in Drought				
	Public Information and Outreach	Water Waste Prohibitions	Metering	Volume-Based Pricing	Water Efficiency Surveys Offered to Customers	Rebates for High Efficiency Plumbing Fixtures	Turf Removal Incentives	Drought Surcharge	Limitations on Irrigation/ Outdoor Watering	Mandatory Reductions/ Allocation	Fines	Suspension of new water connections
Casitas Municipal Water District	X	X	X	X	X	X	X		X	X	X	X
Ventura Water	X	X	X	X	X	X	X	X	X	X	X	X
Golden State Water Company	X	X	X	X	X	X		X	X			
Ventura River Water District	X		X	X	X*	X*	X*	X	X		X	
Meiners Oaks Water District	X		X	X	X*	X*	X*	X		X	X	X
Ojai Basin Groundwater Management Agency	X		X	X								

*Offered by Casitas Municipal Water District

Sources: Casitas Municipal Water District 2016; City of Ventura 2016b; Golden State Water Company 2011; Ventura River Water District 2016; Meiners Oaks Water District 2016.

Comparison of Supply and Demand

~~While it is difficult to quantify, i~~It is estimated that there is between 157,436~~37,700 AF to 44,400~~ AF of annual water supply in the Ventura River Watershed. This supply will vary given drought and operational conditions. Estimated demand is approximately 14,508~~32,700~~ AF~~ and is only about 13 percent greater than demand~~.

~~There are concerns about long-term supplies. SGMA could result in a need to reduce groundwater pumping.~~ Some water agencies in the Ventura River Watershed are evaluating projects to increase supply~~. Several mutual water agencies that receive water from Casitas Municipal Water District have sent letters to Casitas Municipal Water District urging them to pursue options to bring imported water into the watershed~~. The City of Ventura is pursuing additional use of recycled water, including indirect and direct potable reuse and is studying ocean desalination (City of Ventura 2016b).

Water-Related Challenges

Below are the water related challenges for the Ventura River Watershed as of early 2020~~late 2016~~:

Drought and Supply Variability

The 70,000 people in western Ventura County have been impacted by ~~the~~ drought conditions that began in 2012. Due to lack of distribution infrastructure and required agreements, imported water cannot be delivered to western Ventura County and groundwater supply is very limited. Recharge to groundwater is primarily from Ventura River flow and smaller amounts from direct precipitation, percolation from lesser creeks and channels, and mountain~~front~~ recharge. The groundwater in the area is relatively shallow and responds quickly to rainfall ~~or lack thereof~~. Wells operated by Meiners Oaks Water District have gone dry due to low water levels in the Ventura River and ~~they~~ are now entirely dependent on purchases of Lake Casitas water. Ventura River Water District ~~has only one of its four wells still in operation;~~operates six wells and customer needs are ~~being~~ served through purchases of Lake Casitas water supplies. ~~Since 2011, purchases of Lake Casitas water have increased by 1,000 percent. The lake is an important, but dwindling, resource with both water quality and water supply concerns.~~

As of early 2020, t~~T~~he ~~water level~~water volume in Lake Casitas is slightly above~~has dropped below~~ 40 percent of its "full" volume ~~since the onset of the drought in 2012~~. Low water levels in 1968 resulted in significant thermal stratification and anoxic (without dissolved oxygen) conditions, rendering the lake generally unsuitable for aquatic life. The low oxygen levels also created an environment where manganese and hydrogen sulfide, normally trapped in sediments, became soluble, causing the lake water to have color and odor issues~~a brown color and bitter metallic taste~~. There were also large blue-green algae blooms (Casitas Municipal Water District 2013). Casitas Municipal Water District ~~has had to~~ installed a second lake aeration system to avoid anoxic conditions.

Mandatory drought reductions are in place for customers in the Ventura Watershed. Depending on the water supplier, customers need to reduce water use by up to 30 percent.

Water for Environmental Purposes

As water agencies plan to rehabilitate infrastructure or develop more supply there are potential~~can be~~ conflicts with protecting environmental resources~~ and demonstrates the influence laws and regulations, such as the Endangered Species Act, have on water resources.~~

The Robles Diversion is the facility that diverts Ventura River water to Lake Casitas. A "Biological Opinion," (BO) written by the National Marine Fisheries Service includes requirements to provide flow for the migration and passage of the steelhead up and down the main stem of the Ventura River and past the diversion during the steelhead migration season (January 1 to June 30). Implementation of the flow release requirements of the BO started in 2005. The Robles Fish Passage Facility became operational in 2006. There is concern by Casitas Municipal Water District that future changes to the BO could require costly infrastructure and impact diversions to, and the water supply within, Lake Casitas.

In 2008, the City of Ventura began conducting studies of Ventura River flow conditions in order to operate its Foster Park facilities in a more sustainable manner. The City is working towards developing a pumping regime that will balance production demands with environmental concerns. Presently, the City has voluntarily adopted a production schedule that limits its pumping based on annual rainfall conditions. ~~Ventura Water intends to work with experts to ascertain a pumping regime that will balance production with environmental concerns and is presently studying the relationship between groundwater production and surface flows.~~

Quality

W~~In the Ventura River Watershed w~~ater quality is generally not an impairment for domestic water supply~~to using water for domestic water supply~~. ~~However, o~~Other beneficial uses such as fisheries~~habitat~~, wildlife habitat~~,~~ and recreation are negatively affected by water quality in the Ventura River. W~~The majority of w~~ater quality problems involve eutrophication (excessive nutrients, nitrogen, and the resulting algae blooms) and affect the portion of the river from Foster Park to the Estuary. M~~The m~~ajor nitrogen contributors to the Ventura River are~~were~~ identified by the L~~os Angeles~~ ARWQCB as~~:~~ ~~wet weather~~ runoff from urban areas, ~~wet weather~~ runoff from horse/livestock land uses, ~~wet weather~~ runoff from open space~~,~~ and discharges from the Ojai Valley Sanitary District Wastewater Treatment Plant. The Algae TMDL ~~was~~ adopted by the LARWQCB~~os Angeles Regional Water Board in December 2012. The TMDL~~ sets limits on the amount of nutrients that can be discharged from various sources~~,, and~~ requires upgrades to the sewage treatment plant~~, and~~ and requires~~widespread~~ implementation of BMPs to limit fertilizer and animal waste and other sources of nitrogen~~ from the river~~.

Cuyama Watershed

~~Only l~~Limited data is available on the portion of the Cuyama Watershed within Ventura County. The Cuyama Watershed originates in a remote mountainous area of Ventura County within the Los Padres National Forest~~,~~ but also falls within Kern, Santa Barbara, and San Luis Obispo counties. DWR~~The California Department of Water Resources~~ has categorized the Cuyama ~~Groundwater~~ Basin as being in "critical overdraft" and a GSA~~groundwater sustainability agency~~ is being formed. Based on information from the United States Geological Survey (USGS), the critical overdraft conditions of the Cuyama Groundwater Basin reflect extractions and uses outside of Ventura County. The portion inside Ventura County is referred to as the Ventucopa Uplands (USGS 2014). The area is lightly populated~~,~~ but is used for irrigated agriculture. The USGS estimates the groundwater supply in the Ventucopa Uplands to be approximately 22,000 AFY with domestic demands of only 8 AFY and agricultural demands of approximately 10,000 AFY. ~~Nevertheless, as a whole, the basin is in a condition of overdraft.~~

Oxnard Plain

The Oxnard Plain is an important geographic area for water resources (see **Figure 10-2**) and~~. The Oxnard Plain~~ supplies large amounts of groundwater for municipal users ~~including the county's largest city, Oxnard~~. It's estimated that the Oxnard Plain also supplies the water for more than half of the C~~e~~ounty's

$2.2 billion agricultural industry (Ventura County Agricultural Commissioner 2016). The Oxnard ~~Plain Groundwater Basin is a S~~subbasin ~~of the Santa Clara River Valley Groundwater Basin~~ (DWR Groundwater Basin Number 4-004.02) ~~. The Oxnard Plain Groundwater Basin is~~ an alluvial basin containing a collection of interconnected aquifers separated by layers of clay strata. The ~~Oxnard Plain Groundwater Basin can be generally~~subbasin is categorized into three parts: the Oxnard Forebay, the Upper Aquifer System (UAS) and the Lower Aquifer System (LAS).

The Oxnard Forebay is the unconfined portion of the subbasin~~Oxnard Plain Basin~~ generally located along the Santa Clar~~aita~~ River northeast of where the Pacific Coast Highway joins U.S. Highway 101 in the City of Oxnard. ~~The Oxnard Forebay is the primary means by which the Oxnard Plain Groundwater Basin is recharged.~~ The subbasin~~Forebay Basin~~ is recharged by infiltration from ~~the riverbed of~~ the Santa Clara River and spreading basins ~~constructed for that purpos~~e. ~~From the Oxnard Forebay, located in the upper most portion of the Oxnard Plain Basin, g~~Groundwater moves into the Upper and Lower Aquifer Systems because the clay layers which separate the aquifers are not continuous ~~at this location~~.

The ~~Upper Aquifer System (~~UAS~~)~~ comprises of the upper 500 feet of the confined portions of the Oxnard Subbasin~~Plain Basin~~ and~~which~~ includes a semi-perched zone and the Oxnard and Mugu aquifers. The UAS is hydraulically connected to the Pacific Ocean through the Oxnard and Mugu aquifers and is the route by which seawater ~~intrusion~~ enters the subbasin~~Oxnard Plain Basin~~. The ~~Lower Aquifer System (~~LAS~~)~~ ~~includes the deeper confined aquifers~~ includ~~es~~ing the Hueneme, Fox Canyon, and Grimes Canyon aquifers. The LAS is separated by an approximately 80-foot thick layer of silty clay which is continuous except near the ~~Oxnard~~ Forebay.

Because of its importance as a water source, there is ~~great~~ concern about the health of the Oxnard Subbasin~~Plain basin~~. The FCGMA~~In fact, the Fox Canyon Groundwater Management Agency (Fox Canyon GMA)~~ was formed in 1982 to control groundwater overdraft and to minimize ~~the threat of~~ seawater intrusion ~~in the Oxnard Plain~~. ~~A major goal of the~~ FC~~ox Canyon~~ GMA ~~is to~~ regulates groundwater from the Oxnard S~~s~~ubbasin ~~and operate the basin~~ at a safe yield. ~~However, today~~ DWR has characterized the basin as being in "critical overdraft". Evidence suggests that groundwater underlying~~in~~ the Oxnard Plain dropped below sea level as early as the 1940s. The annual overdraft is estimated to be 20,000 to 25,000 AFY (UWCD 2017b). This continued overdraft allows seawater intrusion and puts the area at risk of land subsidence.

Santa Clara River Watershed

The Santa Clara River headwater is at Pacifico Mountain in the San Gabriel Mountains and ~~it~~ flows ~~in a generally~~ west~~ern direction~~ for approximately 84 miles through Tie Canyon, Aliso Canyon, Soledad Canyon, the Santa Clarita Valley, the Santa Clara River Valley~~,~~ and the Oxnard Plain before discharging to the Pacific Ocean near the Ventura Harbor. The Santa Clara River and tributaries~~y system~~ ha~~ves~~ a watershed area of about 1,634 square miles (~1,000,000 acres). ~~-~~Approximately 40 percent of the watershed is in Los Angeles County, with the remaining 60 percent in Ventura County. The Santa Clara River is unique in that it is the largest river system in Southern California ~~remaining~~ in a relatively natural state.

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The climate of the Santa Clara River watershed is characterized by long, dry periods and ~~a~~ relatively short wet winters. Near the coast, cool moist ocean winds produce moderate temperature; summer highs average 74ºF, winter lows average 44 ºF, and frost is rare (Western Regional Climate Center Station 0492852 Ventura). Inland temperatures can exceed 110 ºF in the summer and drop below freezing in the winter (Western Regional Climate Center Station 047957 Santa Paula). Precipitation is generally in the form of winter storms, thunderstorms~~,~~ and tropical cyclones. Approximately 75 percent of the annual precipitation occurs from December through March. The mean seasonal precipitation varies from about 40 inches in the mountainous areas~~portions~~ of the watershed~~,~~ to about 18 inches in the Piru and Fillmore areas (Western Regional Climate Center Stations 046940 Piru ESE and Station 043050 Fillmore WNW) and under 15 inches at the coast (Western Regional Climate Center Station 049285 Ventura).

The cities of Fillmore, Santa Paula, Oxnard ~~(portion),~~ and Ventura ~~(portion)~~ are located in the watershed as are the County areas~~communities~~ of Piru, Bardsdale, Saticoy~~,~~ and El Rio. Land use~~s~~ in the ~~Ventura~~ County areas~~portion~~ of the watershed are as follows:

- Agriculture 42%
- Open Space 27%
- Urban Uses 26%
- Other (urban reserve, open space reserve, harbor) 5%

Surface Water

The major surface water features in the watershed are the Lake Piru Reservoir and the Santa Clara River.

Lake Piru Reservoir. The construction of Santa Felicia Dam on Piru Creek in 1955 created the Lake Piru Reservoir for the ~~specific~~ purpose of recharging groundwater. The reservoir can store approximately 82,000 AF (UWCD 2016). The reservoir receives winter runoff from ~~local~~ drainages and can receive imported SWP water from Pyramid Lake. Water from Lake Piru is released into Piru Creek and flows to the Santa Clara River where it is joined by runoff from Sespe and Santa Paula Creeks. The releases are used to replenish underground aquifers, and water is made available to municipalities, industry~~,~~ and agriculture (UWCD 2016). Lake Piru is operated by United Water Conservation District (UWCD). Generally, UWCD schedules a fall conservation release from Lake Piru ~~(water stored/conserved in the Lake is released)~~ to recharge both the Piru and Fillmore Subbasins~~groundwater basins~~. The remaining portion of the flows are diverted at the Freeman Diversion for recharge in the Oxnard Foreb~~a~~ay area~~ay~~ and distribution to agricultural users.

D~~However, d~~rought and low inflow into Lake Piru ~~will~~ prevents UWCD from performing conservation releases in some years. Operation of the Santa Felicia Dam is regulated by the Federal Energy Regulatory Commission (FERC). ~~The FERC license to operate Santa Felicia Dam has many requirements for structural safety, public safety, water quality, recreational opportunities and protection of biological resources. Specifi~~The FERC license requirements include releasing water to allow migration of steelhead in Piru Creek and portions of the Santa Clara River ~~(dependent on river conditions)~~, as~~based on the~~ applicable to the National Marine Fisheries Service biological opinion.

Santa Clara River. ~~Due to climatic and geologic factors s~~Streamflow in the Santa Clara River can be described as interrupted perennial~~,~~ with alternating ~~perennial reaches~~ and intermittent (summer dry) reaches influenced by surface and~~water~~ groundwater interactions (SFEI 2011). Flow is supplemented by releases from ~~Lake~~ Piru Reservoir and tributary inflow~~s from tributaries~~. About 10 miles from the River mouth~~,~~ UWCD can divert water at the Freeman Diversion for recharge of the Oxnard Sub~~groundwater~~ basin. Several mutual water companies operate small diversions located on Piru Creek, Sespe Creek~~,~~

and the Santa Clara River for agricultural irrigation.~~; the amount of water diverted at these locations are unknown~~ (Ventura County Watershed Protection District 2015b). In the past, several wastewater treatment plants discharged to the Santa Clara River. With the exception of the City of Ventura, most wastewater treatment facilities have been upgraded and now percolate treated effluent to groundwater rather than releasing water to the Santa Clara River (Ventura County Watershed Protection District 2015b). The wastewater treatment facilities are permitted to discharge effluent via WDR from the LARWQCB. The City of Ventura currently discharges to the Santa Clara River Estuary but is actively studying ways to increase recycled water use in a manner protective of the Santa Clara River Estuary (City of Ventura 2016b).

Groundwater

The Santa Clara River Valley Basin is the primary basin underlying the Ventura County portion of the Santa Clara River Watershed. This basin is ~~sub~~divided into sub-basins: Piru (DWR Basin No. 4-004.06), Fillmore (DWR Basin No. 4-004.05), Santa Paula (DWR Basin No. 4-004.04), Mound (DWR Basin No. 4-004.03), and Oxnard (DWR Basin No. 4-004.02). All groundwater basins/subbasins in the Ventura County portion of the Santa Clara River, with the exception of the Santa Paula Subb~~B~~asin (which is adjudicated) are subject to SGMA. ~~As described earlier, in 2014, theCalifornia Department of Water Resources ranked California's groundwater basins as "high," "medium," "low," or "very low" priority. In this ranking process t~~The Oxnard and Piru ~~groundwater~~ subbasins were deemed ~~"~~high~~"~~ priority and the Fillmore, Santa Paula~~,~~ and Mound subbasins deemed ~~"~~medium~~"~~ priority basins. The heavy~~great~~ dependency on groundwater in these~~is~~ a~~r~~eas is~~was~~ a primary factor in the ranking. ~~The Oxnard basin was also listed as being in "critical overdraft."~~

~~Stakeholders have met to discuss forming the necessary groundwater sustainability agency for the Piru, Fillmore, and Mound basins. As of the preparation of this background report, no formal notification of groundwater sustainability agency formation has been filed with the Department of Water Resources for those basins.~~

The F~~Cox Canyon~~ GMA is~~elected to be~~ the GSA~~groundwater sustainability agency~~ under SGMA for the basins within its ~~Fox Canyon GMA~~ boundaries~~y~~ which~~,~~ includes~~ding~~ the Oxnard S~~s~~ubbasin.

~~*Important Recharge Areas*~~

~~The Oxnard Forebay was described above.~~

Imported Supplies

In 1964, the Ventura County Flood Control District (~~currently the Ventura County Watershed Protection District~~VCWPD) contracted with the DWR~~State of California Department of Water Resources~~ for a SWP allocation of 20,000 AF. T~~Currently, t~~he City of Ventura has an allocation of 10,000 AF, Casitas Municipal Water District has an allocation of 5,000 AF, and UWCD has an allocation of 5,000 AF. Port Hueneme Water Agency uses 1,850 AF of UWCD's entitlement and~~but~~ receives the water through Calleguas Municipal Water District. ~~The SWP contract expires in 2035 but negotiations are underway to extend the contract.~~ Up to 3,150 AF of SWP water is permitted to be released from Pyramid Lake and sent to Lake Piru.

From 1991 to 2013 the total SWP delivery has been 34,212 AF and SWP has not been purchased or delivered in every year (Ventura County Watershed Protection District 2015b). The amount of SWP water allocated in each year depends on availability~~,~~ and delivery is only allowed from November 1

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through the end of February (Ventura County Watershed Protection District 2015b). In addition, UWCD has periodically entered into annual agreements with Casitas Municipal Water District and the City of

Ventura to purchase a portion of their unused SWP allocation. According to UWCD "The purchase of SWP water will be considered by United annually on an as-need basis" (UWCD 2016).

In addition to the SWP supplies delivered to Lake Piru Reservoir, the City of Oxnard purchases imported water from Calleguas Municipal Water District. During the period from 1991-2013 direct deliveries of SWP water to the Oxnard area were 316,000 AF – nearly 10 times the amount of water delivered to Lake Piru. These supplies are provided to the Channel Islands Beach Community Services District, the City of Port Hueneme, and Naval Base Ventura County, via the Port Hueneme Water Agency.

The City of Ventura does not have the infrastructure needed to deliver SWP water into its distribution system. However, Ventura is working with Calleguas Municipal Water District and others on a potential plans to bring SWP allocation to the City's system.

Other Supplies

Several water agencies in the Santa Clara River Watershed produce and deliver recycled water, including the following:

- The City of Fillmore,
- City of Oxnard, and
- City of Ventura

Water Quality

The Los Angeles LARWQCB has identified beneficial uses for the Santa Clara River Watershed as detailed in **Table 10-9**. Permit programs and TMDLs have been developed to protect these beneficial uses. The following TMDLs are in place for portions of the Santa Clara Watershed:

- Bacteria in the Santa Clara River Estuary and Reaches 3 (area between Fillmore and Saticoy), 5 (Los Angeles County and eastern 4,500 feet of Santa Clara River within Ventura County), 6 (Los Angeles County), and 7 (Los Angeles County) – TMDL effective March 21, 2012
- Chloride in the Santa Clara River Reach 3 (area between Fillmore and Saticoy) – TMDL effective June 18, 2003
- Chloride in the Upper Santa Clara River (only a small portion lies within the county) – TMDL effective April 28, 2015

In addition to the existing TMDLs, other TMDLs may be developed as several Santa Clara Watershed areas are included in California's 303(d) List. Identified impairments in the Santa Clara River and its tributaries include chloride, pH, boron, sulfates, total dissolved solids, toxicity, as well as multiple chemicals generally referred to as "Chem A". The McGrath Beach area is considered to be impaired by coliform bacteria and toxic sediments.

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TABLE 10-9
DESIGNATED BENEFICIAL USES IN THE SANTA CLARA RIVER WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
SANTACLARARIVER WATERSHED																						
Santa Clara River Estuary (Ends at Harbor Blvd.) [c]							E		E					E	E	E		Ee	Ef	Ef		E
Santa Clara River Reach 1																						
Santa Clara River (Estuary to Highway 101 bridge)	P*	E	E	E	E	E					E	E				E		E	E			E
Santa Clara River Reach 2																						
Santa Clara River (Highway 101 bridge to Ellsworth Barranca)	P*	E	E	E	E	E					E	E				E		E	E			E
Santa Clara River (Ellsworth Barranca to Freeman Diversion)	P*	E	E	E	E	E					E	E				E		E	E			E
Santa Clara River Reach 3																						
Santa Clara River (Freeman Diversion Dam to Santa Paula Creek)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River (Santa Paula Creek to Sespe Creek)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River (Sespe Creek to A Street, Fillmore)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River Reach 4A																						
Santa Clara River (A Street Fillmore to Piru Creek)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River Reach 4B																						
Santa Clara River (Piru Creek to Blue Cut gaging station)	P*	E	E	E	E	E					E					E		E	E			E
Santa Clara River Reach 5																						
Santa Clara River (Blue Cut gaging station to West Pier Highway 99)	P*	E	E	E	E	E					E					E		E				E
Santa Clara River Reach 9																						
Santa Paula Creek (above Santa Paula Water Works Diversion Dam)	P*	E	E	E	E	E					E	E				E		E	E	E		
Santa Clara River Reach 10																						
Sespe Creek (gaging stn below Little Sespe Creek to Potrero John Creek)	P	E	P	E	E						E	E				E	E	Eg	E	E		E
Santa Clara River Reach 11																						
Piru Creek (gaging stn below Santa Felicia Dam to Agua Blanca Creek)	P	E	E	E	E	E					E	E				E		Eg				
Santa Paula Creek (Santa Clara River R4A to Santa Paula Water Works Diversion)	P	E	E	E	E	E					E	E				E		E	E	E		
Sisar Creek	P	E	P	E	E						E	E				E		Eg		E		E

TABLE 10-9
DESIGNATED BENEFICIAL USES IN THE SANTA CLARA RIVER WATERSHED

	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[P]
SANTACLARARIVER WATERSHED																						
Sespe Creek (Santa Clara River R3 to gaging station below Little Sespe)	P	E	E	E	E						E	E				E	E	E	E	E		E
Timber Creek	P*				E							E				E	E	E	E	E		E
Bear Canyon	P*				E						E	P				E	E	E	E	E		E
Trout Creek	P*				E						E	E				E		E	E	E		E
Piedra Blanca Creek	P*				E							E				E		E	E	E		E
Lion Canyon	P*				E						E	E				E			E	E		E
Rose Valley Creek	P*				E						E	E				E				E		E
Howard Creek	P*				E							E				E	E	E	E	E		E
Tule Creek	P*				E							P				E	E	E	E	E		E
Potrero John Creek	P*				E							P				E		E	E	E		E
Hopper Creek	P*	E		E	E	E					E	E				E		Eg				E
Piru Creek (Santa Clara River R4A to Santa Paula Water Works Diversion	P	E	E	E	E	E					E	E				E		Eg	E	E		E
Lake Piru	P	E	E	E	E	P					E	E				E		E		E		

E: Existing beneficial use
P: Potential beneficial use
I: Intermittent beneficial use
E,P, and I: shall be protected as required
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some destinations may be considered for exemption at a later date.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
g: Condor refuge.
j: Out of service.

Source: Table 2-1. Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (electronic copy accessed December 27, 2016).

Available Supplies

Water sources~~The sources of water supply~~ in the Santa Clara River Watershed include surface water, imported water, groundwater~~,~~ and recycled water. A total estimate of supply in the Santa Clara Watershed is provided in **Table 10-11**.

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Surface Water

UWCD collects and releases surface water at Santa Felicia Dam/Lake Piru. The purpose of this water and subsequent~~the~~ releases ~~from the dam~~ are to replenish the Piru, Fillmore~~,~~ and Santa Paula Subbasins~~,~~ and to provide flows to ~~benefit~~ facilities receiving water from the Freeman Diversion. Releases since 1999 averaged 28,369 AFY with an annual minimum of zero and a maximum of 47,400 AF, dependent on ~~rainfall that year~~seasonal conditions and environmental bypass flow requirements (UWCD 2014). UWCD estimates that approximately ten percent of the water released from Santa Felicia Dam is delivered to agricultural users in the Calleguas Creek Watershed via the Pumping Trough Pipeline (PTP) and Pleasant Valley Pipeline. UWCD also has a right to divert Santa Clara River flows at the Freeman Diversion. In recent years UCWD has diverted between 2,500 AF (in 2015) and 94,000 AF (in 2011) at this location (UWCD 2017b). Water diverted in this location is used for both artificial recharge – the primary source of recharge to the Oxnard coastal plain – and direct delivery to agricultural users. ~~To avoid over counting supplies, surface water used for recharge is not counted as a supply in this report.~~

It is estimated that private landowners may divert as much as 880 AFY from the Santa Clara River ~~, but records are not available to confirm the long-term Santa Clara River surface water supply available to private users~~ (SWRCB eWRIMS database).

Imported Water

Since 1991, UWCD has received ~~from 0~~ up to 4,047 AF of imported SWP water in any given year with~~,~~ an average of 1,487 AFY.

DWR prepares a biennial report to assist SWP users and local planners in assessing the near- and long-term availability of supplies ~~from the SWP~~. DWR issued its most recent update, the 2017~~5 DWR~~ State Water Project Delivery Capability Report (DCR), in March~~July~~ 2018~~5~~. In the 2017~~5~~ update, DWR provides SWP supply estimates for SWP contractors to use in their planning efforts. ~~The 2015 DCR~~It includes DWR's estimates of SWP water supply availability under both current and future conditions. ~~The DCR estimates that UWCD on average, will receive between 45 and 70 percent of its allocation, depending on implementation of California WaterFix (SWP Delivery Capability Report, Existing Conveyance High Outflow Scenario Table D.31 and Alternative 4 H3Scenario Table F.31).~~

~~The i~~Imported water acquired by UWCD is intermingled with surface water at Lake Piru and released for groundwater recharge. It is not possible to track UWCD's imported water separate from surface water. ~~; any discussion on~~ Ddirect surface water deliveries and groundwater recharge by UWCD may include a ~~small~~ component of SWP water.

T~~Besides UCWD, t~~he City of Oxnard receives imported water within the Santa Clara River Watershed. The City of Oxnard receives imported water from Calleguas Municipal Water District (Calleguas), who is a member agency of the Metropolitan Water District of Southern California (MWD), a wholesale supplier of SWP~~tate Water Project~~ water. In 2018~~5~~ the City of Oxnard purchased 45%~~12,187 of total supply AF~~ from Callegua and~~s; in the~~

~~future (2020-2040) the City~~ anticipates receiving ~~11,826 AF~~47% of imported water from Calleguas in 2020 (Oxnard 2016).

Groundwater

~~Estimating groundwater supply is a difficult and time-consuming process and must take into account not only basin configuration, underflow, and weather, but other management practices such as volume of applied water and recharge operations.~~ There is not an accepted long-term-yield for groundwater in the Santa Clara Watershed. As part of the SGMA process stakeholders will evaluate long-term sustainable yield. **Table 10-10** presents a high-level estimate of available supply~~groundwater~~ based on available data. ~~The difference in the high and low supply estimate documents the lack of data or consensus on groundwater supply.~~

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TABLE 10-10
GROUNDWATER SUPPLY ESTIMATES
SANTA CLARA RIVER WATERSHED

Basin	Estimate of Groundwater Budget (AFY)	Past Groundwater Extractions (AFY)	Notes
Piru	9,050	12,403	1, 2
Fillmore	22,625	44,598	3, 4
Santa Paula	26,000	25,699	5, 6
Oxnard Subbasin	71,000	78,000	7, 8
Mound	8,000	10,000	9, 10
Low Estimate Groundwater Supply Santa Clara River Watershed		136,400	11
High Estimate Groundwater Supply Santa Clara River Watershed		171,000	11

Notes:
1. DWR 2003, Basin 4-4.06. Assumes low estimate of 5,900 AFY outflow to Fillmore Basin.
2. UWCD 2016. 2014 and 2015 Piru and Fillmore Basins AB 3030 Biennial Groundwater Conditions Report. Average annual extractions 1980-2015.
3. DWR 2003, Basin 4-4.05. Assumes low estimate of 2,400 AFY outflow to Santa Paula Basin.
4. UWCD 2016. 2014 and 2015 Piru and Fillmore Basins AB 3030 Biennial Groundwater Conditions Report. Average annual extractions 1980-2015.
5. Information from the Santa Paula Basins Expert Group estimates annual yield at no less than 26,000 AFY (UWCD 2015). DWR 2003, Basin 4-4.04 budget is 5,593 AFY. Data from the Santa Paula Basins Expert Group is shown in the table.
6. UWCD 2015. 2012 Santa Paula Basin Annual Report. Average annual extractions 1980-2012.
7. USGS 2003.
8. UWCD 2017b.
9. Fugro West, Inc. 1997. Mound Groundwater Basin Annual Report. June.
10. City of Ventura 2011. City of San Buenaventura Water Master Plan and personnel communication D. Detmer of United Water Conservation District.
11. Rounded to the nearest 100 AF

Recycled Water

Ventura County Waterworks District No. 16 (VCWWD 16) plans to construct a tertiary treatment upgrade for the existing Piru Wastewater Treatment Plant to mitigate high chloride and comply with LARWQCB WDRs. After tertiary treatment, effluent from the Piru Wastewater Treatment Plant will meet California Code of Regulations, Title 22 requirements for unrestricted recycled

w~~W~~ater.~~,~~ A~~and a~~pproximately 500 --AFY will be available for use as a new, lower cost irrigation supply for up to 1 square mile (640 acres) of nearby agricultural property. This supply is anticipated in~~before year~~ 2020. In the meantime, treated effluent is discharged to percolation basins.

The City of Fillmore completed a recycled water plant in 2009 and distributes approximately 2,000 -- AFY of reclaimed water to parks and school fields and for groundwater percolation ~~basins~~ (Hydrometrics 2015, Fillmore 2016).

The City of Santa Paula utilizes its recycled water for groundwater recharge. To avoid over counting~~,~~ Santa Paula's recycled water supply is categorized as a groundwater supply.

The City of Oxnard has been pursuing a recycled water program for more than 10 years. The City has constructed an Advanced Water Purification Facility (AWPF) as well as extensive transmission pipelines for the recycled water system. As of 2015 the AWPF has the capacity to produce 7,000 --AFY and~~; but in 2015~~ delivered only 605 --AF in 2015. The City is actively pursuing users for its recycled water including landscape irrigation of parks, schools, golf courses and residential common areas. The City has entered into an agreement with agricultural users in the Oxnard Plain to provide recycled water ~~when available~~. ~~The pipeline to serve the Oxnard Plain is planned for completion in the future.~~ Oxnard anticipates putting between 7,000 up to 14,000 AFY of recycled water to beneficial use starting in 2020~~in the next 10 years~~.

The City of Ventura has access to recycled water supply through the Ventura Water Reclamation Facility. The ~~Currently, the Ventura Water~~ Reclamation Facility discharges most of its tertiary treated effluent to the Santa Clara River Estuary with approximately 700 --AFY diverted as recycled water for landscape irrigation by several users along the City's recycled water pipeline alignment. In the next ten years the City of Ventura intends to increase the amount of recycled water delivered to irrigation customers and is examining direct potable use of recycled water. The City of Ventura service area includes areas~~portions~~ in both the Ventura and Santa Clara watersheds~~,~~ but the recycled water supply is being accounted for in the Santa Clara watershed.

TABLE 10-11
CURRENT (2016) ESTIMATE OF SUPPLY
SANTA CLARA RIVER WATERSHED

Supply Source	Annual Volume (AF)
Surface Water, Santa Clara River[1]	0
Imported Water, City of Oxnard from Calleguas [1]	12,000
Recycled Water	10,200 to 19,700
Groundwater (see Table 10-10)	136,400 to 171,000
Low Estimate (rounded to nearest 100 AF)	*158,400*
High Estimate (rounded to nearest 100 AF)	*202,700*

1. UWCD directly delivers approximately 12,000 AFY to agricultural users in the Calleguas Creek Watershed. This water is diverted in the Santa Clara Watershed but is a supply in the Calleguas Creek Watershed.

Water Suppliers

There are six major water suppliers (entities serving more than 1000 persons) in the Ventura County portion of the Santa Clara River Watershed as well as 74 smaller water systems and irrigation companies. Persons or businesses in the Watershed are also supplied by private wells and surface water diversions. The major urban suppliers~~,~~ documented in **Table 10-12** provide water to the cities but also to the unincorporated County. These are also mapped in **Figure 10-4**.

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TABLE 10-12
MAJOR WATER SUPPLIERS
SANTA CLARA RIVER WATERSHED

Supplier/Primary Source(s)	Type	Area Served	Estimated Population Served	Annual Water Supplied*
Castaic Lake Water Agency Imported water and local groundwater	Special District	The Castaic Lake Water Agency service area extends into Ventura County but at the current time Castaic Lake Water Agency does not supply any water to Ventura County.	NA	NA
City of Fillmore Groundwater	City	City of Fillmore north of Santa Clara River, east of Sespe Creek.	18,600	~ 3,400 AF
City of Oxnard Imported water, groundwater, recycled water	City	City of Oxnard and County unincorporated area along Hueneme Road to Naval Base Ventura County. Excludes Channel Islands Beach.	193,654	~28,600 AF
City of Santa Paula Groundwater	City	Approximately 4.5 square miles (~2,880 acres) within the City of Santa Paula.	29,000	~4,400 AF
United Water Conservation District Surface water, imported water, groundwater	Special District	333 square miles (~ 213,120 acres) in Santa Clara River Valley (portion within Ventura County) and the Oxnard Plain.	**	**
Ventura Water Lake Casitas water, Ventura River, groundwater (Oxnard Plain, Mound, Santa Paula Basins), recycled water	City	City of Ventura and 1.5 square miles (960 acres) within City's sphere of influence. City falls within both the Ventura and Santa Clara Watersheds.	***	***

*Estimated based on records of water supplied 2010 to 2015, rounded to nearest 100 AF. Does not account for planned future expansion of demands and supplies.
**United Water Conservation District provides groundwater recharge and water to retail water agencies, to avoid double counting, information is only listed for retail water agencies.
*** City of Ventura information is described under Ventura River Watershed, to avoid double counting no population or water supply is provided in this table.
Source: UWCD 2016, City of Ventura 2016a and 2016b, City of Fillmore 2005 and 2016, City of Oxnard 2016, City of Santa Paula 2011.

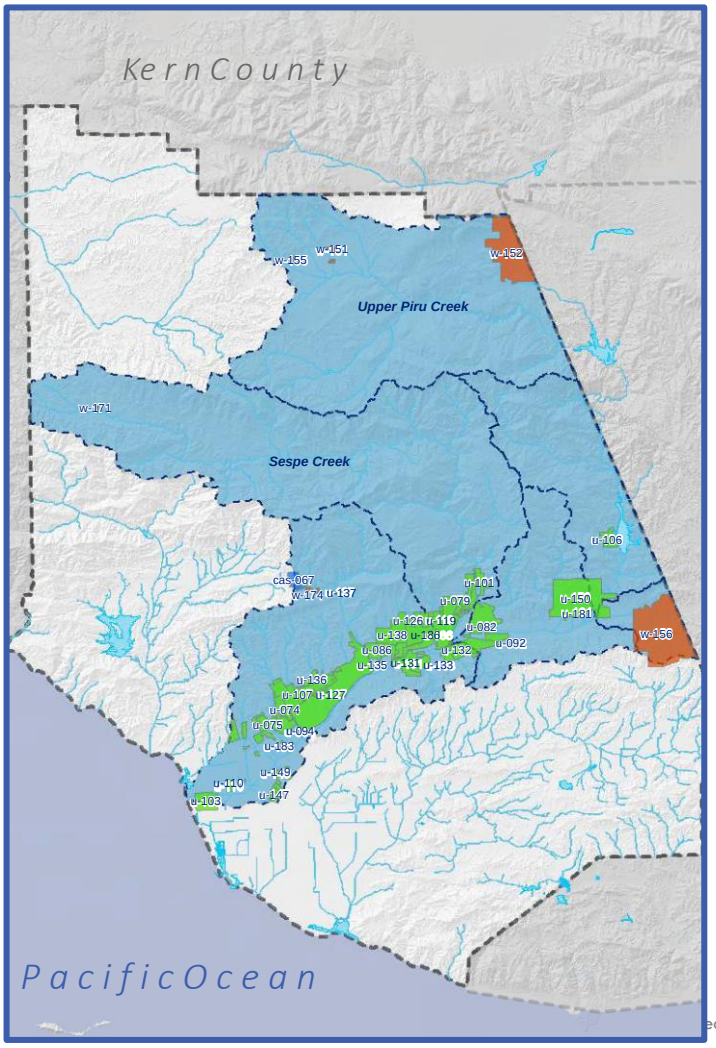
WATER PURVEYORS

UNITED WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
United (u-074)	Aliso MWC
United (u-075)	Alta MWC
United (u-076)	Beedy Street Well
United (u-079)	Brownstone MWC
United (u-082)	City of Fillmore
United (u-082)	City of Fillmore
United (u-084)	Cloverdale MWC
United (u-086)	Community MWC
United (u-091)	El Rio Processing
United (u-092)	Elkins Ranch Company
United (u-094)	Farmers Irrigation Company
United (u-095)	Fillmore Irrigation Company
United (u-096)	Fillmore West Mobile Home Park
United (u-101)	Goodenough MWC
United (u-103)	Coastal Berry
United (u-104)	Alger Family Trust
United (u-106)	Lake Piru Recreation Area
United (u-107)	Limoneira Associates
United (u-108)	Linda Vista Junior Academy
United (u-109)	Middle Road MWC
United (u-110)	Montalvo MWC
United (u-119)	Rancho Sespe
United (u-122)	Rio Plaza Water Company
United (u-123)	Rio Real/Rio del Valle Schools
United (u-126)	San Cayetano MWC
United (u-127)	City of Santa Paula
United (u-129)	Sherwin Acres MWC
United (u-131)	South Mountain MWC
United (u-132)	Southside Improvement Company
United (u-133)	Storke MWC
United (u-134)	Strictland MWC
United (u-135)	Teague-McKevett Company-Limoneira
United (u-136)	Thermal Belt MWC
United (u-137)	Thomas Aquinas College
United (u-138)	Timber Canyon MWC
United (u-139)	Tobock Ranch MWC
United (u-145)	G.P. Resources
United (u-147)	Vineyard Ave Acres MWC
United (u-148)	Vineyard Ave Estates
United (u-149)	Vineyard MWC
United (u-150)	Warring Water Service
United (u-181)	Piru MWC
United (u-183)	Ventura County Property Administrator
United (u-185)	Hardscrabble MWC
United (u-186)	Sespe Agricultural Water
United (u-192)	Citrus MWC
United (u-202)	Rancho Sespe Workers Improvement Association
United (u-203)	Toland Road Water System

CALLEGUAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
Casitas (cas-067)	Sisar MWC

SUPPLIERS WITHOUT WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
None (w-151)	Greeleaf Springs Water System
None (w-152)	Antelope Valley East Kern Water Agency
None (w-152)	East Kern Water Agency
None (w-155)	Camp Three Falls
None (w-156)	Castaic Lake Water Agency
None (w-168)	New Camp Barlett
None (w-171)	Pine Mountain Inn

CASITAS WHOLESALE DISTRICT	
SUPPLIER	WATER COMPANY
None (w-174)	Sweetwater Spring Ranch



Ventura County 2040 General Plan

Figure 10-4:
Water Purveyors in
Santa Clara River Watershed

Map Date: December 02, 2016
Source: Kennedy/Jenks Consultants, 2016.

