

California Department of Water Resources
Attn: Mark Nordberg
P.O. Box 942836
Sacramento, CA 94236

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June 19, 2017

**Re: NOTICE OF INTENT TO BECOME A GROUNDWATER SUSTAINABILITY AGENCY for the
"Camrosa Management Area" of the Pleasant Valley Basin and Oxnard Subbasin**

Mr. Nordberg:

Pursuant to California Water Code sections 10723 of the Sustainable Groundwater Management Act (SGMA), Camrosa Water District provides this notice of its option to act as the groundwater sustainability agency (GSA) for the portions of the Pleasant Valley Groundwater Basin (PV Basin) and Oxnard Subbasin of the Santa Clara River Valley Groundwater Basin (Oxnard Basin) that fall within Camrosa's service area, known for the purposes of this declaration and the development of a GSA and groundwater sustainability plan (GSP) as the "Camrosa Management Area."

The PV Basin underlies a large portion of southeastern Ventura County. It is bounded on the north by the Camarillo Hills, on the south by the Santa Monica Mountains, and on the east by a constriction in the Pleasant Valley Groundwater Basin. The Oxnard Basin also overlies a large portion of southern Ventura County. It is bounded on the north by the Mound and Santa Paula Subbasins of the Santa Clara Basin, on the east by the Las Posas Valley Groundwater Basin and the Pleasant Valley Basin, on the south by the Conejo Hills, and on the west by the Pacific Ocean. The Camrosa Water District overlies portions of the eastern part of both these basins, both within and without the boundaries of the Fox Canyon Groundwater Management Agency (FCGMA), which is defined in Section 10723(c) of SB 1168 as an exclusive GSA within its respective statutory boundary, and operates various production and distribution facilities therein.

The Final CASGEM Basin Prioritization Results of June 2014 characterized the PV and Oxnard Basins as high priorities; as such SGMA requires they be managed by a groundwater sustainability agency (GSA). The District considers it part of our responsibility as the water resource manager for those portions of the basins within our jurisdiction to act as the GSA for those areas, and on June 8, 2016, the Camrosa Board of Directors passed, after a duly noticed public hearing, a resolution to that end (Attachment 1). As the FCGMA availed itself of its exclusive right to be the GSA for basins or portions of basins within its boundaries, including the

PV and Oxnard Basins, on January 9, 2015 by passing Resolution 2015-01 (Attachment 2), Camrosa will act as the GSA for the portion of the PV and Oxnard Basins that lie outside the boundaries of the FCGMA and within Camrosa's boundaries, known as the "Camrosa Management Area."

The areas of the PV and Oxnard Basins that will fall under the jurisdiction of the two respective GSAs are indicated in Attachment 1, and included as a layer in the shape file in the digital attachment. The boundaries of the basins were established in the Department of Water Resources' *California Groundwater Bulletin 118*, and the boundaries of the FCGMA were established by its enabling resolution and depicted by the map referenced therein (Attachment 3). Aside from the FCGMA, Camrosa is not aware that any other agency has elected to be a GSA within these areas of the PV or Oxnard Basins.

The health and sound management of the PV and Oxnard Basins is of paramount importance to Camrosa. The majority of our customers overlie the PV Basin and we operate production and distribution infrastructure throughout that area. While Camrosa does not have many customers in the portion of the Oxnard Basin we overlie, two key facilities are located there. Facilities within the Camrosa Management Area include: the Conejo Creek Diversion Project, the Camrosa Water Reclamation Facility, the University Well, Camrosa's storage ponds, and the Round Mountain Water Treatment Plant.

The Conejo Creek Diversion Project, completed in 2003, diverts and puts to beneficial use 7,000-10,000 acre feet a year (AFY) from the Conejo Creek that would otherwise flow, after a single use in the City of Thousand Oaks, to the sea. Conejo Creek water offsets imported water demand for municipal and agricultural uses in the Camrosa service area and local pumping in a compromised portion of the Oxnard and PV Basins farther west within FCGMA boundaries. As part of the agreement governing the operation of the Diversion Project, Camrosa bypasses a minimum of 6 CFS of creek flows for downstream habitat; the diversion facility and approximately six miles of the downstream channel lie within the Camrosa Management Area, as do the eight upstream miles and the majority of the Camrosa customers who receive that water.

