

## Bryan Bondy

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**From:** Jackie Lozano <Jackiel@unitedwater.org>  
**Sent:** Thursday, August 19, 2021 5:23 PM  
**To:** John Lindquist  
**Cc:** Bryan Bondy  
**Subject:** FW: United Staff's Technical Comments on Draft Mound Basin GSP

Hi John,

This email is to confirm receipt of your technical comments. I am copying the Agency's Executive Director Bryan Bondy for his information. Thank you and the UWCD staff for taking the time to prepare this submission.

Sincerely,

Jackie Lozano | Clerk of the Board for  
Mound Basin Groundwater Sustainability Agency  
(805) 525-4431

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**From:** John Lindquist <johnl@unitedwater.org>  
**Sent:** Thursday, August 19, 2021 4:59 PM  
**To:** Jackie Lozano <Jackiel@unitedwater.org>  
**Subject:** United Staff's Technical Comments on Draft Mound Basin GSP

Hi Jackie;

Following are comments prepared by United WCD's technical staff regarding the June 2021 draft GSP prepared for Mound Basin:

- Section 1.0

The Mound Basin GSP is well organized and written—United staff found the text boxes describing required plan elements at the beginning of each GSP section to be especially helpful for understanding the context of the text, tables, and figures that follow.

- Section 3.0

United staff appreciated the opportunity to contribute to the data summary and analysis provided in Section 3. As new data become available in the future, we look forward to collaborating with the Mound Basin GSA to continually improve our understanding of groundwater conditions and refine the hydrogeologic conceptual model for the basin, as appropriate.

- Section 4.0

United staff believe the sustainable management criteria described in the GSP, including measurable objectives and minimum thresholds, are well-defined and reasonable. Although the current understanding of present-day and future groundwater uses in Mound Basin does not suggest that significant and unreasonable impacts should be expected for the six SGMA sustainability indicators, we were impressed to see measurable objectives and minimum thresholds for relevant indicators included in the GSP, in case conditions change in the future. We agree that “depletion of interconnected surface water” is not an applicable sustainable management criterion in Mound Basin as described in Section 3 of the GSP, for several reasons, including:

- 1) Historical records indicate that no pumping from the shallow alluvial aquifer (the sole aquifer that is potentially in hydraulic connection with perennial or intermittent surface water bodies or GDEs in Mound Basin) has occurred since 1983 and we are not aware of any plans to resume pumping from that aquifer in the future;
- 2) A low-permeability aquitard (the fine-grained Pleistocene deposits) that is 100 to 400 feet thick in most areas of Mound Basin separates the shallow alluvial aquifer from the underlying principal aquifers (primarily Mugu and Hueneme Aquifers) that are pumped for water supply;
- 3) Data from City of Ventura monitoring wells screened in the shallow alluvial aquifer near the Santa Clara River estuary (wells GW-1, GW-2, and GW-3 [data are presented in the Stillwater Sciences report referenced in the GSP]) indicate that groundwater level changes in the shallow alluvial aquifer did not discernibly change in response to significant declines in groundwater levels in the underlying principal aquifers during the 2012-16 drought (this may be worth further discussion in the GSP); and
- 4) Modeling results shown in the GSP (Figure 3.3-02) indicate no discernible relationship between groundwater extractions from the principal aquifers within Mound Basin and interaction of surface water in the Santa Clara River with the shallow alluvial aquifer. This lack of a discernible relationship is consistent with the observation that groundwater elevations in the principal aquifers do not appear to have significant impacts on groundwater elevations (which could theoretically impact surface water flows) in the shallow alluvial aquifer. Furthermore, groundwater withdrawals in Mound Basin have diminished during the past 20 years and there are no plans to significantly increase pumping from the basin in the future. Stable or reduced extractions relative to past pumping rates seem like they could only have a net positive impact on groundwater and surface-water conditions in the basin.

- Section 5.0

United staff agree with the proposed locations, frequency, and potential expansion of the monitoring network for the five sustainable management criteria for which sustainable management criteria have been developed, and look forward to supporting efforts to collect additional data in the future.

- Section 6.0

United staff agree with the GSP's proposed "Projects and Management Actions." Specifically, we agree that it is prudent to develop contingency plans for seawater intrusion and land subsidence, and to coordinate with Ventura County's Watershed Protection District to identify and address improperly constructed or abandoned wells that potentially create conduits for vertical migration of poor-quality groundwater within Mound Basin.

Regards,

**John Lindquist, P.G., C.Hg.** | Senior Hydrogeologist

United Water Conservation District

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