N

0 9 18 Miles

Ventura County Boundary
Rivers Streams
Water Bodies
Subwatersheds
Santa Clara River Watershed

Water Purveyor
Casitas Wholesale District
United Wholesale District
Suppliers Without Wholesale District

Estimate of Demand

TAs described previously, in 2014, the VCWPDentura County Watershed Protection District undertook an estimate of Countywide water demand, documented in the County of Ventura 2013 Water Supply and Demand (January 2015). Results of the study for the Santa Clara Watershed are provided **Table 10**.

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TABLE 10-13
ESTIMATED SANTA CLARA RIVER WATERSHED DEMAND

Watershed/Sub-watershed	Total Agricultural Demand (AF)	Total Municipal Demand (AF)	Total Demand (AF)
Hall Canyon/Arundel	815	9,924	10,739
Ormond Beach	2,797	22,913	25,710
Santa Clara River	114,919	31,284	146,203
Subtotal (Rounded to nearest 100 AF)	*118,500*	*64,100*	**182,600**

Source: Hydrometrics 2015. Table 6.

Notable in Table 10 is the distribution of demands. Agricultural demand is estimated to be significantly higher than municipal demand.

Demand Management

Table 10 summarizes the various water conservation effortsactions undertaken in the Santa Clara River Watershed. It Table 10 summarizes demand management measures undertaken under normal conditions and those extra ordinary additional efforts taken during drought periods.

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Comparison of Supply and Demand

While it is difficult to quantify, iIt is estimated that there is an annual supply of 158,400 AF to 202,700 AF in the Santa Clara Watershed. This supply of course will vary given drought and operational conditions. Estimated demand is approximately 182,600 AF and is outpacing the low-end estimate of annual supply. The high-end estimate of supplies assumes increased recycled water use, the timing of which is uncertain. If the higher supply is achieved, supply could be a little less than 10 percent greater than demand.

Water-Related Challenges

Below are the water related challenges for the Santa Clara River Watershed as of late 2016:

TABLE 10-14
DEMAND MANAGEMENT MEASURES IN SANTA CLARA RIVER WATERSHED

Agency	Conservation Measures in Effect at All Times							Conservation Measures that May Be Implemented in Drought				
	Public Information and Outreach	Water Waste Prohibitions	Metering	Volume-Based Pricing	Water Efficiency Surveys Offered to Customers	Rebates for High Efficiency Plumbing Fixtures	Turf Removal Incentives	Drought Surcharge	Limitations on Irrigation/ Outdoor Watering	Mandatory Reductions/ Allocation	Fines	Suspension of new water connections
City of Fillmore		X	X	X				X	X			
City of Oxnard	X	X	X	X		X	X		X	X	X	X
City of Santa Paula	X	X	X	X					X			
Ventura Water	X	X	X	X	X	X	X	X	X	X	X	X
United Water Conservation District	X		X	X						X*	X	

*UWCD's groundwater allocation is subject to the Fox Canyon GMA. In the event of reductions from FCGMA, UWCD informs their retail agencies of the reductions.
Sources: City of Oxnard 2016; City of Ventura 2016b; United Water Conservation District 2016.

Coastal Groundwater Overdraft

GAs described earlier, groundwater underlyingin the Oxnard Plain dropped below sea level as early as the 1940s. Overdraft conditions now persist in the southern and eastern portions of the Oxnard Plain and, the annual overdraft is estimated to be 20,000 to 25,000 AFY (UWCD 2017b). The is continued ooverdraft allows for seawater intrusion and puts the area at risk of land subsidence.

Sea Water Intrusion

The lLow water levels underlyingin the Oxnard Plain allow for seawater (chloride) intrusionto enter into freshwater aquifers. The USGS and UWCD have documented the inland movement of seawater adjacent to the Hueneme and Mugu submarine canyons.

Water for Environmental Purposes

UWCD diverts Santa Clara River water at the Freeman Diversion to recharge groundwater basins and for direct delivery to agricultural users. UWCD provides bypass flows at the Freeman Diversion for the upstream and downstream migration of Ssouthern California Steelhead. In July 2008, the National Marine Fisheries Service (NMFS) issued a final Biological Opinion (BO) that concluded that operations at the Freeman Diversion were likely to jeopardize the continued existence of Ssouthern California Steelhead in the Santa Clara River. UWCD is currently developing a multi-species habitat conservation plan and is in consultation with NMFS. The resulting bypass flows are unknown, but it is estimated that the current bypass flow regime has decreased diversions (and hence water supply) by up to 22,500 AFY, though this is highly variable from year to year (personnel communication, Robert Richardson, United Water Conservation District).

Quality

The Los AngelesA-RWQCB has identified the Santa Clara River, downstream of Piru Creek, as having water quality impairments related to bacteria. The Los Angeles RWQCB has identified rRunoff from residential, industrial, and commercial areas is identified as the source of the bacteria. This includes fertilizer used for lawns and landscaping, organic debris from gardens, landscaping, and parks; trash such as food wastes; domestic animal waste; and human waste from areas inhabited by the homeless. The indicator bacteria point to the potential contamination of the Santa Clara River by pathogens or disease producing bacteria or viruses. Some waterborne pathogenic diseases include ear infections, dysentery, typhoid fever, viral and bacterial gastroenteritis, and hepatitis A. Elevated bacteria levels are an indicator that a potential health risk exists for individuals exposed to this water and therefore limit the recreational uses of the Santa Clara River.

Calleguas Creek Watershed

The Calleguas Creek Watershed is located in the southeastern portion of Ventura County and drains an area of approximately 343 square mile (219,520 acres) area. The Santa Susana and Oak Ridge Mountains form the northern boundary and, the southern boundary is delineated by the Simi Hills and Santa Monica Mountains. Major creeks and rivers include the Conejo Creek, Arroyo Simi, Arroyo Las Posas, Arroyo Santa Rosa, Calleguas Creek, Revolon Slough, and Mugu Lagoon.

Long-term monitoring by the VCWPDentura County Watershed Protection District shows that the Calleguas
Creek Watershed cycles through wet and dry periods and does not have a common "normal" seasonperiod.

~~Precipitation is in the form of rain and a~~About 85 percent of the rainfall occurs from November to March (Calleguas Creek Steering Committee 2004). Near the coast, cool moist ocean winds moderate temperature with a~~;~~ summer high~~s~~ average of 64ºF and winter low~~s~~ average of 53 ºF (Calleguas Creek Steering Committee 2004). Inland temperatures can exceed 106 ºF in the summer and drop below freezing in the winter (Western Regional Climate Center Station 048904 Thousand Oaks 1 SW).

The watershed includes the cities of Oxnard (portion), Port Hueneme, Camarillo, Moorpark, Simi Valley, Thousand Oaks~~,~~ and unincorporated areas of Ventura County. According to the WCVC~~atersheds Coalition of Ventura County~~ (2014), land uses in the watershed are as follows:

- Undeveloped land 50%
- Agriculture 25%
- Urban uses 25%

Surface Water

The major surface water features ~~in the watershed~~ are Lake Bard, the Arroyo Simi/Arroyo Las Posas/Calleguas Creek system, Conejo Creek system~~,~~ and Honda Barranca/Beardsley Wash/Revolon Slough system.

Lake Bard. Lake Bard is an approximately 10,500 AF surface water reservoir constructed to store treated water from the Metropolitan Water District of Southern California. This water is used to meet emergency demands. Lake Bard is operated by Calleguas Municipal Water District (Calleguas Municipal Water District 2016).

Arroyo Simi/Arroyo Las Posas/Calleguas Creek. The~~is series of c~~ creeks drain precipitation and urban runoff from the Simi Valley, the eastern Las Posas Valley, much of Pleasant Valley, and the eastern portion of the Oxnard Plain. In addition to precipitation and urban runoff, the Arroyo Simi also carries discharges from a series of dewatering wells operated by the City of Simi Valley and~~as well as~~ treated effluent from the Simi Valley Water Quality Control Plant. Under certain conditions the Ventura County Waterworks District #1 Moorpark Wastewater Treatment and the Camrosa Water District Water Reclamation Facility may discharge effluent into Calleguas Creek (Calleguas Creek Steering Committee 2004).

Conejo Creek System. The Arroyo Santa Rosa, Arroyo Conejo~~,~~ and Conejo Creek make up this drainage system. The Santa Rosa Valley, a portion of Pleasant Valley, Tierra Rejada Valley and the City of Thousand Oaks are drained by this system. This system caries precipitation, agricultural runoff, and effluent from the Hill Canyon Wastewater Treatment Plant and Camarillo Sanitary District Wastewater Reclamation Plant.

The Honda Barranca/Beardsley Wash/Revolon Slough. The western portion of the Las Posas valley, a portion of Pleasant Valley and a portion of the Oxnard Plain are drained by the Honda Barranca/ Beardsley Wash/Revolon Slough. ~~The majority of f~~Flow comes primarily from agricultural and storm water drainage (Calleguas Creek Steering Committee 2004).

Groundwater

There are multiple groundwater basins within the Calleguas Creek Watershed. These include the, Pleasant Valley ~~Basin~~ (DWR Basin 004-06), Arroyo Santa Rosa (DWR Basin 004-07), Las Posas Valley

(DWR Basin 4-008), Simi Valley (DWR Basin 4-009), ~~Tapo/Gillibrand (a portion of DWR Basin 4-09),~~ and Tierra Rejada (DWR Basin 4-015). ~~Several smaller basins also exist in the watershed but provide only a minor amount of supply due to low production or poor water quality (less than 500 AFY each basin).~~ As part of SGMA, the Pleasant Valley and Las Posas groundwater basins were deemed "high" priority ~~and the Arroyo Santa Rosa Valley deemed a "medium" priority basin~~. The great dependency on groundwater in this area was a primary factor in the ranking. The Pleasant Valley basin was also listed as being in "critical overdraft."

~~As described earlier, t~~The F~~ox Canyon~~C~~-~~GMA was created by state legislation in 1982 to manage local groundwater basins and resources in an effort ~~manner~~ to reduce overdraft of the Oxnard S~~s~~ubbasin and to stop seawater intrusion. ~~Besides the Oxnard subbasin, the Fox Canyon~~ The FCGMA ~~has also~~ elected to be the GSA~~groundwater sustainability agency~~ under SGMA for the Pleasant Valley and Las Posas Valley B~~b~~asins~~, as well as the portion of the Arroyo Santa Rosa Basin within Fox Canyon GMA boundaries~~.

The Arroyo Santa Rosa Basin GSA, organized in 2016 under a Joint Powers Agreement between the Camrosa Water District and the County of Ventura, with participation from the City of Camarillo, has elected to become the GSA~~groundwater sustainability agency~~ for the portion of the Arroyo Santa Rosa Groundwater Basin east of the Bailey Fault, outside of the FC~~ox Canyon~~ GMA jurisdiction.

Important Recharge Areas

Important recharge areas for the groundwater basins in the Calleguas Watershed include the Oxnard Forebay area of the Oxnard Plain~~n (described earlier)~~, Calleguas Creek, small tributary stream channels and drainages from the surrounding mountain fronts, and areas of bedrock outcrops (USGS 2003). In addition, Calleguas Municipal Water District conducts artificial recharge through injection of imported water in the East Las Posas Basin, as part of the Las Posas Aquifer Storage and Recovery (ASR) Project.

Imported Supplies

Calleguas Municipal Water District is a wholesale water provider for the Calleguas Creek Watershed and portions of the Santa Clara River Watershed on the Oxnard Plain. Calleguas distributes the water supplies to its 19 retail purveyors through 140 miles of pipeline operated and maintained by Calleguas. Calleguas is a member agency of the MWD. Calleguas anticipates receiving approximately 122,000 AF imported water from MWD each year, starting in 2020~~, but this will vary depending on climatic conditions, regulatory conditions and regional demands~~. 86,971-AF of imported water was supplied in 2015.

Other Supplies

~~Within the Calleguas Creek Watershed,~~ Camrosa Water District produces and delivers recycled water in conjunction with the City of Thousand Oaks, the City of Camarillo, Ventura County Waterworks District 8 (City of Simi Valley), Ventura County Waterworks District 1 (Moorpark)~~, produce and deliver recycled water~~. In addition, recycled water produced by the Tapia Water Reclamation Facility in the Malibu Creek Watershed is delivered to users within the Conejo Valley.

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Water Quality

The LAos Angeles RWQCB has identified beneficial uses for the Calleguas Creek Watershed as well as its tributaries, and industrial channels in the area as documented in **Table 10-15**. The following TMDLs are in place for portions of the Calleguas Creek Watershed:

- Calleguas Creek, Its Tributaries and Mugu Lagoon Metals and Selenium – approval of TMDL by SWRCB and US EPA pending.
- Calleguas Creek Salts – TMDL effective December 2, 2008
- Revolon Slough and Beardsley Wash Trash – TMDL effective March 6, 2008
- Calleguas Creek Toxicity – TMDL effective March 24, 2006
- Calleguas Creek Organochlorine Pesticides and PCBs - TMDL effective March 24, 2006
- Oxnard Drain 3 Pesticides, PCBs, and Sediment Toxicity – approved by EPA approval October 6, 2011
- Calleguas Creek Nitrogen Compounds and Related Effects – TMDL effective October 15, 2009

In addition to the existing TMDLs, other TMDLs may be developed. Identified impairments in the Calleguas Creek and its tributaries include ammonia, boron, copper, bacteria, nitrogen, nitrate, selenium, and sulfate, as well as insecticides and pesticides such as DDT, Dieldrin, and Toxaphene. The Channel Islands Harbor area is limited by lead and zinc in sediments and, several Oxnard area beaches are limited by bacteria.

Available Supplies

The water supplies for the Calleguas Creek Watershed consist of imported water from Calleguas, groundwater, a minor amount of potable surface water, non-potable surface water provided by UWCD from the Freeman Diversion delivered to agricultural users in the Pleasant Valley Basin, and recycled water. A total estimate of supply in the Calleguas Creek Watershed is provided in **Table 10-17**.

Imported Water

Calleguas anticipates receiving approximately 122,000 AF imported water from MWD in each year starting in 2020, but this will vary depending on climatic conditions, regulatory conditions and regional demands (CMWD 2016). The City of Oxnard receives approximately 12,000 AFY of water from Callegua buts; this volume is included in the imported supplies in the Santa Clara Watershed and is not reflected in supplies for the Calleguas Creek Watershed.

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TABLE 10-15
DESIGNATED BENEFICIAL USES CALLEGUAS CREEK WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
CALLEGUAS-CONEJOCREEK WATERSHED																						
Calleguas Creek Estuary [c]							P		E					E		E		Ee,p	Ef	Ef		E
Calleguas Creek Reach 1																						
Mugu Lagoon [c]							E		Ed					E	E	Eo	E	Ee,p	Ef	Ef	Ed	E
Calleguas Creek Reach 2																						
Calleguas Creek (Estuary to Potrero Rd.)	P*			E	E	E					E	E				E		Ep				E
Calleguas Creek Reach 3																						
Calleguas Creek (Potrero Rd. to Conejo Creek)	P*	E	E	E	E						E					E						
Calleguas Creek Reach 4																						
Revolon Slough (Calleguas Creek Rch 2 to Pleasant Valley Rd.)	P*	P		E	E						E					E						E
Revolon Slough (Pleasant Valley Rd. to Central Ave.)	P*	P		E	E						E					E						E
Calleguas Creek Reach 5																						
Beardsley Channel (above Central Ave.)	P*					E					E					E						
Calleguas Creek Reach 6																						
Arroyo Las Posas (Calleguas Creek Rch 3 to Long Canyon)	P*	P	P	P	E						E	P				E						
Arroyo Las Posas (Long Canyon to Hitch Rd.)	P*	P	P	P	E	E					E	P				E						
Calleguas Creek Reach 7																						
Arroyo Simi (Hitch Rd. to Happy Camp Canyon)	P*	I			I	I					I					E		E				
Arroyo Simi (Happy Camp Canyon to Alamos Canyon)	P*	I			I	I					I					E		E				
Arroyo Simi (Alamos Canyon to Tapo Canyon Creek)	I*	I			I	I					I					E						
Arroyo Simi (above Tapo Canyon Creek)	I*	I			I	I					I					E						
Calleguas Creek Reach 8																						
Tapo Canyon Creek (above Arroyo Simi)	I*		P	P	I						I					E						
Calleguas Creek Reach 9A																						
Conejo Creek (Camrosa Diversion to Camarillo Rd.)	P*	E	E	E	E						E					E						
Conejo Creek (Camarillo Rd. to Arroyo Santa Rosa)	P*				I	I					I					E				E		

TABLE 10-15
DESIGNATED BENEFICIAL USES CALLEGUAS CREEK WATERSHED

WATERSHED[a]	MUN	IND	PROC	AGR	GWR	FRSH	NAV	POW	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL	WET[b]
CALLEGUAS-CONEJOCREEK WATERSHED																						
Calleguas Creek Reach 9B																						
Conejo Creek (Calleguas Creek Rch 3 to Camrosa Diversion)	P*	E	E	E	E						E					E						
Calleguas Creek Reach 10																						
Arroyo Conejo (Conejo Creek to North Fork Arroyo Conejo)	P*				I	I					I					E		E				
Calleguas Creek Reach 11 (Arroyo Santa Rosa)																						
Arroyo Santa Rosa (above confl. with Conejo Creek)	P*				I	I					I					E						
Calleguas Creek Reach 12																						
North Fork Arroyo Conejo (above confl. with Arroyo Conejo)	P*		<del>	E	E						E					E				E		
Calleguas Creek Reach 13																						
Arroyo Conejo (above confl. with North Fork Arroyo Conejo)	P*				I	I					I					E						
Gillibrand Canyon Creek (Tapo Canyon Creek to Windmill Canyon)	P*				I	I					I					E						
Gillibrand Canyon Creek (above Windmill Canyon)	P*				I						I					E						
Lake Bard (Wood Ranch Reservoir)	E	E	E	E	P						E					E						

E: Existing beneficial use
P: Potential beneficial use
I: Intermittent beneficial use
E,P, and I: shall be protected as required
* Asterisked MUN designations are designated under SB 88-63 and RB 89-03. Some destinations may be considered for exemption at a later date.

a: Waterbodies are listed multiple times if they cross hydrologic area or subarea boundaries. Beneficial use designations apply to all tributaries to the indicated waterbody, if not listed separately.
b: Waterbodies designated as WET may have wetlands habitat associated with only a portion of the waterbody. Any regulatory action would require a detailed analysis of the area.
c: Coastal waterbodies which are also listed in inland Surface Waters Tables (2-1) or in Wetlands Table (2-4).
d: Limited public access precludes full utilization.
e: One or more rare species utilizes all ocean, bays, estuaries, and coastal wetlands for foraging and/or nesting.
f: Aquatic organisms utilize all bays, estuaries, lagoons, and coastal wetlands, to a certain extent, for spawning and early development. This may include migration into areas which are heavily influenced by freshwater inputs.
o: Marine habitats of the Channel Islands and Mugu Lagoon serve as pinniped haul-out areas for one or more species (i.e. sea lions).
p: Habitat of the Clapper Rail.

Source: Table 2-1. Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (electronic copy accessed December 27, 2016).

Groundwater

There is not an accepted groundwater supply estimate for the Calleguas Creek Watershed. As part of the SGMA process stakeholders will evaluate long-term sustainable yield. Table 10-16 presents a high-level estimate of available groundwater based on available data. The difference in the high and low supply estimate documents the lack of data and consensus on groundwater supply. Table 10- does not include the approximately 3,500 AFY of groundwater that the City of Thousand Oaks is planning on developing from the Conejo Groundwater Basin.

Surface Water

The Conejo Creek system, owned and operated by Camrosa Water District, does supply some surface water. The average supply from this creek system is estimated to be 7,920 AF (FCGMA 2016). It is estimated that small private water users may divert and use as much as 3,400 AFY from local surface water (SWRCB eWRIMS database).

TABLE 10-16
GROUNDWATER SUPPLY ESTIMATES
CALLEGUAS CREEK WATERSHED

Basin	Estimate of Groundwater Budget (AFY)	Past Groundwater Extractions (AFY)	Notes
Pleasant Valley Basin	11,418	18,500	1
Arroyo Santa Rosa	3,325 to 8,410	5,000	2
Las Posas Valley	29,280	30,560	3
Simi Valley	5,400	5,500	4
Tapo/Gillibrand	1,350	550	5, 6
Tierra Rejada	1,300	1,500	7
Low Estimate Groundwater Supplies		51,300	8
High Estimate Groundwater Supplies		82,300	8

1. DWR 2003, Basin 4-06.
2. DWR 2003, Basin 4-07.
3. DWR 2003, Basin 4-08.
4. DWR 2003, Basin 4-09.
5. City of Simi Valley, Geohydrologic Evaluation of Maximum Perennial Yield, Tapo Canyon Tributary SubArea (September 2006)
6. Waterworks District 8. 2016. 2015 Urban Water Management Plan. June.
7. DWR 2003, Basin 4-015.
8. Rounded to nearest 100 AF.

Recycled Water

Based on recently completed urban water management plans by water purveyors in the Calleguas Creek Watershed, an estimate of recycled water in the Calleguas Creek area has been prepared. This estimate ~~uses supplies planned~~incorporates usage for~~in~~ the next 10 years (by 2025).

TABLE 10-17
CURRENT (2016) ESTIMATE OF SUPPLY
CALLEGUAS CREEK WATERSHED

Supply Source	Annual Volume (AF)
Surface Water, Conejo Creek Diversion [1]	11,324
Imported Water Calleguas and UWCD Deliveries from Santa Clara Watershed [2]	119,417
Recycled Water [3]	13,931
Groundwater (see Table 10-16)	51,300 to 82,300
Low Estimate (rounded to nearest 100 AF)	*196,000*
High Estimate (rounded to nearest 100 AF)	*227,000*

1. FCGMA 2016. Preliminary Draft Pleasant Valley Groundwater Sustainability Plan Tasks 6 – 10 Report. May.
2. Supplies from Calleguas are anticipated imported water supplies less 12,000 AF expected to go to Oxnard in the Santa Clara Watershed (CMWD 2016, Oxnard 2016). Supplies from UWCD are on average 9,417 AF to the Calleguas Creek Area from the Santa Clara Watershed (FCGMA 2016).
3. Camrosa 2016; Camarillo 2016, VCWWD8 2016, and VCWWD1 2016.

Suppliers

There are nine major water suppliers (entities serving more than 1,000 persons) in the Calleguas Creek Watershed and~~as well as~~ 52 smaller water systems and irrigation companies. Persons or businesses in the Watershed are also supplied by private wells and surface water diversions. The major urban suppliers~~,~~ documented in **Table 10-18** provide water to cities and the unincorporated County. These are also mapped in **Figure 10-5**.

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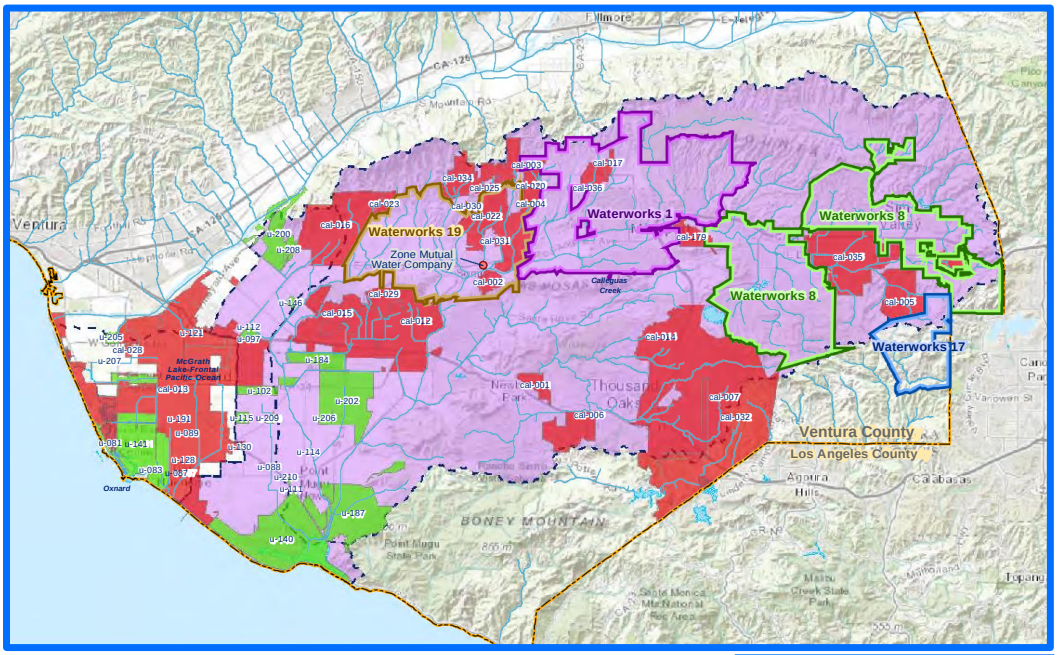
TABLE 10-18
MAJOR WATER SUPPLIERS - CALLEGUAS CREEK WATERSHED

Supplier/Primary Source(s)	Type	Area Served	Estimated Population Served	Annual Water Supplied*
Calleguas Municipal Water District Imported water	Special District	Calleguas Creek Watershed	**	**
City of Simi Valley/Ventura Co. Waterworks District 1 Imported water, groundwater, recycled water	City	Approximately 68 percent of the developed portion of the City of Simi Valley and unincorporated areas located southeast and north of the City boundary.	~97,300	~ 23,800 AF
City of Oxnard Imported water, groundwater, recycled water	City	City of Oxnard, but excluding Channel Islands Beach and County unincorporated area along Hueneme Road to Naval Base Ventura County.	***	***
City of Thousand Oaks Imported water	City	Approximately 36 percent of the City of Thousand Oaks	~53,300	~12,600 AF
City of Camarillo Imported water, groundwater, recycled water	City	14 square miles (8,960 acres) within the western portion of the City, about 75 percent of the City of Camarillo	~42,900	~8,600 AF
Port Hueneme Water Agency Groundwater, imported water	City	Generally, the City of Port Hueneme	~22,000	~5,000 AF
Camrosa Water District Imported water, groundwater, surface water, recycled water	Special District	31 square miles (19,840 acres) within the eastern portion of the City of Camarillo and Santa Rosa Valley.	~30,000	~14,400 AF
Ventura County Waterworks District No. 1 Imported water, groundwater, recycled water	Special District	Generally, the City of Moorpark and ag lands between Camarillo and Thousand Oaks (33.7 square miles / 21,568 acres).	~36,000	~11,800 AF
Ventura County Waterworks District No. 19 Imported water, groundwater	Special District	23 square miles (14,720 acres) of the Somis community and surrounding rural areas.	~3,300	~3,000 AF
Oak Park Water Service Imported water	Special District	Oak Park community, encompassing 4.1 square miles (2,624 acres).	~12,200	~2,200 AF
California American Water Company – Ventura District Imported water	Private Company	Approximately half of Thousand Oaks (25 sq. mi.) and a small portion of unincorporated county in the Las Posas Country Club area.	~63,400	~15,200 AF
California Water Service Company – Westlake District Imported water, recycled water	Private Company	13 square miles (8,320) in south east City of Thousand Oaks	~19,500	~8,100 AF
Golden State Water Company – Simi Valley Imported water, groundwater	Private Company	A portion of the City of Simi Valley and a portion of unincorporated Ventura County including Runkle Canyon	~45,200	~6,500 AF
Pleasant Valley Mutual Water Company Imported water, groundwater	Private Company	Northwestern portion of the City of Camarillo	~7,500	~900 AF
Crestview Mutual Water Company Imported water, groundwater	Private Company	Western portion of the City of Camarillo	Unknown	~900 AF
Zone Mutual Water Company Groundwater, imported water	Private Company	A private agricultural water supplier serving the unincorporated area around Somis.	Ag water supplier	~5,000-6,000 AF

**Estimated based on records of water supplied 2010 to 2015, rounded to nearest 100 AF. Does not account for planned future expansion of demands and supplies.*
***Calleguas Municipal Water District is a wholesale supplier, to avoid double counting information is only provided for retail water agencies.*
****Oxnard falls across two watersheds. Oxnard population and supply provided as part of the Santa Clara River Watershed discussion.*
Source: Calleguas Municipal Water District 2016, City of Simi Valley 2016, City of Thousand Oaks 2016, Ventura County Waterworks District No. 1 2011 and 2016, City of Camarillo 2011 and 2016, Port Hueneme Water Agency 2011 and 2016, California American Water Company 2012 and 2016, California Water Service Company 2011 and 2016, Golden State Water Company 2011 and 2016.



WATER PURVEYORS

UNITED WHOLESALE DISTRICT

SUPPLIER	WATER COMPANY
United (u-016)	Del Norte MWC
United (u-080)*	Camarillo Airport Utility Enterprise
United (u-081)*	Channel Islands Beach Community Services District
United (u-083)*	City of Port Hueneme
United (u-087)	Cypress MWC
United (u-088)	Sunshine Trailer Park
United (u-089)	Dempsey Road MWC
United (u-093)	Evergreen Trailer Park
United (u-097)	Garden Acres MWC
United (u-099)	Glennview Mobile Home Park
United (u-102)	Hailwood, Inc.
United (u-111)	Navalair Mobilehome Court
United (u-112)	Nyeland Acres NWC
United (u-114)	Ocean View School District
United (u-115)	Oxnard Lemon MWC
United (u-121)	Rio Manor MWC
United (u-128)	Saviers Road MWC
United (u-130)	Silver Wheel Ranch Mobile Home Park
United (u-140)*	U.S.N.A.S. - Point Mugu
United (u-141)*	U.S.N.C.B.C. - Port Hueneme
United (u-146)	Ventura School
United (u-184)	Ventura County Dept of Airports
United (u-187)	Guadalasca MWC
United (u-191)	Santa Clara High School
United (u-200)	Lloyd-Butler MWC
United (u-202)	Rancho Sespe Workers Improvement Association
United (u-204)	Thornhill MWC
United (u-205)	Santa Clara Resources
United (u-206)	Houweling's Nursery
United (u-207)	Pyramid Flowers
United (u-208)	Saticoy Country Club
United (u-209)	Vujovich Ranch
United (u-210)	Bouquet Multimedia

* Denotes agencies within the wholesale area of both United and Calleguas

CALLEGUAS WHOLESALE DISTRICT

SUPPLIER	WATER COMPANY
Calleguas (cal-001)	Academy MWC
Calleguas (cal-002)	Arroyo Las Posas MWC
Calleguas (cal-003)	Balcom Bixby MWA
Calleguas (cal-004)	Berylwood Heights MWC
Calleguas (cal-005)	Brandeis-Bardin MWC
Calleguas (cal-006)	Conejo Trailer Park
Calleguas (cal-007)	California Water Service Company
Calleguas (cal-012)	City Camarillo Water District
Calleguas (cal-013)*	City of Oxnard
Calleguas (cal-014)	City of Thousand Oaks
Calleguas (cal-015)	Crestview MWC
Calleguas (cal-017)	Epworth MWC
Calleguas (cal-020)	Fuller Falls MWC
Calleguas (cal-022)	Sunshine Ranch
Calleguas (cal-023)	La Loma Ranch MWC
Calleguas (cal-025)	Las Lomas Water Systems
Calleguas (cal-028)	Oxnard Union High School District
Calleguas (cal-029)	Pleasant Valley MWC
Calleguas (cal-030)	Rancho Canada Water Company
Calleguas (cal-031)	Tom Grether Farms, Inc.
Calleguas (cal-032)	Russell Valley MWD
Calleguas (cal-034)	Solano Verde MWC
Calleguas (cal-035)	Golden State Water Co. - Simi Valley
Calleguas (cal-036)	Thermic MWC
Calleguas (cal-042)	Waters Road Users Group
Calleguas (cal-179)	Butler Ranch MWC
Calleguas (cal-190)	Water Canyon Water Well
	Zone Mutual Water Company

* Denotes agencies within the wholesale area of both United and Calleguas

Ventura County 2040 GENERAL PLAN

Figure 10-5:
Water Purveyors in Calleguas Creek Watershed

- Ventura County
- Subwatersheds
- Calleguas Creek Watershed
- Rivers Streams
- Water Bodies

Water Purveyor

- Calleguas Wholesale District
- United Wholesale District

Map Date: December 2017
Source: Kennedy/Jenks Consultants, 2017

8 Miles

Estimate of Demand

~~As described previously, i~~In 2014, the VCWPD~~County of Ventura Watershed Protection District~~ undertook an estimate of Countywide water demand, documented in the *County of Ventura 2013 Water Supply and Demand* (January 2015). Results of the study for the Calleguas Creek Watershed are provided in **Table 10-19**.

TABLE 10-19
ESTIMATED CALLEGUAS CREEK WATERSHED DEMAND

Watershed/Sub-watershed	Total Agricultural Demand (AF)	Total Municipal Demand (AF)	Total Demand (AF)
Calleguas Creek	112,701	89,335	202,036
Malibu Creek	1,083	19,291	20,374
South Coast	86	2,035	2,121
Subtotal (rounded to nearest 100 AF)	*113,900*	*110,700*	**224,600**

Source: Hydrometrics 2015. Table 6.

Comparison of Supply and Demand

Estimated supply in the Calleguas Creek Watershed ranges from 196,000 AF to 227,000 AF in any given year. This supply of course will vary given drought and operational conditions. Estimated demand is approximately 224,600 AF. If the low-end estimate of supply is correct, demand is outpacing supply. If the high-end supply estimate is correct, supply is only slightly greater (1%) than demand.

Water-Related Challenges

Below are the water related challenges for the Calleguas Creek Watershed as of late 2016.

Long-Term Groundwater Overdraft and Increased Salinity

The Pleasant Valley Basin is in long-term overdraft (UWCD 2017a). Declining groundwater levels and over-pumping in the southern portion of the basin has led to upwelling of brines from high chloride zones (UWCD 2017b). In the northern Pleasant Valley Basin, streambed recharge with treated wastewater has caused increased salinity in the vicinity of the Arroyo Las Posas.

Localize Pumping Depressions

Within the w~~W~~est Las Posas B~~subb~~asin, groundwater levels have dropped by 325 feet between 1950 and the early 1990s (LPUG 2012). There is~~is is raising~~ concern~~s~~ regarding~~about~~ subsidence, increased pumping lifts, decreased production and~~,~~ eventually~~,~~ dry wells (LPUG 2012). D~~In addition, d~~epressed groundwater levels may induce inflows of poor-quality groundwater from surrounding areas.

Heavy Dependence on Imported Water by Urban Users

~~Imported water makes up roughly 20 percent of Ventura County water supply.~~Approximately 75 percent of the County population receives water imported by Calleguas. Drought, earthquakes, and environmental demands on the SWP system could limit or even interrupt this water supply. Calleguas Municipal Water District, the primary imported water wholesaler in the region, has taken proactive steps to mitigate supply disruptions, including the construction of a local surface water storage reservoir (Lake Bard), construction of facilities to store surface water in local groundwater basins as well as facilities to

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extract this water if needed, obtaining and storing spare pipe for emergencies, and building multiple interconnections with other water suppliers.

SECTION 10.5 TRENDS AND FUTURE CONDITIONS

~~As documented above, t~~Traditional water supplies are limited in the Ventura County area and it is necessary to develop different supplies for Ventura County. Trends going forward include:

- Increased use of brackish groundwater. Ventura County has abundant sources of groundwater in parts of the county, but particularly in the Calleguas Creek Watershed, much of it is too high in salts for municipal and agricultural use. Two brackish groundwater treatment plans are currently in operation in the county (Port Hueneme Water Authority's Brackish Water Reclamation Demonstration Facility, Camrosa Round Mountain Desalter). Other additional desalters are proposed. Use of this brackish groundwater would require connection to salinity management pipeline such as that operated by the Calleguas Municipal Water District.
- Delivery of SWP water to western Ventura County. The City of Ventura, UWCD, Casitas Municipal Water District, and Calleguas are coordinating a study to build a connection to the SWP.
- Increased use of recycled water. The City of Oxnard has constructed the Advanced Water Purification Facility (AWPF)~~, sometimes called the AWPF,~~ which intensively treats wastewater to produce water suitable for irrigation, industrial processes, groundwater recharge and potable~~, and could be used for~~ use~~potable water in the future~~. ~~Many o~~Other water agencies in Ventura County are proposing increased use of recycled water and ~~many are~~ building infrastructure to deliver recycled water to agriculture and other irrigation users. In June 2016, the City of Ventura launched the Recycled Water Mobile Reuse Program whereby business, residents and other property owners in the City can use the City's recycled water fill station, fill their own containers, then haul the water for use within the City. Agencies are also actively pursuing groundwater recharge with recycled water and direct potable reuse of recycled water.
- Expanded conjunctive use. Conjunctive use is the coordinated and planned use and management of both surface water and groundwater resources to maximize the availability and reliability of water supplies. Conjunctive use involves planned and managed operation of a groundwater basin and a surface water storage system using coordinated conveyance infrastructure. When surface water is available it is recharged and stored in a groundwater basin for later use.
- Increased use of stormwater and dry weather runoff. Currently these are underutilized sources of supplies that could augment groundwater supplies. This will include stormwater detention in medians and along curbs, permeable pavement, and other means to retain and recharge runoff. Various agencies within Ventura County are planning and coordinating increased use of stormwater as documented in the Ventura Countywide Municipal Storm Water Resource Plan (September 2016).
- Ocean desalination. The City of Ventura, Channel Islands Beach Community Services District and Calleguas are exploring the feasibility of ocean desalination (City of Ventura 2016b; Citizens Journal 2015; Calleguas 2016).
- Increased call for urban water use efficiency. In May ~~9,~~ 2016, Governor Brown issued Executive Order B-37-16, which called for the establishment of long-term water conservation measures. DWR and the SWRCB ~~are to publicly release~~released a draft long-term conservation framework in April 2017.~~by January 2017~~. This framework ~~will~~ included new water use targets based on strengthened

standards for indoor residential water use, outdoor irrigation, commercial/institutional/industrial water use, and distribution system water loss.

