



Ventura County Coalition of Labor, Agriculture and Business

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Ventura County Board of Supervisors
800 S. Victoria Avenue,
Ventura, CA 93009
Transmitted via email to Brian Palmer

RE: Recommendations for Options for the County of Ventura as a Groundwater Sustainability Agency under the Sustainable Groundwater Management Act – Item 54 – 12-16-14

The Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB) has the following recommendations for the County of Ventura as a potential participant in Groundwater Sustainability Agencies per the goals of the Sustainable Groundwater Management Act (SGMA):

According to the California Department of Water Resources (DWR) there are 12 groundwater basins in Ventura County that are ranked medium or high priority¹. Each of these basins has a variety of water agencies, districts and stakeholder groups with historical expertise, and each basin has a different level of hydrogeological study that has been accomplished. We believe the County should be cautious in its elections to participate in GSAs as the level of effort will stretch its departments' available resources and potentially add unnecessary bureaucracy and a political agenda to a process that must be based on science and water law.

As the cost of groundwater management will directly impact stakeholders, we recommend that the County take either Option 5 or a modified Option 4; where County staff would meet in a public process with all agencies with an interest in medium or high priority basins and determine whether the County would bring any management expertise that is not already provided. If the interested agencies and stakeholders believe the County's involvement is necessary, then a partnership should be considered with budgetary restraints. If not, the county should not take a role in the GSA.

Funding the implementation of the SGMA countywide will be a challenge and the more public agencies involved will directly correspond to increased staff, driving up the cost of water to stakeholders, including agricultural and domestic pumpers and ratepayers. For example, there are already three water districts and the City of Ventura that have expressed interest in jointly managing the Upper

¹Note that the existing CASGEM basin priority rankings include numerous factors, most not related to the level of impairment of the basin itself: (a) the overlying population of the basin; (b) the projected growth of that population; (c) the total number of wells; (d) the number of wells used for public supply; (e) the amount of irrigated acreage in the basin; (f) the basin's reliance on groundwater as the primary source of water; and (g) impacts on the groundwater; including overdraft, subsidence, saline intrusion, and other water quality degradation and (h) any other information determined to be relevant by the DWR.

Ventura River basin. Each entity will want to have access to new fees that will be levied on water users under the SGMA leading to increased bureaucracy rather than scientifically based solutions. The focus needs to be on completing the Groundwater Sustainability Plans as a “collaborative effort between impacted agencies and stakeholders.”

While the county staff report asserts that “Watershed Protection District staff administers the County’s Well Ordinance” and “provides administrative and technical staffing to the FCGMA”, that does not mean it is appropriate for the County to take a management role in every GSA. Per the goals of the SGMA, the County should continue to “collect and share groundwater data” while “empowering local water agencies to manage groundwater sustainability” in an open public process that “respects overlying and other property rights”.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynn Gray Jensen".

Lynn Gray Jensen
Executive Director

Cc:

Tully Clifford via email

Gerhardt Hubner via email

VC COLAB Board of Directors: Richard Atmore | Harry Barnum | Tim Cohen | John Hecht | Jurgen Gramckow | John Lamb | Patrick Loughman | David Martinez | Neal Maguire | Matt Meyring | Kioren Moss | Jack Poe | Bud Sloan | Alex Teague | Patty Waters