

UPPER VENTURA RIVER GROUNDWATER AGENCY

NOTICE OF SPECIAL MEETING*

NOTICE IS HEREBY GIVEN that the Upper Ventura River Groundwater Agency (“Agency”) Board of Directors (“Board”) will hold a special **Board Meeting** at **1:00 P.M.** on **Thursday, February 9, 2017** at **Casitas Municipal Water District, Board Room, 1055 Ventura Avenue, Oak View, California, 93022.**

UPPER VENTURA RIVER GROUNDWATER AGENCY BOARD OF DIRECTORS
AGENDA

Thursday, February 9, 2017

- 1. CALL TO ORDER.**
- 2. PLEDGE OF ALLEGIANCE.**
- 3. PUBLIC COMMENTS ON ITEMS NOT APPEARING ON THE AGENDA**

The Board will receive public comments on items not appearing on the agenda and within the subject matter jurisdiction of the Agency. The Board will not enter into a detailed discussion or take any action on any items presented during public comments. Such items may only be referred to the Executive Director or other staff for administrative action or scheduled on a subsequent agenda for discussion. Persons wishing to speak on specific agenda items should do so at the time specified for those items. The presiding Chair shall limit public comments to three minutes.

4. ACTION ITEMS

a. Authorize Contract with Brownstein Hyatt Farber Schreck (Brownstein) for Legal Services

In order to continue receiving legal services from Brownstein, the Agency must enter into a legal services agreement with Brownstein. **This item was continued from the February 1, 2017 meeting.**

b. Adoption of Interim Budget

The Board shall adopt an interim budget to cover the Upper Ventura River Groundwater Agency’s operational costs until the final budget is adopted by May 5, 2017. **This item was continued from the February 1, 2017 meeting.**

c. Creation of Committees to Develop Annual Budget, Bylaws, and Conflict of Interest Code.

The Board shall create three separate committees to develop the annual budget, bylaws, and conflict of interest code according to the schedule identified in the JPA creating the Upper Ventura River Groundwater Agency. **This item was continued from the February 1, 2017 meeting.**

** In compliance with the Americans with Disabilities Act, all possible accommodations will be made for individuals so they may attend and participate in meetings.*

d. Thank You Letters to the Center for Collaborative Policy and the California Department of Water Resources

The Board shall authorize staff to draft and send thank you letters on behalf of the Upper Ventura River Groundwater Agency to the Center for Collaborative Policy and the Department of Water Resources for facilitation services provided during the formation the URVGA. **This item was continued from the February 1, 2017 meeting.**

e. Preparation of Comments on Ojai Basin Groundwater Management Agency's ("OBGMA") Alternative Submittal under Sustainable Groundwater Management Act ("SGMA").

The Board shall discuss submitting comments on behalf of the Upper Ventura River Groundwater Agency to the California Department of Water Resources regarding OBGMA's Alternative submittal. Comments are due by February 26, 2017. **This item was continued from the February 1, 2017 meeting.**

f. Coordination with the California Water Action Plan

The Board shall discuss coordination with the State Water Resources Control Board and the California Department of Fish and Wildlife regarding the relationship between the development of the GSP for the Upper Ventura River Groundwater Basin and the development of an instream flow study.

5. DIRECTOR ANNOUNCEMENTS.

6. ADJOURNMENT

UPPER VENTURA RIVER GROUNDWATER AGENCY

Item No. 4(a)

DATE: February 9, 2017 (Continued from the February 1, 2017 meeting)
TO: Board of Directors
SUBJECT: Authorize Contract with Brownstein Hyatt Farber Schreck (Brownstein) for Legal Services

SUMMARY

In order to continue receiving legal services from Brownstein, the Agency must enter into a legal services agreement with Brownstein.

RECOMMENDED ACTION

Authorize the Executive Director to enter into a legal services agreement with Brownstein for legal representation of the Agency.

BACKGROUND

Brownstein provided legal services for the formation of the Upper Ventura River Groundwater Agency (Agency) through a contract with the Ventura River Water District. The scope of work and budget in this contract does not include serving the Agency after the execution of the JPA and creation of the Agency. In order to continue receiving legal services from Brownstein, the Agency must enter into a separate legal services agreement.

Brownstein has prepared the attached scope of work and budget, which anticipates an estimated monthly cost of \$6,000.00 for representation of the Agency.

FISCAL SUMMARY

The monthly fiscal impact on the Agency to enter into a legal services agreement with Brownstein is estimated to be \$6,000.00.