- Increased call for agricultural water use efficiency. Grant-funded efforts are being developed and implemented to provide financial incentives for equipment upgrades and similar efforts will likely continue, dependent upon funding availability.
- Changes in the operation of surface water supplies to protect endangered species. Water users are likely to pay more to build and maintain habitat protection measures. There will likely be less water available for agriculture and urban users because more flow will need to be left in waterways to protect habitat.

SECTION 10.6 KEY TERMS

The following key terms used in this report are defined as follows:

303(d) List. References section 303(d) of the Clean Water Act whereby states, territories, and tribes are to develop lists of waterbodies that are polluted or otherwise degraded and not meeting water quality standards. The 303(d) List is used to develop Total Maximum Daily Loads and or identify other mechanisms to improve water quality.

Acre-feet (AF). The amount of water necessary to cover an acre (43,560 square feet) to a depth of one foot, or 43,560 cubic feet, which is equivalent to 325,828 gallons.

Adjudication: With regard to water rights, a legal decision that allocates water to parties in proceedings and is overseen by a court-appointed watermaster.

Aquifer. A subsurface geological formation sufficiently permeable to conduct groundwater and capable of yielding usable quantities of water to a well or surface water spring.

Beneficial Uses. The various purposes for which water or aquatic ecosystems may be used. Examples include municipal and domestic water supply, agricultural water supplies, preservation and protection of areas of special biological significance resources, freshwater habitat, commercial and sport fishing, estuarine habitat, freshwater replenishment, groundwater recharge, industrial supply, marine habitat, fish migration, navigation, preservation of rare and endangered species, recreation, shellfish harvesting, and wildlife habitat.

Best Management Practice (BMP). Any program, technology, process, siting criteria, operational methods or measures, or engineered systems, which when implemented prevent, control, remove, or reduce pollution.

Conjunctive Use. The practice of storing surface water in a groundwater basin (typically in wet years) and withdrawing it from the basin in later (typically dry) years.

Critical Overdraft. As defined in the Sustainable Groundwater Management Act a basin is subject to critical overdraft when continuation of present water management practices would probably result in significant adverse overdraft-related environmental, social, or economic impacts.

Coastal Zone. That portion of the land and water area of Ventura County as shown on the "Coastal Zone" maps adopted by the California Coastal Commission.

Groundwater Basin. An aquifer or system of aquifers that has reasonably well-defined boundaries and more or less definite areas of recharge and discharge. Refers to subsurface deposits and geologic formations that are capable of yielding usable quantities of water to a well or spring. The Sustainable Groundwater Management Act defines "basin" as a groundwater basin or subbasin identified and defined in Department of Water Resources Bulletin 118 or as modified pursuant to Section 10722 of the Act.

Integrated Regional Water Management. A comprehensive and collaborative approach for managing water to concurrently achieve social, environmental and economic objectives. This integrated approach delivers higher value for investments by considering all interests, providing multiple benefits, and working across jurisdictional boundaries at the appropriate geographic scale. Examples of multiple benefits include improved water quality, better flood management, restored and enhanced ecosystems, and more reliable water supplies" (Department of Water Resources 2014, California Water Plan Update 2013).

Mutual Water Company. A private corporation or association organized for the purposes of delivering water to its stockholders and/or members.

Permanent domestic water supply. A supply or supplies of potable water to be provided by a system or systems approved by a public health agency of the State of California or the Environmental Health Division of the Ventura County Resource Management Agency and the Ventura County Public Works Agency in a quantity sufficient to supply adequately and continuously the total domestic requirements of all consumers under maximum demand conditions.

Retail Water Supplier. A water agency that provides water to individual customers and end users such as homes and businesses.

Safe Yield. Commonly defined as the maximum quantity of water that can be continuously withdrawn from a reservoir or groundwater basin without causing adverse effects.

State Water Project. The SWP is the largest state-built, multi-purpose water project in the country. It was authorized by the California State Legislature in 1959, with the construction of most initial facilities completed by 1973. Today, the SWP includes 28 dams and reservoirs, 26 pumping and generating plants and approximately 660 miles of aqueducts. The primary water source for the SWP is the Feather River, a tributary of the Sacramento River. Storage released from Oroville Dam on the Feather River flows down natural river channels to the Sacramento-San Joaquin River Delta (Delta). While some SWP supplies are pumped from the northern Delta into the North Bay Aqueduct, the vast majority of SWP supplies are pumped from the southern Delta into the 444-mile-long California Aqueduct. The California Aqueduct conveys water along the west side of the San Joaquin Valley to Edmonston Pumping Plant, where water is pumped over the Tehachapi Mountains into Southern California.

Stormwater Pollution Control Plan. A plan identifying potential pollutant sources from a construction site and describing proposed design, placement and implementation of Best Management Practices to effectively prevent non-stormwater discharges and reduce pollutants in stormwater discharges to the storm drain system, to the maximum extent practicable during construction activities.

Stormwater Pollution Prevention Plan. A plan, as required by a State General Permit for Stormwater Discharges, identifying potential pollutant sources and describing the design, placement and implementation of Best Management Practices, to effectively prevent non-stormwater discharges and reduce pollutants in stormwater discharges during activities covered by the General Permit.

Stormwater Quality Master Plan. A plan that defines the strategy and describes the design, placement and implementation of Best Management Practices to effectively prevent non-stormwater discharges and reduce pollutants in stormwater discharges to the maximum extent practicable, for post-construction discharges to the stormdrain system.

Total Maximum Daily Load. A regulatory "pollution budget" based on a calculation of the maximum amount of a pollutant that can occur in a waterbody and still meet water quality standards so as to protect beneficial uses. The TMDL also allocates the necessary reductions to one or more pollutant sources. TMDLs can force the implementation of BMPs, infrastructure improvements, and other actions to limit pollution.

Watershed. A geographic region within which all water drains into a particular river, stream, or other waterbody. Also referred to as a catchment area.

Wholesale Water Supplier. A water agency that provides water to retail water agencies rather than directly providing water to the end user (homes, businesses, etc.).

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APPENDIX 10.A: SGMA/CALIFORNIA GOVERNMENT CODE

65350.5. REVIEW AND CONSIDERATION OF GROUNDWATER REQUIREMENTS

Before the adoption or any substantial amendment of a city's or county's general plan, the planning agency shall review and consider all of the following:

(a) An adoption of, or update to, a groundwater sustainability plan or groundwater management plan pursuant to Part 2.74 (commencing with Section 10720) or Part 2.75 (commencing with Section 10750) of Division 6 of the Water Code or groundwater management court order, judgment, or decree.

(b) An adjudication of water rights.

(c) An order or interim plan by the State Water Resources Control Board pursuant to Chapter 11 (commencing with Section 10735) of Part 2.74 of Division 6 of the Water Code.

65352. REFERRAL OF PROPOSED GENERAL PLAN UPDATES TO OTHER AGENCIES

(a) Before a legislative body takes action to adopt or substantially amend a general plan, the planning agency shall refer the proposed action to all of the following entities:

(1) A city or county, within or abutting the area covered by the proposal, and any special district that may be significantly affected by the proposed action, as determined by the planning agency.

(2) An elementary, high school, or unified school district within the area covered by the proposed action.

(3) The local agency formation commission.

(4) An areawide planning agency whose operations may be significantly affected by the proposed action, as determined by the planning agency.

(5) A federal agency, if its operations or lands within its jurisdiction may be significantly affected by the proposed action, as determined by the planning agency.

(6) (A) The branches of the United States Armed Forces that have provided the Office of Planning and Research with a California mailing address pursuant to subdivision (d) of Section 65944, if the proposed action is within 1,000 feet of a military installation, or lies within special use airspace, or beneath a low-level flight path, as defined in Section 21098 of the Public Resources Code, and if the United States Department of Defense provides electronic maps of low-level flight paths, special use airspace, and military installations at a scale and in an electronic format that is acceptable to the Office of Planning and Research.

(B) Within 30 days of a determination by the Office of Planning and Research that the information provided by the Department of Defense is sufficient and in an acceptable scale and format, the office shall notify cities, counties, and cities and counties of the availability of the information on the Internet. Cities, counties, and cities and counties shall comply with subparagraph (A) within 30 days of receiving this notice from the office.

(7) A public water system, as defined in Section 116275 of the Health and Safety Code, with 3,000 or more service connections, that serves water to customers within the area covered by the proposal. The public water system shall have at least 45 days to comment on the proposed plan, in accordance with subdivision (b), and to provide the planning agency with the information set forth in Section 65352.5.

(8) Any groundwater sustainability agency that has adopted a groundwater sustainability plan pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code or local agency that otherwise manages groundwater pursuant to other provisions of law or a court order, judgment, or decree within the planning area of the proposed general plan.

(9) The State Water Resources Control Board, if it has adopted an interim plan pursuant to Chapter 11 (commencing with Section 10735) of Part 2.74 of Division 6 of the Water Code that includes territory within the planning area of the proposed general plan.

(10) The Bay Area Air Quality Management District for a proposed action within the boundaries of the district.

(11) A California Native American tribe that is on the contact list maintained by the Native American Heritage Commission and that has traditional lands located within the city's or county's jurisdiction.

(12) The Central Valley Flood Protection Board for a proposed action within the boundaries of the Sacramento and San Joaquin Drainage District, as set forth in Section 8501 of the Water Code.

(b) An entity receiving a proposed general plan or amendment of a general plan pursuant to this section shall have 45 days from the date the referring agency mails it or delivers it to comment unless a longer period is specified by the planning agency.

(c) (1) This section is directory, not mandatory, and the failure to refer a proposed action to the entities specified in this section does not affect the validity of the action, if adopted.

(2) To the extent that the requirements of this section conflict with the requirements of Chapter 4.4 (commencing with Section 65919), the requirements of Chapter 4.4 shall prevail.

65352.5. REQUIREMENT TO PROVIDE WATER-RELATED DOCUMENTS TO GENERAL PLAN AGENCY

(a) The Legislature finds and declares that it is vital that there be close coordination and consultation between California's water supply or management agencies and California's land use approval agencies to ensure that proper water supply and management planning occurs to accommodate projects that will result in increased demands on water supplies or impact water resource management.

(b) It is, therefore, the intent of the Legislature to provide a standardized process for determining the adequacy of existing and planned future water supplies to meet existing and planned future demands on these water supplies and the impact of land use decisions on the management of California's water supply resources.

(c) Upon receiving, pursuant to Section 65352, notification of a city's or a county's proposed action to adopt or substantially amend a general plan, a public water system, as defined in Section 116275 of the Health and Safety Code, with 3,000 or more service connections, shall provide the planning agency with the following information, as is appropriate and relevant:

(1) The current version of its urban water management plan, adopted pursuant to Part 2.6 (commencing with Section 10610) of Division 6 of the Water Code.

(2) The current version of its capital improvement program or plan, as reported pursuant to Section 31144.73 of the Water Code.

(3) A description of the source or sources of the total water supply currently available to the water supplier by water right or contract, taking into account historical data concerning wet, normal, and dry runoff years.

(4) A description of the quantity of surface water that was purveyed by the water supplier in each of the previous five years.

(5) A description of the quantity of groundwater that was purveyed by the water supplier in each of the previous five years.

(6) A description of all proposed additional sources of water supplies for the water supplier, including the estimated dates by which these additional sources should be available and the quantities of additional water supplies that are being proposed.

(7) A description of the total number of customers currently served by the water supplier, as identified by the following categories and by the amount of water served to each category:

(A) Agricultural users.

(B) Commercial users.

(C) Industrial users.

(D) Residential users.

(8) Quantification of the expected reduction in total water demand, identified by each customer category set forth in paragraph (7), associated with future implementation of water use reduction measures identified in the water supplier's urban water management plan.

(9) Any additional information that is relevant to determining the adequacy of existing and planned future water supplies to meet existing and planned future demands on these water supplies.

(d) Upon receiving, pursuant to Section 65352, notification of a city's or a county's proposed action to adopt or substantially amend a general plan, a groundwater sustainability agency, as defined in Section 10721 of the Water Code, or an entity that submits an alternative under Section 10733.6 shall provide the planning agency with the following information, as is appropriate and relevant:

(1) The current version of its groundwater sustainability plan or alternative adopted pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code.

(2) If the groundwater sustainability agency manages groundwater pursuant to a court order, judgment, decree, or agreement among affected water rights holders, or if the State Water Resources Control Board has adopted an interim plan pursuant to Chapter 11 (commencing with Section 10735) of Part 2.74 of Division 6 of the Water Code, the groundwater sustainability agency shall provide the planning agency with maps of recharge basins and percolation ponds, extraction limitations, and other relevant information, or the court order, judgment, or decree. Sustainable Groundwater Management Act, and related provisions (as chaptered) Page 6 As Effective January 1, 2016 [rev. 1/15/2016]

(3) A report on the anticipated effect of proposed action to adopt or substantially amend a general plan on implementation of a groundwater sustainability plan pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code.

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Downing, Clay

From: David Magney <dmagney@cnps.org>
Sent: Thursday, February 27, 2020 4:51 PM
To: Curtis, Susan; General Plan Update
Cc: Kipp Callahan; Nick Jensen; Weiner, Jason; Ileene Anderson; Patt McDaniel
Subject: CNPS comments on DEIR for the VC GP 2040 update
Attachments: CNPS-Ventura County General Plan 2040 DEIR Comments-20200227-Magney.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Ms. Curtis,
Please find attached California Native Plant Society comments on the DEIR and GP 2040 update.
We would like to have additional time to provide additional focused comments.
Respectfully,

--
David L. Magney, CCB-0001
Rare Plant Program Manager
Chair, Board of Certification
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27 February 2020

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, California 93009-1740
susan.curtis@ventura.org, GeneralPlanUpdate@ventura.org

Re: Comments on the Draft Environmental Impact Report for the County of Ventura Draft 2040 General Plan

Dear Ms. Curtis:

The California Native Plant Society (CNPS), a membership-based 501(c)(3) nonprofit corporation herein provide these comments on the proposed Ventura County 2040 General Plan (GP) and associated Draft Environmental Impact Report (DEIR). CNPS's comments are focused on the biological resources with the intent to ensure that they are appropriately conserved through land use planning and government actions and management at the discretion of the county.

General Comments:

There is no mention of information on the botanical resources of Ventura County that have been developed and made available to the public, such as by the Channel Islands Chapter of the California Native Plant Society (CNPSCI), available online at http://cnpsci.org/, and by David Magney for the Ventura County flora (www.venturaflora.com). The GP mentions information provided by the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS), which is a good starting point; however, so much more detail is available that would be helpful to decisionmakers and the public that the true picture of the incredible biodiversity and species richness found in Ventura County.

For example, there is no mention of bryophyte resources, nor any mention of lichens, which are generally referred to as nonvascular plants. Both of these groups are both diverse and important components of the biological resources of Ventura County.

Qualified Biologist – since there are no codified criteria that the VCPD uses consistently to determine who is qualified, CNPS highly recommends that the following be inserted under the definition of a qualified biologist:

> Require use of a Certified Consulting Botanist for botanical resource assessments and surveys.
>
> Require use of a Certified Restoration Ecologist or Certified Consulting Botanist for habitat restoration planning, mitigation, or implementation work.

Thresholds of Significance (page 4.4-13) uses the term "substantially". "Substantially" is an ambiguous term that can be next to impossible to quantify, particularly if the impact appears to be small in some way. Without an actual metric, significant impacts could be considered less-than-significant by some biologists. Using actual numbers would be better, with some means to deviate if sufficient evidence is

provided to make a reasonable and sound, science-based argument for a different significance threshold number or metric.

For example, impacts to wetland habitat functions is identified as significant, if they are substantial. Measuring the total area of a wetland directly impacted is fairly straightforward; however, measuring the wetland functions that are impacted is more complex, and doing so for indirect impacts is even more challenging. It would be easier and fairer, and more accurate to use a tested assessment method, and set a significance threshold, say a 5% change, to determine if the impact would be significant. The only objective tool currently available to measure wetland functions is the U.S. Army Corps of Engineers' Hydrogeomorphic Assessment Method (HGM), which is described in more detail in comments below.

Policies

Following are the proposed General Plan (GP) Conservation and Open Space Element policies, with CNPS's assessment of their benefit in protecting biological resources and how they could be improved to better meet the stated objectives.

The Public Review Draft Policy Document, Section 6.1 – Biological Resources, provides a **very** general overview that hardly captures the richness, diversity, and uniqueness of the biological resources within Ventura County. At least a bit more information would be beneficial in expressing this fact since so much information about the biological resources of the county is readily available, much of it compiled in each biological assessment performed for every project that has gone through a CEQA assessment.

For example, expand the sentence "Ventura County contains a diverse range of elevations, biogeographic features and ecosystems" with ", which provides a large variety of habitats that supports 321 species of lichens, 97 species of bryophytes, 1,939 **native** vascular plants (Magney 2020 - http://venturaflora.com/files/vcfloristics.htm), 338 bird species, 11 amphibian species, 30 reptile species, several freshwater fish species, 50 mammal species, and an unknown (very high) number invertebrate species, but at least 117 species of butterflies."

Policy COS-1.1: Protection of Sensitive Biological Resources. The County shall ensure that discretionary development that could potentially impact sensitive biological resources be evaluated by a qualified biologist to assess impacts and, if necessary, develop mitigation measures that fully account for the impacted resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts. If the impacts cannot be reduced to a less than significant level, findings of overriding considerations must be made by the decision-making body.

This policy is good except there is no need or justification to insert "when feasible" regarding how to adhere to approaching mitigation measures for significant impacts. CEQA guidelines already provide the order of preference. The biggest challenge this policy faces is in how a "qualified biologist" is determined (see detailed comments and recommendations below).

Policy COS-1.2: Consideration of Sensitive Biological Resources. The County shall identify sensitive biological resources as part of any land use designation change to the General Plan Land Use Diagram or zone designation change to the Zoning Ordinance that would intensify the

uses in a given area. The County shall prioritize conservation of areas with sensitive biological resources.

This policy is good; however, the means and criteria that should be used to determine which biological resources are considered sensitive needs to be defined. This should not be left to the environmental consulting firms hired by project proponents that will almost certainly have an inherent bias against identifying sensitive resources that would harm their client's project interests.

Policy COS-1.7: Balancing Resource Preservation and Flood Protection. The County shall require that discretionary development and County-initiated projects balance the preservation of streams, wetlands, and riparian habitats with the need to adequately protect public safety and property from flooding hazards by incorporating natural or nature-based flood control infrastructure, (e.g., wetland restoration, soil conservation, vegetated levees), when feasible.

CNPS supports this policy.

Policy COS-1.8: Bridge Crossing Design. The County shall require discretionary development that includes new or modified road crossings over streams, wetlands and riparian habitats to include bridging design features with bridge columns located outside the riparian habitat areas, when feasible.

CNPS supports this policy.

Policy COS-1.9: Agency Consultation Regarding Biological Resources. The County shall consult with the California Department of Fish and Wildlife, the Regional Water Quality Control Board, the U.S. Fish and Wildlife Service, National Audubon Society, California Native Plant Society, National Park Service for development in the Santa Monica Mountains or Oak Park Area, and other resource management agencies, as applicable during the review of discretionary development applications to ensure that impacts to biological resources, including rare, threatened, or endangered species, are avoided or minimized.

This policy is good except consultation should cover the entire county, not just for the Santa Monica Mountains and Oak Park areas. The VCPD staff biologists have in the past convened the biologists from the above listed entities to review various discretionary projects under review to obtain guidance on impacts and mitigation measures. At a minimum, these entities should receive formal notice of all discretionary projects that may impact biological resources so that they have an opportunity to provide comments, on any project anywhere in the county. The VCPD should maintain a list of contacts of biologists with each of these entities as part of this policy.

Policy COS-1.10: Evaluation of Potential Impacts of Discretionary Development on Wetlands. The County shall require discretionary development that is proposed to be located within 300 feet of a wetland to be evaluated by a County-approved biologist for potential impacts on the wetland and its associated habitats pursuant to the applicable provisions of the County's Initial Study Assessment Guidelines.

This policy is good but it should be strengthened by including impacts to wetland functions, not just habitats. Indirect impacts that adversely affect one or more wetland functions needs to be included in

this policy. Also, the criteria for determining how the approved biologist is determined needs to be developed (see comments below about qualified biologists and wetland assessment methods).

Policy COS-1.11: Discretionary Development Sited Near Wetlands. The County shall require discretionary development to be sited 100 feet from wetland habitats, except as provided below. The 100-foot setback may be increased or decreased based upon an evaluation and recommendation by a qualified biologist and approval by the decisionmaking body based on factors that include, but may not be limited to, soil type, slope stability, drainage patterns, the potential for discharges that may impair water quality, presence or absence of endangered, threatened or rare plants or animals, direct and indirect effects to wildlife movement, and compatibility of the proposed development with use of the wetland habitat area by wildlife. Discretionary development that would have a significant impact on a wetland habitat shall be prohibited unless mitigation measures are approved that would reduce the impact to a less than significant level. Notwithstanding the foregoing, discretionary development that would have a significant impact on a wetland habitat on land within a designated Existing community may be approved in conjunction with the adoption of a statement of overriding considerations by the decision-making body.

This policy is good except the evaluation must be conducted by a Certified Wetland Scientist or a Certified Consulting Botanist. Since there are no standard or consistent methods used by the County to determine which biologists are actually qualified, such determinations are best made by professional peers, such as certification entities."

Furthermore, the evaluation/assessment should use an objective assessment tool or model, such as the Hydrogeomorphic Assessment Method (HGM) regional models (https://wetlands.el.erdc.dren.mil/pdfs/wrpde9.pdf), which have been used successfully in Ventura County in the past using either the Santa Margarita River Riverine HGM model for low gradient streams and rivers or the South Coast Santa Barbara Riverine HGM model for high gradient streams. California Rapid Assessment Method (CRAM) models have only limited applicability in that CRAM does not measure wetland functions, only HGM models do. To determine significance, a percent change in wetland functions is an appropriate and unbiased approach. A 10% change threshold has been used successfully in such assessments in Ventura County using regional HGM models, but a 5% change may be more appropriate since a fully functioning wetland is extremely important for ecosystem health.

Policy COS-1.12: Discretionary Development and Landscaping. The County shall require landscaping associated with discretionary development, or subject to the California Water Efficient Landscape Ordinance (WELO), to be water-efficient and include native, pollinator-friendly plants consistent with WELO guidelines, as applicable. The planting of invasive and watch list plants as inventoried by the California Invasive Plant Council shall be prohibited, unless planted as a commercial agricultural crop or grown as commercial nursery stock.

The WELO ordinance was developed in San Mateo County and calls for 6 inches of compost and 3 inches of mulch in landscaping with the goal of conserving soil moisture from evaporation. This simplistic approach is not necessarily appropriate for landscaping using local native plants, and in many instances will kill them. The policy should be modified to include the development

of landscaping guidelines that are appropriate for Ventura County communities and native plants that meet the basic goals of WELO.

Policy COS-1.13: Partnerships for Protection of Natural and Biological Resources. The County shall continue to work in partnership with agencies, organizations, and entities responsible for the protection, management, and enhancement of the county's biological resources.

This policy is good, but listing of the entities would help eliminate potential for failure to notify select groups. Certainly, count CNPS in as both willing and able to work in partnership with the County to implement this policy.

Policy COS-1.14: Ecological Information Programs. The County shall support programs that encourage awareness and respect for the natural environment.

This policy sounds great; however, what level and types of support will the County provide? The policy language needs to go into greater depth on how the County will implement it.

Policy COS-1.15: Countywide Tree Planting. The County shall establish and support a countywide target for the County, cities in Ventura County, agencies, organizations, businesses, and citizens to plant two million trees throughout the county by 2040.

CNPS fully supports this policy, with the proviso that no invasive exotic tree species be planted under this policy, and that native (to Ventura County) tree species should be emphasized and prioritized.

Policy COS-2.1: Beach Erosion. The County shall strive to minimize the risk from the damaging effects of coastal wave hazards and beach erosion and reduce the rate of beach erosion.

CNPS supports this policy. However, how it is implemented is important in that some hardscaping actions could harm coastal biological resources. The County needs to take the bigger, longer-term perspective when deciding what beach erosion control projects are planned and approved. Sea level is rising and there is little the County can do to prevent it. Emphasis should be placed on natural processes, which should take priority over manmade structures (which require expensive maintenance). Furthermore, coastal species need to have places to migrate (inland) to as sea level rises; therefore, migration paths must be either created or maintained to accommodate that migration.

Policy COS-2.2: Beach Nourishment. The County shall support activities that trap or add sand through beach nourishment, dune restoration, and other adaptation strategies to enhance or create beaches in areas susceptible to sea-level rise and coastal flooding.

See comments for Policy COS-2.1 above.

Policy COS-2.4: Mining Activities. The County shall require discretionary development for all mining activities in County streams and rivers to incorporate all feasible measures to mitigate beach sand replenishment impacts.

CNPS supports this policy.

Policy COS-2.5: Shoreline Protective Structure Design. The County shall require all shoreline protective structures which alter natural shoreline processes to be designed to eliminate or mitigate adverse impacts on local shoreline sand supplies.

CNPS supports this policy. See comments for Policy COS-2.1 above.

Policy COS-2.9: Estuarine Protections. The County shall support efforts by other agencies and organizations to maintain and enhance estuarine systems in order to protect and enhance coastal fisheries and other marine resources.

CNPS supports this policy.

Policy COS-2.10: Saltwater Intrusion. The County shall work with Federal, State, and local jurisdictions, agencies, and organizations to monitor saltwater intrusion and take proactive steps to reduce intrusion, including:

- working to maintain and restore coastal wetlands buffers;
- enhancing groundwater management to prevent excessive pumping in order to restore groundwater levels needed to reduce saltwater intrusion; and
- implementing mitigation measures to prevent saltwater intrusion into estuaries and groundwater basins including, but not limited to, implementation of reactive barriers and use of pumps to divert saltwater.

CNPS generally supports this policy.

Policy COS-2.11: Dune Vegetation. Discretionary development which would result in the removal of dune vegetation shall be conditioned to replace the vegetation.

CNPS supports this policy. However, it would be preferable to avoid the impact if at all possible. The policy should reflect that avoidance of impacts to dune vegetation is preferred.

Policy COS 9.3: Open Space Preservation. The County shall place a high priority on preserving open space lands for recreation, habitat protection, wildlife movement, flood hazard management, public safety, water resource protection, and overall community benefit.

CNPS supports this policy.

The following California Environmental Quality Act (CEQA) policy language regarding compensatory mitigation: "When there is no other feasible alternative to avoiding an impact to a wetland habitat, the County shall require the discretionary development to provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of wetland habitat results from the development. The restoration and/or replacement habitat shall be 'in kind' (i.e. same type and acreage) and provide wetland habitat of comparable biological value. On-site restoration and/or replacement shall be preferred wherever possible. A habitat restoration and/or replacement plan to describe and implement such compensatory mitigation shall be developed in consultation with all agencies that have jurisdiction over the resource.

Implementation Programs

- Program A: Standards for Compact Development. The County shall update the Non-Coastal Zoning Ordinance to include development standards for project design that features compact development adjacent to scenic or sensitive biological resources.

  CNPS supports this policy.

- Program B: Update Initial Study Assessment Guidelines. The County shall update the Initial Study Assessment Guidelines to identify a range of mitigation measures for protected biological resources. This will include updating Section 4, Biological Resources, to include the following California Environmental Quality Act (CEQA) policy language regarding compensatory mitigation: "When there is no other feasible alternative to avoiding an impact to a wetland habitat, the County shall require the discretionary development to provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of wetland habitat results from the development. The restoration and/or replacement habitat shall be 'in kind' (i.e. same type and acreage) and provide wetland habitat of comparable biological value. On-site restoration and/or replacement shall be preferred wherever possible. A habitat restoration and/or replacement plan to describe and implement such compensatory mitigation shall be developed in consultation with all agencies that have jurisdiction over the resource.

  CNPS supports this policy program.

- Program C: Update Tree Protection Ordinance. The County shall update existing Tree Protection Regulations in the Non-Coastal Zoning Ordinance to further enhance conservation of our urban forests and the preservation of the County's oak woodland resources. Updates shall include incorporation of Board-adopted recommendations from the Ventura County Oak Woodlands Management Plan (2007), which include tree replacement offsets for ministerial development projects that remove protected trees, revisiting mitigation ratios for tree removal and oak woodland impacts for discretionary development projects. The update shall also evaluate existing protections for invasive, non-native trees and consider the degree to which they provide habitat for a species during critical life stages (e.g., colonial roost sites, breeding sites, etc.). In addition, the evaluation shall also include anticipated effects of climate change on the urban forest environment.

  CNPS supports this policy; however, the evaluation for any updates should include Certified Consulting Arborists (particularly those with experience in assessing the functions (not the values) of trees from a habitat/ecological function perspective and Certified Consulting Botanists.

- Program D: Research Feasibility of Updating Vegetation Maps. In partnership with other natural resource agencies and organizations, the County shall explore the feasibility of updating vegetation maps for unincorporated areas to facilitate the accurate analysis of potential impacts of development on vegetation communities and other sensitive biological resources. If necessary, the County shall develop or modify regulations and development standards to ensure adequate protections for vegetation communities.

  There really is no need to "research the feasibility of updating vegetation maps" as there is an ongoing statewide program that CDFW and CNPS have been implementing for over a decade

now. The goal is to map all the natural vegetation of the state according to The Manual of California Vegetation classification system. Part of the county has already been so mapped, including the entire Ventura River floodplain (by David Magney Environmental Consulting [DMEC] through Aspen Environmental Group as part of the Matilija Dam Removal project), the Santa Monica Mountains (by CNPS and the National Park Service), the Santa Clara River 500-year floodplain (by TNC through the California State Coastal Conservancy), and a portion of the eastern end of the Santa Susana Mountains (by CNPS). In 2006, DMEC cobbled together all the existing (at that time) vegetation maps for VCPD as a starting point. That map, as a GIS database (which was used as the basis for Figure 8-4 Vegetation Communities on Page 8-27 of Appendix B of the DEIR but not fully credited), was intended to be updated with each vegetation mapping effort for each discretionary project submitted to VCPD, but a lack of funding impeded this effort. This policy should instead focus on identifying means to obtain the funding needed to update the vegetation map of the county in one consistent effort.

The County should collaborate with CDFW and federal land management agencies to obtain funding to update and complete the vegetation mapping of Ventura County.

- Program E: Update Non-Coastal Zoning Ordinance Standards for Vegetation Communities. Based on the results of Implementation Program COS-D, (updated vegetation mapping), the County shall develop or modify regulations and development standards to ensure adequate protections for vegetation mapping, if necessary.

  CNPS supports this policy program.

- Program F: Evaluate Increase to Standard Setback from Wetland. The County shall evaluate whether a standard 200-foot setback from wetlands should apply to development in order to improve water quality, reduce the impacts of flooding and provide adequate protection for sensitive biological resources.

  CNPS supports this policy program; however, the use of the appropriate regional HGM model can answer this basic question on a project-by-project basis. Studies have shown that a 300-foot setback buffer is better to protect may wetland and habitat functions, considerably more for some resources/functions (Robins 2002[1]). DMEC's assessment of wetland function impacts for a single-family residence in the Ojai Valley that was to be placed within the County's wetland 100-foot setback zone provided an objective assessment of expected project impacts while also identifying specific mitigation measures that could be adopted that would significantly improve wetland functions onsite (DMEC 2006).

- Program G: Identification of Critical Habitats. The County shall continue to partner with state and federal agencies to identify those areas of the County that are considered to be

[1] Robins, James D. 2002. Stream Setback Technical Memo. 18 October 2002. Jones & Stokes Associates, Oakland, California. Prepared for Napa County Conservation Development and Planning Department, Napa, California.

critical habitats of endangered, threatened or rare species as well as for other significant biological resources.

Unfortunately, since politics too often prevents federal and state agency biologists from formally designating what habitat(s) are critical for listed species (it too often gets bumped up to Washington DC where development lobbyists are most powerful and the local experts recommendations are overruled), the County should include NGOs that have expertise with these listed species in the analyses of what habitats are indeed critical for the species continued existence in Ventura County. Those NGOs include CNPS, Audubon Society, The Wildlife Society, and others. For County planning purposes, the VCPD, through collaboration with agency and NGO expert biologists, should determine what area and habitats meet the definition of Critical Habitat rather than Washington or Sacramento political appointees. The County can use existing definitions for sensitive habitats that are already developed, such as Environmentally Sensitive Habitat (ESHA) for the Coastal Zone or Sensitive Ecological Areas (SEAs) in Los Angeles County.

- Program H: County Tree Planting Program. The County shall plant at least one thousand trees annually on County property.

  This is a great policy; however, planting of invasive exotic tree species should be expressly prohibited. The policy should also be more inclusive as "County property" will likely become saturated with trees in a few years. Requiring trees to be included in landscape plans for all new homes and existing homes that request significant changes would increase the number of trees planted each year.

PFS-12 – To protect life and property through the efficient provision of fire prevention, suppression, and rescue services and facilities.

PFS-12.1 Collaboration Amount Partners. The County shall encourage the Fire Protection District to continue to develop relationships with local, state, and federal agencies and non-profit organizations to collaboratively inform and prepare citizens for wildland fires.

CNPS supports this policy and is willing to collaborate with the Fire Protection District.

PFS-12.4 Consistent Fire Protection Standards for New Development. The County, in coordination with local water agencies and the Fire Protection District, shall require new discretionary development to comply with applicable standards for fire flows and fire protection.

Considerable research has been conducted on what measures are most effective in protecting houses from wildfires, and removing natural vegetation more than 100 feet is away is not the solution. Require all new homes and homes being remodeled to incorporate effective measures such as vent screens with 1/16th inch mesh, not allow combustible materials within 3 feet of the home/building, installing rooftop sprinklers that are supported by municipal water supplies or pumped from a well or tank with a battery power backup in case of a power outage.

Planting with local low growing natives, appropriately spaced and maintained is preferable to clearings exotic annual grasses which are prone to fire when dry. Native plants should not be avoided on the assumption of flammability without adequate data and should be encouraged near natural areas. Zone

appropriate planting around structures, as described in the CNPS Fire Recovery Guide should be practiced around structures. https://www.cnps.org/give/priority-initiatives/fire-recovery

Zone 1: Within 0 - 30 feet of your home.

Make this area and your evacuation route "lean, clean, and green."

• Create a 5-foot no-fuel zone around your house to deter fire under the eaves of your home. (Relocate wood piles, garbage cans, mulch, wooden fences, and flammable plant material.)
• Prevent trees and large shrubs from touching each other or hanging over structures. (Cal Fire currently instructs spacing of at least 10 feet.)
• Remove "laddering" plants that can spread a ground fire up to a tree's crowns.
• Remove loose plant debris from gutters, roofs, and other structures.
• Remove dead or dying trees. (Note: Make sure a tree is actually dead. See page 29.)
• Break up continuous, flammable ground cover (e.g., grasses, mulch) with hardscaping and other fire-resistant features.
• Provide good access to water within 30 feet of your home.

Zone 2: Within 30 - 100 feet of your home, reduce fuels.

• Keep your yard clear of trash, natural debris, and dried grasses.
• Mow grasses before 10 a.m. and avoid mowing on hot, windy days.
• Use low-maintenance plants that require low water and pruning.
• Clear dead and diseased plants. (See page 29 for post-fire care of trees.)
• Create both horizontal and vertical spacing between plants. Avoid laddering understory plants; space trees and shrubs at one or two times their mature height.
• Periodically re-open gaps between plants as plants grow closer together.
• Consider expanding this zone up to 300 feet for steep slopes with flammable shrubs.

These guidelines/prescriptions are more appropriate than thick mulch (which can be flammable) and compost.

Coastal Area Plan Policies

- Section 30240 Environmentally Sensitive Habitat Areas, Adjacent Developments:
- ESHA shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.
- Development in areas adjacent to ESHA and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

CNPS generally supports these policies; however, additional comments will be provided later.

Oak Park Area Plan

- Policy 1.3.2.2: Discretionary development shall be located to avoid the loss or damage to healthy mature trees and sensitive plant species, including: Catalina Mariposa Lily, Wind Poppy and Santa Susana ~~Tar Plant~~Tarplant and other rare or endangered species.

This policy is good; however, a mechanism needs to be included to determine what a "healthy mature tree" is. The only commonly used tool available to arborists is focused on assessing trees in the landscape setting and emphasizing hazard risk to humans and property, not the biological and habitat functions mature trees have. Furthermore, this policy should be included in all Area Plans, not just the Oak Park Area Plan.

- Policy 1.3.2.3: Where applicable, developers shall be required to submit an updated Oak Tree Report, covering all oaks located within 50 feet of any proposed grading or construction. Trees, along with identifying number, health and aesthetic grades, shall be shown on the grading plan.

  All assessments of trees should be conducted by a Certified Consulting Arborist, such as by the International Society of Arboriculture. All assessments of impacts to special-status plants should be performed by a California Certified Consulting (or Field) Botanist. A "County-approved qualified biologist" is not sufficient for the reasons previously described. This policy should apply to the entire county, and in each Area Plan.

- Policy 1.3.2.4: All discretionary development shall comply with the oak tree preservation and mitigation requirements of the adopted Oak Park Development Plans.

  Agreed.

Ojai Valley Area Plan

- Policy 1.4.2.7: Discretionary development ~~which~~ that would result in a significant adverse impact to a Locally Important Plant Community shall be required to replace such Locally Important Plant Community proposed for removal on at least a 1:1 basis and will be required to monitor the success of such planting for a minimum of seven years. In lieu of replacement, developers may dedicate without compensation, acreage containing such Locally Important Plant Community to a government agency or non-profit organization (e.g., a homeowners' association, a land conservancy) provided such entity will provide assurances that the dedicated Locally Important Plant Community acreage will be retained in a permanent undeveloped state. Such dedicated lands shall be at least two times the acreage of the Locally Important Plant Community which is proposed for removal. The form of such dedication may be fee title, conservation easement or other instrument approved by the County.

  This policy has some good elements; however, it also has some flaws that need to be corrected. Including a "homeowners' association" with NGOs that can receive lands for the purposes of mitigating impacts to Locally Important Plant Communities is flawed in that there are very few, if any, homeowners' associations that have either adequate funds, interest, or expertise to properly manage such property. Some NGOs do, such as land conservancies and some government agencies; however, government agencies, such as the U.S. Forest Service, National Park Service, California Department of Parks and Recreation, to not accept lands with dead restrictions or conservation easements, which are common tools used to protect properties with sensitive resources.

Lake Sherwood/Hidden Valley Area Plan

- Policy 2.1.2.8: No blasting shall be permitted from February 15 through June 30 unless a field survey determines that there are no nesting raptors (other than kestrels) within 1/2 mile of the blasting site or unless studies are conducted to the satisfaction of Ventura County which indicate that blasting in an area will have no significant impact on nesting raptors.