The 1.5 MGD Camrosa Water Reclamation Facility (CWRF), which provides approximately 1,500 AFY of tertiary-treated Title-22 recycled water for agriculture and landscape irrigation, also resides in the Camrosa Management Area. The ponds Camrosa operates to store these two classes of water are also in this portion of the basin, as is the alignment for the new recycled interconnection pipeline Camrosa intends to build, with the aid of a Proposition 84 grant, to receive tertiary-treated Title-22 recycled effluent from the Camarillo Sanitary District's effluent discharge pipeline.

In 2014, Camrosa completed construction on the Round Mountain Water Treatment Plant (RMWTP), a 1.0 MGD brackish groundwater desalination facility, which offset ten percent of the District's imported water demands. This facility, too, is within the Camrosa Management Area, along with the connections between the CWRP and the RMWTP to the Salinity Management Pipeline (Attachment 6).

The programs Camrosa has developed and plans to develop are intended for sustainable and beneficial use of the District's groundwater resources over the long term. A fair number of residents within the Camrosa Management Area own and operate their own wells, for both domestic and agricultural use. Some of these wells, especially in the Perched Aquifer where the well that feeds the RMWTP draws its supply, are no longer serviceable due to degraded water quality resulting from decades of importing State Water Project water (and the salts that come with it) and various land-use practices. The District has worked with these well owners to their mutual benefit for many years, and, recognizing the important role local well owners play in the practical management of a groundwater basin, Camrosa looks forward to continuing those relationships.

All of the foregoing is activity that Camrosa has been doing since long before groundwater management reached its current heightened state of exposure, and that the District would plan to do independent of the Sustainable Groundwater Management Act.

The resolution establishing Camrosa as the GSA does not include any new bylaws as the governing board of the GSA will be the existing Camrosa Water District Board of Directors.

The Oxnard and PV Basins encompass a number of public agencies that could form GSAs for various portions of the basins, and the FCGMA, which has already availed itself of its exclusive GSA status. Camrosa will pursue and develop the necessary coordination agreement(s) required by Chapter 6 Section 10727(b)(3) of the SGMA to ensure the entire basin is covered by compatible sustainability plans.

Pursuant to Section 10723.8(a)(4), the following identifies interested parties, the ways Camrosa may engage them as part of the management of the GSA, and how they will be considered in the implementation of the agency's groundwater sustainability plan:

- **Holders of overlying groundwater rights, including agricultural users and domestic well owners:** Camrosa considers groundwater producers the primary stakeholders of the GSA and will prioritize their input and engagement.
- **Municipal well operators:** Camrosa Water District is the only municipal well operator in the Camrosa Management Area portion of the PV and Oxnard Basins.
- **Public water systems:** Camrosa Water District is the only public *potable* water system in the Camrosa Management Area.

- **The City of Camarillo/Camarillo Sanitary District (CamSan)** overlies the area. CamSan's water reclamation facility is located within the management area, as is a portion of their recycled water distribution system, but the City does not provide potable water within Camrosa's boundaries. Camrosa and the City/CamSan enjoy a cooperative working relationship, and Camrosa is confident the GSA will be able to rely on the City's expertise where and when necessary.
- **Pleasant Valley County Water District (PVCWD):** PVCWD shares Camrosa's western boundary in the southern, discontinuous portion of the District. Camrosa delivers excess Conejo Creek water to PVCWD, which helps offset groundwater pumping in stressed portions of the PV and Oxnard Basins. The two organizations enjoy a productive daily working relationship, and Camrosa looks forward to continued input and information sharing from PVCWD. There are other portions of the PV and Oxnard Basins outside both the FCGMA and the Camrosa Management Area; should PVCWD become involved in any of the GSAs developed to meet the needs of these other areas, Camrosa will look forward to productive interagency cooperation with PVCWD.
- **United Water Conservation District (United):** United's service area constitutes another layer of agency jurisdiction in a large swath of the PV and Oxnard Basins, including some of the areas outside the FCGMA boundaries. It does not overlap with the PV Basin portions of the Camrosa Management Area, but being coincident with the boundaries of the Santa Clara River Valley Groundwater Basin, it does overlap with the Oxnard Basin portion. Should United become involved in any of the GSAs developed to meet the needs of these areas, Camrosa will look forward to productive interagency cooperation where and when necessary.
- **Local land use planning agencies:**
 - **City of Camarillo/Camarillo Sanitary District:** The Pleasant Valley Basin encompasses the City of Camarillo, and CamSan maintains facilities in the Camrosa Management Area. As Camrosa and the City/CamSan have shared interests and overlapping areas of concern with regard to water supply and demand, the City will be kept abreast of all goings-on within the GSA. The City of Camarillo does not overlie the Oxnard Basin.
 - **Ventura County Resource Management Agency:** The agency is the land use regulator within the portions of the Camrosa Management Area that lie in unincorporated Ventura County land.
- **Environmental users of groundwater:** N/A.
- **Surface water users, if there is a hydrologic connection between surface and groundwater bodies:** The main watercourses in the Camrosa Management Area are the