Action: _____

Motion: _____ 2nd: _____

B. Kuebler___ M. Bergen___ J. Pratt___ M. Krumpschmidt___ S. Epstein___

L. Rose___ E. Ayala___

January 26, 2017

Russell M. McGlothlin
Attorney at Law
805.882.1418 tel
805.965.4333 fax
RMcglathlin@bhfs.com

Board of Directors
Upper Ventura River Groundwater Agency
409 Old Baldwin Rd.
Ojai, CA 93023

RE: Proposed Scope of Work and Budget for Routine Legal Services to the Upper Ventura River
Groundwater Agency

Dear Board of Directors,

Brownstein Hyatt Farber Schreck, LLP ("Brownstein") appreciates the opportunity to have assisted in the formation of the Upper Ventura River Groundwater Agency ("Agency"). We propose the following future scope of work and budget to provide routine legal services to the Agency.

For this work, we anticipate that our billings will average approximately \$6,000 per month. This estimate includes reviewing agendas and staff reports, attending Board meetings, and answering routine legal questions and correspondence. Litigation and other matters that require extensive legal research or negotiation with third parties are outside the scope of this budget and would cause us to exceed our monthly estimate. We cannot reasonably predict what those matters may be or estimate associated legal costs at this time. Should such a matter arise, we will do our best to estimate a scope of work and budget to address the specific matter.

Again, we have enjoyed the opportunity to assist in the formation of the Agency and the professional relationships that we have established in the process. We would, of course, be delighted to provide legal services to the Agency. Please contact me with any questions or instructions.

Sincerely,



Russell M. McGlothlin

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1020 State Street
Santa Barbara, CA 93101-2711
main 805.963.7000

UPPER VENTURA RIVER GROUNDWATER AGENCY

Item No. 4(b)

DATE: February 9, 2017 (Continued from the February 1, 2017 meeting)

TO: Board of Directors

SUBJECT: Adoption of Interim Budget

SUMMARY

The Board should review the current financial status and adopt an interim budget of \$50,000.

The fiscal impact is \$10,000 for each Member Agency.

RECOMMENDED ACTION

Approve the interim budget.

BACKGROUND

The Board discussed the financial status and interim budget of the Agency at its meeting on January 5, 2017. Section 14.2 of the JPA sets forth the following three options for funding the Agency's expenses and ongoing operations:

1. Voluntary contributions from Members;
2. Assessment of Member contributions; and
3. Imposing fees on groundwater users pursuant to the Sustainable Groundwater Management Act ("SGMA")

Based on these options, the Board proposed that each Member Agency seek authorization from its governing board to contribute \$10,000 towards the Agency's ongoing operational costs until the Annual Budget is approved no later than May 5, 2017.

FISCAL SUMMARY

The fiscal impact for each Member Agency between now and when the Annual Budget is adopted is \$10,000.

Action: _____

Motion: _____ 2nd: _____

B. Kuebler___ M. Bergen___ J. Pratt___ M. Krumpschmidt___ S. Epstein___

L. Rose___ E. Ayala___

UPPER VENTURA RIVER GROUNDWATER AGENCY

Item No. 4(c)

DATE: February 9, 2017 (Continued from the February 1, 2017 meeting)
TO: Board of Directors
SUBJECT: Creation of Committees to Develop Annual Budget, Bylaws, and Conflict of Interest Code

SUMMARY

The Joint Exercise of Powers Agreement (“JPA Agreement”) requires that the Agency adopt Bylaws, an annual budget, and a local conflict of interest code pursuant to the schedule and provisions described below. The JPA Agreement also allows for the appointment of committees to assist in carrying out the purposes and objectives of the Agency.

There is no fiscal impact associated with the creation of committees to develop the Agency’s annual budget, bylaws, and conflict of interest code.

RECOMMENDED ACTION

Authorize the creation of the following three committees and determine who will serve on each.

1. Annual Budget Committee
2. Bylaws Committee
3. Conflict of Interest Code Committee

BACKGROUND

Section 14.1 of the JPA Agreement requires the Board of Directors to adopt a budget for the Agency for the ensuing fiscal year within one hundred and twenty (120) days after the first meeting, which is May 5, 2017.

Section 8.5 of the JPA Agreement requires the Board of Directors to adopt a local conflict of interest code pursuant to the provisions of the Political Reform Act of 1974 (Government Code sections 81000, et seq.) within six (6) months following the appointment of both Stakeholder Directors, which is August 1, 2017.