  CNPS supports this policy.

- Policy 2.1.2.9: A field survey by a qualified biologist shall be done prior to destruction or modification of any rocky outcrops. Mitigation measures recommended by the survey shall be implemented.

  CNPS supports this policy; however, since this habitat type is very special, the field survey and impact assessment should be performed by a California Certified Consulting Botanist, not just a "qualified biologist" for which there is not clear, defined, and consistent set of criteria to determine their qualifications.

The County shall include the following new implementation program in the 2040 General Plan.

Implementation Program COS-X: Protection of Sensitive Biological Resources

The County shall update the Initial Study Assessment Guidelines, Biological Resources Assessment report criteria to evaluate discretionary development that could potentially impact sensitive biological resources with the following:

- The qualified biologist shall conduct an initial data review to determine the sensitive biological resources (i.e., special-status plant, special-status wildlife, sensitive habitats [e.g., riparian habitat, sensitive plant communities, ESHA, coastal beaches, sand dunes, other sensitive natural communities], wetlands and other non-wetland waters, native wildlife nursery sites, or wildlife corridors) that have the potential to occur within the project footprint. This will include but not be limited to review of the best available, current data including vegetation mapping data, mapping data from the County and California Coastal Commission, and database searches of the CNDDB and the CNPS Inventory of Rare and Endangered Plants of California.

  This is a good start; however, there is no mention of searches of databases and checklists for locally rare/Locally Important Species as part of this initial assessment. The Initial data review MUST include the potential for presence onsite or adjacent to the project site for locally rare species as well. Two resources are available to identify locally rare and uncommon native plants of Ventura County, the Ventura County Flora website (www.venturaflora.com) and the CNPSCI website (www.cnpsci.org). A search of Calflora online tool (www.calflora.com) will provide all reported occurrences of all native and naturalized plants using its "What Grows Here" tool. A search of the California Consortium of California Herbaria (CCH on the UC Jepson Herbarium website) will provide links to all accessioned and uploaded voucher specimens that have been deposited into a participating herbarium. Magney's Venturaflora.com website provides a checklist of all known native and naturalized vascular known to occur in Ventura County as well

as numerous local plant checklists. These resources should be part of every botanist's pre-site visit review to maximize detection of special-status plants that may occur on the project site.

- The qualified biologist shall conduct a reconnaissance-level survey for sensitive biological resources within the project footprint (including proposed access roads, proposed staging areas, and the immediate vicinity surrounding the project footprint) to determine whether sensitive biological resources identified during the initial data review have potential to occur.

  CNPS is extremely concerned that this part of the implementation program is flawed as the timing of the reconnaissance survey and the expertise of the "qualified biologist" are absolutely critical to determining the potential for determining whether there is potential for sensitive biological resources present. Many species are simply not detectable for long periods of each year and almost certainly would not be detected during a reconnaissance-level survey. All site botanical surveys should be floristic in nature, and timed to maximize the opportunities to detect the presence of sensitive species.

- If the reconnaissance-level survey identifies no potential for sensitive biological resources to occur, the applicant will not be subject to additional mitigation measures.

  CNPS strongly objects to the element of the implementation program. There are too many instances when even more thorough site surveys have failed to detect sensitive biological resources to simply claim, through a reconnaissance-level survey, that there is no potential for sensitive resources to be present onsite. There are very few circumstances when such a conclusion can be made, and then they should only be made by a Certified Consulting Botanist for botanical resources and a Certified Wildlife Biologist for wildlife resources.

- If sensitive biological resources are observed or determined to have potential to occur within or adjacent to the project footprint during the reconnaissance-level survey, then the following measures shall apply:

Special-Status Species

- If special-status species are observed or determined to have potential to occur within or adjacent to the project footprint, a qualified biologist shall conduct focused or protocol-level surveys for these species where established, current protocols are available (e.g., Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities [CDFW 2018], Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If an established protocol is not available for a special-status species, then the qualified biologist will consult with the County, and CDFW or USFWS, to determine the appropriate survey protocol.

  CNPS basically supports this step. However, the consulting biologists should be Certified, not just a "qualified biologist".

- If special-status species are identified during protocol-level surveys, then the County shall require implementation of mitigation measures that fully account for the adversely

affected resource. When feasible, mitigation measures should adhere to the following priority: avoid impacts, minimize impacts, and compensate for impacts.

CNPS basically supports this step. However, the consulting biologists should be Certified, not just a "qualified biologist".

- If impacts on special-status species are unavoidable, then the project proponent shall obtain incidental take authorization from USFWS or CDFW (e.g., for species listed under ESA or CESA) prior to commencing development of the project site, apply minimization measures or other conditions required under incidental take authorization, and shall compensate for impacts to special-status species by acquiring or protecting land that provides habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of project implementation; generally at least a 1:1 ratio. Compensation may include purchasing credits from a USFWS- or CDFW-approved mitigation bank or restoring or enhancing habitat within the project site or outside of the project site.

  CNPS basically supports this step. However, the consulting biologists should be Certified, not just a "qualified biologist". Avoidance of the impact shall take precedence over other forms of mitigation as translocation of special-status species as mitigation is mostly experimental and what has been done has has very low levels of success. For botanical resources, the impact assessment and mitigation plan and measures should be performed by a California Certified Consulting Botanist and by a Certified Wildlife Biologist for wildlife impacts.

These are some of CNPS's comments on the proposed GP update and DEIR; however, additional time is required (and previously requested) to be able to adequately review all the relevant documents and provide substantive and thoughtful comments and suggestions.

Please contact me via email at dmagney@cnps.org or by phone at 916/447-2677 ext. 205 if you have any questions.

Respectfully,

David L. Magney
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ISA Certified Consulting Arborist #WE-7674
Ventura County Qualified Biologist
Rare Plant Program Manager
California Native Plant Society
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Downing, Clay

From: Malloy, Timothy <malloy@law.ucla.edu>
Sent: Thursday, February 27, 2020 4:53 PM
To: General Plan Update
Subject: Comments regarding the Ventura County General Plan EIR
Attachments: Malloy Comments.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Curtis,

Attached please find my comments. Thank you for your consideration.

Sincerely,

Tim Malloy

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February 27, 2020

Susan Curtis, Manager, General Plan Update Section
Ventura County Resource Management Agency,
Planning Division
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Re: Comments Regarding Draft General Plan EIR

Dear Ms. Curtis:

I am writing to provide comments on the Draft General Plan EIR. The Background Report and the Draft EIR do not adequately address the impact of pesticide use in the agricultural sector. In its discussion of Environmental Impacts and Mitigation Measures, the Draft EIR identifies impacts associated with the use of pesticides as a concern. It describes the role of the County Agricultural Commissioner's office in evaluating the use of restricted materials but does discuss the efficacy of the program beyond reference to the 2018 report of the Ventura County Grand Jury.[1] That Grand Jury report focused primarily on implementation of monitoring requirements, concluding that "the monitoring of fumigants like 1,3-D, methyl bromide and chloropicrin utilized in County agriculture demonstrates that levels of drift are below cumulative harmful levels."[2] The Draft EIR then concludes that pesticide exposure would not be addressed further.[3] The draft Background Report likewise describes the restricted permitting process but does not evaluate its effectiveness.[4]

The Grand Jury report did not address the efficacy of the restricted materials permitting program. Two recent reports by researchers at UCLA evaluated the restricted materials permitting system. Those reports concluded the restricted permitting system throughout California, including in Ventura County, does not comply with two regulatory requirements established to implement the substantive requirements of CEQA. First, in approving the application of restricted materials, county officials fail to ensure the performance of meaningful alternatives analysis (AA), meaning systematic evaluation of safer alternatives such as more benign pesticides or cultural practices.[5] Second, in assessing the impacts of restricted materials, county officials do not perform cumulative impacts assessment (CIA), defined as consideration of the additive or

[1] Draft Environmental Impact Report: Ventura County 2040 General Plan (January 2020) at 4.2-5 to 4.2-6.
[2] Ventura County Grand Jury, Final Report: Pesticide Monitoring Near Schools and Day-Care Centers (April 25, 2019) at 5.
[3] Draft Environmental Impact Report: Ventura County 2040 General Plan (January 2020) at 4.2-5 to 4.2-6.
[4] Ventura County 2040 General Plan Update Background Report (January 2020) at 9-39.
[5] Timothy Malloy, *et al.*, *Governance on the Ground: Evaluating Pesticide Regulation in California (2019).*

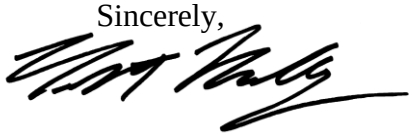
synergistic effects of exposing workers, bystanders and environmental receptors to multiple pesticides.[6]

The research focused on mixtures of three restricted materials — chloropicrin, Telone and metam salts — that are frequently used on high-value crops such as strawberries, tomatoes, tree nuts and stone fruits. The UCLA report demonstrated that their combined adverse effects can be greater because the materials may interact to increase damage to cells and can reduce the body's ability to remove or neutralize toxic substances. Using data from the Pesticide Research Institute, which collaborated with UCLA, the research examined the area near Rio Mesa High School in Ventura County from July 26 to August 3, 2013. The air modeling showed contemporaneous exposure to multiple pesticides at locations such as schools, day care centers and parks.[7] The Ventura County Grand Jury report did not address the impact of cumulative exposure to mixtures of pesticides. Copies of the UCLA reports can be found at https://law.ucla.edu/centers/environmental-law/emmett-institute-on-climate-change-and-the-environment/publications/governance-on-the-ground/ and https://law.ucla.edu/centers/environmental-law/emmett-institute-on-climate-change-and-the-environment/publications/exposure-and-interaction/

Given these identified deficiencies in the restricted materials permitting system, pesticide exposure should not have been excluded from further analysis in the Draft EIR. The EIR should examine how the existing deficiencies impact pesticide exposures and consider implementation of measures to mitigate these problems in the goals of the General Plan.

Thank you for your consideration. If you have any questions, please do not hesitate to contact me via e-mail at malloy@law.ucla.edu. (Please note that the comments represent my views only. Use of the UCLA letterhead is for identification purposes only.)

Sincerely,



Timothy F. Malloy

[6] Timothy Malloy, *et al., Governance on the Ground: Evaluating Pesticide Regulation in California (2019);* Virginia Zaunbrecher,*et al., Exposure and Interaction: The Potential Health Impacts of Using Multiple Pesticides (2016).*

[7] Virginia Zaunbrecher,*et al., Exposure and Interaction: The Potential Health Impacts of Using Multiple Pesticides (2016).*

Downing, Clay

From: VC2040.org Comments <alan.brown@ventura.org>
Sent: Thursday, February 27, 2020 4:55 PM
To: Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley
Cc: Brown, Alan

Follow Up Flag: Follow up
Flag Status: Flagged

You have a NEW Comment

Name:

Derek McLaughlin

Contact Information:

760-579-1437 271 S Ventura Rd #299 Port Hueneme

Comment On:

Draft Environmental Impact Report

Your Comment:

Don't allow expansion of the port in Port Hueneme. I live about 1/3 of a mile east of it & often I & thousands of others are downwind of it. It already has far to much air pollution. At least make them have all large vessels plug into the grid upon arrival before any expansion is seriously considered or have to install excellent air pollution equipment on their exhaust, such as scrubbers like those on one of the Wallenius Wilhelmsen auto carriers.
Even without any thought of port expansion, cleaning up the port's air pollution & the ships while in port needs to be much further the list of county air pollution priorities. Many schools are downwind of the port & almost always people are downwind of it.

Quite putting so many new residential units in highly air polluted areas near freeways. Bad for the residents till we have much cleaner fleets of vehicles.

Try hard to avoid more of the coast being lined with rip-rap & seawalls. Keep the shoreline way more natural then that. Discus-sting when you go north of the city of Ventura. So much of the coast is rip-rap instead of natural beaches, dunes, wetlands, bluffs etc.

Regarding two things from Aug. 6, 2019 Board of Supervisor hearing, session I attended: one, Supervisor Parks idea on tree planting has a lot of good points though we must consider if more greenhouse gases will be produced then the trees make up for, by the transporting of water to water them & if water trucks will be used to water many of them. I've heard &/or read the Calif. Water Project is the largest user of electricity in the state & that's just one of the 3 large aqueduct systems that bring water to So. Calif. Water trucks should be electric, hydrogen or better, otherwise will also have air pollution from them. One fellows 90 seconds comment that day addressed problem if the trees degrade the natural ecosystems of the county. I agree that's a serious concern though Parks said we should use drought tolerant trees which will help narrow the choose to natives & a few others. That's good. We could concentrate on replacing native trees where they have been removed with natives. I think eucalyptus tend to drop stuff on the ground that

prevent native plants from growing plus they blow over easy & aren't native & probably bad in fires.
2nd: I agree with all of supervisor Bennett's comments on climate change he mentioned on Aug. 6th. Not to downplay all the very important other considerations of the general plan, but I strongly feel that is the most important issue the county should address in the general plan.
Try to help insure we always have the Oxnard performing arts center

Mary Kathleen McGrath

c/o Hoffman, Vance & Worthington

1000 S. Seaward Avenue

Ventura, CA 93001

February 24, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

V

Sincerely,

Mary Kathleen McGrath

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:32 PM
To: Simmons, Carrie
Subject: FW: Comments on Ventura County General Plan DEIR

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at **vcrma.org/planning**
Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Patrick de Nicola <patrickdenicola@gmail.com>
Sent: Thursday, February 27, 2020 4:31 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Comments on Ventura County General Plan DEIR

Ventura County Resource Management Agency, Planning Division

Attn: Susan Curtis, Manager, General Plan Update Section

800 South Victoria Avenue, L#1740

Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and

farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Laura McAvoy

I support this letter-
Patrick de Nicola

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:35 PM
To: Simmons, Carrie
Subject: FW: Ventura County General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Patrick de Nicola <patrickdenicola@gmail.com>
Sent: Thursday, February 27, 2020 4:33 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura County General Plan

Susan Curtis,

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:38 PM
To: Simmons, Carrie
Subject: FW: Ventura County General Plan comments
Attachments: page3image3744272.png; page2image1668752.png; page3image3743440.png; page3image3766944.png; page1image1665632.png; page3image3766736.png; page4image1774048.jpeg

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From: Patrick de Nicola <patrickdenicola@gmail.com>
Sent: Thursday, February 27, 2020 4:35 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura County General Plan comments

Sanger Hedrick, Chair
Agricultural Policy Advisory Committee (APAC) County of Ventura
800 S. Victoria Blvd.
Ventura, CA 93003

Re: 2040 General Plan Environmental Impact Report (EIR)

Dear Mr. Hedrick and Honorable Members of APAC:

Thank you for the opportunity to provide comments following today's presentation by Ventura County Planning staff on t

There are several issues with the 2040 General Plan EIR that CoLAB believes will negatively impact the viability of local ag

Proposed mitigation measure AG-2: The County proposes that any project that either directly or indirectly results in the l
into perpetual agricultural preservation twice the total of the farmland loss. This mitigation measure is infeasible. Contra

Planning staff today at the APAC meeting, the California Environmental Quality Act (CEQA) requires that all mitigation pro
Section 21061.1 defines feasible as "capable of being accomplished in a successful manner within a reasonable period of

" (*emphasis added*). All mitigation measures proposed in an EIR must be shown to reduce impacts

and an infeasible mitigation measure, by definition, cannot and will not reduce impacts.

The EIR does not provide evidence of any of the following:

1. 1) Whether there is sufficient land available for purchase/conservation

   easement for each farmland category;

2. 2) The cost per acre to purchase each category of farmland;
3. 3) The anticipated cost of establishing a conservation easement for each

   category of farmland;

4. 4) The anticipated cost associated with managing each category of farmland

   under a conservation easement;

5. 5) The anticipated cost associated with monitoring these mitigation parcels

   scattered throughout the County and who will bear that cost;

6. 6) Any information that could constitute a "plan" for management of farmland

   in conservation easements;

February 19, 2020

7. 7) An analysis of direct and indirect impacts caused by this mitigation measure (including impacts associated w
   increased urban-ag-interface);
8. 8) Whether the smallest possible mitigation acreage required will achieve the minimum to ensure viability of a
9. 9) Whether the proposed mitigation is in conflict with other ordinances and regulations, such as the County's
   minimum lot sizes.

The County is already aware that this proposed mitigation measure is infeasible. On March 24, 2016, at a Local Agency Fo
Supervisor Linda Parks attempted to establish an "Agricultural Mitigation Measure" through the LAFCo project approval p
have required the 1-to-1 purchase of local farmland (half of what is proposed in the 2040 General Plan EIR) to replace far
proposed development. Ventura County Counsel, Michael Walker, informed both LAFCo and Supervisor Parks that the pr
meet the standard for economic feasibility, and, for that and other reasons, LAFCo could not adopt Supervisor Park's prop

referenced a 2015 legal decision, City of Irvine v. County of Orange, in which the Court stated, "the sheer astronomical ex
the EIR that the purchase of an agricultural conservation easement is a non-starter."

In addition to being infeasible, CoLAB does not believe that this mitigation measure will reduce impacts on agricultural la
issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the increasing regulatory d
competition for water resources, and increased compatibility conflicts from development.

Indirect Impacts
The EIR dismisses "indirect impacts" that will occur as a result of implementing the 2040 General Plan as "less than signifi

Page 4.2-13 of the EIR states "AG-2.3 maintains the Right-to-Farm Ordinance to protect agricultural land uses from conflic
as to help land purchasers and residents understand the potential for nuisance, (e.g., dust, noise, odors) that may occur a
agricultural areas...These sections of the code protect farmers engaged in agricultural activity from public nuisance claims
community, including Important Farmlands and farms less than 10 acres, from developments that would inhibit their abil
production."

Page 4.2-17 of the EIR states: "Residential growth in areas nearby agricultural lands has the potential to result in land use
generally more sensitive and prone to conflict with adjacent agricultural land uses than commercial or industrial land use
such as residences and schools, nearby classified farmland can negatively impact both uses due to conflict including odor
machinery. The countywide Right-to-Farm Ordinance protects existing agricultural and farming operations from conflicts
development...Therefore, the potential for conflicts would be minimal. This impact would be less than significant" (*emph*

This is simply not true. Historic and recent County actions have shown that the County has and will continue to create ne
a significant impact on existing agricultural

and farming operations because of conflicts attributed to residential development. The recent interim

urgency ordinance restricting hemp cultivation is one such example.

Contrary to statements made today by Ventura County Planning staff, an EIR, whether it is labeled as "programmatic" or
foreseeable consequences of the action that is proposed. For the 2040 General Plan EIR, the action proposed is the imple
within. Therefore, if the implementation of a policy in the 2040 General Plan will result in an impact, that impact must be
General Plan contains land use designation changes that will increase allowable housing density near agricultural land. It
houses will create more compatibility conflicts with normal farming operations. The impact of these compatibility conflic

In 2014, the California Court of Appeal stated in a ruling that "[T]he fact that this EIR is labeled a 'project' rather than a 'p
an EIR as a program EIR ... does not by itself decrease the level of analysis otherwise required in the EIR. All EIRs must cov
of specificity of an EIR is determined by the nature of the project and the "rule of reason," rather than any semantic label

It is CoLAB's opinion that indirect impacts from increasing urban-ag interface are SIGNIFICANT and cannot be dismissed ir

Direct and indirect impacts of increased costs
The 2040 General Plan has policies that will increase the costs of normal farming operations. CoLAB believes that the mos
of agricultural land to non-agricultural uses is to take active measures to allow farming to remain profitable. And even the
of farming reduces conversion of agricultural land in their discussion of the Williamson Act in Chapter 4.2 of the EIR.

But the County fails to analyze direct and indirect impacts of 2040 General Plan policies that will increase the cost of norm

- Policy AG-5.2: Electric- or Renewable-Powered Agricultural Equipment. The County shall encourage and suppo renewable-powered or lower emission agricultural equipment in place of fossil fuel-powered equipment when
- Policy AG-5.3: Electric- or Renewable-Powered Irrigation Pumps. The County shall encourage farmers to conve to systems powered by electric or renewable energy sources, such as solar power, and encourage electric utilit charges.

Direct and indirect impacts of increased competition for water resources
The County fails to evaluate the impact of increased competition for water resources caused by development a either the conversion of agricultural land or the loss of agricultural lands through the loss of topsoil.

The EIR states on page 4.2-3 that "...a reduction in available water resources for irrigation" is an example of inc to loss of topsoil from increased wind and water erosion.
But the County fails to analyze or propose mitigation measures to address this significant impact.

APAC is the expert charged with advising County decision-makers on agricultural issues in Ventura County. And the Count APAC about the actual issues that will impact farmland under the 2040 General Plan: lack of economic sustainability, the agriculture, increased competition for water resources, and increased compatibility conflicts from development.

CoLAB encourages APAC to provide guidance to the County on appropriate and effective mitigation measures to prevent non-agricultural uses. These may include:

1. 1) Strengthen the Right-to-Farm ordinance to prevent nuisance complaints from being used to justify setbacks or regulatory restrictions on normal farming practices;
2. 2) Expand the Land Conservation Act Program to include Open Space zoned properties that are enga and
3. 3) Protect agricultural land from urban-ag interface encroachment and compatibility conflicts by esta land that will restrict the construction of bike paths, public trails, and sensitive receptors within 2000'

Thank you again for the opportunity to provide comments on this issue. We appreciate your consideration and

Sincerely,

Louise Lampara Executive Director

In support of this letter-
Patrick Chambers de Nicola

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:38 PM
To: Simmons, Carrie
Subject: FW: Comments to 2040 General Plan Draft EIR
Attachments: VC DEIR 2040 General Plan RenPet comments 2-26-2020.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
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From: Marc Traut <marc@renpetllc.com>
Sent: Thursday, February 27, 2020 4:35 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Maureen Carson <maureen.t.carson@gmail.com>; Steve Snow <snowlawcorp@snowlaw.com>
Subject: Comments to 2040 General Plan Draft EIR

See attached.

Renaissance Petroleum, LLC

P.O. Box 20456
Bakersfield, CA 93390-0456
Phone 661-324-9901 / Fax 661-324-9902

February 26, 2020 By: Email only

Ms. Susan Curtis
General Plan Update Manager
Ventura County Planning Division
800 S. Victoria Ave.,
Ventura, CA 93009

Re: Comments to Draft EIR to Ventura County General Plan

Dear Ms. Curtis,

I find redundancy and flaws in the description and analysis of the 2040 General Plan released January 13, 2020 (Draft EIR) that significantly impact potential policy changes. I will specifically address two proposed new policy items associated with Section 4.12, Mineral and Petroleum Resources.

1. On page 4.2-8, the Draft EIR is proposing "**new policy**" as described as COS-7.2 (revised page 4.12-18): Oil Well Distance Criteria. Under this new policy the *"County shall require that new discretionary oil and gas wells be sited a minimum of 1,500 feet from the well head to sensitive use structures which include dwellings, childcare facilities, hospitals, health clinics, and school property lines."* In light of the "significant and unavoidable" impact that COS-7.2 (DEIA page 4.12-22) would have on hampering or precluding access to petroleum resources in Ventura County and potentially exposing the County to liability for damages associated with precluding landowners the right to enjoy the benefit of the development of their mineral resources, the County should suspend the inclusion COS-7.2 until the State legislature has had the opportunity to deal with the matter and develop policy (i.e. AB345) which most probably will be in conflict with any form of COS-7.2 that the County develops.

   In the last several years there has been an abundance of information published by setback advocates concerning setbacks from oil and gas production facilities. Health related studies of populations living in the vicinity of an oil and gas production facility are not conclusive, and may be significantly biased by knowledge that a facility, previously unknown, is "discovered" to exist. From my own review of the published sources, none conclusively establish an appropriate setback distance and, because wells and facilities differ, not one size fits all. A steam injection related facility on the Oxnard Plain is significantly different from a light oil and gas facility on the Oxnard Plain; both oil and gas, but each has radically differing impacts. The former having the lingering smell of tainted rotten eggs and the latter no noticeable emissions impacts at all. The majority of the published studies used by both the Los Angeles County and California Council on Science and Technology that were cited as support in the Draft EIR were performed in areas outside of California (i.e. TX, CO, PA etc.) where the regulatory requirements for emissions from oil and gas facilities are significantly less stringent than those required in California, of which the APCD in Ventura County has been ahead of the pack for over a decade.

   In conclusion, suspending action of a setback requirement until the State has generated policy is a prudent course of action given the uncertainty associated with the implantation of COS-7.2 and the potential liability that the County could be exposed to in the future. Lastly, existing Ventura County policy has not been demonstrated to be inadequate.

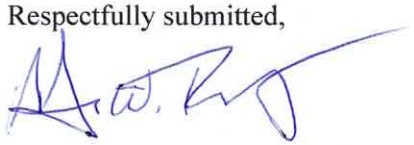
2. On page 4.2-8, the Draft EIR is proposing "**new policy**" as described as COS-7.7 (revised page 4.12-31): Conveyance for Oil and Produced Water. Under this new policy the *"County shall require new discretionary oil wells to use pipelines to convey crude oil and produced water, if feasible. Trucking of crude oil and produced water may only be allowed if the proponent demonstrates that conveying the oil and produced water via pipeline is infeasible. In addition, trucking of crude oil and produced water is allowed in cases of emergency and for testing purposes consistent with federal, state and local regulations."* The current VCNCZO establishes oil development guidelines and states that "An applicant should use the guidelines in the design of the project and anticipate their use as permit conditions, unless the applicant can demonstrate that they are not feasible or practicable" (VCNCZO §8107-5.5.) and further states that "Pipelines should be used to transport petroleum products off-site to promote traffic safety and air quality" (VCNCZO §8107-5.5.5.a).

   As stated in the above, the requirement to utilize pipelines to transport petroleum products is based on the feasibility and practicality of utilizing a pipeline as oppose to other sources of transportation such as trucking. Feasibility and practicality include the economic feasibility of a pipeline in support of a project. I am cited on page 4.12-23 of the DEIR analysis where my firm, Renaissance Petroleum, LLC (RenPet), provided Ventura County an economic evaluation for the interconnection of RenPet's Cabrillo Oil Field to a pipeline to transport crude oil. The DEIR correctly summarizes the findings that such a project would be uneconomic.

   Figure 4.12-4 of the Draft EIR is fatally flawed. The map purportedly displays "Major Oil Transmission Pipelines" in yellow and includes an orange "2 Mile Setback" in an effort to show the proximity of the majority of the oil production in Ventura County to crude oil pipelines. As a significant flaw, the lines shown as yellow on Figure 4.12-4 **include gas transmission lines**. These gas transmission lines represent the majority of the "Major Oil Transmission Pipelines" shown on the map. Please refer to the Grand Jury sourced map attached to my 2016 memo for an accurate presentation of crude oil transmission pipelines in Ventura County (see attached). There is significantly less access to a crude oil pipeline than Figure 4.12-4 and its setback distance suggests, and south of SR 101 there is very limited access. The implantation of COS-7.7 could strand significant crude oil resources located south of SR 101 to the financial detriment of the landowners in this area and Ventura County. As a result, what is characterized as a potentially significant impact (DEIR page 4.12-31) **should be elevated to a significant impact, based on the flawed map included in the DEIR as Figure 4.12-4.**

Thank you very much for your consideration of my comments.

Respectfully submitted,



Marc Wade Traut
President

Attachment MWT memo to file 12-22-2016

Memorandum
Renaissance Petroleum, LLC

PO Box 20456
Bakersfield, CA 93390-0456
Phone 661-324-9901 / Fax 661-324-9902

To: File
From: Marc Traut
Date: 12-22-2016

Subject: Cabrillo Oil Field Pipeline Options and Economic Feasibility

Ventura County (VC) Planning has requested that RenPet provide a discussion on the economic feasibility of transporting Cabrillo Oil Field (Cabrillo) crude oil from the field's Naumann Drillsite to market by way of a pipeline instead of by tanker truck. This request has been made to assess whether RenPet's activities at the Naumann Drillsite are consistent with the oil development guideline standards that are defined in the Ventura Non-Coastal Zoning Ordinance (VCNCZO) Section 8107-5.5. Importantly, the aforementioned reference states that these guidelines shall be "…applied whenever physically and economically feasible and practicable…." The guidelines include Section 8107-5.5.5.a that states "…Pipelines should be used to transport petroleum products off-site to promote traffic safety and air quality…." The following is RenPet's response to the request made by VC Planning.

Cabrillo crude oil has historically been transported by truck from the processing and storage hub for Cabrillo, which is the Naumann Drillsite located on Etting Road in the southern sector of the Oxnard Plain. From the Naumann Drillsite, the transportation route is by various VC roads north to SR 101 and then south to refineries in the Carson/Torrance area of southern California. Section 4.2.6 of the current version (10-20-2015) of the Ventura County General Plan, Public Facilities and Services Appendix (VC General Plan) provides a general discussion of the existence of oil pipelines in Ventura County. Not included in the current version of the VC General Plan is a map showing the location of these oil pipelines. Maps of oil pipeline locations had been included with earlier versions of the VC General Plan (i.e.1987). RenPet was able to locate a report prepared for the Ventura County Grand Jury in 2015 that included a map of oil pipelines within VC. The report was prepared to address concerns over pipeline safety within VC following the pipeline rupture and ensuing oil spill in Santa Barbara County in 2015. A copy of the pipeline map included with the VC Grand Jury report is attached to this memo. Oil pipelines are shown as solid red lines. Also attached to this memo is an enlargement of the same map that shows the location of oil pipelines in relation to the Naumann Drillsite.

The enlargement of the VC pipeline map shows the location of three oil pipeline interconnection possibilities that represent the nearest options for RenPet to interconnect Cabrillo to the existing oil pipeline system. These interconnections are considered possibilities. RenPet has never had contact with any of the pipeline owners to explore if pipeline access is feasible and to determine what the tariff would be for pipeline access and crude oil transport. Each of these three options is described in the following:

- Oil pipeline interconnection Option 1 is approximately 8.1 miles from the Naumann Drillsite. The interconnection point is at the intersection of Los Angeles Avenue (SR 118) and Santa Clara Avenue. The oil pipeline is owned and operated by Crimson and serves to transport crude oil east and ultimately south from the Ventura Avenue Oil Field area to Los Angeles area refineries.

- Oil pipeline interconnection Option 2 is approximately 6.6 miles from the Naumann Drillsite. The interconnection point is at the intersection of Santa Clara Avenue and Central Avenue. The owner of the pipeline is unknown; however that oil pipeline serves the Santa Clara Avenue Oil Field and interconnects with an oil pipeline that was formerly owned by Union Oil Company that transports crude oil eastwards along the Santa Clara River and ultimately south to Los Angeles area refineries.

- Oil pipeline interconnection Option 3 is approximately 10.6 miles from the Naumann Drillsite. The interconnection point is west of Harbor Boulevard in the vicinity of the Mandalay Beach generating plant. The owner of the pipeline is unknown; however that oil pipeline serves the West Montalvo Oil Field and appears to interconnect with the same oil pipeline that was formerly owned by Union Oil Company that transports crude oil eastwards along the Santa Clara River and ultimately south to Los Angeles area refineries.

All three of the oil pipeline interconnection options for Cabrillo that are shown on the attached enlargement face challenges. For Options #1 and #2, the largest hurdle is an undercrossing of SR 101. For options #1, #2 and #3, the Cal Trans, VC, and city of Oxnard road right-of-ways could be used for pipeline placement as the routes would use common segments of Etting Road, Rice Road, and Santa Clara Avenue. Interconnection Option #3 would use part of the same right-of-way as options #1 and #2, but would cut west through the city of Oxnard, and then into the VC Coastal Zone, and then north and west to the possible interconnection point in the vicinity of Mandalay Beach.

Based on pro forma cost estimates, the three oil pipeline interconnection options described above would cost 1.2 to 1.5 million dollars per mile. The estimated average cost for the three options is 11.4 million dollars for permitting, design, engineering, and construction. The necessary lead time for any of these options would be 4 to 5 years.

The economic feasibility of any pipeline project would be based on the differential savings between the cost of transporting Cabrillo oil by pipeline versus the cost of transporting Cabrillo oil by tanker truck after consideration of the capital investment of pipeline construction. RenPet pays approximately $2.50 per barrel to transport its Cabrillo crude oil from the Naumann Drillsite to markets in southern California. An estimated tariff to transport Cabrillo crude via pipeline is $0.50 per barrel. The estimated net savings realized by utilizing a pipeline for crude oil transport instead of truck transport is $2.00 per barrel.

Cabrillo crude oil has been trucked from the Naumann Drillsite from inception of activities there in 1992. The highest rate of production achieved to date for Cabrillo was a rate of approximately 12,500 barrels of oil per month beginning in late 2010. The production rate declined rapidly. Cabrillo oil production is currently approximately 1800 barrels of oil per month. The exponential decline over the past five years is typical for the Cabrillo reservoir.

A discounted cash flow analysis was performed to determine the net present value (NPV) of a hypothetical Cabrillo pipeline project on a go forward basis, that is, from the current level of production forecasted out for 25 years. The assumptions are as follows:

1. Pipeline Capital Investment: $11,385,000
2. Net Crude Transportation Savings per barrel: $2.00
3. Discount Rate: 5%
4. Project life: 25 years; years 6-31
5. Future production decline: Exponential ($y=80221x^{-0.673}$)

The NPV of the pipeline project with the above assumptions is ($10,512,490).

A second discounted cash flow analysis was performed to determine the NPV of a hypothetical Cabrillo pipeline project on the basis of a restart of the Cabrillo production rate achieved in 2011 as a starting point and then declining out for 25 years. The assumptions are as follows:

1. Pipeline Capital Investment: $11,385,000
2. Net Crude Transportation Savings per barrel: $2.00
3. Discount Rate: 5%
4. Project life: 25 years; years 1-25
5. Future production decline: Exponential ($y=80221x^{-0.673}$)

The NPV of the pipeline project with the above assumptions is ($10,176,737). Note that there is a slight improvement in NPV over the first analysis, as a result of the addition of an early period of higher initial production rates. Nonetheless, the pipeline project is still completely uneconomic. To meet basic financial criteria for the project to be considered economically feasible, the NPV would have to be no less than $0 which equates to a 5% rate of return on the original capital investment.

A third discounted cash flow analysis was performed as a sensitivity to the second case to determine the initial annual production rate required to drive the NPV to $0. The assumptions were the same as the second case above. The initial annual production rate required to drive the NPV to $0 is 1,305,808 barrels of oil. This hypothetical volume is more than 16 times the previous annual Cabrillo production rate peak of 80,221 that was realized in 2011. This sensitivity serves to demonstrate the extremely large volume of oil production required to begin to enter a discussion regarding a Cabrillo pipeline interconnection. Until other options become available, a pipeline project as described above to transport Cabrillo crude oil from the Naumann Drillsite by pipeline is not economically feasible or justifiable. As a result, RenPet's plan for Cabrillo and the Naumann Drillsite is to continue to transport Cabrillo crude oil by tanker truck.


33
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FILLMORE
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Santa C
SANTA PAULA
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MOORPARK
Simi Valley
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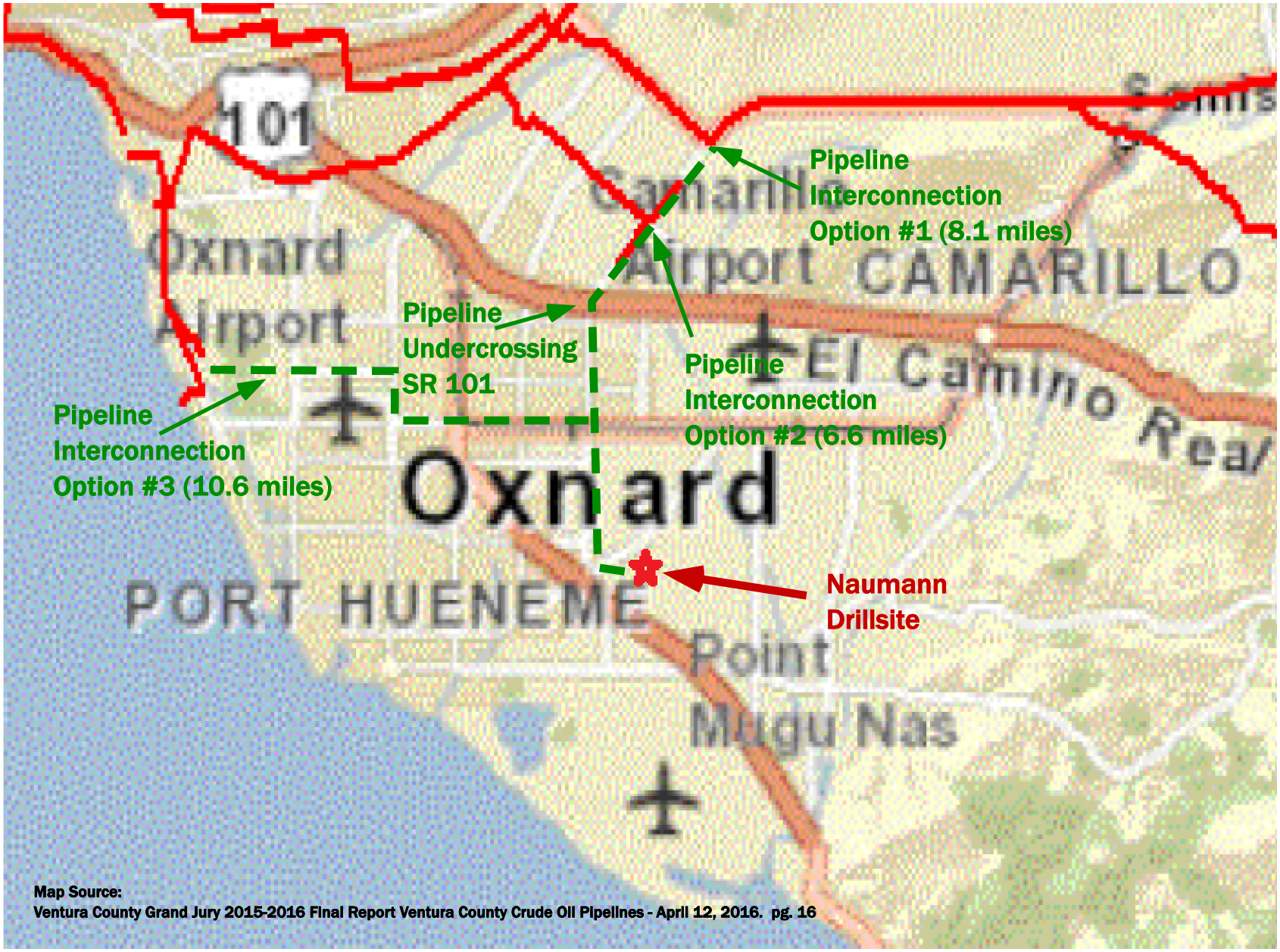
Somis
118
Camarillo
Airport
CAMARILLO
Thousand Oaks
Oxnard
Airport
El Camino Real
Newbury Park
Canoga Pa
Oxnard
PORT HUENEME
Point
Mugu Nas
Westlake Village
CALABASAS
AGOURA HILLS
Ventura Fwy
Mulholland Hwy
Pacific Coast



Map Source:
Ventura County Grand Jury 2015-2016 Final Report Ventura County Crude Oil Pipelines - April 12, 2016. pg. 16

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:54 PM
To: Simmons, Carrie
Subject: FW: PL17-0141 VC 2040 General Plan Update
Attachments: CEQA_Memo_PL17-0141-GeneralPlan2040-WPD-Rvw-20200227.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at **vcrma.org/planning**
Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Husted, Dawn <Dawn.Husted@ventura.org>
Sent: Thursday, February 27, 2020 4:50 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: CEQA <CEQA@countyofventuraca.onmicrosoft.com>
Subject: PL17-0141 VC 2040 General Plan Update

Susan, please see attached WPD Memo dated 2-27-20. Please let us know if you have any questions.

