



Ventura County Coalition of
Labor, Agriculture and Business

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November 25, 2014

Ventura County Watershed Protection District
Tully Clifford, Director
800 S. Victoria Avenue,
Ventura, CA 93009
Transmitted via email to Tully.Clifford@ventura.org

RE: Comments on Changes to the Water Well Ordinance No. 4184, Article 1 – Groundwater Conservation

The Ventura County Coalition of Labor, Agriculture and Business (VC CoLAB) represents over 350 members throughout the county, including many agricultural and industrial businesses and rural residents who will potentially be impacted by the recommended changes to this ordinance. Our comments are listed by Section as follows:

Section 4811 PURPOSE:

Our major concern with the new ordinance is the language change of the Purpose, which could allow the Watershed Protection District (WPD) to step over the line into groundwater management, which we believe is outside of their purview. We recommend that the language “management and” be removed from this paragraph.

Section 4812 – DEFINITIONS:

We fully support the addition of “Backup or Standby Well” and suggest that these, and the category “Replacement Well”, be added to the Type of Work section of the Application For Well Permit form. We request that changes to the Application form be available for public comment as was stated in the stakeholder workshop.

The definition of Contaminant is synonymous with Pollutant, and the definition of Pollution is defined as an action (verb) which is confusing as it does not match its use as a noun in the document.

Section 4814 – STANDARDS:

Subsection C: We recommend the language in the third paragraph be amended to be: “Every new water supply well shall be equipped with a flowmeter...” It would not be appropriate for other types of wells as identified on the Application For Well Permit to require a flowmeter. We do not support the expansion of this requirement to existing wells as a possible future action by WPD. These kinds of rules would

unnecessarily impact many disadvantaged communities, particularly in remote areas of the County that have no identified groundwater issues.

Subsection D: We support the added language in the first paragraph: "A check valve may also be utilized to meet this backflow prevention requirement."

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

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