Article 11 of the of the JPA Agreement requires the Board of Directors to be draft, approve, and amend Bylaws of the Agency to govern the day-to-day operations of the Agency on or before the first anniversary of the Board’s first meeting, which is January 5, 2018.

Article 12 of the of the JPA Agreement provides that the Board of Directors may from time to time appoint one or more advisory committees or establish standing or ad hoc committees to assist in carrying out the purposes and objectives of the Agency. The Board shall determine the purpose and need for such committees and the necessary

qualifications for individuals appointed to them. Each committee shall include a Director as the chair thereof. Other members of each committee may be composed of those individuals approved by the Board of Directors for participation on the committee. However, no committee or participant on such committee shall have any authority to act on behalf of the Agency.

FISCAL SUMMARY

There is no fiscal impact associated with this action.

Action: _____

Motion: _____ 2nd: _____

B. Kuebler___ M. Bergen___ J. Pratt___ M. Krumpschmidt___ S. Epstein___

L. Rose___ E. Ayala___

UPPER VENTURA RIVER GROUNDWATER AGENCY

Item No. 4(d)

DATE: February 9, 2017 (Continued from the February 1, 2017 meeting)
TO: Board of Directors
SUBJECT: Thank You Letters to the Center for Collaborative Policy and the California Department of Water Resources

SUMMARY

The Member Directors would like to acknowledge the funding provided by the Department of Water Resources (“DWR”) and the services provided by the Center for Collaborative Policy (“CCP”) to facilitate development of a Joint Exercise of Powers Agreement (“JPA Agreement”) establishing the Upper Ventura River Groundwater Agency (“Agency”).

There is no fiscal impact associated with this agenda item.

RECOMMENDED ACTION

Authorize staff to send the attached letters on behalf of the Agency.

BACKGROUND

In August 2015, the GSA Formation Committee (Ventura River Water District, Meiners Oaks Water District, City of Ventura (“Ventura Water”), Casitas Municipal Water District, and the County of Ventura) received funding through DWR’s Facilitation Support Service Program to assist with stakeholder outreach, strategic planning, and governance assessment.

Facilitation services were provided by CCP. The facilitator interviewed stakeholders and helped the committee develop a work plan for creation of the Agency. The CCP provided leadership and organization that kept the effort on track and on time.

FISCAL SUMMARY

There is no fiscal impact associated with this action.

Action: _____

Motion: _____ 2nd: _____

B. Kuebler___ M. Bergen___ J. Pratt___ M. Krumpschmidt___ S. Epstein___

L. Rose___ E. Ayala___

February 9, 2017

Ms. Mindy M. Meyer, Lead Facilitator
Center for Collaborative Policy
California State University, Sacramento
6000 J Street
Sacramento, CA 95819

Dear Mindy:

The Member Directors of the Upper Ventura River Groundwater Agency (Agency) want to extend our heartfelt gratitude for all your effort in guiding us through the process of developing the Joint Exercise of Powers Agreement and the formation of the Agency.

You gave your attention and commitment to the project at every step of the way, through long meetings and sometimes difficult discussions. Your organizational skills kept us on track and on time. You allowed full expression while keeping the exchanges respectful and on topic. Your humor and good nature were exemplary.

Thanks to you, in the end, we have a solid legal document and good working relationships. Your work was the ingredient that made it all possible.

With warm regards,

Cc: Dave Ceppos

February 9, 2017

Mr. William Croyle, Acting Director
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Dear Mr. Croyle:

The Member Directors of the newly formed Upper Ventura River Groundwater Agency (Agency) want to thank you for providing the funding to hire the Center for Collaborative Policy (Center) to facilitate development of a Joint Exercise of Powers Agreement (Agreement) establishing the Agency. The Agreement was finalized in December 2016 and the Agency held its first meeting on January 5, 2017.

The Center provided leadership and organization that kept the Agency's formation process on track and on time. The Center's facilitator, Mindy Meyer, kept discussions respectful and on topic. In the end we had a solid legal document and good working relationships.

Our Agency is now ready to embark on the process of becoming a Groundwater Sustainability Agency. Thank you for helping us on our way.