Thank you,

Dawn Husted
Management Assistant II
Watershed Protection District – Planning & Permits

800 S. Victoria Ave. / #1610
Ventura, CA 93009
P: 805.662-6882
VCPWA Online | Facebook | Twitter

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WORKS

WATERSHED PROTECTION
WATERSHED PLANNING AND PERMITS DIVISION
800 South Victoria Avenue, Ventura, California 93009
Sergio Vargas, Deputy Director – (805) 650-4077

MEMORANDUM

DATE: February 27, 2020

TO: Susan Curtis RMA Manager
County of Ventura

FROM: Sergio Vargas, Deputy Director, Watershed Protection District, PWA
S.V.

SUBJECT: PL17-0141 Ventura County 2040 General Plan Update
Draft Environmental Impact Report
INCOMPLETE

Pursuant to your request dated January 13, 2020, this office has reviewed the submitted materials and provides the following comments.

PROJECT LOCATION:

All unincorporated areas within Ventura County

PROJECT DESCRIPTION:

The proposed project is a comprehensive update of the County of Ventura General Plan, also known as the 2040 General Plan. The 2040 General Plan will set forth the County's vision of its future and identify the goals, policies, and implementation programs that will guide future decisions concerning a variety of issues, including but not limited to land use, climate change, agriculture, transportation, hazards, public facilities, health and safety, environmental justice, and resource conservation out to the year 2040. The County, as the lead agency, has prepared an EIR in accordance with CEQA. The County requests that interested persons review and provide comments on significant environmental issues, mitigation measures, and range of reasonable alternatives addressed in the EIR. The 2040 General Plan is anticipated to be adopted in 2020. With implementation of the 2040 General Plan, development may occur on or near site(s) identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5

APPLICATION COMPLETENESS:

INCOMPLETE from our area of concern.

COMMENTS:

Coastal Wave and Beach Erosion Hazards:
It is noted in the currently available documents that climate change will be incorporated into the General Plan Update. The existing general plan notes goals, policies, and programs related to coastal hazards and erosion. Consistent with the Policies of the California Coastal Commission the General Plan Update should consider expanding this section to address the hazards of sea level rise as it relates to discretionary development. The current policy: "*Discretionary development in areas adjacent to coastal beaches shall be allowed only if the Public Works Agency with technical support from the Ventura County Watershed Protection District, determines from the applicant's submitted Wave Run-up Study that wave action and beach erosion are not hazards to the proposed development, or that the hazard would be mitigated to a less-than-significant level, and that the project will not contribute significantly to beach erosion.*" The General Plan Update and associated environmental documentation should address sea level rise as a component of the wave run-up and beach erosion hazard analysis.

References to the District's Design Hydrology Manual:
Document references the 2006 version of this manual instead of the latest 2017 version. Please revise.

If you have any questions, please feel free to contact me by email at Sergio.Vargas@ventura.org or by phone at (805) 650-4077.

END OF TEXT

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 4:55 PM
To: Simmons, Carrie
Subject: FW: Ventura Water Comments on the Draft EIR for the VC 2040 GP
Attachments: 2.27.2020 Ventura Water Comments on the Draft EIR VC 2040 GP.PDF

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at **vcrma.org/planning**
Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Monica Noeng <mnoeng@cityofventura.ca.gov>
Sent: Thursday, February 27, 2020 4:53 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Susan Rungren <srungren@cityofventura.ca.gov>; Peter Gilli <pgilli@cityofventura.ca.gov>
Subject: Ventura Water Comments on the Draft EIR for the VC 2040 GP

Hi Susan,

We are respectfully submitting comments on the Draft EIR for the Ventura County 2040 General Plan. Please see the attached correspondence. If you have any questions, let me know.

Thank you,

Monica Noeng
Environmental Services Specialist
Ventura Water
Phone: (805) 652-4508
mnoeng@venturawater.net
www.venturawater.net

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February 27, 2020

Susan Curtis, General Plan Update Manager
Ventura County Resource Management Agency
Planning Division
800 South Victoria Avenue
L #1740
Ventura, CA 93009-1600
Email to: Susan.Curtis@ventura.org

Subject: **Ventura Water Comments on the Draft Environmental Impact Report for the Ventura County 2040 General Plan**

Dear Ms. Curtis:

Thank you for the opportunity to comment on the Draft EIR for the Ventura County 2040 General Plan dated January 13, 2020. The City of Ventura's water and wastewater department, Ventura Water, has two comments on the Utilities section under Impact 4.17-4.

Comment #1

As discussed in the Utilities section under Impact 4.17-4, the City of Ventura understands that the 2040 General Plan could potentially adversely impact available water supplies. The City currently has at least two ordinances in place to mitigate this impact in line with the proposed mitigation measure UTL-1 in the Draft EIR.

The Water Rights Dedication, Water Resource Net Zero Fee, and Water Resource Net Zero Requirements (Ordinance 2016-004) was adopted to ensure that new development does not adversely affect the water supply or water supply reliability of the City's existing customers and/or approved new development. The Ordinance requires subject projects to offset new or increased water demand through several compliance options. The fee proceeds shall be used to acquire additional water rights or develop water resources for new potable supplies for use by the City. The Ordinance is codified in San Buenaventura Municipal Code Chapter 22.180.

In addition, the City has a policy on water connections outside of City limits but within the City's Sphere of Influence per San Buenaventura Municipal Code Section 22.110.055, Water Connections Outside City Limits.

Comment #2

Ventura Water suggests striking the following language from Mitigation Measure UTL-1:

Implementation Program WR-X: Demonstrate Adequate Water Supply during Normal, Single-Dry, and Multiple-Dry Years
Water-demand projects (as defined in Section 15155 of the State CEQA Guidelines) that require service from a public water system shall prepare a water supply assessment prior to project approval. If the projected water demand associated with the project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment must address the public water system's total projected water supplies available during normal, single-dry, and multiple-dry water years for a 20-year projection. The assessment shall describe if the new water service will be sufficiently met under this 20-year projection. The water supply assessment shall be prepared to the satisfaction of and approved by the governing body of the affected public water system and the County. ~~If, as a result of its assessment, the public water system concludes that its water supplies are, or will be, insufficient, the public water system shall provide to the County its plans for acquiring additional water supplies.~~ A water-demand project that includes a new water service from a public water system shall not be approved unless adequate water supplies are demonstrated.

We think this sentence should be removed for two reasons. First, the water supply assessment should already include a discussion of the public water system's plans to acquire additional water supplies, to the extent that discussion is relevant or necessary for the water-demand project. Second, if the water supply assessment concludes that adequate water supplies are not available for the water-demand project, then the burden should be on the applicant to demonstrate additional water supplies available for the water-demand project – the burden should not be on the public water system.

Conclusion

If you have any questions about the above, please let us know. We also plan on submitting comments on the Public Review Draft 2040 General Plan by the March 30, 2019 deadline.

Sincerely,

Susan Rungren
General Manager
Ventura Water

cc: Peter Gilli, City of Ventura - Community Development Director

Simmons, Carrie

From: Erik Fruth <efruth@callutheran.edu>
Sent: Thursday, February 27, 2020 4:59 PM
To: General Plan Update
Subject: Comments on Draft General Plan
Attachments: draft.General.Plan_comments_Fruth.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Dear General Plan team,

My name is Erik Fruth, I'm a Camarillo resident and a MSc student of Environmental Planning. I'd like to submit some comments on the Ventura County Draft General Plan ("Public Review Draft 2040 General Plan" on https://vcrma.org/vc2040.org/review/documents).

Please find my comments in the attached document.

Thank you,

Erik Fruth (he/him)
MSc Student in Environmental Planning | *Technische Universität Berlin*
efruth@callutheran.edu / esfruth@protonmail.com (secure) / +1 805 657-9378 (cell) / +856 20 95 466575 (WhatsApp)

While I appreciate the inclusion of environmental justice as a cross-cutting issue that is addressed throughout the various sections of the Plan, I see opportunities in nearly every written goal/objective to make social justice, environmental justice, and inclusivity a stronger focus. I've only examined Section 10 due to personal time constraints, but would likely have many comments on other sections if there are public comment periods in the future.

Within Section 10 on Economic Vitality, I suggest the following edits:

- EV-1.2 should read "The County shall prioritize investment in infrastructure, services, safety net programs and other assets that are critical to future economic vitality, including public safety, healthcare, library services, water supply and quality, transportation, energy, and environmental resources. This investment shall improve equity in investment opportunities to designated disadvantaged communities, including designated Opportunity Zones under the federal Tax Cuts and Jobs Act of 2017. The focus of these efforts shall be to improve social equity and opportunity for all. (FB, SO) *[Source: VCEVSP Policy A.3, E.1, modified]"*
- EV-1.3 should read: "The County shall continue to work with cities and community organizations to implement, assess, and improve best practices, pursue funding to improve housing affordability, and implement programs that a) reduce the cost of housing in order to retain and attract employers, employees, and young graduates and professionals, b) improve the number of affordable housing units accessible to the most vulnerable/disadvantaged communities, and c) meaningfully address the underlying causes of unaffordable housing in Ventura County. (MPSP, IGC) *[Source: VCEVSP Policy F.1, modified]"*
- EV-1.4 should read: "The County shall promote socioeconomic inclusivity and business-friendliness in the regulatory and permitting environment throughout Ventura County through collaboration (especially with existing local organizations that serve vulnerable/disadvantaged groups), exchange of ideas and best practices, improvement in clarity and efficiency in the permitting process, taking advantage of opportunities for streamlining in the development process, promoting cooperative and nonprofit business models and supporting their growth in Ventura County, and improving consistency in policy and practice among cities and the County. (RDR, IGC) *[Source: VCEVSP Policy F.3, modified]"*
- EV-1.6 should read: "The County shall work with local chambers of commerce, countywide economic development organizations, and businesses to support the appropriate and socially inclusive expansion of the local economy that improves the standard of living for the most vulnerable/disadvantaged communities in Ventura County first and foremost and also leads to the creation of environmentally sustainable and cutting-edge jobs for long-term economic prosperity, particularly in Existing Communities and unincorporated Urban Areas where zoning allows. (MPSP, JP) *[Source: New Policy]"*
- EV-1.7 should read: "The County shall strive to attract industries based on existing and projected workforce demographics, educational attainment, skills, and commute patterns, and which provide opportunities to residents living in designated disadvantaged communities. The County shall equip designated disadvantaged communities with the educational attainment, skills, and commute patterns that allow them to be highly competitive in the industries that develop in Ventura County in the future. (MPSP, JP) *[Source: New Policy]"*
- EV-1.8 should read: "The County shall coordinate and work with cities in the county to enhance the efficiency of development of remaining vacant commercial and industrial sites and encourage infill and revitalization of underutilized sites so that nearby neighborhoods become more walkable, green, cohesive, and affordable. (MPSP, IGC) *[Source: VCEVSP A5]"*
- EV-1.9 should read: "The County shall facilitate the development of a range of commercial uses in urban areas and Existing Communities, where zoning allows, that not only fulfill the daily needs of residents and visitors but also make the communities more walkable, cohesive, affordable, and vibrant. (MPSP, JP) *[Source: Existing GPP Goal 3.4.1.1, modified]"*
- EV-1.10 should read: "The County shall strive to attract and retain high-quality, full-service, affordable, and culturally appropriate grocery stores and other healthy food purveyors to fill local

needs in Existing Communities and adjacent urban areas, particularly in underserved areas. (MPSP, JP) *[Source: New Policy]"*

- EV-3.2 should read: "The County should promote and expand existing small business and women-owned business development programs by identifying partnerships between industry and educational organizations, and identifying potential mentoring, job training, networking, and professional development opportunities between these organizations and by supporting and promoting efforts of the Small Business Administration to provide technical assistance to small business owners and employees through classes and assistance in the areas of business management, marketing, and legal assistance. The County should allow entrepreneurs to use government property or facilities to test new products and services that are beneficial to the public good for micro enterprises of five employees or fewer to encourage economic and social opportunities in low-income areas. (IGC, JP) *[Source: New Policy]"*
- EV-3.5 should read: "The County shall support local efforts to attract firms in key industries from outside the county that have a history of positive social, environmental, and economic charity. The County shall facilitate the entrepreneurial development of new firms and cooperative business models within the county as well as support the necessary training to develop entrepreneurship and innovation in the local workforce. (IGC, JP) *[Source: VCEVSP Strategy C, modified]"*
- EV-4.2 should read: "The County shall support the development of industries and businesses that promote and enhance environmental sustainability, greenhouse gas reductions, decarbonization, climate change adaptation, resiliency, and renewable energy generation, storage, and transmission, including solar power, wind power, wave energy and other appropriate renewable sources. The County shall promote the efforts of existing businesses that meet green business criteria and encourage them to become more diverse and inclusive in their daily operations, organization, and local impact; provide job training in green building techniques and regenerative farming and trainings on starting social enterprises built on cooperative business models; and strive to build green technologies into and decarbonize existing government buildings and facilities. (MPSP, JP) *[Source: New Policy]"*
- EV-4.3 should read: "The County shall encourage the development and expansion of businesses and business models (eg. cooperatives) that advance social equity, inclusivity and fairness, environmental quality, and economic sustainability, as well as capitalize on key industry strengths. Economic sustainability includes planning and preparation for disaster response and long-term resiliency of businesses and economic assets in the county. (JP) *[Source: New Policy]"*

Within the Climate Action Plan, I see opportunities to make Ventura County a stronger leader in both reducing our contribution to the climate crisis as well as addressing social/environmental injustice. One urgent need in the Climate Action Plan is to establish a framework for making the implementation (and success) of the Plan observable and measurable so that the public can hold polluters and public officials accountable if they fail to meet the goals established in the Plan – that framework should include some details on the specific indicators chosen to measure implementation/success of the Plan. I would suggest that the planners and decision-makers working on this update establish close contact with CFROG (Climate First: Replacing Oil and Gas) to set up an appropriate framework. The framework should also have a robust public outreach component where local stakeholders are invited into the assessment and monitoring of the Climate Action Plan on an iterative basis. The public outreach component of the monitoring protocol should center around the needs of Ventura County's vulnerable, disadvantaged, and/or historically marginalized communities and meaningfully include their voices.

Simmons, Carrie

From: Chris Tull <ctull17@gmail.com>
Sent: Thursday, February 27, 2020 6:32 PM
To: General Plan Update
Subject: Please support a dedicated county bike network

Follow Up Flag: Follow up
Flag Status: Flagged

Please support the Santa Clara River Loop trail and the Santa Paula Branch Line bike/ped trails to help form a bike/ped backbone throughout our county.

Thank you,

--
Christopher Tull
Oxnard, CA 93030

Simmons, Carrie

From: Jack Breuker <jack.vcei@gmail.com>
Sent: Thursday, February 27, 2020 8:46 PM
To: General Plan Update
Subject: Forwarding General Plan Feedback

Follow Up Flag: Follow up
Flag Status: Flagged

A friend of mine sent the following comments but the email bounced back. I am re-sending it on his behalf. Commenters name is "Walt Beil". His email is docdoggr@gmail.com. Please respond to him.

27 February 2020

Ventura County Resource Management Agency
800 S. Victoria Ave
Ventura, CA 93009

To whom it may concern:

My name is Walt. I have worked in the local oil and gas industry for many years. I am writing because many local oil and gas employees have expressed deep concern about the overall direction that the 2040 General Plan Update appears to be taking. I have reviewed the Draft Environmental Impact Report (DEIR) document and believe it unfairly targets the industry with the goal of shutting down local oil and gas production completely.

The DEIR recognizes the importance of the oil and gas industry when it states, "The County shall promote the extraction of mineral resources locally to minimize economic costs and environmental effects associated with transporting these resources." With this in mind, it is troubling that the DEIR then proposes several new policies that would further restrict local production, therefore jeopardizing the livelihoods of hundreds of workers in our industry.

Policy COS-7.8, for example, essentially prohibits oil and gas producers from flaring except in emergency cases. Flaring is an industrywide practice that operators use to burn off excess natural gas that cannot be captured or used in other ways. It is used as a safety practice used to safeguard workers on site and preserve local air quality. It is the most environmentally friendly alternative to releasing excess natural gas into the atmosphere or back into the ground. The alternatives do not adequately explain the impacts of restricting flaring.

The DEIR acknowledges that the policies included in the General Plan Update would result in the construction and operation of new pipelines (Page 4.8-38). The DEIR does not go far enough to show that construction and operation of new pipelines for the conveyance of oil, gas and produced water is feasible and will result in GHG emissions reductions. In addition, the policies promoting new pipelines are contradictory to proposed policies related to fault lines.

The General Plan is critical to the county's future success. API Coastal Chapter firmly believes that it should be used to strike a balance between economic vitality and environmental protection, not unfairly regulate the oil and gas industry out of the county.

With regards,

Walt Beil
Ventura

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:48 AM
To: Simmons, Carrie
Subject: FW: Ventura County Planning

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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Visit the Planning Division website at **vcrma.org/planning**
Ventura County General Plan Update. Join the conversation at **VC2040.org**
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From: Zaragoza, John <John.Zaragoza@ventura.org>
Sent: Friday, February 28, 2020 4:01 PM
To: Prillhart, Kim <Kim.Prillhart@ventura.org>; Ward, Dave <Dave.Ward@ventura.org>; Curtis, Susan <Susan.Curtis@ventura.org>
Subject: FW: Ventura County Planning

FYI

From: Michael Hayes <michael@michaelhayes.la>
Sent: Thursday, February 27, 2020 3:13 PM
To: Bennett, Steve <Steve.Bennett@ventura.org>; Parks, Linda <Linda.Parks@ventura.org>; Long, Kelly <kelly.long@ventura.org>; Supervisor Huber <Supervisor.Huber@ventura.org>; Zaragoza, John <John.Zaragoza@ventura.org>; cheitmann@cityofventura.ca.gov; mlavere@cityofventura.ca.gov; srubalcava@cityofventura.ca.gov; jfriedman@cityofventura.ca.gov; lbrown@cityofventura.ca.gov; citymanager@cityofventura.ca.gov
Subject: Ventura County Planning

Hello Ventura leaders,

My name is Michael Hayes, and over the weekend I had the familiar, yet infrequent pleasure of spending time in Ventura county; coming from what can often seem like the other side of the state (Los Angeles) Ventura county isn't always conveniently accessible.. I wish I could more easily and regularly enjoy the splendors of Ventura county; but that's not the point of this message. Unfortunately, the motivation for this message is about my concern with what I had seen over the weekend.

Nobody wants unsolicited advice or critique, so I apologize for being obtuse, if not flat-out disrespectful; but I feel so strongly about these issues that it really frustrates me to think about the colossal planning mistakes that have taken place in America over the past 60 years, mistakes that I really *really* hope Ventura will not continue to make. That grand failure of American society is truly senseless and completely vapid suburban sprawl.

> *Without making this some sort of Manifesto... a brief recap of the default planning guidelines introduced in the late '50s. Sprawl has negatively affected the health of, now car-dependent, Americans; the air quality of the, now-smog filled, skies, the foundation of low density residential creates an exhaustive network of financially burdensome infrastructure and public services without an adequate tax base to properly maintain itself; siphoning funds from more essential civic services. Sprawl prohibits the ability to provide affordable housing in job rich areas, it disconnects people from a sense of place and it separates American's into political factions. Controversial or looney as it may seem, I truly believe SPRAWL is the single largest cause of a deflated American Spirit and the harbinger of collapsed American Ideals.*

Anyone reading this message that has been in California for at least ~20 years has witnessed the insatiable consumption and the destruction of such beautiful and fertile land. In my short lifetime, I've seen Oxnard, Camarillo and Ventura transform from agrarian paradises and small town havens into an extension of West Covina or San Bernardino. Farms, Bungalows, Main streets, paved over and replaced by beige stucco boxes, banal shopping centers and other characterless vestiges of suburban sprawl. Already frustrated beyond words about the approval and early stage construction of LA County's "Newhall Ranch" I drove along the 126 to see a handful of new Riverside County-esque subdivisions, tracts of homes, the *United States of Generica*-style shopping centers that follow them, freeway-width "roads" and of course the suffocating and unavoidable traffic that comes in thereafter.

I spent an entire day just walking around Fillmore and Santa Paula enjoying the "small town" feel, talking with shop owners, all of whom couldn't believe how the area was changing for the worse. The city and county websites are full of pictures of the area's rich agricultural past, "Last Small Town..." yet at the same time, you're willing to pave over that history and beauty with some garbage cheap homes from KB Homes or Lennar?

I know Ojai as being the quintessential success story for staving off the plague of sprawl and its associated "Generica" monotony. It's a destination within the region precisely because it's different, it's charming, it's human-oriented, it embraces its agricultural roots. So, why isn't the rest of the county following in those footsteps? What is the recourse for city and county to prevent the spread of sprawl and the destruction of the otherwise beautiful landscapes? And most importantly, is this even a priority for leadership?

If this type of "growth" is at all a concern, there are really only 2 options. A) halting all growth or B) changing the way in which we grow. A moratorium would seem like the easy route, but a foolish decision in the long run. The real solution is hidden in planning guidelines of yesteryear; the solution is in higher density, village-like, transit oriented communities. Places that are walkable and are rich with character, individuality and some distinguishable uniqueness. A convenient and manageable concentration of people that create an identity and a community. Luckily for Ventura county, its cities and towns already possess many of these qualities, I'd hope that they expand on that identity, rather than erase it.

The foundation for any *great* city, town or village is formed by its accessibility and mobility. After 60 years of planning exclusively for car mobility, we've witnessed its major shortcomings. If there were one piece of transformative infrastructure that could drastically improve access, convenience, quality of life, economic opportunity and preserve open space in Ventura it would be reactivating the rail ROW from Ventura to Piru and operating a Light Rail (perhaps similar to San Diego's Sprinter or LA's E line) this vein could have the capacity to alleviate transit woes for thousands of residents / commuters and contain and concentrate manageable growth around stations allowing for characterful neighborhoods to flourish.

There is so much to love and enjoy about Ventura County and the cities within it, I'd hope those characteristics that make it lovable are preserved, cherished and expanded upon, not dismantled and paved over like the rest of southern california.

All the best and thank you for your commitment to bettering the lives of the people you represent!

-m

City of Camarillo

601 Carmen Drive • P.O. Box 248 • Camarillo, CA 93011-0248

February 21, 2020

Ventura County Resource Management Agency Via E-Mail: GeneralPlanUpdate@ventura.org
Planning Division
Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

RE: Response to Ventura County 2040 General Plan EIR (SCH No. #2019011026)

Dear Ms. Curtis:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (EIR) for the Ventura County 2040 General Plan that has been prepared by the County of Ventura for public review pursuant to the California Environmental Quality Act (CEQA) Guidelines. After reviewing the EIR, we submit the following comments for your consideration.

Agricultural Land and Buffers to Protect Sensitive Receptors
City's Position: The EIR should require buffers around City jurisdictions and require farming techniques that will protect existing sensitive receptors from strong, unpleasant odors associated with hemp farming.

Reasoning: The EIR only addresses agricultural odors from the standpoint of ensuring that new sensitive receptors are not placed in proximity to existing agricultural uses without providing disclosure to new uses and that it does not limit the right to farm. The EIR should address odor impacts associated with types of agricultural crops – and how they are farmed – that may have a substantial odor impact on existing sensitive receptors. The County should ensure that existing sensitive receptors will not be adversely impacted based on the introduction of new types of crops being farmed such as industrial hemp.

Very Low Density Residential (VLDR)
City's Position: To ensure that development in the County adjacent to development in the City is compatible, the VLDR designation should have a maximum density of three units per acre.

Reasoning: The General Plan Land Use Element proposes a land use category of predominantly Very Low Density Residential (VLDR) within the Camarillo Sphere of Influence north of the City limits. Page 2-21 of the County Land Use and Community Character Element indicates this designation would have a maximum density of four dwelling units per acre with a minimum lot size of 10,000 square feet. This is in conflict with Page 2-36, which indicates the VLDR designation has a maximum density of three dwelling units per acre. The City of Camarillo

General Plan Land Use Element designates this area in the Sphere of Influence, north of the City limits, as Rural Density Residential (2.5 dwelling units per acre). This is consistent with the designation of most of the land that is in the City adjacent to the City boundary line, which is designated Rural Density Residential.

Local Infrastructure

City's Position: Policies in the County General Plan should ensure new development on County land within and adjacent to the City Sphere of Influence is compatible with surrounding land uses in the City and that the use will not adversely impact local infrastructure.

Reasoning: The increase in density and 10,000 square foot minimum lot size in the VLDR designation adjacent to City limits within the City's Sphere of Influence needs to be analyzed in the EIR with respect to land use compatibility with adjacent development within the City, and impacts on City utilities and streets, as these areas may be annexed and connected to City infrastructure.

Wireless Communication Facilities

City's Position: The General Plan should encourage cooperation between the County and Cities for the proper placement and design of wireless communication facilities.

Reasoning: The City has provided comments to the County to oppose the placement of an 80-foot tall mono-Eucalyptus along Pleasant Valley Road at Bridgehampton Way, which divides the City and County boundaries. Pleasant Valley Road is a designated scenic corridor in the Camarillo General Plan Community Design Element and the proposed wireless facility would not be consistent with the City General Plan. The County should have policies discouraging new macro wireless facilities adjacent to City boundaries, unless they are stealth and consistent with height structures in the surrounding area. The County General Plan should have policies to ensure new wireless facilities are properly sited and designed to avoid land use incompatibility; that it will not be inconsistent with the City General Plan; and that it will not result in an adverse aesthetic impact.

SCAG Data Forecasts

City's Position: The County should use data consistent with the SCAG population forecasts.

Reasoning: Table 5-2 – Forecasted Growth of Incorporated Cities within Ventura County indicates Camarillo's population to be 79,900 in 2040. The City has verified that SCAG has incorporated the data provided to SCAG during the Local Input Process for the 2020 RTP/SCS. The population forecasts that are being used by SCAG are: 75,240 in 2035 and 76,093 in 2045.

Thank you, once again, for the opportunity to comment.

Respectfully,

Dave Norman
City Manager

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

February 25, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,

Mary Ellen Gravel

Mary Ellen Gravel
President, Elkins Royalty Group

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:49 AM
To: Simmons, Carrie
Subject: FW: 2040 General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis l Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740 Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org For online permits and property information, visit VC Citizen Access

-----Original Message-----
From: Martha Branson <marthab876@gmail.com>
Sent: Thursday, February 27, 2020 5:08 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: 2040 General Plan

Dear Ms Curtis,

I think the board's assessment of Ventura County's vulnerability is out of date. In 2018 the IPCC released a revised report of the climate crisis and the projection is far more dire. We are already suffering the effects of global warming and we have only a few years to make a difference in our planet's fate. You have plans that extend to 2040, 2050, and 2090! This will be far too little far too late. I believe you should take a much stronger approach to your net zero emissions goals, and I would like to see real quantifiable plans explaining how you will reach net zero.

I believe you have a responsibility to begin shutting down the fossil fuel industry in our county. I do understand how costly it will be, but I also understand the economic cost and the cost to human lives, and to our planet if you allow the drilling to continue.

Sincerely,

Martha Brown

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:49 AM
To: Simmons, Carrie
Subject: FW: EIR review
Attachments: RMA planning letter 022720.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Heather Wise <heatherwise8302@hotmail.com>
Sent: Thursday, February 27, 2020 5:05 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: EIR review

Attached please find my letter after reviewing parts of the County's EIR for the General Plan. Please submit them for review.

Regards,
Heather Gilchrist-Wise

Heather A. Gilchrist-Wise
8302 Sulphur Mountain Road
Ojai, CA 93023

February 27, 2020

Attn: RMA Planning Division
General Plan Update
800 Victoria Ave., L #1740
Ventura, CA 93009-1740
Susan.Curtis@ventura.org

Dear Planning Division:

In reviewing the 2040 General Plan Environmental Impact Report (EIR), I have some grave concerns that were not addressed and will affect many people in this county. I have listed some below for your review and response:

1. Wildfire risk – EIR states that "managing fuel through activities such as vegetation removal and controlled burns, the County and other agencies would be directly reducing the chance of wildfire as well as fuels that would feed wildfires. This statement does not take into regard that it is in *direct opposite* of County Policies COS-3.2, COS-1.15, Implementation Program COS-H, Implementation Program COS-C and the recent restrictions on brush removal in the Wildlife Corridor. All of these Policies and restrictions will increase wildfire risk and in order to comply with the EIR, must be removed or re-written.
2. CEQA requires that indirect impacts be analyzed: Specifically, the impact on agriculture from the buildout planned in the 2040 General Plan. As the population grows, there will be more interactions with farm land. Presently, in most cases, this leads to more costs for the farmer and can cause a negative effect on this industry in this county.
3. The EIR states that the policies in the 2040 General Plan will decrease water supply for irrigation, but the County has not evaluated this impact. Reducing water supply for irrigation, or even increasing cost to obtain water, will remove ag lands from production which will affect the County significantly.
4. The EIR also does not address the impact of the General Plan that will require ag to use all electric equipment and pumps. This is very expensive and will impact this industry considerably.
5. The General Plan does not seem to take into effect that agriculture is a major industry in the County and will affect the County's revenues if it does not analyze the negative effects that these new policies will have on this industry.

Respectfully submitted,

Heather Gilchrist-Wise

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 8:08 AM
To: Simmons, Carrie
Subject: FW: Comments on Ventura County General Plan DEIR
Attachments: Ventura County General Plan Letter_Taylor.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
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From: Kasey Taylor <ksea.taylor@gmail.com>
Sent: Thursday, February 27, 2020 8:07 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Bill <william.m.taylor87@gmail.com>
Subject: Comments on Ventura County General Plan DEIR

Hi Susan,

Please see attached letter concerning the Ventura County General Plan DEIR.

Thank you!
Kasey and William Taylor

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I am a part of the McLoughlin Family. We have been farming in Ventura County for approximately 150 years. We currently own 300 acres of agricultural property off of Olivas Park Road in the County of Ventura near the Ventura Marina on Harbor Rd, in proximity to the City of Ventura.

The McLoughlin family has farmed this land and other parcels for generations going back to 1863. It remains our desire to continue this legacy, however, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. That, however, is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. The DEIR, however, never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

  Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. No further details beyond this conclusory statement are provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. It's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.
Sincerely,

William Taylor

Kasey Taylor

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org
February 25, 2020
Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value

and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

After numerous devastating wildfires over the last few years, which significantly impacted ag,
the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,

Sherlayne Glenn

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:49 AM
To: Simmons, Carrie
Subject: FW: VC2040 General Plan Input Re Climate Change Mitigation

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
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Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Diana Kubilos <kubilos.d@gmail.com>
Sent: Thursday, February 27, 2020 5:03 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: VC2040 General Plan Input Re Climate Change Mitigation

Dear Ms. Susan Curtis,

As a member of the Ventura County Climate Hub, I have signed my name to the very thorough petition sent by the organization regarding the climate change mitigation- related components of the VC2040 Draft General Plan (and EIR). I also wanted to add a emphasize a few more points personally, covering some core areas regarding the urgent and vital climate change mitigation work we need to do, especially in the next decade.

Community Collaboration
Establish a Citizen Advisory Committee, to work with the Board of Supervisors (and relevant County staff), to help both give input to climate change mitigation efforts, as well as advise the County on critical community resilience- building work.

Sustainable Transport
Since the transportation sector is a core contributor to carbon emissions, we need to follow the lead of model green cities (such as Portland, Oregon), and establish cycling/walking linkages throughout core routes in our cities. I live in Ventura, and believe people here are desperate for more sustainable and healthy transport options.

Food Security
Please include edible, fire-mitigating, and indigenous trees in Supervisor Parks' 'two million trees' planting campaign.

Water Security
Please support community water resilience- building projects, such as one the Climate Hub is planning, called 'Transition Streets'

Thank you for your critical work,
Diana Kubilos

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:49 AM
To: Simmons, Carrie
Subject: FW: draft EIR

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
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Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Michelle Leahy <michelleleahy@hotmail.com>
Sent: Thursday, February 27, 2020 5:02 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: draft EIR

We are in a climate emergency. Humanity is facing an existential threat.

In October 2018, the United Nations Intergovernmental Panel on Climate Change sounded the alarm bells in a dire report, warning that governments everywhere, much take "rapid, far-reaching and unprecedented changes in all aspects of society" to dramatically cut emissions by 2030 if we hope to avoid climate catastrophe. And by all governments, that includes Ventura County. So we've got just ten years, and likely even less than that, since more sobering findings regarding tipping points and feedback loops have come out in recent months. As Bill McKibben puts it, "Winning slowly is the same as losing" when it comes to climate change.

Since we neglected to take the necessary actions decades ago, we no longer have the luxury to take small incremental steps; the magnitude and urgency of the crisis requires big, bold, swift action. It means no more business as usual, no more kicking the can down the road, no more catering to fossil fuel interests, no more short-term thinking, no more excuses. It means coming together and working

toward our collective common good. It means a moon shot, putting a stake in the ground and committing to achieving it.

The good news is that solutions are readily available, we just need to start acting on them.

The current draft EIR of the general plan update does not meet the urgency of action that the climate crisis demands. All policy decisions must be seen through a climate impact and mitigation lens.

- Michelle Ellison, Ojai

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

REC'D FEB 27 2020

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I am apart of the McLoughlin Family. We have been farming in Ventura County for approximately 150 years. We currently own 300 acres of agricultural property off of Olivas Park Road in the County of Ventura near the Ventura Marina on Harbor Rd, in proximity to the City of Ventura.

The McLoughlin family has farmed this land and other parcels for generations going back to 1863. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

  Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:49 AM
To: Simmons, Carrie
Subject: FW: County buildout study

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Kristin Viemeister <viemeister@sbcglobal.net>
Sent: Thursday, February 27, 2020 5:02 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: County buildout study

To: Susan Curtis-

County failed to evaluate mitigation measure for feasibility- 500' set back for "sensitive receptors" from freeways and high traffic roads.

Mitigation Measure AQ-3 (Policy HAZ10-X) creates a minimum 500' set back for "sensitive receptors" from freeways and high traffic roads. Yet the County states in the Land Use section of the EIR that "the majority of the anticipated build out will be within the freeway corridors."

Has the County completed a "buildout study" to ensure that the establishment of this set back still leaves enough room for development to occur? Will this mitigation measure be economically feasible?

Kristin Viemeister

Sent from my iPhone

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I am apart of the McLoughlin Family. We have been farming in Ventura County for approximately 150 years. We currently own 300 acres of agricultural property off of Olivas Park Road in the County of Ventura near the Ventura Marina on Harbor Rd, in proximity to the City of Ventura.

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Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Marcia Zarnecki

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:50 AM
To: Simmons, Carrie
Subject: FW: 2040 General Plan Draft EIR Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Dario Grossberger <dariogro@gmail.com>
Sent: Thursday, February 27, 2020 5:00 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>; chris@rinconstrategies.com; llampara@colabvc.org
Subject: 2040 General Plan Draft EIR Comment

Regarding the 2040 General Plan,

The County failed to analyze the impact of allowing alternative fuel production in an Industrial area.

The County must analyze any impact that creates hazards on public health and safety through the transport, use or disposal of HazMat and HazWaste.

The County failed to evaluate Policy CTM-6.4 (alternative fueling stations) and has failed to even mention Policy LU-11.X (alternative fuel production) or Implementation Program LU-Program X (County shall allow the production of alternative fuel). These policies were not analyzed for impacts - and yet the County claims, without having conducted a complete and thorough analysis, that the impact will be less than significant (pg. 4.9-12 and 4.9-14).

This analysis was grossly inadequate and needs to be corrected and the EIR needs to be recirculated.

Sincerely yours,

Simmons, Carrie

From: Curtis, Susan
Sent: Monday, March 2, 2020 8:50 AM
To: Simmons, Carrie
Subject: FW: General Plan Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Adam Vega <adam@pesticidereform.org>
Sent: Thursday, February 27, 2020 4:58 PM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: General Plan Comments

Susan,

I feel there is a great opportunity to improve the Food Security (8.4) section of our General Plan. I've included a link to the Santa Barbara Food Action Plan for your review. From this plan I've gleaned language which I feel is vital for your consideration!

https://www.sbcfoodaction.org/wp-content/uploads/2016/09/SBC-Food-Action-Plan-2016FinalReport-update.pdf

***

INVEST IN OUR FOOD ECONOMY

Invest in Our Food Economy calls us to support a new, diverse generation of food and farming entrepreneurs with training, education, preferential purchasing policies, and investments in food distribution infrastructure. These upstream investments are designed to pay increasing dividends over time as these entrepreneurs build local businesses and create jobs.

- Support the next generation of farmers and food system entrepreneurs by creating or expanding agriculture and vocational education at the high school and community college level.

INVEST IN OUR HEALTH & WELLNESS

Invest in Our Health & Wellness

Calls us to address the continuing diet-related challenges in our community by creating networks of neighbor-to-neighbor support, and by engaging employers, teachers, and physicians as partners to promote healthy living. The strategies focus on the information gaps that make it hard to make good health choices.

- Facilitate the adoption and implementation of workplace wellness policies that include support for healthy eating behaviors and access to healthy foods.

Thank you,

Adam
--
Adam Vega
Pesticide Community Organizer
Californians for Pesticide Reform
4225 Saviers Rd., Oxnard, CA 93033
Phone: (805) 312-6875
www.pesticidereform.org
Working together for a just & sustainable food system since 1996

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 8:23 AM
To: Simmons, Carrie
Subject: FW: Ventura Co Gen Plan-EIR letter 2-25.docx
Attachments: Ventura Co Gen Plan-EIR letter 2-25.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Toril Raymond <toril.raymond@yahoo.com>
Sent: Thursday, February 27, 2020 8:23 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Ventura Co Gen Plan-EIR letter 2-25.docx

Sent from my iPhone

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 S. Victoria Ave., L #1740
Ventura, CA 93009-1740

GeneralPlanUpdate@ventura.org

Dear Ms. Curtis:

I am writing to call your attention to significant flaws in the process, data, and conclusions of the Ventura County General Plan, Draft EIR, and supplemental documents.

My great grandfather, Mark McLoughlin (1843-1914), was a true Ventura County pioneer, purchasing his first 318 acres of undeveloped land in Ventura County in 1875. He was a hard-working visionary, revered by his community. With his son—my grandfather, James Patrick McLoughlin—he raised livestock and farmed the land, providing jobs and feeding the growing towns of Oxnard and Ventura.

Our land, in a vitally important location on Olivas Park Drive across from the Ventura Marina, has been in the family, and part of the economic fabric of the community, for 100 years. And we want it to be part of the future of this community, with a flourishing economy, a thriving job market, and unsurpassed quality of life for its residents.

