



Ventura County Coalition of
Labor, Agriculture and Business

P.O. Box 4237, Ventura, CA 93007

Email: execdirector@colabvc.org

www.colabvc.org

June 13, 2015

Los Angeles Regional Water Quality Control Board
Attention: Cris Morris, P.E., Chief
Municipal Permitting Unit (NPDES)
Sam Unger, Executive Officer
320 West 4th Street, Suite 200
Los Angeles, CA 90013

RE: Amendment to Order No. R4-2011-0079-A01 and Order No. R4-2008-0083 - Water Discharge Requirements and Monitoring for the City of Oxnard Groundwater Recovery, Enhancement, and Treatment Program (GREAT) – Non-Potable Reuse Phase 1 Project (File No. 08-070, CI-9456)

Dear Ms. Morris,

CoLAB Ventura County is a non-profit membership organization representing numerous agricultural landowners and operators within the Ventura County groundwater basins including the Oxnard Forebay, Oxnard Plain, Pleasant Valley, Los Posas and Santa Rosa basins. We have deep appreciation for the efforts of the Water Board under the leadership of Executive Officer Sam Unger, to develop the amendments referenced above. We also have appreciation for the support of Assemblymember Jacqui Irwin and her staff for coordination of this critical collaborative effort to lessen the impending consequences to the agricultural community in this prolonged statewide drought.

The drought is a significant challenge, requiring governmental agencies and stakeholders to work together to support local infrastructure projects, particularly those that have the ability to deliver new water to basins in support of beneficial uses. The Oxnard GREAT Program is just such an opportunity and we appreciate the Regional Water Board's quick and focused attention to consider the temporary distribution system of recycled water (RW) via the Regional Salinity Management Pipeline to deliver water to local farmers. Ventura County agriculture is a unique resource, providing healthy fruits and vegetables to our community, State and nation.

CoLAB fully supports this temporary solution which will speed up the delivery of much needed water as was envisioned in the Fox Canyon Groundwater Management Agency (GMA) Resolution No. 2013-02, adopted approximately two years ago on June 26, 2013. This resolution contains the following language that supports the value and benefits of the GREAT Project:

“Whereas, the GMA Management Plan describes the use of RW generated from the GREAT Program as an important management strategy that will result in improvements to water supply reliability and water quality conditions within the Agency; and

Whereas, the primary benefits of the GREAT Program include: (a) generation of approximately 7,000 AFY of new water supplies for the region; (b) increased use of supplemental water supplies and the concomitant reduced groundwater pumping in the areas of the Oxnard Plain and Pleasant Valley subbasin; (c) introduction of RW into the Pumping Trough Pipeline (PTP) and Pleasant Valley County Water District (PVCWD) systems which will increase United water Conservation District's (UWCD) ability to recharge surface water to the Forebay under certain conditions; (d) shifting groundwater pumping from the coastal and Pleasant Valley areas that are most difficult to recharge, to the Forebay/Near Forebay, which is easily recharged; (e) overall increase in groundwater recharge; and (f) the removal of tons of salts from the Oxnard Plain and Forebay groundwater; and...

Whereas, UWCD, PVCWD and the City have developed a plan to utilize RW within the UWCD PTP and PVCWD ("PV") distribution systems, along with direct delivery of RW to agricultural users along the pipeline alignment (collectively, "RW users")...

CoLAB strongly believes that the agencies that collaborated to adopt this Fox Canyon GMA Resolution 2013-02 have provided the language and tools to implement the GREAT Program in a way that will utilize this new source of recycled water to benefit users while protecting the integrity of the groundwater basins. Such language is contained in this Resolution with Attachment A - Recycled Water Management Impact Analysis (RWIA) and Attachment B - Monitoring Plan:

Resolution 2013-02 specifies that any subsequent Recycled Water Pumping Allowance (RWPA) accrued by the City of Oxnard will depend on “*Forebay water levels and then existing Hydrogeologic conditions (Section 12)*.”

- Section 2(c) specifically requires: “*Limitation and restrictions on Forebay pumping based on groundwater level triggers and Hydrogeologic conditions.*”
- Section 12(c) states “*To the extent the Agency, the City and UWCD do not agree on restrictions on the use of RWPA for any given year, based on the then existing and anticipated hydrologic circumstances, the City shall use the RWPA consistently with UWCD Board of Directors' determination in consultation with the Agency.*” This should allay any concerns pertaining to short or long term
- Section 14 states: *Unless otherwise authorized pursuant to the Coordination Meetings, the City shall not pump its RWPA from the Forebay when evacuated groundwater from storage in the Forebay reaches 80,000 acre-feet (as regularly determined by UWCD), or groundwater levels in the Forebay reach 19 feet above mean sea level. Resumption of pumping of RWPA from the Forebay shall occur as authorized pursuant to the Coordination Meetings as provided in Section 12.*”

While UWCD is not a signatory to and was therefore not included in discussions on the use agreement with respect to the Salinity Management Pipeline, both the District and the Fox Canyon GMA had already assured the protection of Fox Canyon aquifers as described in detail in Resolution 2013-02. While UWCD has a proposed brackish water project that may be “a key strategy to achieving sustainability”, the reality is that completion of this project is likely 10 to 15 years in the future.

CoLAB feels strongly that the amended orders with respect to the GREAT Program are prudent and necessary as defined in the purpose of Order No. R4-2011-0079-A01 as follows:

“The Pleasant Valley County Water District (PVCWD) and, the City of Oxnard (City) requested the delivery of recycled water produced by the Advanced Water Purification Facility (AWPF) starting in August of 2015 to offset the loss of agricultural water due to the extended drought. The City’s AWPF is part of the Groundwater Recovery, Enhancement, and Treatment (GREAT) Program, which was scheduled to deliver the water to Pleasant Valley growers in 2016. The PVCWD requests that the water be transported into PVCWD’s irrigation distribution system via the Calleguas Regional Salinity Management Pipeline (SMP) until the planned permanent connection can be constructed or additional flows into the SMP render the option not feasible, whichever comes first.”

Without reservation, CoLAB Ventura County urges the Regional Board to avoid any delay in approving these Amendments. The Amendments represent a thoughtful and collaborative effort by public entities, state and local legislators and agricultural growers to promote the use of recycled water in a manner that responds to drought conditions in Ventura County, preserves groundwater resources, and protects environmental resources.

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