Sincerely,

UPPER VENTURA RIVER GROUNDWATER AGENCY

Item No. 4(e)

DATE: February 9, 2017 (Continued from the February 1, 2017 meeting)

TO: Board of Directors

SUBJECT: Preparation of Comments on Ojai Basin Groundwater Management Agency's ("OBGMA") Alternative Submittal under Sustainable Groundwater Management Act ("SGMA")

SUMMARY

SGMA established a process for local agencies to develop an alternative groundwater sustainability plan ("Alternative") in lieu of a Groundwater Sustainability Plan ("GSP") (Water Code §10733.6) for evaluation by the Department of Water Resources ("DWR"). OBGMA submitted an Analysis of Basin Conditions as an Alternative on December 27, 2016. DWR is accepting public comments on OBGMA's submittal until February 26, 2017.

There is no fiscal impact associated with the preparation of comments on the submission of comments on OBGMA's Alternative.

RECOMMENDED ACTION

Draft comments on behalf of the Agency requesting DWR to condition approval of OBGMA's Alternative upon (1) an update of the Ojai Groundwater Basin Management Plan addressing steelhead habitat in San Antonio Creek between Ojai Basin's outlet and the Ventura River confluence within 180 days, and (2) entering into a coordination agreement with the Agency regarding steelhead habitat issues in the Ventura River.

BACKGROUND

SGMA established a process for local agencies to develop an Alternative in lieu of a GSP (Water Code §10733.6) for evaluation by DWR. Alternatives must be consistent with one of the following (Water Code §10733.6(b)):

1. A plan developed pursuant to Part 2.75 (commencing with Section 10750) or other law authorizing groundwater management.
2. Management pursuant to an adjudication action.
3. An analysis of basin conditions that demonstrates that the basin has operated within its sustainable yield over a period of at least 10 years ("Analysis of Basin Conditions").

OBGMA submitted an Analysis of Basin Conditions as an Alternative in lieu of a GSP on December 27, 2016. The Alternative concludes, "[t]here is no evidence to suggest that current groundwater extraction levels are causing significant or unreasonable adverse impacts on instream beneficial uses."

DWR is accepting public comments on OBGMA's submittal until February 26, 2017. An agency submitting an alternative demonstration has 180 days to correct any deficiencies identified by DWR.

Chair Kuebler, Ventura River Water District has prepared the attached summary of concerns and potential comments on OBGMA's Alternative for the Board's consideration in drafting comments.

FISCAL SUMMARY

There is no fiscal impact associated with this action.

Action: _____

Motion: _____ 2nd: _____

B. Kuebler___ M. Bergen___ J. Pratt___ M. Krumpschmidt___ S. Epstein___

L. Rose___ E. Ayala___

PROPOSED UVRGA COMMENTS TO DWR
ON
OBGMA ALTERNATIVE DEMONSTRATION

ISSUE

Steelhead habitat in San Antonio Creek

SITUATION

OBGMA's Alternative concludes, "[t]here is no evidence to suggest that current groundwater extraction levels are causing significant or unreasonable adverse impacts on instream beneficial uses." The Alternative was submitted to DWR for approval with a 60-day comment period ending February 26, 2017.

UVRGA CONCERN

The GSP must address steelhead habitat in the Ventura River, including downstream of San Antonio Creek. San Antonio Creek contributes to that habitat. If DWR approves the Alternative as is, the Agency could have sole responsibility for Ventura River steelhead habitat.

RECOMMENDED COMMENT

Request DWR to condition approval of the Alternative upon (1) an update of the Ojai Groundwater Basin Management Plan addressing steelhead habitat in San Antonio Creek between Ojai Basin's outlet and the Ventura River confluence within 180 days and (2) entering into a coordination agreement with the Agency regarding steelhead habitat issues in the Ventura River.

BACKGROUND

Alternative

- This is not a 'plan' but a statement of existing conditions.
- It contains no goals, policies, or management actions.
- It contains a brief analysis of San Antonio Creek steelhead habitat using, as a proxy for instream beneficial uses, presence/absence of four life stages of steelhead in three reaches of the Creek covering 2008 to 2016.
- The on-line (DWR website) functionally equivalency analysis portion of the Alternative states an environmental baseline has been established for each sustainability indicator but the Alternative contains no such information.
- It should be functionally equivalent to a GSP, which must contain minimum thresholds, measurable objectives, and management actions, among many other requirements.
- Inter-basin coordination agreements are required to prevent one Basin's plan from interfering with a hydrologically connected basin's achievement of sustainability.
- An agency submitting an Alternative has 180 days to correct any deficiencies identified by DWR.