But the General Plan and DEIR do not describe a viable path for us as landowners going forward.

I will begin with some specific issues regarding language in the Coastal Area Plan, 4-82-83 and 4-94-95. Part of our land is located in the Central Coastal Zone, adjacent to the Ventura Marina, on Olivas Park Drive at Harbor Blvd. The only conclusion the Plan draws about our land is the statement that, "unlike the Preble area, services are not readily available to the Olivas lands." This is false. Our property has access to all utilities, water, main roads, and the freeway. Indeed, easements on our property serve surrounding areas with utilities.

The Plan also claims that our property is "not included in the City's sanitation district because of problems with water pressure." This language is irrelevant and incorrect. There is no evidence that there are water pressure issues, and the sanitation district's pipelines actually traverse our property.

While we do not know the original source of these misstatements, such misrepresentations—now repeated in the Plan—threaten to diminish the value of our land in relation to the Preble property. And, of course, they undermine the goal and the value of the Plan itself.

The General Plan also speaks of the widening of Olivas Park Drive, our southern boundary. This would have a direct impact on our property. But the Plan does not address how this would happen or how it would affect our land.

Damaging misstatements about our property also appear In the DEIR. Contrary to the portrayal in the DEIR, our property has significant infrastructure in place, as well as prime accessibility to the highway and the harbor. In fact, with easy access to the marina and beach community, and with the railroad as part of our eastern boundary, our land is uniquely suited to be an important part of future economic development in the area. We are entitled to have all these matters corrected.

I would also like to raise some additional concerns:

1. The General Plan and DEIR continue to ignore the 28% increase in the homeless population in our community.

2. According to the General Plan, if we were to build an acre of low income / worker housing we would need to buy two replacement acres of same Ag land to be placed into perpetual agricultural preservation. This is unrealistic and infeasible, and certainly not in line with the State government's housing policies.

3. The EIR does not adequately address the enormous "indirect impacts" that will occur as a result of implementing the General Plan, calling them "less than significant."

4. The General Plan contains policies that will increase the costs of normal farming operations, making it difficult for farming to remain profitable.

5. The Plan does not adequately evaluate the impacts of increased competition for water in our community.

The EIR is a flawed document, full of errors, that does not disclose all impacts, direct and indirect, caused by the General Plan. It was obviously rushed—completed in six weeks. It is inaccurate and incomplete, and fails to provide members of the community with the information that they are legally entitled to. This EIR should be corrected and reconsidered, and a reasonable time period should be allowed for meaningful and thoughtful community input.

Sincerely,

Simmons, Carrie

From: VC2040.org Comments <alan.brown@ventura.org>
Sent: Thursday, February 27, 2020 8:53 AM
To: Downing, Clay; General Plan Update; Curtis, Susan; Sussman, Shelley
Cc: Brown, Alan

Follow Up Flag: Follow up
Flag Status: Flagged

You have a NEW Comment

Name:

Sophia Valentina Arce

Contact Information:

sophie2arce@gmail.com

Comment On:

All

Your Comment:

We need a climate action plan with measurable targets and outcomes. The current policies aren't measurable or enforceable, and are not sufficient to drive the kind of change necessary to meet the greenhouse gas reduction targets.

Simmons, Carrie

From: Scott Hirsch <scotthirschsound@gmail.com>
Sent: Thursday, February 27, 2020 9:26 AM
To: General Plan Update
Subject: Re: General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

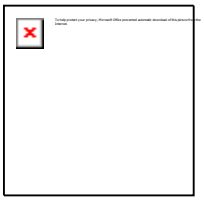
To Whom It May Concern,

Climate change is here, its effects are already evident in out county. The General Plan update fails to provide enough emissions reduction to meet the state-mandated goals. A robust plan, with the help of technical and scientific input, needs to be included for the 2040 General Plan, including a strong defense of the five pound air emissions limit for the Ojai Valley.

Sincerely,
Scott Hirsch
Ojai, CA

—

Scott Hirsch



Simmons, Carrie

From: ka lottes <kalottes@yahoo.com>
Sent: Thursday, February 27, 2020 10:01 AM
To: Curtis, Susan; General Plan Update
Subject: GenPlan Update 2040 & DEIR
Attachments: 2.27.20 letter, to VCRMA, GP.DEIR.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Susan,
Please see my letter attached.
Thanks,
Kathy Lottes

February 27, 2020

Susan Curtis
Manager, General Plan Update Section
VCRMA, Planning Division
800 S. Victoria Avenue
Ventura, CA
E-mail: GeneralPlanUpdate@ventura.org
Susan.Curtis@ventura.org

Re: County of Ventura 2040 General Plan Update and DEIR

Dear Susan,

I am writing to express my support of comments on the 2040 General Plan Update and DEIR submitted by Dr. Steven Colomé and also those comments submitted by Climate First: Replacing Oil & Gas (CFROG). As I recall, when the County conducted an early outreach effort on the General Plan Update, results came back showing a very high level of residents' concern about climate change. Since then, we've had extraordinary and damaging wildfires including the Thomas Fire and the Woolsey Fire; we've also had the County's commissioned report on sea level rise finding the County is highly susceptible both to the impending sea level rise as well as storm surge flooding. Yet, the County still cannot bring itself to adequately address and meet greenhouse gas (GHG) reduction goals of the State or even the County's own stated General Plan goals.

Ventura County oil and gas production is one of the highest in the state. So, this sector – oil and gas development, including existing operations – is where we must plan and execute a huge reduction of GHG emissions over the next 20 years. The problems with the baseline inventory of GHG emissions, emission forecasting, lack of effective, meaningful policies, inadequate mitigations, and failure to produce an effective CAP (Climate Action Plan) are laid out in the comments from Dr. Colomé and CFROG.

The County is failing to take hold of the power of a General Plan and use it - to implement necessary and important change – to reduce our GHG emissions. In particular, the County must incorporate mitigation measures to: 1) prohibit all new oil well drilling, 2) prohibit all flaring, and 3) phase out all non-conforming/antiquated facilities and operations through amortization.

Please remember and embrace the residents' concern about climate change at the outset of the General Plan process and show leadership in this time of climate crises. You must act in the best interests of Ventura County residents.

Sincerely,
Kathryn Lottes

Simmons, Carrie

From: John Foster <jfoster@greenwood-associates.com>
Sent: Thursday, February 27, 2020 10:33 AM
To: General Plan Update
Subject: Comments, Archaeology

Follow Up Flag: Follow up
Flag Status: Flagged

I would urge the County to include how the agency would establish a "preponderance of evidence that the resource is not archaeologically or culturally significant." See below. How would this be done and could it be appealed?

The number of archaeological sites in Ventura County is decreasing at a rapid rate and the definition of archaeological significance should be revised, "that all Native American archaeological sites, should be considered significant since the prehistoric identity of the Indigenous groups is tied solely to archaeological evidence." Loss of any sites would irrevocably result in loss of significant portions of their culture.

Thank you for your consideration.

John M. Foster, RPA
President, Greenwood and Associates

For the purpose of this draft EIR, implementation of the 2040 General Plan would have a significant impact on cultural, tribal cultural, or paleontological resources if it would:
 Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not archaeologically or culturally significant. Demolish or materially alter in an adverse manner those physical characteristics of an archaeological resource that convey its archaeological significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources. Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant. Cultural, Tribal Cultural, and Paleontological Resources Ventura County 4.5-6 2040 General Plan Draft Environmental Impact Report Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA. Cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074. Result in the disturbance of human remains, including those interred outside of formal cemeteries. Result in grading and excavation of fossiliferous rock (identified as “Moderate to High” or “High” on Table D.2 of the ISAG) or increase access opportunities and unauthorized collection of fossil materials from valuable sites.

--
John M. Foster
President
Greenwood and Associates

SoCalGas

A Sempra Energy utility

Jennifer Pezda, MESM
Environmental Policy Advisor

555 W. Fifth Street, GCT 21C5
Los Angeles, CA 90013

Email: jpezda@semprautilities.com

6/21/2019
Susan Curtis
RMA Planning Division, General Plan Update
800 South Victoria Avenue., L #1740
Ventura, CA 93009-1740

RE: Ventura County 2040 General Plan Update and Climate Action Plan

Dear Ms. Curtis,

SoCalGas appreciates the opportunity to submit comments on County's Preliminary Public Review Draft General Plan (Draft Plan). We have been continually engaged in the development of the Draft Plan and further appreciate the opportunities to attend public workshops, planning commission meetings, and participate in online surveys as means to submit feedback throughout the planning process. We believe this document will provide valuable direction for the County to pursue effective, long-term sustainable planning goals. SoCalGas especially supports the County's direction to pursue policies that promote furtherance of renewable energy development and expansion while also contributing to regional and local resiliency. We support many of the policies currently included in the Draft Plan and look forward to partnering with the County to achieve these ambitious strategies and actions. We do believe the Draft Plan could benefit from active identification and incorporation of the following takeaways:

- **The Draft Plan can be greatly enhanced by pursuing significant synergies between production and use of renewable natural gas (RNG) and the County's renewable energy goals, waste reduction/diversion targets, and emission reduction strategies.**
- **Because the pipeline system that delivers RNG is inherently resilient to aboveground climate events, it can greatly help increase the resiliency of County infrastructure and operations to climate hazards and impacts.**

Most prominently, we are excited at the potential opportunities that exist between the county's waste reduction and diversion targets, as stated in the Draft Plan, and development and use of RNG resources that can drive and incentivize their attainment. RNG can be produced from existing waste streams within the County, including organic waste, green waste, and agricultural waste. This aligns with the goals of Strategy PFS-5.5 – "support the beneficial reuse of agricultural wastes...such as energy generation" and PFS-5.6 – "promote value-added alternatives to solid waste management, such as...energy." Further, the organic waste diversion incentives generated by RNG production would also help the County achieve the organic waste diversion targets mandated under SB 1383. Similarly, use of existing waste

resources to produce RNG aligns with the County's emphasis to increase the use of renewable energy as stated in Policy COS-8 and its supporting strategies that advocate promoting development and use of renewable energy resources (including bioenergy) and transitioning to zero net energy buildings (Strategies COS-8.1 and 8.5, respectively). We are ecstatic to see that such synergies are acknowledged in the GHG Mitigation and Climate Adaptation Measures in the County's Draft Climate Action Plan, Appendix B of the Draft Plan, such as in Policy AG-L which prompts the County to develop a program to coordinate public-private local investment in biogas control systems.

Because RNG is produced from existing methane sources that are otherwise being emitted into the air, unabated, capturing these emissions to produce RNG helps reduce both regional and local methane and GHG emissions. As a short-lived climate pollutant, methane has a greater global warming potential than carbon dioxide—specifically, methane is approximately 28 times more potent than carbon dioxide in the atmosphere[1,2]. From a lifecycle perspective, because RNG production removes a greater quantity of more potent GHG emissions from the air than what it produces at end uses, its production is a **carbon negative process**, and can be used to offset other uses that cannot achieve carbon neutrality. As the County is aware, SoCalGas recently filed a request with the California Public Utilities Commission seeking to offer RNG to all customers, which would have significant potential to significantly reduce both local and regional GHG emissions. In fact, replacing only 20% of existing natural gas supply with RNG achieves the same emissions reductions as electrifying the entire building sector by 2030, but at one-third of the cost.[3] For these reasons, we recommend that the Draft Plan include additional policies and supportive strategies to promote both production and use of RNG as an incentive mechanism to enhance organic waste reduction/diversion, in addition to use as a renewable fuel option for decarbonizing the building and transportation sectors.

The underground natural gas system is more resilient than the aboveground electric system

Use of RNG as a renewable energy source also has synergies with County resilience goals and targets. As stated at the recent Planning Commission General Plan Update Workshop on June 13th, 2019, County staff directly acknowledged the dual importance of decarbonizing energy supplies but while also keeping in mind the critical importance of energy reliability. As we know, the impacts of global climate change are set to continually increase in severity, which will result in more severe wildfires, storms, and floods. Wildfire risk, specifically, is one of the most prominent climate change hazards facing the County, especially as just over the past two years Southern California has experienced two of the largest wildfires in the State's history that burned millions of acres and destroyed thousands of homes and property, a significant portion of which occurred within Ventura County. To this end, SoCalGas supports the draft policies

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[1] IPCC. Global Warming Potential Valueshttps://www.ghgprotocol.org/sites/default/files/ghgp/Global-Warming-Potential-Values%20%28Feb%2016%202016%29_1.pdf

[2] California Air Resources Board (CARB). Understanding Global Warming Potentials. https://www.epa.gov/ghgemissions/understanding-global-warming-potentials

[3] PR Newswire. New Study Advises Policymakers to Consider Renewable Natural Gas for Low-Carbon Buildings Strategy. August 8, 2018. https://www.prnewswire.com/news-releases/new-study-advises-policymakers-to-consider-renewable-natural-gas-for-low-carbon-buildings-strategy-300691318.html

aimed at enhancing local adaptative capacity such as Policy HAZ-11.4, which supports education and outreach efforts to inform local communities about climate change impacts, and Policy HAZ-P, which aims to identify critical infrastructure vulnerable to extreme heat.

As seen in the recent wildfires and mudslides that ravaged Southern California, energy system vulnerability is a significant factor that affects local resilience to such hazards. As the electric system is almost entirely aboveground, it is significantly more exposed to threats and, when impacted, can not only leave hundreds to thousands of residents without power at their homes, but also affect operation of critical facilities. For example, in 2017 the Thomas Fire damaged electric power lines throughout the City of Ventura. Because the City's water pumps to supply water to firefighters ran on electricity without any other form of backup power, firefighters were unable to get water from the pumps to put out burning residences[4]. If the water pumps had been connected to a backup power system, such as a natural gas generator, firefighters would have been able to access the water.

In contrast, as the natural gas system is mostly underground, it is very resilient to extreme weather events. For example, in 2012, after Superstorm Sandy, the entire natural gas system in the Northeast was essentially intact, allowing residents to support back-up generators, cook, and keep warm. Businesses with natural gas-powered fuel cells were able to operate and compressed natural gas (CNG) buses in New Jersey were used to shuttle residents to safety[5]. Further, when Hurricane Harvey temporarily disabled almost 30% of the nation's refining capacity, CNG shuttles were able to continue operating, and hospitals that had on-site combined heat and power systems were able to provide urgently needed medical attention, despite flooding. These examples demonstrate the critical role natural gas infrastructure can play in supporting local and regional energy supply resilience in the face of extreme climate events and use of renewable natural gas can achieve additional co-benefits in reducing GHG emissions.

SoCalGas has been engaging with stakeholders and consultants to conduct case studies and risk assessments of the natural gas system with the intent to demonstrate the security and resilience of our system. SoCalGas intends to use this information to help local and regional cities and counties undertake similar efforts to identify system and infrastructure vulnerability. We also offer our annual Climate Adaptation and Resilience Grant[6] to local cities and counties to help fund efforts to update and develop local adaptation and resilience plans. We greatly appreciate recognition of our grant in the Draft Climate Action Plan and encourage the County to apply during this year's application period.

---

[4] ICF. Case Studies of Natural Gas Sector Resilience Following Four Climate-Related Disasters in 2017. https://www.socalgas.com/1443742022576/SoCalGas-Case-Studies.pdf

[5] https://www.energy.gov/eere/articles/5-ways-alternative-fuels-aid-response-hurricanes-and-natural-disasters?utm_source=EERE+Weekly+Digest+of+Clean+Energy+News&utm_campaign=f048cbec65-EMAIL_CAMPAIGN_2017_09_25&utm_medium=email&utm_term=0_96dffafa2f-f048cbec65-34678197

[6] SoCalGas Climate Adaptation and Resiliency Planning Grant Program. https://www.socalgas.com/smart-energy/sustainability-at-socalgas/climate-grant

Looking forward, we believe renewable natural gas will play an important role in the County's renewable energy plans and help it achieve State GHG emission reduction goals, organic waste diversion goals, as well as climate resiliency goals. Decarbonizing our natural gas delivery system keeps intact the inherent energy efficiencies of direct uses of natural gas, at lower carbon-content, while also demonstrating synergies with County waste reduction goals by boosting efforts to enhance organic waste management and recycling. SoCalGas appreciates the opportunities provided by the County to engage throughout the formation of this Draft Plan and hopes to continue communication for the duration of the planning process. If you have any questions, please do not hesitate to reach out via telephone or email. Thank you!

Sincerely,

Jennifer Pezda, MESM
Environmental Policy Advisor
Southern California Gas Company

Simmons, Carrie

From: Wayne Morgan <waynemorgan1@yahoo.com>
Sent: Thursday, February 27, 2020 10:57 AM
To: General Plan Update
Subject: 2040 General Plan Comment submission
Attachments: CountyPlanning2040_Comments1.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Hello -

Please find the attached Word document containing my comments on the 2040 General Plan.

Thank you,

Wayne Morgan
Ventura, CA

Dear County Supervisors and members of the Planning Commission:

I am deeply concerned about our future if we do not take significant action to curb green house gas emissions. Fossil fuel use is driving climate change. The impacts associated with climate change include droughts, fires, forced migration of animal and humans (which is one of the treats to national security), sea level rise, spread of disease and threats to biodiversity, to name a few. Also fossil fuels threaten the ocean ecosystem (because of acidification), reduce air quality, pose threats to our water supplies, are a fire threat (note recent refinery fires), and threaten economic stability because of volatile fossil fuel markets. Current levels of CO2 are at historic highs yet we still put more into the atmosphere. The scary thought to me is that it takes decades for nature to take CO2 out of the atmosphere. Estimates range from 30 – 90 years (Ref: *Archer, David (2009). "Atmospheric lifetime of fossil fuel carbon dioxide". Annual Review of Earth and Planetary Sciences. **37**. pp. 117–34*). Other literature cites ranges from 20 – 200 years. So even if we stop all GHG emissions today, the earth will still be coasting to a warmer climate for decades.

Oil Production

I am concerned that Ventura has oil operations that I feel pose a risk. Some financial advisors are advising investment firms to be wary of fossil fuel investments. As renewable and green energy become increasingly less costly than fossil fuels and the projected displacement of petrol fueled cars by EVs, the market for fossil fuels will drop dramatically in the 2020s causing many oil operations to drop out of the market, leaving stranded assets. (Ref: See works by authors Ross Tessian and Tony Seba. Blackrock Investments.) So, not only could oil operations in Ventura become uneconomical, there is a risk to Ventura that cleanup of abandoned operations will be dropped on Ventura's doorstep.

Oil production threatens the health of residents located close oil operations. Benzene, toluene, and hydrogen sulfide, among others, pose health risks, especially to children. To many in the community this is an environmental justice issue. Wells must be properly shutdown to insure safe environment for the community.

I recommend phasing out oil operations in the county as soon as possible and cleaning up the operation sites before they become a County financial liability.

Transportation

Technology will disrupt transportation in the 2020s. Many transportation experts are predicting economics will price petrol-fueled vehicles out of the market mid 2020s. Why, because EV's will be cheaper to produce, cheaper per mile to drive and much cheaper to maintain. (They have typically about 18 moving parts compared to 1,000+ moving parts for a petrol car.) Also, battery improvements will lead to cheaper, longer range, faster charging and longer lasting batteries. Already there are many Teslas that have more than 250,000 miles on their batteries and Tesla estimates that their new batteries will last to about 1 million miles). Note that electric vehicles don't use much, if any, oil for lubrication. This will lessen the roadway oil runoff and its associated impacts. And EVs are quieter.

Autonomous electric vehicles will start to come online in the 2020s. This will start a dramatic change in the transportation model. Ride hailing of autonomous vehicles will become the norm. In the future, most people will not own cars – It will be cheaper to just hail a ride with your smartphone. Just tell your phone where you want to go and when, and the ride hailing service will send an autonomous vehicle to pick you up. I envision most future urban transportation will be done this way. (Ref Three Revolutions: Steering Automated, Shared and Electric Vehicles to a Better Future by Daniel Sperling, 2018).

This revolution will mean less land is needed for parking and many parking lots may be repurposed. Transportation over long distances could be done with rail lines and the last miles be done with hailed autonomous vehicles. Rail lines could be built in the medians of many of the existing highways. One specific project could be a light rail connecting CSUCI to the 101 Freeway (Camarillo MetroLink Station). Autonomous trains could provide continuous and on demand service to greatly increase travel convenience. This could be modeled after airport transportation light rails, such as at Hartsfield Airport in Atlanta. (An aside, rail service should be used where possible in place of vehicles with rubber tires to reduce hazardous air particulates). Because of the coming changes, the County should carefully look at the wisdom of investing in road expansions with the possibility that fewer cars will be on the roads in the future.

Also note that the authors Ross Tessian and Tony Seba, to name a few, predict that these changes to will occur quicker than we think, maybe less than a decade.

Economics

Many of the investments in renewal energy will pay for themselves in less than a decade. Implementation of renewable projects should be viewed as an investment. To me it is a no-brainer.

I would encourage the County to assist home owners, builders and apartment owners to find financing for renewal and energy saving investments. Maybe bundling, facilitated by government agencies, would create opportunities for more and less expensive funds to be available.

Renewables have few external costs, whereas fossil fuels have many such as climate change impacts, air pollution, water pollution, health hazards, fire hazard, security costs (domestic and foreign), subsidies, spills, and oil runoff from vehicles to name a few. We all pay for these hidden costs. Considering these costs make the renewables even more attractive.

Other

In the future homes and buildings should run only on electricity – Use heat pumps for heating and cooling, hybrid electrical water heaters and electrical cooking appliances.

Solar panels on rooftops & batteries for housing increases grid stability, reliability and security. It reduces electrical distribution costs and reduces the need for peaker plants. Peaker plants will be a thing of the past.

Environmental justice is a problem in the County, especially near oil operations. Environment justice should be given a heavy weight in considering the future projects to protect Ventura citizens, especially the children.

Comments on some specifics:

CTM-6.6 Policy CTM-6.5: Electric Vehicle Charging Stations.

Comment: Electric vehicles could offer electrical grid stabilization at a low capital cost by utilizing part of their storage to supply power during high electrical demand or when other renewals are not available. This applies to EVs used for personal as well as ride hailing services. As such, charging during daylight hours becomes very desirable and thus charging stations

should be required at all public buildings and parking lots. Businesses should also offer charging at their facilities. Charging hubs that have storage capability to allow for very rapid charging, say, less than 10 minutes, should be built and possibly located at under utilized sites.

Policy COS-8.10: Battery Energy Storage Systems.

Comment: County buildings and critical services should be backed-up using battery storage. This battery storage could be part of a Virtual Power Plant concept (need to coordinate with electrical utilities) and could bring revenue to the County by supply excess capacity during peak demand. Back-up has become very important due to disruptions in electrical service due to fires and fire prevention. These comments also apply to **Implementation Program T: Energy Consumption Performance.**

Policy PFS-7.6: Smart Grid Development.

Comment: Smart grid development is vitally needed to stabilize the grid through both load leveling and utilizing electrical storage efficiently. Battery storage can instantly respond to load variations which will greatly improve efficiency and reduce reserve power levels from variable sources. County building should be equiped with storage and made part of the smart grid.

Thank you for you time and consideration.

Respectfully,

Wayne Morgan
Ventura, CA

Simmons, Carrie

From: Jennifer Rivera <jrivera@cipa.org>
Sent: Thursday, February 27, 2020 11:02 AM
To: General Plan Update
Subject: Comments on Ventura County 2040 General Plan Draft Environmental Report
Attachments: Ventura General Plan Update DEIR Comment Letter.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Please see attached comments from California Independent Petroleum Association (CIPA) to Ventura County's 2040 General Plan Draft Environmental Report.

Thank you.

CIPA
California Independent Petroleum Association

JENNIFER RIVERA
VICE PRESIDENT OF PUBLIC AFFAIRS

PHONE: (562) 522-9596

California Independent Petroleum Association
1001 K Street, 6th Floor
Sacramento, CA 95814
Phone: (916) 447-1177
Fax: (916) 447-1144

February 27, 2020

VIA ELECTRONIC DELIVERY

Susan Curtis, Manager, General Plan Section Update
Ventura County Resource Management Agency, Planning Division
800 S. Victoria Ave., L#1740
Ventura, CA 93009
GeneralPlanUpdate@ventura.org

Re: Comments on Ventura County 2040 General Plan Draft Environmental Report (State Clearinghouse No. #2019011026)

Dear Ms. Curtis,

The California Independent Petroleum Association (CIPA) appreciates the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) prepared for the County of Ventura's (County) proposed update to its existing general plan (GP 2040). While we appreciate the County's efforts to comply with the California Environmental Quality Act (CEQA) in preparing the DEIR, our review of the DEIR reveals that it contains numerous legal defects. Many sections of the DEIR must be substantially revised, and the DEIR must be recirculated, before it can be considered for certification.

CIPA represents several independent oil and gas producers in the County. CIPA's producer members actively contribute to the County's economic base, provide myriad local employment opportunities and produce oil and gas resources within the County in an environmentally responsible manner.

CIPA seeks to promote greater understanding and awareness of the critical role domestic oil and gas production plays in powering the County's vibrant economy. Local oil and natural gas producers provide both the energy and the building blocks of nearly every material that County residents utilize on a daily basis, and we recognize that the affordability, reliability and resilience of those supplies will largely determine whether the County achieves a more vibrant

and inclusive economy, a more equitable society, and continued improvements in environmental quality.

The policies and additional restrictions proposed in the general plan (GP 2040) will devastate the vitality of the County of Ventura by: eliminating thousands of high-paying, middle-class jobs; costing the County tens of billions of dollars; relinquishing tens of millions of dollars in local tax revenues; raising the cost of living for all Ventura residents; and threatening the economy and the livelihoods of Ventura residents by increasing dependence on unreliable foreign sources of oil.

The DEIR not only lacks proper analysis on the economic impacts said restrictions and policies will have on the residents of Ventura County, but relies on factually incorrect and underpin assumptions to complete its analysis.

For these reasons and many others, we urge the County to revise the DEIR and recirculate before it's considered for certification.

CEQA COMMENTS:

1. CIPA joins in the comments submitted by Aera Energy LLC.

CIPA member Aera Energy LLC has submitted a number of comments concerning the legal adequacy of the DEIR, and CIPA joins in those comments.

2. CIPA joins in the comments submitted by Western States Petroleum Association.

The Western States Petroleum Association (WSPA) has also submitted numerous comments on the DEIR. CIPA joins in those comments as well.

3. The DEIR's GHG emissions analysis is legally flawed.

To reduce the production of greenhouse gas (GHG) emissions we must decrease our reliance on energy imports for over 90% of our natural gas, 70% of our oil and 30% of our electricity needs. GP 2040 proposes adoption of policies that will significantly increase Ventura's dependence on imported energy, meaning that Ventura is delegating its environmental leadership to other states, countries and regimes that do not share our environmental, labor, and human rights standards.

The DEIR concedes that adoption of GP 2040 will cause the County to rely on imported energy, but fails to quantify, evaluate or propose mitigation for the resulting increase in GHG emissions. In section 4.12, the DEIR states that "the demand for California-produced oil and gas would be satisfied through the importation of additional oil and gas from other countries and Alaska, which in turn could have indirect environmental impacts such as those associated with transporting the oil and gas from outside of Ventura County." This is extremely alarming since

the increase of imported energy has a clear and direct impact on our environment, much more than from the result of local production. The DEIR makes no attempt to analyze this impact. The DEIR must evaluate this known adverse impact and propose feasible mitigation measures.

4. Factually incorrect and unsupported assumptions underpin much of the DEIR's analysis.

The DEIR assumes that new discretionary permits will be issued for oil and gas wells, but fails to recognize the fact that oil and gas operations within the GP 2040 boundary will continue to operate under, valid and vested entitlements. To the extent the DEIR assumes that such operations will be subject to further discretionary review and the imposition of additional mitigation measures and/or conditions, that assumption is incorrect as a matter of law, and all analysis flowing from it is flawed.

GP 2040 Policies COS 7.2 and COS 7.3 are presented in the DEIR as limiting effects on human health. The DEIR cites a County of Los Angeles 2018 report as the basis for assuming that stated limiting effect on human health. What the Draft EIR fails to mention or quantify in any substantial manner, is the fact that the County of Los Angeles 2018 report's conclusions and recommendations lack grounding scientific research. The report lacks objective scientific data from the County of Los Angeles; reviews other jurisdictions outside of California when making recommendations or claims; uses weak, unsubstantiated, misleading language and science; excludes the County of Los Angeles Department of Heath's own data and previous studies.

The Draft EIR also makes reference to the 2019 City of Los Angeles Oil and Gas Health Report. That report clearly states, "There is a lack of empirical evidence correlating oil and gas operations within the City of Los Angeles to widespread negative health impacts. The lack of evidence of public health impacts from oil and natural gas operations has been demonstrated locally in multiple studies by the Los Angeles County Department of Public Health, the Los Angeles County Oil & Gas Strike Team, the South Coast Air Quality Management District and the comprehensive Kern County Environmental Impact Report and Health Risk Assessment." Lastly, the DEIR relies in part on unsettled legislation, Assembly Bill 345. Assembly Bill 345 is not law and the DEIR cannot treat it as such.

We thank the County for this opportunity to review and comment on the DEIR for GP 2040, and we ask that these comments be included in the record of proceedings in this matter. As set forth above and further articulated in the comments submitted by Aera Energy LLC and WSPA, the DEIR suffers from numerous legal defects. These defects must be cured and the DEIR must be recirculated

Sincerely,

Rock Zierman
Chief Executive Officer
California Independent Petroleum Association

Simmons, Carrie

From: Carol Holly <carol.holly2@gmail.com>
Sent: Thursday, February 27, 2020 11:25 AM
To: Curtis, Susan; General Plan Update
Subject: COS-7.2 setback distance, DEIR comments
Attachments: Carol's Setback comments Final.docx

Follow Up Flag: Follow up
Flag Status: Flagged

To: Susan Curtis, Manager, General Plan Update, Susan.Curtis@ventura.org

Comments on COS-7.2 setback requirements for oil and gas wells, **DEIR for GPU 2040**

From: Carol Holly, 10508 Sulphur Mountain Road, Ojai, CA 93023

Proposed General Plan 2040 Policy:

- **COS-7.2: Oil Well Distance Criteria.** The County shall require new discretionary oil wells to be located a minimum of 1,500 feet from residential dwellings and 2,500 from any school. (RDR) [Source: New Policy]

The DEIR suggests a mitigation measure to the above policy to decrease the setback from schools (and to include day care centers) from 2500' to 1500'. The reasoning in the DEIR for this decrease in setback is to allow a potential operator in the future who perhaps wanted to drill an oil well without directional drilling to place the well on the drill pad anywhere they want. The DEIR stretches common sense with this argument. If the future operator can drill horizontally 1500' as stated in the DEIR, why not 2500'? There is a difference in the cost of drilling, but the risk to the health and safety of young children far outweighs the small economic cost to an operator or two.

I was an elementary school principal in Ojai Unified School District for 22 years. In my role, among other things, I was responsible for ensuring the health and safety of children assigned to my school. Many young children suffer from asthma and skin allergies. All children love to run and play at recess. It is critical that those sensitive children are protected from unwanted and unnecessary exposure to air toxins that may cause serious complications leading to poor school attendance and miserable days of recovery time.

In my last assignment before retiring, I was principal at a school with three classrooms of special needs children, some of whom were medically fragile and who suffered from life-threatening childhood illnesses. This latter group of children were often highly sensitive to changes in their environment and the reactions they suffered were sometimes immediate and very serious. I remember asking one mother of such a child, "when would you like me to call 911?" Her response was, "any time you want to." As chilling as that sounds, it was real.

Air toxins are dangerous to anyone in close proximity to the source of the emissions, but they are especially dangerous to young children. Children who are medically fragile may find them intolerable.

Bad Accidents Happen

In 2006, oil well #36 in the Ojai Oil Field began spewing a mixture of brine water and oil at the rate of 210 gallons per minute (5 barrels) after a 3.1 magnitude earthquake on the San Cayetano Fault (see attached DOGGR report). Summit School at that time had a population of approximately 80 K-6 grade students. The school is cited about 1000' from well #36 (see attached map). The well continued to spew a toxic mix of brine water and unknown other

chemicals used in the capping process onto the land for three months. The well casing break was very difficult to get under control. Finally, after accruing a cost of 4 million dollars, the flow was stopped. During the entire time the well was being worked on by teams of international well control experts no one at the school was notified of the disaster unfolding on the hillside upwind from the school. Children continued to play on the playground, teachers taught physical education, parents with babies dropped off and picked up their students. **No one knew**. Where was the Ventura County Environmental Health Department? Where was DOGGR? Where was the fire department whose station is just a few hundred feet east of Summit School? Were any tests done on air quality near the school?

After the well was capped and the drill rigs and heavy equipment all cleared out, a parent of children at the school was told of the disaster by a worker from the oilfield. The story spread and we were collectively horrified. There was never any follow-up study or even a quick check-in to see how the children of Summit School were doing. No one knows if the school attendance went down, or if there are students with lasting health issues caused by breathing toxic chemicals for three months. No one knows because no one asked.

If staff and the industry assert in response to this comment that there is no evidence that anyone was sick or hurt by the break in well #36, be aware. How can there be evidence when 1) no one knew of the emergency in real time, 2) no studies were ever done to look for possible effects of the spill to human health at the school and 3) the air quality at the school was never tested?

A setback distance of 2,500', roughly 1/3 of a mile, is about all we can do to protect the health of young children at a school near active or idled oil and gas activities.

I can assure you that no one with a medically fragile child would ever rent or buy a house 1500' from an active oil well if they could possibly avoid it, why would they have to send their child to a school 1500' from such a well?

Please reject the mitigation measure and retain the 2500' setback from schools and day care centers.

Thank you,

Carol Holly,

Retired Elementary School Principal, Ojai Unified School District,

MS Educational Administration

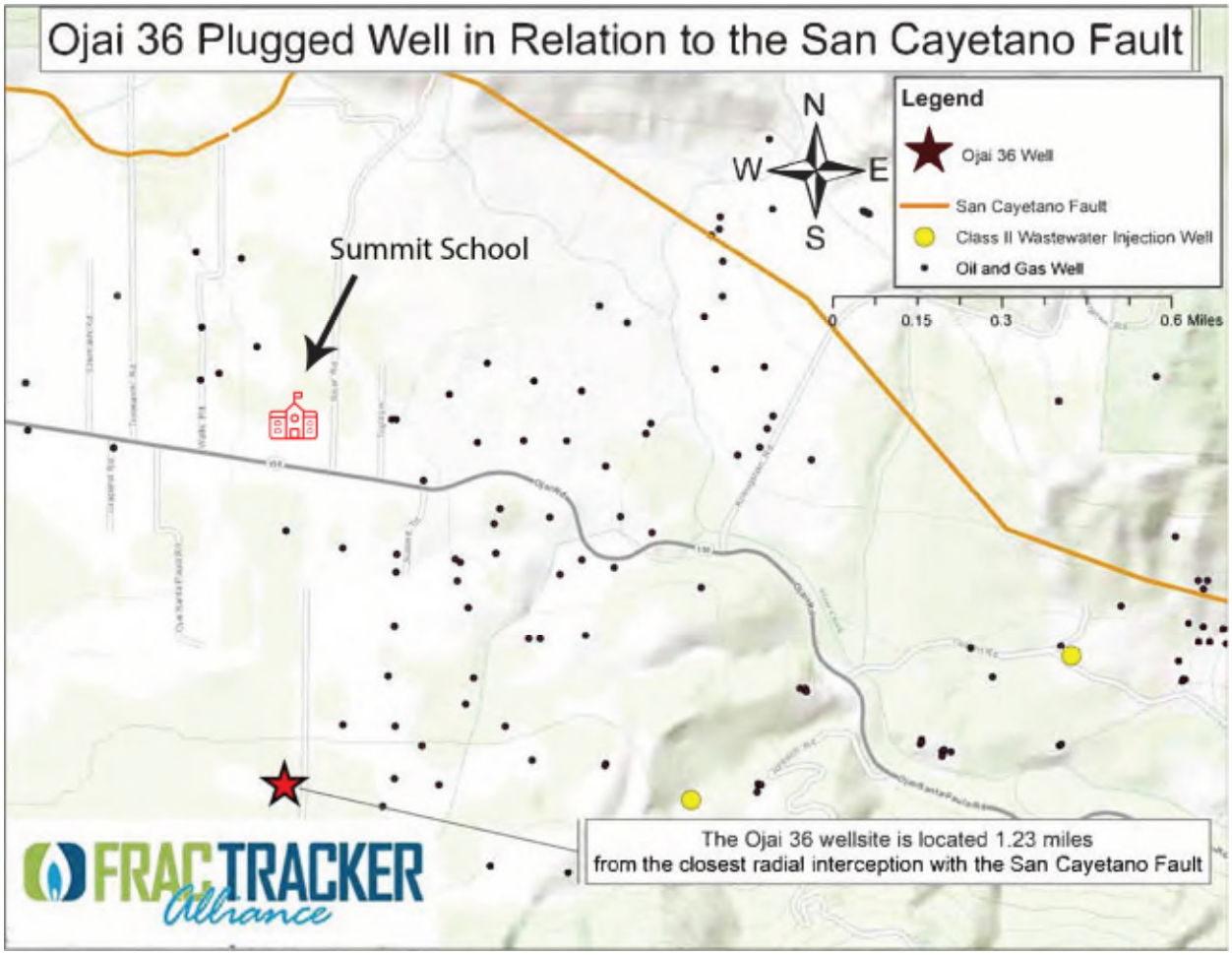
ABANDONMENT OF WELL "OJAI" 36

On March 3, 2006, immediately following a seismic event along the San Cayetana fault in the Sespe oil field, idle-well "Ojai" 36, located approximately five miles west along this same fault zone in the Sisar Creek Area of the Ojai oil field, began to flow water at a rate of five barrels per minute. Well records indicated the well penetrated a fault and had encountered a high-pressure water sand. The operator, VPC, contracted with international well-control specialists Boots and Coots to begin emergency operations to secure the well site and bring the well under control. Division staff were on location daily to witness operations. The well was eventually killed with 20 pound-per-gallon mud and permanently plugged and abandoned by May 1st at a cost of approximately $4 million (Photos 1 and 2).

Photo 2

Photo 1

"2006 Annual Report of the State Oil & Gas Supervisor." California Department of Conservation– Division of Oil, Gas, & Geothermal Resources, 2007.



Arbelaez, Jhon, Shaye Wolf, and Andrew Grinberg. *On Shaky Ground: Fracking, Acidizing, and Increased Earthquake Risk in California*. Pg. 14, 2014. Print.

Simmons, Carrie

From: John Brooks <jbrooksnp@gmail.com>
Sent: Thursday, February 27, 2020 12:45 PM
To: General Plan Update
Subject: General Plan Comments
Attachments: Climate Change Comments.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Please confirm receipt - thanks

John Brooks
140 Beech Rd
Newbury Park, CA 91320

February 27, 2020

Transmitted via e-mail: generalplanupdate@ventura.org

Susan Curtis,
Ventura County Resource Management Agency,
Planning Division
800 S. Victoria Ave
Ventura, CA 93009

Re: Comments on County General Plan and Climate Action Plan

Dear Ms. Curtis:
I appreciate the opportunity to review and comment on the County's General Plan and the integrated Climate Action Plan. It is a very significant undertaking and I wanted to recognize that staff has made great strides in incorporating the diversity of interests and often conflicting perspectives.

