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California Department of Water Resources
1416 9th St.
Sacramento, CA 95814

Re: Support for the Ojai Basin Groundwater Management Agency (OBGMA) Alternative Demonstration according to Water Code Section 10733.6(b)(3)

Ventura County CoLAB is an agricultural advocacy organization representing over 450 members countywide. Many members reside in Ojai and are water users in the Ojai Basin.

The OBGMA has comprehensive basin monitoring and extraction measurement systems, an envious computer modeling system for groundwater management, a “no export” policy, a water conservation program and is enforcing a basinwide moratorium on well permits.

According to the enabling legislation for the OBGMA in 1991, the agency has express powers for groundwater management. The Legislature declared that the preservation of groundwater *“for the protection of agricultural, municipal, and industrial uses, is in the public interest and for the common benefit of water users within the agency.”*

The OBGMA Alternative Groundwater Sustainability Plan (AGSP) submittal satisfies objective 10733.6(b)(3) demonstrating *“that the basin has operated within its sustainable yield over a period of 10 years.”* Further, as required, the AGSP is supported by technical information, including modeling, in a report signed by a registered professional geologist and certified hydrogeologist, submitted with a seal under a California state license.

The Ojai basin has a unique hydrogeology that refills very quickly with rainfall because the surface to aquifer interface is extremely porous and the drainage area is relatively large. According to the OBGMA’s AGSP, *“there has not been a sustained average decline over several decades. This observation is supported by OBGMA’s numerical model results... Despite years of historically deficient rainfall, key water levels presently remain above historic lows... groundwater extraction rates have been operating at a sustainable level over the past several decades.”*

With the exception of four drought periods in the last 60 years, the Ojai Basin depth to groundwater has cycled between 50 ft. and 175 ft. Importantly, the Basin’s water levels have recovered after each drought period. Even after this extended five-year drought, at the low point, water levels in the Ojai Basin were 47 ft. higher than the all-time low. And, with the winter rains, the basin level has risen 39 feet from the low point in August of 2016.

The AGSP clearly shows that the Ojai basin has been sustainable over time due to its rapid recharge and a decrease in pumping when water levels decline. The graph on page 29 shows that overall average irrigation demand has decreased over time and that both total extractions and private well extractions have decreased historically during drought cycles. The chart on page 28 shows a 30% decrease in private well extractions in the drought years 2014 and 2015 over the 2011 wet year.

The decrease in extractions is facilitated by pumpers purchasing water from Lake Casitas, a backup water supply during drought periods. At its low point in 2016, the lake was 34% full and with the 2017 winter rains, the lake level reached 43.7% full in February.

Unlike many groundwater basins in California, the Ojai Basin has a calculated safe annual yield (approximately 5,026 acre-feet) that has been supported by science and numerical modeling and tested over time. There is relatively little risk of change to the developed environment as growth is strictly prohibited and while agriculture is an important and historical resource, it is marginally profitable in the Ojai Valley. Therefore, there is little reason to construct complex allocation systems as may be appropriate in other basins.

With respect to submitted comments on adverse impacts to beneficial uses, including the southern California steelhead, there is no evidence that past management of the Ojai Basin has had significant and unreasonable adverse impacts to fish species. In fact, the OBGMA AGSP presents the results of the fish surveys indicating *“both a slight decline in presence and a rebound in presence during the current drought cycle, indicating the capacity of fish to maintain and sustain... There is no evidence to suggest that current groundwater extraction levels are causing significant or unreasonable adverse impacts on instream beneficial uses.”*

Fundamentally, we do not believe that the Ojai Basin will benefit from a long-term GSP as described in the Sustainable Groundwater Management Act. The expense of the process will not change the long-standing balance between recharge and extractions. We believe the limited resources of the OBGMA are better spent on future basin management actions including the investment in new innovative projects to increase water availability, vetted through a robust stakeholder process including all water users in the Ojai Basin.

Sincerely,

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

Lynn Gray Jensen, P.G. # 5816

Executive Director