Ojai Groundwater Basin Management Plan

- Latest version is 2007.
- Contains no mention of instream beneficial uses, i.e., steelhead habitat, in San Antonio Creek, neither inside nor outside the Basin.
- Goal is to protect water supply for users inside the Basin.
- Does not contain target levels for any of the parameters being monitored.
- Reports to DWR on the Plan are required annually.
 - Only two (2010 [filed Feb. 2011] and combined 2011/12 [filed March, 2014]) are available on the OBGMA website.
 - Neither of those reports mention instream beneficial uses or steelhead habitat.

Steelhead Habitat

The Ventura River Watershed Management Plan states, “San Antonio Creek offers the most important spawning and rearing habitat in the watershed now accessible to steelhead. The creek generally flows for longer periods of time than other accessible streams, contains a significant amount of gravel needed for spawning, and steelhead are known to grow faster in the San Antonio Creek than elsewhere in the watershed.” (Goals, Objectives, and Findings, Section 2.1.2.4, Healthy Ecosystems, p. 68)

San Antonio Creek is supplied in part by outflow from the Ojai Groundwater Basin. An important steelhead habitat in the Ventura River is over-summering pools between San Antonio Creek confluence and Foster Park. Data and information are insufficient to determine what effect, if any, operations in the Ojai Basin are having on steelhead habitat in San Antonio Creek outside the Basin.

An instream flow requirement for the Ventura River is being studied by the State Water Resources Control Board under authority of the California Water Action Plan. This involves a habitat study by the Department of Fish and Wildlife and surface-groundwater computer model of the watershed’s four groundwater basins. The extent to which this activity will apply to OBGMA’s management of the Ojai Basin is uncertain.

Litigation

There is active litigation to protect the Ventura River’s over-summering pools. Parties currently are Santa Barbara Channelkeeper, City of San Buenaventura, and State Water Resources Control Board.

UPPER VENTURA RIVER GROUNDWATER AGENCY

Item No. 4(f)

DATE: February 9, 2017
TO: Board of Directors
SUBJECT: Coordination with the California Water Action Plan

SUMMARY

The State Water Resources Control Board (State Water Board) and California Department of Fish and Wildlife (CDFW) are working to identify potential actions that may be taken to enhance and establish instream flow for anadromous fish in five priority streams. The Ventura River was recently identified as a priority stream in the California Water Action Plan (WAP). Chair Kuebler would like to discuss his concerns with State Water Board's study and would like to gather input from the Directors ahead of a conference call with State Water Board staff.

There is no fiscal impact associated with this action.

RECOMMENDED ACTION

None.

BACKGROUND

The State Water Board and the CDFW are currently working to identify potential actions that may be taken to enhance and establish instream flow for anadromous fish in five priority streams. The Ventura River was recently identified as a priority stream in the WAP, which was signed by Governor Edmund G. Brown Jr. and released to the public on January 22, 2014. The State Water Board solicited proposals in December 2016 to develop or refine existing water resource modeling tools including surface water, groundwater, water quality, and other water management for the Ventura River Watershed. The models will incorporate elements from existing modeling efforts and include simulations of baseline, unimpaired, and alternative scenario flow and water quality conditions. The project will focus on the update and expansion of existing groundwater and surface water models, and the development of a nutrient transport model. The model will then be used to evaluate at least four surface water scenarios:

1. Unimpaired flows conditions in the watershed.
2. Existing conditions in the watershed.
3. Effects of climate change on surface water resources in the watershed.
4. Effect of Matilija Dam removal on surface water resources in the watershed.

Coordination with the WAP on an instream flow for steelhead in Ventura River is a crucial part of developing and implementing a Groundwater Sustainability Plan (GSP). The attached email from Director Kuebler to Kevin DeLano highlights some of the

coordination concerns. In response to that email, Kevin has set up a conference call in mid-March with Director Kuebler to discuss coordination in more detail. As preparation for that call, Chair Kuebler wants to conduct a brainstorming session to clarify thinking about how the GSP will evolve and interface with the State's efforts.

While it may be premature to presume much about what the Upper Ventura River GSP will look like, it is not premature to develop a working relationship with the State regarding coordination of SGMA and the California Water Action Plan.

FISCAL SUMMARY

There is no fiscal impact associated with this action.