I have attached comments to this letter and divided them into comments specifically addressing a Policy/Program and an additional more generic set of comments, resources and research that I relied on as part of my evaluation or I was unsure which section or sections to include them in. Hopefully the additional context will assist in the refinement of the GP and CAP.

There is an overreliance on state legislation as a source of emissions reductions in the early years. Local efforts need to be more robust given the urgency of the issue and the potential that the IPPC targets are not substantive enough given the latest scientific analysis. Please see the CFROG letter from June 5, 2019 for a more comprehensive overview. To avoid redundancy, I am not replicating all the CFROG comments. However, I am including them as part of my comments by reference.

Sincerely,

John Brooks

Specific comments on sections of the CAP

LU-11.4 Change Shall to Require

LU-16.5 Change Shall to Require

LU-18.5 – "encourage stakeholders" and "have opportunity to learn about" is a pretty low bar. Please upgrade to County shall conduct programs/outreach in their neighborhoods or community gatherings and include multi-lingual capabilities as needed to reach out to the Hispanic and Mixteco populations.

PFS-1.2 & 1.3 – The County should adopt a policy of considering the 100-year projections when evaluating infrastructure since these facilities have significant sunk costs and it is significantly cheaper to upgrade when planning a facility versus retrofitting an existing building.

PFS-2.3 State law requires commercial buildings to be zero net energy (ZNE) in 2030. The County should show leadership, by requiring all new buildings to be ZNE and existing buildings to be in substantial compliance if the County is leasing greater than 50% of the building space.

PFS-E – The County procurement policies should be updated to require all suppliers, vendors and consultants to disclose the sustainability of their operations. The County could award as little as one point to this category, however, the requirement to disclose will have a significant effect on the adoption of policies and procedures that are environmentally beneficial. The County could develop a one-page form checklist that they submit with their bids. Alternatively, large corporations can share their corporate sustainability or ISO certifications and smaller ones can show that they follow the Ventura County Green Business practices if they have already completed those more comprehensive processes.

COS-8.1 – include promotion of microgrids as both a carbon reduction and resiliency measure for PSPS events.

COS-8.9 - Change Shall to Require and have a list of recommended shade trees appropriate for that region and tolerant of parking lot conditions. This could assist with stormwater mitigation measures and help reduce financial impacts to the County from flow into the public ROW.

COS-H – Ensure that the goal is net additional trees beyond replacement of dead/dying trees or mitigation trees for a project. Recommend that preference be given for tree planting in EJ or low-income communities.

COS-M – In addition, oil companies should pay an extraction fee per barrel for an insurance mitigation fund to ensure that abandoned wells and sites owned by bankrupt companies do not become a burden to taxpayers.

COS-Z – These should be online with easily understandable charts or graphs enabling the public to understand the data and compare to the projected savings to determine if individual measures are being met.

COS-CC I commend the recommendation to establish a Climate Emergency Council to advise the Board.

COS-DD – A critical component to assist in the development and implementation. An Office of Sustainability should be established within the CEO's office and the primary staffperson in charge of this effort should be a direct report to the CEO recognizing both the critical and cross-cutting nature of this work and ensure the full cooperation of all County offices.

COS-EE - Measures should be incorporated to ensure that projects continue to implement requirements after the project if finished and occupancy is granted or face substantial penalties. For example, if they bypassed one or more measures, they could agree upfront to a penalty of 10x the carbon wasted with the funds going to assist in low-income areas of the county to weatherize or otherwise reduce their carbon footprint.

Haz-1.4 – The County should develop reach fire codes for the urban-wildland interface to minimize both property damage and the danger to emergency responders trying to protect structures in the new fire environment.

Haz-10.7 Change to read that the County will purchase ZEVs, unless they are not readily available in the vehicle class or purpose needed or the lifetime cost of the vehicle including purchase, fuel and maintenance exceeds 15% of the cost of a non-ZEV. The County needs to show leadership and these vehicles are a very public way to showcase the transition to the low-carbon economy.

HAZ-11.6 What provisions will be made to identify and transport those without transportation and the elderly or disabled who cannot afford or do not have access to AC to cooling centers? Will the cooling centers be open 24/7? One of the problems is that the nights are heating up faster than the days so residnets may need to stay overnight. Will animals be allowed in these facilities?

PSPS/Wind Events

PSPS outages – need to be prepared for 3-7 days of electricity outages. These are not considered emergencies by the Red Cross, so they will not staff shelters. If a substantial part of the county is without power, we will need cooling shelters (with power) which can be a mix of day use only and overnight shelters. The centers will need to have robust electrical charging stations to run oxygen tanks and other medical equipment. Medicines may need to be refrigerated and monitored. Have the shelters been retrofitted with generators or are they wired correctly for three-phase generators? Where will generators be located to quickly deploy especially if routes like the 101 freeway are closed?

A power outage may do the following:

- Disrupt communications, water, and transportation
- Close retail businesses, grocery stores, gas stations, ATMs, banks, and other services
- Cause food spoilage and water contamination
- Prevent use of medical devices and operations or medical/senior center facilities

From Ready LA County

A spike in generator purchases and rentals by people unfamiliar with their safe operation is likely and may result in carbon monoxide poisoning.

7.13 Wildfire – The County should adopt reach codes for fire.

Although Santa Anas have decreased in in frequency and severity of extreme wind events, the Santa Ana window or primary season is moving to Nov-Jan. This could result in more fires in this period, particularly in dry years[1].

7.13 P – Should also include infrastructure at risk that the County does not control but relies on.

7.13 Does not include anything related to the more intense rains and flooding expected from less frequent, but more intense storms.

In addition, wildfire has profound effects on storm runoff, erosion, and sedimentation in the complex terrain within Ventura County. For several years following a fire, runoff rates can more than double due to fire-driven changes in soil properties that render it water-repellant and reduce infiltration rates (USGS 2005; USGS 2019). Short-duration, high-intensity precipitation under these conditions increases surface runoff that can cause movement of ash, burned vegetation, soil, rocks, and other debris. This material is scoured from steep channels and moved downslope where it may impact communities or infrastructure below as a debris flow.

9.8 G – The County should adopt a policy to establish parcel-based water budgets to prepare for the implementation of the state water efficiency mandates "Making Water Conservation a Way of Life". This will ensure that parcels that use more than their fair share are targeted for outreach and punitive measures as necessary to comply with the state law.

10 Economic Vitality

EV-4.2 Economic Development Opportunity

California and Ventura County are well-positioned to be leaders in the development and deployment of greenhouse gas (GHG) reduction solutions that will assist in the transition to a low-carbon economy. Because of California's size and early adoption of significant environmental controls, Cap & Trade, AB 32, and mandatory organics recycling, the state is already a key player in finding sustainable solutions that include cleaner emission vehicles, energy efficient appliances, and green chemistry requirements. These are also the types of jobs and opportunities we need to develop locally to provide opportunities for our youth and to sustain our region.

The aerospace sector was a huge boost to the Southern California region in the 70s. The Bay area has developed the Silicon Valley, and North Carolina has the Research Triangle. What were the key components that enabled these areas to develop into such well-known powerhouses? How can we leverage the transition to a green economy and position Ventura County as a regional Green Innovation Hub?

Next 10 in November 2014, published the *Regional Clean Economy Series* of five reports highlighting five sectors of the state that are forming and nurturing regional clean economy sectors focused on the "core clean economy." Next 10 is an independent, nonpartisan organization that focuses on the environment, the economy, and the quality of life for all Californians.

[1] Ventura_Climatechange_Review_Oakley.pdf slide 28

They define the core clean economy as, *"businesses that provide the cutting-edge products and services that allow the entire economy to transition away from fossil fuels and use natural resources more efficiently."*

The regions and core clean economy focus for their reports include:

1. Los Angeles and Orange – advanced transportation
2. Sacramento – electric vehicles, building energy efficiency and solar, waste-to-energy
3. San Diego and Imperial – smart grid and biorenewables
4. San Francisco Bay Area – advanced transportation, energy storage, building energy efficiency
5. San Joaquin Valley – water-agriculture, renewable energy

General Comments

Requested Policy – Each County department should prepare a Climate Action Plan that evaluates their footprint, mitigation measures, risks to their clientele and mitigation or outreach measures that they will adopt. A substantial portion of this may be done by centralized staff. However, the department staff need to understand the issues and incorporate mitigation measures into their routine activities. This could be the Public Works department, the County Health Department. Climate changes will impact their day-to-day operations and they need to start recognizing, planning for and accommodating those changes.

Economic Related issues

Requested Policy - The Pacific Coast Highway in the Malibu region and the 101 between Ventura and Santa Barbara are both vulnerable. Short-term shutdowns would be disruptive. However, if the corridor was closed for multiple months this would significantly impact traffic and may result in substantial economic impacts. Critical infrastructure should be evaluated regardless of ownership and mitigation plans prepared as warranted.

Article related to Ventura County

Fires, floods and free parking: California's unending fight against climate change – Scott Wilson, Washington Post December 5, 2019

Since 1895, the average temperature in Santa Barbara County has warmed by 4.1 degrees Fahrenheit, according to The Post's analysis. Neighboring Ventura County has heated up even more rapidly. With an average temperature increase of 4.7 degrees Fahrenheit since preindustrial times, Ventura County ranks as the fastest-warming county in the Lower 48 states. [Some climate scientists believe that there is an error in the Post's projections].

Public Health

Climate change has been called "the biggest global health threat of the 21st century" (Costello et al. 2009). In the LA region, the health impacts of climate change are far-reaching, including direct and indirect impacts related to extreme heat, poor air quality, wildfires, infectious diseases, floods and mudslides, mental health concerns, and increasing disparities caused by disproportionate impacts to vulnerable populations. (NOTE: LA Region includes Ventura County in the analysis) …

The number of extreme heat days in southern California is expected to increase considerably by the middle of the century as a result of climate change (pp. 11–12). Extreme heat is one of the most significant health impacts of climate change and already causes more deaths each year in the United States than floods, storms, and lightning combined (Berko et al. 2014). Exposure to extreme heat can cause direct heat-related illness (heat cramps, heat exhaustion, and heat stroke) and death, and can also exacerbate certain existing medical conditions. Heat waves are associated with increases in the number of people seeking emergency medical care for a variety of health conditions, though the magnitude of this effect depends on many factors, including geographic location, demographics, and availability of adaptive strategies such as air conditioning. During California's 2006 heat wave, there were 16,166

excess emergency department visits and 1,182 excess hospitalizations across the state, with increases in visits for kidney related diseases, diabetes, and cardiovascular disease (Knowlton et al. 2009)[2].

While all residents are affected to some extent by extreme heat, certain populations are more vulnerable to severe impacts. These include (a) low-income communities and communities of color, which often experience a greater urban heat island effect due to a lack of trees and other vegetation, and which have lower access to air conditioning (Reid et al. 2009a); (b) older adults, young children, people with chronic medical conditions, and people taking certain medications, who are physiologically vulnerable to the effects of heat (Kenny et al. 2010; Reid et al. 2009a; Tsuzuki-Hayakawa, Tochihara, and Ohnaka 1995); and (c) outdoor workers (Bethel and Harger 2014), people experiencing homelessness (Harlan et al. 2013), and others who spend a significant amount of time outside and are more exposed to extreme heat. Unlike cities that have consistently experienced extreme heat in the past, the housing stock in LA is not designed for extreme heat. Approximately 51% of households in the LA-Long Beach area have central air conditioning (American Housing Survey 2015). While California code requires that landlords provide adequate heating facilities in homes, air conditioning is not a requirement. Moreover, the LA region's affordable housing crisis may prevent many renters from being able to move to air-conditioned homes where they would be less impacted by heat. Access to air-conditioned spaces may be additionally limited by factors such as mobility, vehicle ownership, perceptions of neighborhood safety, and distance to transit. These factors can prevent vulnerable populations from implementing adaptive and health protective strategies, such as getting to cooling centers or other air-conditioned locations.[3]

Do we know the percentage of our houses without AC? Although many resident's dependent on social security or other limited income may not turn on the AC even if they have it in their homes due to financial concerns it would be a starting point.

Climate change may impact mental health through various pathways, including but by no means limited to (a) increases in the frequency and severity of extreme weather events; (b) increasing economic instability; and (c) uncertainty about the future of the planet. Extreme weather events such as fires and floods can have acute mental health impacts. Clear links exist between extreme weather events and anxiety and depression (Kar and Bastia 2006), post-traumatic stress disorder (Neria, Nandi, and Galea 2008; Kar and Bastia 2006), and suicide (Krug et al. 1999).[4]

Public transit infrastructure - *Transit design can mitigate human exposure to extreme heat (p. 44). Exposure to extreme heat can result in heat-related illnesses such as heat cramps, heat stroke, and heat exhaustion, and can also exacerbate pre-existing conditions. Further, extreme heat may discourage transit use altogether. Environmental exposure results from access and waiting. Transit users from areas with low residential density, limited high capacity roadways, and irregular street networks not located along direct paths between major activity centers, are likely to experience prolonged access and/or waiting times (Fraser and Chester 2017a)…. The placement of transit stops impacts how long passengers are exposed to the environment, and, coupled with walking, may leave them at risk for negative heat-*

[2] Fourth Climate Change Assessment – LA Region pg 21
[3] Fourth Climate Change Assessment – LA Region pg 22
[4] Fourth Climate Change Assessment – LA Region pg 24

related outcomes. Walking times can vary significantly by age and physical condition. They can increase by up to 30% for the slowest age group (Bohannon and Williams Andrews 2011).[5]

Human health effects of extreme heat

Climate change poses a threat to public health. Heat causes more reported deaths per year on average in the United States than any other weather hazard (NOAA, 2017). In addition to the long-recognized health impacts of extreme heat, hospital admissions and emergency room visits, deaths and other adverse health outcomes have been associated with the warm season in California.

In 2006, dramatic increases in many heat-related illnesses and deaths were reported in California following a record-breaking heat wave. During the summer months, large urbanized areas can experience higher temperatures compared to nonurban outlying regions. “Urban heat islands” create health risks both because of the increased temperatures and because of the enhanced formation of air pollutants. Warming temperatures can amplify the transmission of mosquito-borne diseases (such as West Nile Virus) and make conditions more hospitable for invasive species that may transmit diseases.

While difficult to track using indicators, climate change can impact human well-being in many ways, including injuries and fatalities from extreme events, and respiratory stress from poor air quality (Mellilo et al., 2014).6

Climate Change is a Health Emergency – Coalition of health organizations

Yale Climate Connections on Health

Information on the health effects of climate change from the Third National Climate Assessment’s Health Chapter.

Mental Health

People's anxiety and distress about the implications of climate change are undermining mental health and well-being, according to a new federal report reviewing existing research on the topic. Issued by the U.S. Global Change Research Program, the report is the first time the federally mandated group has published an assessment solely focused on climate change and health.

The report is notable for another reason, too: It contains a chapter devoted to mental health and well-being, a significant step forward for an assessment of this type, says lead author Daniel Dodgen, PhD, a clinical psychologist at the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Preparedness and Response. "I think people realize that if you're going to talk about health, you have to talk about mental health," he says.

The report also found that:

Exposure to climate- and weather-related natural disasters can result in mental health consequences such as anxiety, depression and post-traumatic stress disorder. A significant proportion of people affected by those events develop chronic psychological dysfunction.

[5] Fourth Climate Change Assessment – LA Region pg 50
[6] Indicators of Climate Change in California pg 161

Some people are at higher risk for mental health consequences from weather-related disasters. Among them are children, pregnant and postpartum women, people with pre-existing mental illness, people who are economically disadvantaged, those who are homeless and first responders to the disaster.

Representations of climate change in the media and popular culture can also influence a person's stress response and mental well-being.

Climate change is threatening mental health -= American Psychological Association

1. Target populations of Concern
2. Outside workers (including County staff)
3. Children
4. Medically fragile, asthmatics, etc.
5. Pregnant women

Pregnancy effects *According to **research published** in Nature Climate Change, birth rates were 5% higher on days when the temperature exceeded 90 degrees Fahrenheit. And, perhaps more concerning, births on those days occurred up to two weeks earlier — and 6.1 days earlier on average — than they would have otherwise.*

"That's enough to take somebody from what's considered to be a pretty healthy pregnancy into a 'we are somewhat worried' pregnancy," said Alan Barreca, a UCLA professor of environment and human health and lead author of the study…. Early delivery could cause long-term harm to the affected infants. Previous research has shown that early deliveries are linked to cognitive differences later in childhood, though it's unclear whether this applies to heat-related early deliveries specifically. Another study found a direct link between mothers experiencing extreme heat during their third trimester of pregnancy and reduced income for their offspring once they reach adulthood. That might be due in part to earlier deliveries, too.

Air Quality - *Hotter future temperatures (Section 2.2) will act to increase surface ozone concentrations both due to chemistry producing more ozone and higher rates of biogenic emissions, while increases of water vapor also influence chemistry by increasing ozone production in already polluted areas (Steiner et al. 2006). It's been estimated that ozone could increase up to 5-10 parts per billion (ppb) by 2050 in LA (Jacobson 2008; Pfister et al. 2014), and the number of days with ozone over 90 ppb could increase between 22-33 days (Abdullah Mahmud et al. 2008).*[7]

Water

Drought

Anticipate a 64% decrease in snowpack by end of century[8]

By virtue of its Mediterranean climate and location along the periphery of the Pacific subtropical high, California experiences warm and dry summers with wet winters. During the wet winter months, which in Southern California typically begin in November and terminate in March, the bulk of precipitation arrives in a few, large storms (Dettinger et al. 2011; Oakley et al. 2018b). Should these storms not arrive due to

[7] Fourth Climate Change Assessment – LA Region pg 20
[8] Ventura_Climatechange_Review_Oakley.pdf slide 20

the presence of a persistent blocking ridge of high pressure in the North Pacific Ocean, precipitation deficits will be large (Cook et al. 2018). These deficits will be superimposed with climatologically high evaporative demands and may be exacerbated by above-normal winter season temperatures. Such dry years occur commonly in California, and multi-year periods of severe drought are not uncommon. However, evidence from various locations in California and throughout the southwestern United States indicates that extreme droughts lasting decades to several centuries have occurred numerous times since the end of the last ice age (e.g., Stine 1994; Benson et al. 2002; Woodhouse et al. 2010; Dingemans et al. 2014). The most recent extreme and persistent droughts occurred during the Medieval period, approximately 800-1000 years ago, with locally warm and dry conditions inferred from paleoproxy evidence provided by sedimentary cores taken from Zaca Lake in the San Rafael Mountains of Santa Barbara County (Dingemans et al. 2014). These droughts indicate that such extreme periods of aridity can occur under natural conditions (i.e., independent of human-driven changes in greenhouse gas concentrations) implying consideration of extended drought is prudent to sustainable water resource management, especially if projected warming increases drought risk Hatchett et al. 2015). Modeling studies of the Central Sierra Nevada have shown these droughts to be of comparable precipitation deficits to the most recent California Statewide drought that began in winter 2012 and ended in January of 2017 (Hatchett et al. 2015). The severity of the recent drought was exacerbated by anomalously warm temperatures driving a surplus in atmospheric evaporative demand and reducing the fraction of precipitation falling as snow in mountain regions (Williams et al. 2015b; Hatchett et al. 2017). The duration and severity of the recent drought varied statewide, with Ventura County being one of the first regions to go into drought conditions and one of the last to emerge (U.S. Drought Monitor 2019).9

Rain

4.2 Implications of Changes in Precipitation

• The number of dry days increases in the spring and fall (Fig. 4.6); however, there is little change projected in precipitation totals for these seasons (Fig. 4.2), implying some intensification of precipitation in these seasons, although these increases grow with time (Appendix A). Prolonged dry periods are associated with wildfire activity (e.g., Nauslar et al. 2018). With more dry days there may be potential for a longer wildfire season due to additional opportunities for persistence of dry conditions.

• Groundwater recharge is projected to decrease in the Southwest in a warming climate (Niraula et al. 2017) and may in part be related to increasing rainfall intensities (Dettinger and Earman 2007). Precipitation intensification at the seasonal to sub-daily timescales may have implications for the methods by which groundwater recharge occurs or how surface water is conveyed, captured, and stored.

• Roughly half of models project more frequent days exceeding historic 85th percentile daily precipitation totals (Fig. 4.7), resulting in more days with storm water management concerns if these outcomes are realized.

• Intensification of sub-daily precipitation (Figs. 4.8-16) raises concerns for increased flash flooding (Modrick and Georgakakos 2015), landslides, and debris flows (e.g., Oakley et al. 2018a) in a warming climate. In addition to the potential for increased threats to life and property, this may have impacts on infrastructure design and water resource management.

[9] Ventura Climate 2019_Bookmarked.pdf pg 51-52

• Potential for storms with similar atmospheric characteristics to historic events to produce greater event total precipitation due to warming and ability for greater amounts of water vapor to be present in the atmosphere (Figs. 4.17-18; Prein et al. 2017).

• With uncertainty in annual precipitation changes, potential for increasing dry days, and increased temperatures (Section 3) and evapotranspiration (Section 5), diversified water supply portfolios will likely allow for more resilient water management (Sterle et al. 2019).10

Atmospheric rivers (Ars) show a 20-50% increase in frequency of ARs along west coast and studies suggest fewer, but stronger and longer duration ARs in SoCal.11 ARs can transport ten times the volume of the Mississippi River in water vapor and release a significant amount of the water when they rise over the coastal mountains.

*Moreover, the peak season of atmospheric rivers may also lengthen, which could extend the flood-hazard season in California. The current generation of GCMs project a nearly 40% increase in precipitation during atmospheric river events over southern California by the late-21st century under RCP8.5. The number of atmospheric river events is also projected to increase in the future, possibly around a doubling of days by the end of the century (Warner et al. 2015; Hagos et al. 2016; Gao et al. 2015*12*).*

Short-duration, high intensity rainfall

Because of their ability to trigger flash floods and mass movements, short duration, high intensity precipitation events pose a major threat to life and property in Ventura County.[13]

Floods 1.5-2x more likely to exceed top 0.05% of historic hourly precipitation[14].

If these rains occur after a significant fire then widespread flooding, mud flows and/or slope failure could result.

Evaporative Demand

Evapotranspiration represents the fluxes, or transfer, of moisture from open water and soil moisture (evaporation), and plant transpiration of water to the atmosphere under ambient conditions….

Historically, positive changes in ET0 have been associated with increased water demand (Hobbins and Huntington 2017), increased wildfire activity (Abatzoglou and Williams 2016), and ecosystem impacts (Schwinning and Sala 2004). Thus, with projected ET0 increases, the following impacts may be anticipated:

• All seven models project county-wide increases in annual ET0, with minimum increases of at least 2 in. and maximum increases of approximately 6.5 in, which may impact water demand for crops (Hall et al. 2018), ecosystems, and municipal water use.

[10] VenturaClimate2019_Bookmarked.pdf pg 31
[11] Ventura_Climatechange_Review_Oakley.pdf slide 19
[12] Fourth Climate Change Assessment – LA Region pg 14
[13] VenturaClimate2019_Bookmarked.pdf pg 6
[14] Ventura_Climate_Projections_Hatchett.pdf slide 35

• The greater thirst of the atmosphere will deplete soil and plant moisture leading to faster rates of fuel moisture decline and longer periods of dry vegetation. This will increase the susceptibility of landscapes to wildfire and drought, as there is the potential for vegetation to dry more quickly and for longer periods of time.

• Reductions in soil moisture associated with increased ET0 may reduce runoff production in some areas. The greatest increases in ET0 (and thus reductions in soil moisture) are projected to occur in inland elevated terrain.[15]

Although the greatest changes in absolute ET0 occur during summer (Fig. 5.2c), percentage-wise, the largest increases (between 4–8%) are observed during fall in terms of spatial extent and magnitude (Fig. 5.3d). This will add stress to vegetation, decrease fuel moisture, and increase fire risk. Dry conditions extending into the late fall and early winter have a greater chance to coincide with Santa Ana winds. These conditions can lead to destructive wildfires such as the December 2017 Thomas Fire (Nauslar et al. 2018) and the November 2018 Woolsey Fire. Spring and summer show similar magnitudes of change and are consistent in the locations of change, though the core regions of greatest percentage increases shift westward from the Santa Clara River watershed (Fig. 5.3b) to the Ventura River watershed (Fig. 5.3c) during summer[16].

Beyond Los Angeles: Imported Water Availability

The LA region is intimately connected to other Western U.S. watersheds. Water supply agencies rely on imported water for a majority of regional water supply (Gold et al 2015; Porse et al. 2017). Three main water sources supply metropolitan LA water agencies: the California Aqueduct as part of the State Water Project, the Colorado River Aqueduct that supplies southern California's allocation of Colorado River water, and the LA Aqueduct that imports water from the Owens Valley. Imported sources comprise a majority of water demands. For instance, in LA County, imported sources meet 55-60% of annual urban water demands, with the remaining amount supplied by groundwater (35-40%) and recycled water for nonpotable uses such as irrigation. From 2000-2010, these water agencies received an annual average of 810,000 acre-ft from MWD's imported sources, through in recent years averaging closer to 700,000 acre-ft. The entire American Southwest is expected to see increased drought and reduced availability of future water for agriculture and growth (MacDonald 2010). Such large-scale changes across a broad geography, which includes California, will pose unique risks for each of the massive infrastructure systems that import water to LA.

A substantial portion of Ventura County's water comes from the State Water Project through MWD.

The State Water Project of California brings water from the northern and western Sierra Nevada mountains south through the Sacramento-San Joaquin Delta to urban and agricultural users in southern California. Historically, the State Water Project contributed the majority of water supply to MWD's sources (53% from 1976-2010). Numerous studies have documented the likely shifts in precipitation regimes that will result from climate change in California, including reductions in snowpack, advances in the timing of runoff leading to reduced seasonal capture and storage capacity, and hotter coastal and

[15] VenturaClimate2019_Bookmarked.pdf pg 45-46
[16] VenturaClimate2019_Bookmarked.pdf pg 48

inland temperatures increasing demand (Anderson et al. 2007; Brekke et al. 2004; N. L. Miller, Bashford, and Strem 2003; Tanaka et al. 2006; Vicuna and Dracup 2007; Dracup and Vicuna 2005). Additionally, the system of reservoirs will face increasing operational risks in managing more extreme rainfall events and preventing floods (Brekke et al. 2009). Applying such projections in planning can be challenging, given longterm uncertainties and sunk costs in current infrastructure (Groves, Yates, and Tebaldi 2008). Given these long-term likelihoods, the reliability of water deliveries from northern California will likely stir significant continued political debate and uncertainties, especially regarding future management alternatives for critical habitat and conveyance areas of the California Delta (Madani and Lund 2010).[17]

CASE STUDY | MANAGING FOR SCARCITY TO WEATHER THE DROUGHT
Caryn Mandelbaum

The Inland Empire Utilities Agency (IEUA) water and energy optimization is a great example of climate resiliency in one of the hottest areas of southern California. The IEUA's service area covers 242 square miles where Riverside and San Bernardino Counties meet and where summer temperatures soar to over 110°F (43°C). The IEUA distributes imported and regionally-produced water and provides industrial/municipal wastewater collection and treatment services to more than 830,000 people throughout its nine member agencies.

How, you might ask, did they manage to have surplus water during the state's worst-ever drought? The short answer is they had been managing for scarcity for the past 20 years. Leadership had the foresight to establish a grant writing department that matched every dollar spent with grants for efficiency projects. They invested nearly $500 million in developing regional water supplies, including state-of-the-art recycled water and groundwater recharge facilities, water use efficiency programs, and infrastructure improvements that avoided leaks.

They also developed close ties with their customers through public affairs staff and communications campaigns. This allowed the water agencies to enforce water budgets for each ratepayer. The budget provided a specific monthly allowance of water, depending on the number of occupants and outdoor footprint. The outdoor space was measured aerially to the square foot. They learned about how their consumption patterns measured up to prior use and that of their neighbors. When customers exceeded their budget, they were penalized and provided with tools for conservation. Armed with information and tools, ratepayers were able to better control their water consumption.

Remarkably, while the IEUA developed surplus water during California's historic drought, they were also becoming one of the most energy-efficient utilities in the state. In 2010, the agency installed the world's largest fuel cell system powered by renewable biogas and reduced energy consumption by nearly 25% upgrading operations. In 2017, they launched an advanced energy storage system designed by Tesla that integrates solar, wind, biogas, and grid resources to optimize renewable generation, reduce demand, and lower energy costs. Together with dynamically controlling consumption, IEUA is on track to go gridless by 2020 with almost no capital investment by the Agency.

[17] Fourth Climate Change Assessment – LA Region pg 62-63

Earthquake/levee collapse threats to water supply

"*The problem becomes almost intractable*," he continued. "*Keep in mind, one failure took $100 million to fix, and now we're looking at scores of failures, so the water managers for the state are petrified of this. They are not sure they can ever get this system up and running, or at the very least, it's going to take multiple years. So this is pretty serious*."

"*The State Water Project is essential, both from the volume standpoint as it provides a lot of our water, and from a water quality perspective, as the water quality is quite good from it. As currently configured, the levees are highly vulnerable, not necessarily for San Andreas events but for the local events directly beneath. The repair time is uncertain; it's almost certainly very long. They don't even know how long it would take, and I think by any measure, it is not resilient, and this is the problem*."

https://mavensnotebook.com/2018/01/03/earthquake-resilience-southern-californias-water-distribution-systems/

Making Water Conservation a California Way of Life

"Making Water Conservation a California Way of Life" (Governor's Executive Order B-37-16) replaces and increases water conservation requirements. AB 1668 (Friedman, 2018) and SB 606 (Hertzberg, 2018) implement various provisions of the Governor's Executive Order including the establishment of long-term urban water use efficiency standards, an indoor water budget of 55 gpcd which decrease over time, and outdoor allocations based on irrigated or irrigable landscaped area.

Based on industry recommendations the state set a provisional standard for indoor water use of 55 gallons per person, per day. This standard was based on a report produced by the Water Research Foundation. To ensure that this standard is reasonable the state will be funding a research study to determine an appropriate budget.

Also, the state is developing an outdoor water usage standard based on irrigated area and other factors like local climate conditions.

Based on these standards, all water districts will be given a maximum water budget for their agency. The budgets are being developed currently, with a draft budget expected January 2021, and the final budget at the end of 2021. While the state is developing the standards, we will be developing the tools and processes necessary to track and stay within the budget.

Proposals also include a requirement for each agency to develop a five-year drought plan, including conservation strategies necessary to achieve conservation levels that range from ten percent up to, and beyond, fifty percent reduction in water usage.

Each agency must document the steps to be taken in the event of a water conservation reduction of:

- 10%
- 20%
- 30%
- 40%
- 50%
- Beyond 50%

How climate change could threaten our water supply

Published 11:00 a.m. PT July 8, 2017 |

Gov. Jerry Brown announces that California will host a global climate summit.

SACRAMENTO - When it comes to California and climate change, the predictions are staggering: coastal airports besieged by floodwaters, entire beaches disappearing as sea levels rise.

Another disturbing scenario is brewing inland, in the sleepy backwaters of the Sacramento-San Joaquin Delta. It's a threat to the Delta's ecosystem that could swallow up a significant portion of California's water supply.

Scientists from government and academia say rising sea levels caused by climate change will bring more saltwater into the Delta, the hub of California's water-delivery network. As a result, millions of gallons of fresh water will have to be flushed through the Delta, and out into the ocean, to keep salinity from inundating the massive pumping stations near Tracy. That will leave less water available for San Joaquin Valley farmers and the 19 million Southern Californians and Bay Area residents who depend on Delta water — eventually as much as 475,000 acre-feet of water each year, enough to fill Folsom Lake halfway, according to one study by the Public Policy Institute of California.

"With rising sea levels, with climate change, that creates additional pressure coming in from the ocean," said Michael Anderson, the state's climatologist, in a recent interview. "Sea level rise is going to become more of an influence."

It figures to become a pocketbook issue for practically any Californian who drinks water that runs through the Delta. A 2010 study by scientists from the University of California, Davis said rising seas, coupled with the inundation of some islands in the western Delta, will translate into higher costs for purifying water for human use. The additional cost could go as high as $1 billion a year, "making the Delta less desirable as a conventional water source," the study said.

That cost doesn't include the $17.1 billion Gov. Jerry Brown proposes to spend on the Delta tunnels, his controversial plan for reshaping the estuary's plumbing system.

Brown's administration is heralding the threat from climate change as one of the reasons for building the tunnels, which would increase water bills for urban Southern Californians and San Joaquin Valley farmers. An environmental impact statement released by state and federal officials in December said the tunnels are needed to prevent a significant cutback in water deliveries from the Delta.

Without the tunnels, the ability to pump water south "will be reduced under future climate and sea level rise conditions," state and federal officials wrote. "Delta exports would be reduced by as much as 25 percent by the end of the century."

Complicating the issue, climate scientists also agree a warmer climate will mean more rain and less snow. The Sierra snowpack serves as a giant reservoir that naturally releases water long after the rainy season ends. If more of California's precipitation falls as rain instead of snow, much of that water will flow to the ocean in winter and spring, while it's still raining. That will leave less water available in summer to satisfy human needs and to offset salinity in the Delta.

Saltwater is already a problem at the Contra Costa Water District, which serves 500,000 residents in eastern and central Contra Costa County. Its location near the spot where water becomes brackish in the Delta puts Contra Costa on the front lines of the battle against salinity from the ocean. One of its four main intake pipes at the western edge of the Delta is precariously close to the point where water becomes too salty to drink without substantial treatment.

The agency has invested millions on intake pipes that are further and further away from the ocean. In 1997 it opened an intake along the Old River closer to the heart of the Delta. In 2010 it spent $80 million building another intake a few miles east of the Old River facility. It considered building a desalination plant a few years ago, but the project, estimated to cost $175 million, has been tabled.

Contra Costa's main weapon against salinity is Los Vaqueros Reservoir, a 19-year-old man-made lake. Though it's in the southwest Delta, it feeds off a pipeline from a San Joaquin River tributary from the east. Its purpose is to hold 160,000 acre-feet of fresh water that Contra Costa uses to dilute the supply that washes in from the Pacific.

"Things can get very salty for prolonged periods of time," said Maureen Martin, the agency's senior water resources specialist, during a recent tour of Los Vaqueros.

Contra Costa has spent nearly $560 million on Los Vaqueros, and it isn't done yet. Working with 11 other Bay Area agencies, it's developing a plan to expand Los Vaqueros' capacity by two-thirds, an $800 million project.

Martin said her agency doesn't consider sea-level rise "an imminent threat to Delta water quality." But the scientific projections are influencing Contra Costa's long-term planning on Los Vaqueros and other facilities.

Climate change "would probably cause the Delta to become saltier," she said. If climatologists are correct, the just-ended drought gave Delta residents a taste of things to come. In 2015, when the drought was at its worst and relatively little fresh water was trickling through the estuary, state officials worried about a surge of saltwater gushing in. The Department of Water Resources built a temporary rock barrier on the West False River, near the heart of the Delta, to hold back the salty ocean water.

The price was $37 million, including the expense of removing the 150,000 tons of rocks when the rainy season started. State officials declared it a successful investment. The barrier helped the state avoid releasing 90,000 acre-feet of water from upstream reservoirs to flush out the salinity.

Over the long haul, state officials believe keeping the salt at bay will be crucial to the viability of the State Water Project and the federal government's Central Valley Project, the delivery networks that move much of Northern California's water through the Delta to the water agencies of Southern California and the San Joaquin Valley.

It's a task that could become increasingly difficult as sea levels rise. Not only will higher waters bring a generally higher volume of salt into the estuary, they will put more stress on the 1,100 miles of levees protecting Delta farms and homes. A levee breach could inundate the SWP and CVP pumping stations with saltwater, forcing them to shut down and reduce operations.

It represents one of the state's arguments for the tunnels project: By diverting a portion of the Sacramento River's flow at Courtland, at the northern fringe of the Delta, and piping it directly to the

Tracy pumps, the state and federal water projects can sidestep much of the saltwater and keep pumping water more reliably.

"The location of the north Delta diversion facility is further inland, making it less vulnerable to salinity intrusion," officials wrote in the environmental report last December.

Tunnels opponents aren't swayed by that argument.

They don't dispute that rising seas will bring more salt to the Delta. But they say the tunnels would actually worsen the problem and make Delta water dangerously salty for farming and drinking water needs. By pulling some of the fresh water out of the Sacramento at the upstream location, opponents fear it will increase the salt concentration in the remaining water flowing through the Delta. In that respect, they're insulted that the threat from global warming is being used to justify the project.

"Whatever the truth might be about the extent or arrival of (climate) changes, the theory is being used as one more arrow shot at us," said John Herrick, attorney for the South Delta Water Agency.

"There isn't a shadow of a doubt in our minds that once they're able to take water from up north, they'd doom us," he added.

Distributed by Tribune Content Agency

Simmons, Carrie

From: Jenn Foster <jenniferfoster7317@yahoo.com>
Sent: Thursday, February 27, 2020 12:45 PM
To: General Plan Update
Subject: General Plan 2020 Updates

Follow Up Flag: Follow up
Flag Status: Completed

Hello,

I would urge the County to include how the agency would establish a "preponderance of evidence that the resource is not archaeologically or culturally significant." How would this be done, by whom would it be done, and could any decisions be appealed?

The number of archaeological sites in Ventura County is decreasing at a rapid rate and the definition of archaeological significance should be revised, "that all Native American archaeological sites, should be considered significant since the prehistoric identity of the Indigenous groups is tied solely to archaeological evidence." Loss of any sites would irrevocably result in loss of significant portions of their culture.

Thank you for your consideration.

Simmons, Carrie

From: Jen Hernandez-Munoz <jhernandez@cecmail.org>
Sent: Thursday, February 27, 2020 12:48 PM
To: General Plan Update; Bennett, Steve; Parks, Linda; Long, Kelly; Supervisor Huber; Zaragoza, John
Cc: Sigrid Wright; Michael Chiacos; Cameron Gray; Allegra Roth
Subject: Comments - Ventura County 2040 General Plan - Draft Environmental Impact Report
Attachments: CEC-SB VC2040 DEIR Comments to the Board.docx

Follow Up Flag: Follow up
Flag Status: Completed

Chair Bennett and Supervisors,

Please find attached Community Environmental Council's comments regarding the Ventura County General Plan Draft Environmental Impact Report. We appreciate your efforts in this endeavor and the opportunity to share our feedback with you.

Sincerely,

Jennifer Hernández-Muñoz
she/her/hers | they/them/theirs
Energy & Climate Program Associate
Community Environmental Council
O: (805) 963-0583 x102
C: (805) 402-7302 (preferred)
Community Environmental Council creates regional solutions to climate change.