Action: _____

Motion: _____ 2nd: _____

B. Kuebler____ M. Bergen____ J. Pratt____ M. Krumpschmidt____ S. Epstein____

L. Rose _____ E. Ayala_____

From: pbkuebler <pbkuebler@sbcglobal.net>
Subject: Ventura River Watershed scope of work
Date: January 8, 2017 at 10:04:39 PM PST
To: "Kevin@Waterboards DeLano" <kevin.delano@waterboards.ca.gov>

Hi Kevin, I finished reading it and some serious concerns about relationship between your CWAP activity and the UVRGA's ability to create and manage a GSP for the UVR basin. Bottom line, I think the Water Boards should replace the Ventura River as one of the 5 streams because of complicated problems it creates for the GSA. I wonder, if in selecting the Ventura River, any thought was given to how the CWAP process would interface with the GSP preparation and implementation, and if so, what approach was thought of so the two processes could be integrated. SGMA provides a role for the Water Boards when DWR finds a GSA not following the law and refusing to correct GSP deficiencies. Because of the circumstances in our basin, the Water Boards are taking a lead role from the outset. I doubt that was the legislative intent in passing SGMA.

If replacement is not an option, I think next best would be to have the CWAP goal to be to support the UVRGA in development of the GSP. As I have stated, the major issue for the GSP is instream beneficial uses, i.e., steelhead habitat. That is what the WAP is about. Without very careful collaboration, the Water Boards activity will interfere with, if not prevent, the UVRGA from effectively making and implementing the required GSP. For example, the scope of work provides for training Water Boards staff on how to use the integrated surface/groundwater model but there is no training for UVRGA staff to be trained, leaving only the State to be able to use the model to make adaptive management decisions in implementation of the GSP. This comment applies to the OBGMA to the extent Water Boards decisions affects San Antonio Creek. Also, GSPs require minimum thresholds and measurable objectives for each sustainability indicator. Will the Water Boards do that for instream uses as part of its work, and if not, how can UVRGA do it without use of model?

Other parts of the scope of work have implications to the GSP. For example, one of the 4 scenarios for each surface and groundwater model is for climate change. No guidance is give for consultant to construct that scenario. It would be helpful if DWR guidance for the GSPs is used. Another issue is the unimpaired flow scenario. That turns back the clock, so to speak, whereas GSP guidelines allow the GSA to select its base period/ starting time.

Here are some other comments on the Scope of Work:

Page 36, footnote 5. Does unimpaired flow mean groundwater extractions are deleted from the hydrologic system?

Page 38, third line. I suggest adding after Water Boards, "and local water districts."

Page 38, #2. Who will be the contract manager?

Page 39, Groundwater Basins Delineation. Suggest specifying use of new boundaries and not giving option to use areas outside, which may unnecessarily complicate model use by UVRGA to develop and implement the GSP.

Page 39, Model Development. One scenario will be existing gw conditions. "Existing" as of one year (which one), representative of some recent period of wet and dry years, or the 'present' defined by GSA as starting point for GSP? How deal with our 5-year drought?

Page 39, Model Development. In climate change scenario, how are "groundwater resources" different from "groundwater conditions" in "existing" scenario?

Why is Matilija Dam removal a scenario? It is at least 5 yr away, probably wouldn't have much effect on groundwater flow and seems to unnecessarily complicate the process.

Page 39, Model Calibration. Calibration shall be with 'existing data' yet there is provision for new gages, which are important at the mouth of Matilija canyon, on San Antonio Creek at outlet from Ojai Basin, and on Ventura River just upstream of San Antonio Creek confluence. How does 'existing' fit with that important new data?

Page 40, line 9. I assume the 'hydrologic budget information' would be consistent with DWR's guidance for GSP preparation. If not, it would be helpful to have it that way.

Ditto, Task 3. Same comment about 'existing data' for the new groundwater model.

Ditto, #5. Low flow period continues into mid- to late-fall. If talking about surface, because groundwater flow is continuous year round, dry period is usually from late April to mid November. The gaining reach of Ventura River below San Antonio Creek is a special case and would probably be a special management area in the GSP.

Page 41, #9. Model calibration during low-flow periods and droughts is important but I would state the issue as calibrating model so it accurately simulates the time lag and quantitative effect between upstream pumping and the downstream effect on surface and subsurface flow in the river reach between San Antonio Creek and the Foster Park bridge.

Ditto, #3. What is meant by "stresses" that were used in Groundwater Model?

Page 42, #3. I hope the Water Boards contract manager would encourage a working relationship with UVRGA staff.

Page 43, Task 8. As indicated in opening comments, I suggest including UVRGA and OBGMA staff in the knowledge transfer.

Thanks for your consideration of the issues presented here. I look forward to further discussions. Bruce