Community Environmental Council

26 West Anapamu St., 2nd Floor, Santa Barbara, CA 93101
tel: 805.963.0583 fax: 805.962.9080 • www.cecsb.org

February 27, 2020

Board of Supervisors, Ventura County
Ventura County Government Center
Hall of Administration
800 S. Victoria Avenue
Ventura, CA 93009

Re: Ventura County 2040 General Plan: Draft Environmental Impact Report

Dear Chair Bennett and Supervisors,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Ventura County General Plan Update. The Community Environmental Council (CEC) is working with dozens of partners on many climate solution projects throughout Ventura County, including electric vehicle readiness, energy efficiency planning, renewable energy and energy storage development, food waste reduction, and carbon farming and sequestration activities.

Ventura County is the fastest warming county in the lower 48 United States, and is already experiencing a range of devastating and expensive impacts[1]. While language in the DEIR is careful to point out that federal policy lacks support for strong emissions regulation and that most local GHG emissions will come from current development, the State of California is leading with innovative programs to drive down emissions and the County should implement the most effective local policies that will curb emissions, mitigate impacts, and build community resilience in the current climate crisis.

CEC strongly urges the County to set higher carbon reduction goals, as well as incorporate a carbon neutrality goal at or before 2045, as guided by Executive Order B-55-18, mandating that California reaches carbon neutrality by 2045. CEC suggests the County of Ventura adopt a similar goal as the County of Santa Barbara, planning for a 50% reduction of greenhouse gas emissions from 1990 levels by 2030. CEC also encourages the County to set aggressive carbon neutrality goals, such as the City of San Luis Obispo's current Climate Action Plan seeking carbon neutrality by 2035.

[1] https://www.washingtonpost.com/graphics/2019/national/climate-environment/climate-change-california/

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As acknowledged in the draft General Plan (page 4.8-40), the County will not reach the goal of reducing emissions to 41.3% of 2015 baseline levels by 2030 through the policies outlined. Although the County's goal is to reach the 2030 goals for GHG emissions reductions, the DEIR only quantifies approximately 30% of those emissions reductions and leaves the rest to mostly voluntary actions. Further, the DEIR indicates that the climate impacts of GHG emissions resulting from growth over the next 20 years will be "significant and unavoidable", yet presents very few quantifiable mitigation actions to reduce them. As a result, the County is at a very high risk for failing to meet its own GHG emissions reduction goals, the state's goals of Carbon Neutrality by 2045, and for experiencing increased climate impacts.

In response, CEC suggests modifying existing policies or creating new policies to include more quantifiable targets to support the following:

- An oil and gas tax on new and existing operations that seeks to slowly phase out oil and gas production by 2045, in line with State carbon neutrality goals, while creating revenue to fund climate action programs
- Parking and pricing policies that disincentivize driving
- Electrification of light duty and medium-heavy duty vehicles
- Increased zero-emissions vehicle miles traveled
- Electrification of the county fleet
- An actionable food waste reduction plan that supports SB 1383
- An unincorporated county zero waste goal
- Restrictions on new oil and gas development
- Elimination of existing oil and gas operations within environmental justice communities
- Programs to sequester carbon in our natural and working lands

Adopting these enforceable policies will have a measurable impact that can be accurately assessed in the EIR.

In 2019, CEC partnered with the Ventura County Regional Energy Alliance and the Ventura County Air Pollution Control District to develop an Electric Vehicle Readiness Blueprint[2] that outlined targets and strategies for a county-wide transition to zero emissions vehicles in-line with State mandates. We suggest that the County refer to this document as a reasonable guide for setting policy goals with quantifiable impacts. The County can leverage its role as an employer of approximately 8,000 people to enact measures such as building charging stations at all county facilities and establishing programs to help employees adopt EVs at a faster rate than the general population.

The County can lead by example by emulating the State's mandates for zero emissions vehicles in its general services department[3]. The County can also look to the City of San Luis Obispo's goal of replacing

[2] https://www.vcenergy.org/electric-vehicle-blueprint/
[3] https://green.ca.gov/fleet/about/initiatives/

Community Environmental Council

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40% of VMT with electric miles by 2030 for setting its own similar target in the unincorporated County areas.

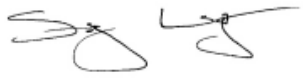
As it stands, Appendix B is not an actionable climate action plan. It kicks the can down the road by proposing a Climate Emergency Council (CEC), established under COS-CC, to consider future policies. Instead, actionable policies should be included by the County through this planning process.

CEC would like to recognize the efforts of the general plan team to incorporate Environmental Justice themes throughout the draft General Plan; however, there is a glaring lack of accountability to Ventura County's environmental justice and frontline communities in the DEIR as well as a lack of prioritizing projects that would correct these historic injustices. Specifically, there is no analysis or mitigation strategy to support the plan's Environmental Justice guiding principle to "…protect disadvantaged communities from a disproportionate burden posed by toxic exposure and risk…". Failure to deeply analyze which communities face disproportionate impacts, beyond the SB 244 definition of a "disadvantaged unincorporated community" creates a gap in addressing their needs outside of the parameters of basic environmental protection outlined in LU-17.3.

CEC recommends that the County establish a more substantial, locally relevant definition of an Environmental Justice Community with both qualitative and quantitative elements. The County should also prioritize specific mitigation measures for disproportionately impacted communities, or set enhanced mitigated measures for growth in those communities, and incorporate them into the EIR.

While the draft plan and draft EIR are stated to be in line with state mandates for GHG emissions reductions, they fall short of meeting the bold and drastic changes needed to help our communities be truly adaptive and resilient. The draft General Plan fails to adequately mitigate for climate change impacts, finding a significant and avoidable impact. Other communities have adopted more complete Climate Action Plans that calculate mitigation measure that allow these agencies to reduce their emissions in line with State goals. The County of Ventura's planning fails in these areas and needs significant revision before the EIR can be certified and the General Plan adopted.

Sincerely,



Sigrid Wright

Executive Director, Community Environmental Council

Simmons, Carrie

From: Ventura County Archaeologicalical <vcas.arch@gmail.com>
Sent: Thursday, February 27, 2020 1:26 PM
To: General Plan Update
Cc: Curtis, Susan; julie swift
Subject: VC2050 General Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Curtis:

Regarding the proposed VC2040 General Plan, we request the County to include how the agency would establish a preponderance of evidence that the resource is not archaeologically or culturally significant. How would this be done and could it be appealed?

The number of archaeological sites in Ventura County is decreasing at a rapid rate and the definition of archaeological significance should be revised, "that all Native American archaeological sites, should be considered significant since the prehistoric identity of the Indigenous groups is tied solely to archaeological evidence." Loss of any sites would irrevocably result in loss of significant portions of their culture.

Thank you for your consideration.

Respectfully,

Julie Swift
President-Elect
Ventura County Archaeological Society
VCAS.arch@gmail.com or julie_swift@ymail.com https://www.venturacountyarchaeologicalsociety.com

Simmons, Carrie

From: bev <bevg@hvwonline.com>
Sent: Thursday, February 27, 2020 1:26 PM
To: Curtis, Susan; General Plan Update
Subject: Letter
Attachments: doc02310820200227132001.pdf; doc02310920200227132011.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Please see attached letter.

Thank you.

Bill Kendall

VIA ELECTRONIC MAIL: GeneralPlanUpdate@ventura.org

February 25, 2020

Ventura County Board of Supervisors
Attn: RMA Planning Division
General Plan Update
800 Victoria Avenue L#1740
Ventura, California 93009-1740

Dear Board of Supervisors and Staff:

We are writing this letter to urge the Board of Supervisors to reconsider moving forward with the Draft General Plan EIR. The draft EIR has been accelerated to the point that too many issues and impacts have not been properly addressed or studied. These impacts and the corresponding mitigation measures will have severe impacts to land owners and especially those, like us in the agricultural industry and other productive economic segments.

Our family has been involved in the agricultural industry for more than 100 years in Ventura County. We have owned numerous land holdings that remain in the family to this date. We have farmed throughout Ventura County and hope to continue to do so in the future.

The Draft EIR is deficient on many levels. CEQA requires that all mitigation measures must be technically and economically feasible. Numerous proposed mitigation measures are neither. We have in the past attempted to identify land and any owners that would be open to sell their development rights for land that was converting from agricultural to commercial use. Not only did we not find anyone that would do so, no one would even quote a price. The only positive response from numerous land owners were that you can buy my property for full market value and then you can do what you want. There is not a project that can be built by adding double land cost to the equation. This was very recently experienced based on proposed policies at LAFCo. These policies were eventually not enacted due to the inability to purchase development rights in an economical feasible manner. This was when LAFCo was contemplating an acre for acre ag preserve. The new policy that is proposed in the 2040 General Plan is requiring 2 acres for every 1 acre of land converted from ag to any other use. This will eliminate the ability to add any new required ag buildings or even farm worker housing. The Draft EIR must study these impacts, since they are not feasible.

The Draft EIR also deals with water in a manner that is not properly studied. There is no analysis on increased water costs and diminishing availability of water. Without reasonable water costs and supply, there is no agricultural industry.

The General Plan indicates that agriculture is a high priority in the County. However, new policies and requirements in the General Plan add additional mitigation measures that will make ag virtually

1601 EASTMAN AVENUE, SUITE 100
VENTURA, CALIFORNIA 93003
(805) 642-4773 FAX (805) 642-4662

impossible. These include new setbacks, limiting types of fumigants pesticides and fertilizers. The General Plan also requires the conversion of all farm equipment to be all electric. Again, not feasible. The costs to purchase new pumps, farm equipment and other existing fuel using equipment will increase operational costs to a point that the County crops will not be competitive in the open market. These new mitigation measures are not sufficiently studied and again are not economically feasible.

The Draft EIR is extremely difficult to read and understand. The background reports are lacking in depth of what has been studied other than numerous general statements and very poor mapping. Detailed studies must be added to sufficiently identify impacts and the related mitigation measures for both direct and indirect impacts on the agricultural industry. It is our understanding that reports and studies need to be timely prepared. However numerous studies are older than 5 years. Not timely.

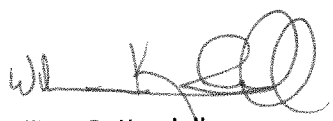
After numerous devastating wildfires over the last few years, which significantly impacted ag, the General Plan continues to lay out limiting mitigation measures for fire prevention. The Wildlife corridor eliminates any ag operation or fire prevention in the proposed corridor areas. This is also a major concern not studied in the Draft EIR.

The Draft EIR for the 2040 General plan does not provide adequate analysis for the expansion of permanent bike paths and pedestrian walking trails throughout the County. These impacts are very severe due to constant conflicts from trail users and ag operations. Spraying, dust, odors from ag operations, along with impacts created by the trail users. These are usually theft, vandalism, litter and pet waste. The proposed mitigation measures require additional setbacks from these trails which renders additional land unusable for ag operations.

In addition to the above comments on the agricultural aspects and related land use concerns of the DEIR, the undersigned is also a mineral owner directly interested in the impacts on oil and gas production of the DEIR and related General Plan 2040 proposed provisions. In these documents there is a total failure to address the economic impacts of the various policies proposed in violation of the requirements for this process, including but not limited to the loss of royalty income to a large group of County residents. I join in the detailed comments on the various deficiencies and concerns identified in the DEIR as described in the concurrent submissions on behalf of Aera Energy and other operators delivered this week to the County.

Please look at the long-term consequences of these General Plan policies and mitigation measures. We formally request additional studies and a revised Draft EIR that will properly look at these and many more issues. The DEIR must be corrected with details of the revisions. Then it can be recirculated.

Sincerely,



William B. Kendall
President
Epic Group

Simmons, Carrie

From: Chad Christensen <chad.christensen@mrca.ca.gov>
Sent: Thursday, February 27, 2020 1:37 PM
To: General Plan Update; Curtis, Susan
Cc: Paul Edelman
Subject: SMMC comment letter regarding VC General Plan update
Attachments: SMMC 02-24-20 Item 10(b) Com Ltr VC GenPlan.pdf

Good afternoon,

Please find attached a comment letter from the Santa Monica Mountains Conservancy regarding the County of Ventura's Draft 2040 General Plan update.

Best regards,
Chad

Chad Christensen
Project Analyst
Mountains Recreation and Conservation Authority
26800 Mulholland Highway
Calabasas, California 91302
310-589-3230, ext.121

SANTA MONICA MOUNTAINS CONSERVANCY
Los Angeles River Center & Gardens
570 West Avenue Twenty-six, Suite 100
Los Angeles, California 90065
(323) 221-8900

February 24, 2020

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L #1740
Ventura, California 93009-1740

Draft Programmatic Environmental Impact Report for the Ventura County Draft 2040 General Plan (PL17-0141)

Dear Ms. Curtis:

The Santa Monica Mountains Conservancy (Conservancy) supports much of the Ventura County (County) proposed Draft 2040 General Plan Update as analyzed in the Draft Environmental Impact Report (draft EIR).

Specifically, the Conservancy supports the County's inclusion of new policies established by the County's Wildlife Corridor Policy as related to Conservation and Open Space Elements COS-1.3 *Wildlife Corridor Crossing Structures*, COS-1.4 *Consideration of Impacts to Wildlife Movement*, and COS-1.5 *Development Within Habitat Connectivity and Wildlife Corridors*.

The Conservancy also commends the County for proposing COS-1.6 *Discretionary Development on Hillsides and Slopes* that would require development on slopes greater than 20-percent to be sited and designed in a manner to avoid significant impacts to sensitive biological resources to the extent feasible and COS-1.8 *Bridge Crossing Design* to require new or modified road crossings over streams, wetlands, and/or riparian habitat to site bridge columns outside the riparian habitat areas, when feasible.

The inclusion of COS-1.15 *Countywide Tree Planting* to establish and support a countywide target to plan two million trees throughout the County by 2040 is commendable and an opportunity for community engagement and cooperation among public agencies, private organizations, and local businesses to help mitigate against concurrent impacts of climate change.

Further, the Conservancy fully supports the Public Facilities, Services, and Infrastructure Element PFS-10: To develop and maintain a comprehensive system of parklands and recreational facilities that meet the active and passive recreational needs of residents and visitors, as funding is available. The Conservancy has been dedicated to this goal since its

inception in 1980 and looks forward to coordinating with the County to help expand trails, parklands, and accessible amenities in the western Santa Monica Mountains and within the Rim of the Valley Trail Corridor.

The Conservancy also recognizes the constraints that specific zoning classifications impose on "using" open space lands as parks and recreational opportunities. Thus, the Conservancy also supports the proposed *Implementation Program N* to establish a new Open Space zone for public lands that will be limited to parks and recreational uses.

Thank you for your consideration. Should you have any questions, please contact Paul Edelman, Deputy Director Natural Resources and Planning, at (310) 589-3200 ext. 128, edelman@smmc.ca.gov, or at the above letterhead address.

Sincerely,

IRMA MUÑOZ
Chairperson

#

U4EA Ranch

Tina Rasnow (805) 236-0266

February 26, 2020

Ventura County Board of Supervisors
Hall of Administration
800 South Victoria Ave.
Ventura, CA 93009

Re: General Plan Amendment Environmental Impact Report

Dear Honorable Members of the Board of Supervisors:

We are heartened to see more comprehensive environmental protection measures included the General Plan objectives, as outlined in the Environmental Impact Report, but disappointed that so much focus is still placed on aesthetics as opposed to true health and safety concerns. We also feel that the General Plan Amendment falls short of tackling the full extent of the climate crisis and its likely impact on Ventura County. The new General Plan should provide a blueprint to guide us into the future, but in elevating aesthetics to equal standing with true health and safety issues, it fails as a roadmap to navigate the growing environmental and social challenges of the future.

1. For example, when it comes to telecommunications towers, the emphasis on disguising or hiding them, including protecting the view of the ridgelines, does a great disservice to community health, because cell towers are safest when located away from people. Ridgelines that provide excellent coverage, but are not located near schools, businesses or homes are an ideal location for telecommunications towers, far safer than flagpoles, church steeples, and strip mall facades. This is particularly true as the cell phone carriers migrate to 5G which emits far more EMF and RF than the earlier versions of transmission.

2. While maintaining open space is important, the SOAR initiative allows those with existing homes to veto new development, particularly low income and affordable housing, which is desperately needed to provide shelter for our service worker sector. If lower wage earners cannot afford to live near where they work, the commute required increases congestion and air pollution, deteriorating the quality of life for the whole community.

3. Given that the General Plan is projected to take us to 2040, and the existential threat the climate crises poses, we think far more needs to be done to cease fossil fuel extraction and transition to 100% renewables in the short term. We need to have a comprehensive public transit system based on renewable energy, methods for harvesting rain water so

less storm water runoff goes to the sea, and planning on what portions of our coast line we may have to abandon to sea level rise.

4. The book, *Drawdown: The Most Comprehensive Plan Ever Proposed to Reverse Global Warming*, edited by Paul Hawken (Penguin Books, 2017), compiles the results of research from hundreds of the world's top scientists and climate experts, and identifies specific actions that governments and local communities can take to reverse global warming. Our General Plan should incorporate those drawdown solutions that can be undertaken on a local level, many of which are surprisingly simple. For example, reduced food waste and encouraging people to adopt a more plant-rich diet can have a profound effect on reducing green house gasses. So can good family planning clinics and incentives to reduce procreation rates. A most effective and inexpensive drawdown action would be to implement regenerative agricultural methods here in Ventura County. By transitioning away from chemical fertilizer and pesticide use, no-till land management, and building soil with organic material, including biochar, we can sequester carbon in the soil while building its quality and productivity, eliminating contamination of ground and surface water, and improving air quality.

5. We do not have to invent solutions to address the current and growing environmental and social challenges. Other forward thinking regions are tackling these challenges and can provide us with a template that can be tailored to our own local conditions. For example, on Salt Spring Island in British Columbia, the community is faced with a housing crisis similar to our own in Ventura County. Strict development restrictions and limited residential units have priced housing beyond the reach of many residents. Meror Krayenhoff, a global consultant on rammed earth building methods and featured on The Nature of Things with David Suzuki, suggested that a compliance driven, as opposed to vision driven, policy paradigm can result in anarchic, subversive response when the populace thumbs their noses at regulations that don't represent the will and needs of the population. He proposes a number of innovative solutions, including encouraging the use of local, renewable materials in building. Ventura County, with access to rock, sand, straw bales and other renewables, can become a beacon for permitted home building solutions for the rest of California, and the nation. Green projects could get reduced permitting fees and priority in the permit queue, with a single point advisor. For example, composting toilets should not only be permitted, but encouraged, as it is wasteful in the extreme to use precious potable water to flush away human waste.

6. We suggest Ventura County consider concepts implemented elsewhere, such as Seattle granting a 25-30% increase in allowable floor area and increased height limits for Living Building Challenge ("LBC") projects (See https://living-future.org/lbc/); or New Zealand's SIREWALL community center project, which made approval contingent upon demonstrating reconciliation with Maoris, training opportunities for youth, a high environmental standard that the community (of all ages) supported, that it would elevate the well-being of the community, and encourage responsible tourism. (See https://www.nzherald.co.nz/northern-advocate/news/article.cfm?c_id=1503450&objectid=12076863)

7. Ventura County can embrace LBC requirements that buildings be net positive in terms of water, energy, sewage and liquid waste, and contain no red-listed toxic materials, express beauty in terms of spirit, inspiration, and education, create health and happiness through such things as biophilia, among other inspiring attributes.

8. While the General Plan is intended to cover the length of a generation, it would not be at all unsound to at least contemplate the next seven generations, consistent with indigenous cultural tradition. Measuring progress with such a long term view will require a different framework than juggling one climate or housing emergency after another. Priorities and decision-making can be measured in a rational and holistic manner, with careful thought for the generations yet to come.

9. The General Plan should explicitly reflect the County's Climate Action Plan and its evolution. Achieving net zero CO2 emissions (and sequestration) will require a rapid ending to oil and natural gas extraction (and certainly no expansion, no granting new leases, new pipeline permits, etc. It should encourage green energy generation and storage in both distributed and centralized manners.

10. Wildfires are clearly changing in their severity and nature. The County should lead in research and experimentation with methods of fire protection and damage mitigation, such as (un)controlled small burns, and unconventional methods advocated by http://californiachaparral.com – including ember barriers and sprinklers, which are more effective and ecologically sound than enormous denuded hillsides.

11. Our General Plan needs to steer our county toward good land and resource stewardship. To recap, aesthetics play far too important a role in our land use planning, particularly because "beauty is in the eye of the beholder," and what one person sees as creative genius, another sees as a monstrosity. Land use regulations should be focused on environmental safeguards that protect air, water, and soil while at the same time meeting the food and shelter needs of our communities.

12. As Meror Krayenhoff has stated, "We are in a time when the scale of the emergencies we face need to be addressed with solutions of a corresponding scale. These emergencies also have urgency. . . .[W]ithout governance that can act with pace, boldness, courage and the power to implement, we are wasting our time." We hope that Ventura County acts with such pace and boldness to adopt a General Plan that guides us in a new direction of carbon drawdown, while promoting innovation in design, building, and conservation for generations to come.

Thank you for your kind consideration.

Sincerely,

Tina Rasnow, Brian Rasnow

Tina Rasnow and Dr. Brian Rasnow on behalf of the
Rasnow Family

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 8:36 AM
To: Simmons, Carrie
Subject: FW: 2040 General Plan Draft EIR Comment
Attachments: Ag13-Ag conversion.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis l Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740 Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org For online permits and property information, visit VC Citizen Access

-----Original Message-----
From: Toril Raymond <toril.raymond@yahoo.com>
Sent: Thursday, February 27, 2020 8:30 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: 2040 General Plan Draft EIR Comment

Sent from my iPhone

The County did not conduct a complete analysis of impacts in regard to conversion of farmland.

The EIR erroneously and without supporting evidence states "the General Plan would not result in any other changes that due to location and nature would result in conversion of farmland."

This statement is simply not true and the EIR itself contradicts this statement.

The EIR acknowledges the impacts of both economic burdens and decrease in water supply for irrigation (page 4.2-3). As water supplies decrease and costs to obtain that water increase, land will be removed from agricultural use. This is a direct significant impact that will convert ag land.

Actual issues impacting agriculture in Ventura County that contribute to the conversion of ag land are:

1) water
2) economics (extremely expensive area to do ag)
3) lack of farmworker supply and housing
4) increased regulatory burden from increasing compatibility issues from urban/ag interface.

County analyzed NONE of these issues. And proposed no mitigation to address any of these issues.

The EIR needs to be corrected and recirculated.

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 9:16 AM
To: Simmons, Carrie
Subject: FW: 2040 Ventura County General Plan
Attachments: County GP Comment Letter - McLoughlin Family Committee.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis l Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740 Visit the Planning Division website at vcrma.org/planning
Ventura County General Plan Update. Join the conversation at VC2040.org For online permits and property information, visit VC Citizen Access

-----Original Message-----
From: Toril Raymond <p_raymond@sbcglobal.net>
Sent: Thursday, February 27, 2020 9:14 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: 2040 Ventura County General Plan

Please see attached Letter.
Sincerely,
Pat Peters

Sent from my iPhone

Ventura County Resource Management Agency, Planning Division
Attn: Susan Curtis, Manager, General Plan Update Section
800 South Victoria Avenue, L#1740
Ventura, CA 93009-1740

Re: Comments on Ventura County General Plan DEIR

Dear Ms. Curtis:

I represent and serve on the McLoughlin Family Committee, a group of family members that own approximately 300 acres of agricultural property off of Olivas Park Road in the County of Ventura, in proximity to the City of Ventura.

The McLoughlin family has farmed this land for generations. It remains our desire to continue this legacy. However, in the face of never-ending changes to the regulatory environment, we again find ourselves attempting to ascertain how new policies and programs as proposed in the draft 2040 General Plan will impact and challenge our ability to serve as stewards of this heritage.

It had been our hope that the DEIR would provide some clarity and insight into how the new policies and programs within the revised General Plan would impact our farming operation. However, that is not the case. Simply said, we believe the General Plan Update and subsequent Environmental Impact Report fail to adequately analyze or study impacts on the farming industry.

With that said, we would like to specifically present the following:

- The Background report Table 6-26: Transportation Department Planned Capital Projects lists sections of roadways the County plans for expanded capacity or widening, along with the scope of those enhancements. It also covers in length the plan to add bike paths and bike lanes in accordance with existing County wayfarer plans. However, the DEIR never analyzes the loss of farmland resulting from these changes in infrastructure – it's not even mentioned as a possibility in the DEIR.

  Olivas Park Road between Victoria and Harbor is listed as one of the areas planned for road widening, a stretch of roadway that borders the entire eastern portion of our farmland and property. While the impact on our farming operation and financial losses due to property loss are clearly quantifiable, the report fails to list or quantify these impacts.

- In Section 3-8, The DEIR states that because there will be no "substantive" change to the agricultural, open space, or rural designations, the General Plan Update (GPU) will be consistent with SOAR. However, no further details beyond this conclusory statement is provided. There is no way for the reader to come to his or her own conclusion on whether the GPU will result in inconsistencies with SOAR that might lead to physical environmental impacts. There is no description of the changes to the Agriculture, Open Space, and Rural policies to determine whether they are in fact non-substantive.

Given the length and breath of the Draft General Plan update and CEQA analysis, we made an attempt to focus our initial review and subsequent comments to issues specific to agriculture and farming. However, it's clear that the 2040 General Plan will impact the Ventura County local economy across

sectors – all of which influence the ability to live and work in this region. The DEIR's lack of analysis of those economic impacts, calls into question the legitimacy of both the draft General Plan update, and the CEQA analysis. As such, we respectfully request that the DEIR be recirculated in the hopes that further study will resolve these shortcomings.

I appreciate your consideration.

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 9:33 AM
To: Simmons, Carrie
Subject: FW: Board of Supervisor EIR Report Letter
Attachments: 20200227091711646.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

Ventura County Resource Management Agency | Planning Division
P. (805) 654-2497 | F. (805) 654-2509
800 S. Victoria Ave., L #1740 | Ventura, CA 93009-1740
Visit the Planning Division website at **vcrma.org/planning**
Ventura County General Plan Update. Join the conversation at **VC2040.org**
For online permits and property information, visit **VC Citizen Access**

From: Johnny Lopez <jclopez@vertical-wellness.com>
Sent: Thursday, February 27, 2020 9:26 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Cc: Elyse Kaplan <ekaplan@vertical-wellness.com>
Subject: Board of Supervisor EIR Report Letter

Goodmorning,

Elyse asked me to send this to you,

Attached is the letter to the Ventura County Board of Supervisors on behalf of Vertical Wellness. Please let us know if you have any questions, comments, concerns.

Thank you,
Johnny
--
Johnny Lopez
VERTICAL WELLNESS
Unleashing Natures Potential
29800 Agoura Road, Suite 108 | Agoura Hills, CA 91301
Office 888.600.3146

Website www.vertical-wellness.com

VERTICAL WELLNESS

Unleashing Nature's Potential

Friday, February 21, 2020.

RMA Planning Division
800 Victoria Avenue, L #1740
Ventura CA 93009-1740

RE: Flawed General Plan Environmental Impact Report (EIR)

To Whom It May Concern:

Vertical Wellness, a California-based farming operation, would like to formally submit our position that as written, the 2040 General Plan Environmental Impact Report (EIR) was a rushed job that is severely flawed and inadequate, and must be corrected and recirculated to protect a fair and compliant planning process for Ventura County.

There are several issues with the General Plan that Vertical Wellness believes severely and negatively impacts the welfare of local agriculture here in Ventura County, including our own operations.

The California Environmental Quality Control Act (CEQA) requires that all proposed mitigation be technically and economically feasible. **The EIR does not meet this standard**. For example, AG-2 proposes that any project that either directly or indirectly results in the loss of farmland must obtain and place into perpetual agricultural preservation twice the total of the farmland loss. The county has not conducted any sort of feasibility report, which if conducted, would likely show that this standard is unrealistic in terms of economic feasibility for farmers. Furthermore, there are no details on how the county will implement or monitor this program, especially taking into account they are not the local experts in agriculture. You can be certain, however, that if this mitigation measure is put into effect, Vertical Wellness will likely find it economically infeasible to operate in Ventura County.

CEQA also requires that the mitigation not make the impacts worse. **The EIR does not meet this standard**. For example, shortage of farm worker housing was identified as one of the biggest issues facing ag in Ventura County. However, farm operators like Vertical Wellness will have no incentive to build more farm housing and alleviate the shortage if we are forced to purchase considerable additional land for preservation on top of the house building costs. You are essentially punishing responsible operators who are trying in good faith to help mitigate the problem.

CEQA requires that the EIR contain enough detailed information to allow the reader to understand and evaluate the County's impact analysis. **The EIR does not meet this standard**. The EIR and accompanying background report are filled with errors, vague statements, outdated information and conflicting ideas. As written, Vertical Wellness would be utterly lost and confused with how to comply with issues that should be clear to follow like water supply for irrigation.

Most recently, Vertical Wellness has been dealing with the financial loss associated with the new Hemp Ordinance that impedes our ability to grow Hemp this upcoming season. The County's own Right to Farm Ordinance has carried absolutely no weight with the County. Instead, it has been completely dismissed. Thus, the County's assumption in the EIR that the Right to Farm Ordinance would reduce impacts to Ag to "less than significant" and will suddenly prevent the County from creating or expanding more setbacks and operational restrictions on agriculture is completely unsupported. In light of the current actions of the County and the Board of Supervisors to place severe set-backs on hemp cultivation and create economic injury to farmers, for the EIR to assert that the County will utilize the Right to Farm Ordinance to protect agricultural operations from nuisance complaints is misguided and inappropriate, at best. All analysis flowing from the County's erroneous assumption are flawed. The analysis of impacts to Ag from nuisance complaints must be corrected and the EIR recirculated.

The EIR is a flawed document that has failed to achieve its primary purpose. In no way is it a tool of disclosure of all impacts caused by the 2040 General Plan. Vertical Wellness urges the County to take the time to correct and re-circulate the EIR instead of continuing to shortcut the process to the detriment of the community members.

Thank you,

Elyse Kaplan
Corporate Counsel

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 11:39 AM
To: Simmons, Carrie
Subject: FW: Amendment to Ventura County General Plan Environmental Impact Report
Attachments: 2020_02_26_22_37_09.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>
Sent: Thursday, February 27, 2020 9:44 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: FW: Amendment to Ventura County General Plan Environmental Impact Report

Received by the Clerk of the Board.

Lori

From: Tina Rasnow [mailto:tina@rasnowpeak.com]
Sent: Wednesday, February 26, 2020 10:49 PM
To: ClerkoftheBoard, ClerkoftheBoard <ClerkoftheBoard@ventura.org>; Bennett, Steve <Steve.Bennett@ventura.org>; Parks, Linda <Linda.Parks@ventura.org>; Zaragoza, John <John.Zaragoza@ventura.org>; Long, Kelly <kelly.long@ventura.org>; Supervisor Huber <Supervisor.Huber@ventura.org>
Cc: brian rasnow <brian@rasnowpeak.com>
Subject: Amendment to Ventura County General Plan Environmental Impact Report

Dear Clerk of the Board and Honorable Members of the Board of Supervisors,

Attached please find the letter from our family regarding the proposed amendment to the Ventura County General Plan and EIR relative thereto. Our family recently completed the donation of almost half of our ranch in the Santa Monica Mountains to the Conejo Open Space Conservation Agency, so we hope that our actions provide credibility to our words. Respectfully,

Tina Rasnow

Tina Rasnow
1000 So. Ventu Park Rd.
Newbury Park, CA 91320
cell: 805-236-0266

tina@rasnowpeak.com
www.rasnowpeak.com

U4EA Ranch

Tina Rasnow (805) 236-0266

February 26, 2020

Ventura County Board of Supervisors
Hall of Administration
800 South Victoria Ave.
Ventura, CA 93009

Re: General Plan Amendment Environmental Impact Report

Dear Honorable Members of the Board of Supervisors:

We are heartened to see more comprehensive environmental protection measures included the General Plan objectives, as outlined in the Environmental Impact Report, but disappointed that so much focus is still placed on aesthetics as opposed to true health and safety concerns. We also feel that the General Plan Amendment falls short of tackling the full extent of the climate crisis and its likely impact on Ventura County. The new General Plan should provide a blueprint to guide us into the future, but in elevating aesthetics to equal standing with true health and safety issues, it fails as a roadmap to navigate the growing environmental and social challenges of the future.

1. For example, when it comes to telecommunications towers, the emphasis on disguising or hiding them, including protecting the view of the ridgelines, does a great disservice to community health, because cell towers are safest when located away from people. Ridgelines that provide excellent coverage, but are not located near schools, businesses or homes are an ideal location for telecommunications towers, far safer than flagpoles, church steeples, and strip mall facades. This is particularly true as the cell phone carriers migrate to 5G which emits far more EMF and RF than the earlier versions of transmission.

2. While maintaining open space is important, the SOAR initiative allows those with existing homes to veto new development, particularly low income and affordable housing, which is desperately needed to provide shelter for our service worker sector. If lower wage earners cannot afford to live near where they work, the commute required increases congestion and air pollution, deteriorating the quality of life for the whole community.

3. Given that the General Plan is projected to take us to 2040, and the existential threat the climate crises poses, we think far more needs to be done to cease fossil fuel extraction and transition to 100% renewables in the short term. We need to have a comprehensive public transit system based on renewable energy, methods for harvesting rain water so

less storm water runoff goes to the sea, and planning on what portions of our coast line we may have to abandon to sea level rise.

4. The book, *Drawdown: The Most Comprehensive Plan Ever Proposed to Reverse Global Warming*, edited by Paul Hawken (Penguin Books, 2017), compiles the results of research from hundreds of the world's top scientists and climate experts, and identifies specific actions that governments and local communities can take to reverse global warming. Our General Plan should incorporate those drawdown solutions that can be undertaken on a local level, many of which are surprisingly simple. For example, reduced food waste and encouraging people to adopt a more plant-rich diet can have a profound effect on reducing green house gasses. So can good family planning clinics and incentives to reduce procreation rates. A most effective and inexpensive drawdown action would be to implement regenerative agricultural methods here in Ventura County. By transitioning away from chemical fertilizer and pesticide use, no-till land management, and building soil with organic material, including biochar, we can sequester carbon in the soil while building its quality and productivity, eliminating contamination of ground and surface water, and improving air quality.

5. We do not have to invent solutions to address the current and growing environmental and social challenges. Other forward thinking regions are tackling these challenges and can provide us with a template that can be tailored to our own local conditions. For example, on Salt Spring Island in British Columbia, the community is faced with a housing crisis similar to our own in Ventura County. Strict development restrictions and limited residential units have priced housing beyond the reach of many residents. Meror Krayenhoff, a global consultant on rammed earth building methods and featured on The Nature of Things with David Suzuki, suggested that a compliance driven, as opposed to vision driven, policy paradigm can result in anarchic, subversive response when the populace thumbs their noses at regulations that don't represent the will and needs of the population. He proposes a number of innovative solutions, including encouraging the use of local, renewable materials in building. Ventura County, with access to rock, sand, straw bales and other renewables, can become a beacon for permitted home building solutions for the rest of California, and the nation. Green projects could get reduced permitting fees and priority in the permit queue, with a single point advisor. For example, composting toilets should not only be permitted, but encouraged, as it is wasteful in the extreme to use precious potable water to flush away human waste.

6. We suggest Ventura County consider concepts implemented elsewhere, such as Seattle granting a 25-30% increase in allowable floor area and increased height limits for Living Building Challenge ("LBC") projects (See https://living-future.org/lbc/); or New Zealand's SIREWALL community center project, which made approval contingent upon demonstrating reconciliation with Maoris, training opportunities for youth, a high environmental standard that the community (of all ages) supported, that it would elevate the well-being of the community, and encourage responsible tourism. (See https://www.nzherald.co.nz/northern-advocate/news/article.cfm?c_id=1503450&objectid=12076863)

7. Ventura County can embrace LBC requirements that buildings be net positive in terms of water, energy, sewage and liquid waste, and contain no red-listed toxic materials, express beauty in terms of spirit, inspiration, and education, create health and happiness through such things as biophilia, among other inspiring attributes.

8. While the General Plan is intended to cover the length of a generation, it would not be at all unsound to at least contemplate the next seven generations, consistent with indigenous cultural tradition. Measuring progress with such a long term view will require a different framework than juggling one climate or housing emergency after another. Priorities and decision-making can be measured in a rational and holistic manner, with careful thought for the generations yet to come.

9. The General Plan should explicitly reflect the County's Climate Action Plan and its evolution. Achieving net zero CO2 emissions (and sequestration) will require a rapid ending to oil and natural gas extraction (and certainly no expansion, no granting new leases, new pipeline permits, etc. It should encourage green energy generation and storage in both distributed and centralized manners.

10. Wildfires are clearly changing in their severity and nature. The County should lead in research and experimentation with methods of fire protection and damage mitigation, such as (un)controlled small burns, and unconventional methods advocated by http://californiachaparral.com – including ember barriers and sprinklers, which are more effective and ecologically sound than enormous denuded hillsides.

11. Our General Plan needs to steer our county toward good land and resource stewardship. To recap, aesthetics play far too important a role in our land use planning, particularly because "beauty is in the eye of the beholder," and what one person sees as creative genius, another sees as a monstrosity. Land use regulations should be focused on environmental safeguards that protect air, water, and soil while at the same time meeting the food and shelter needs of our communities.

12. As Meror Krayenhoff has stated, "We are in a time when the scale of the emergencies we face need to be addressed with solutions of a corresponding scale. These emergencies also have urgency. . . .[W]ithout governance that can act with pace, boldness, courage and the power to implement, we are wasting our time." We hope that Ventura County acts with such pace and boldness to adopt a General Plan that guides us in a new direction of carbon drawdown, while promoting innovation in design, building, and conservation for generations to come.

Thank you for your kind consideration.

Sincerely,

Tina Rasnow, Brian Rasnow

Tina Rasnow and Dr. Brian Rasnow on behalf of the
Rasnow Family

Simmons, Carrie

From: Curtis, Susan
Sent: Thursday, February 27, 2020 11:39 AM
To: Simmons, Carrie
Subject: FW: Climate change has environmental impacts!

Follow Up Flag: Follow up
Flag Status: Flagged

Susan Curtis | Manager
General Plan Update Section
susan.curtis@ventura.org

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From: Paul Aist <info@email.actionnetwork.org>
Sent: Thursday, February 27, 2020 9:53 AM
To: Curtis, Susan <Susan.Curtis@ventura.org>
Subject: Climate change has environmental impacts!

Susan Curtis,

Dear Ventura County Board of Supervisors and Planning Department,

Climate issues are something I feel worried about. Ventura County is warming as fast or faster than any county in the nation. Our ocean is acidifying faster. Drought, fire and floods have hit us worse, and we can expect more extreme weather.

My family and community are counting on you to assure analysis of the full scope of environmental impacts and mitigations in the Draft EIR.

First, it is necessary that all greenhouse gas emissions be counted based on the most current science.

There are many ways to mitigate climate impacts, like a sunset plan for oil and gas production, decarbonization of transportation and buildings, zero waste, incentives for regenerative agriculture and water management, and reducing emissions from tailpipes.

I want an EIR that covers major climate impacts via a systematic plan.

Thank you—
Paul Aist
Ventura

Paul Aist
paulaist@gmail.com
8892 Tacoma Street
Ventura , California 93004