Conejo Creek and the Calleguas Creek. **The Calleguas Creek** begins in Simi Valley, passing through Moorpark in the Las Posas Valley and Camarillo in Pleasant Valley before making its way south across the PV and Oxnard Basins to the Pacific Ocean. The portion of the creek in the Simi and Las Posas Valleys is wetted year round due to discharges from wastewater treatment plants. Before the creek reaches the southern end of the Las Posas Valley, however, it has ceased to run above ground, and flows are only seen between Moorpark and the confluence with the Conejo Creek during rain events. **The Conejo Creek** traverses the geologic boundary between the PV and Arroyo Santa Rosa Valley Basins and runs southwest in a manmade channel along the foot of the Conejo Hills until its confluence with the Calleguas Creek about eight miles upstream from the ocean. The creek flows year round as it is fed by the Hill Canyon Treatment Plant in Thousand Oaks, as well as the north and south forks of the Arroyo Conejo. The combined creek, which assumes the name of the Calleguas Creek, runs another seven miles south of the confluence before entering into the Mugu Lagoon at the coast.

- As a result of its long experience of water management in the Pleasant Valley Basin, and hydrologic studies in the Camrosa Management Area, Camrosa understands the hydrologic connection between surface flows and the Perched Aquifer, but assumes there is limited communication with the upper or lower aquifer systems of the PV Basin proper.
- As part of the agreements establishing the Conejo Creek Diversion Project, riparian users along the portions of the Conejo Creek upstream of the diversion abandoned their riparian rights in exchange for surface water deliveries from Camrosa. Thus, while there are a large number of surface water users, all such supply is delivered by Camrosa. Nevertheless, riparian rights holders will be invited to join the stakeholder group, and, as several of those landowners are also well owners and large agricultural users, we anticipate their active involvement in the GSA. Tributaries to the creek comprise primarily culverts and arroyos, flood channels that are dry the majority of the year and do not offer sufficient flows for surface water use.
- **Calleguas Creek Watershed:** The watershed group comprises a variety of stakeholders, from private and public utility agencies to environmental NGOs to agricultural groups, et cetera, who work together to meet regulatory requirements, seek grant funding, pursue integrated management, and collaborate on projects to benefit the watershed. Camrosa is in good standing and works closely with the watershed group, and Camrosa welcomes the group's input at public meetings and in the public review period of the groundwater sustainability plan.

- **Watersheds Coalition of Ventura County:** Linking the Calleguas Creek Watershed group with the other two watersheds in Ventura County, the WCVVC is primarily interested in integrated water management planning. Camrosa is in good standing and works closely with the WCVVC, and Camrosa welcomes the group's input at public meetings and in the public review period of the groundwater sustainability plan.
- **Ventura County Watershed Protection District (WPD):** WPD provides for "the control and conservation of flood and storm waters and for the protection of watercourses, watersheds, public highways, life and property in the district from damage or destruction from these waters," and, as such, will be a valuable resource in developing the Camrosa GSA's groundwater sustainability plan.
- **City of Thousand Oaks:** The majority of the water in the Conejo Creek is discharge from the Hill Canyon Water Treatment Plant, which is a City of Thousand Oaks public works facility. As the City holds water right and use permits for Conejo Creek water, Camrosa will continue to work closely with the City in all matters regarding its use.
- **California Department of Fish and Wildlife:** Much of CDFW's interests in and responsibilities for the watercourses overlaying the Pleasant Valley Basin are covered by the water right permit for Conejo Creek water held by the City of Thousand Oaks. The department will be consulted as necessary during the development of the groundwater sustainability plan should it involve any lands or activities under the department's jurisdiction.
- **The federal government, including, but not limited to, the military and managers of federal lands:** N/A. There are no federal agencies or federal lands in the areas overlaying the portion of the Pleasant Valley Basin outside the boundaries of the FCGMA.
- **California Native American tribes:** Round Mountain is a historical/cultural site of great importance to the Native community in Ventura County. Though the mountain itself is not within the *Bulletin 118* boundaries of the Pleasant Valley and Oxnard Basins, its proximity, and the presence of the waterway and other potential historical lands in the basin boundaries, require Camrosa actively engage with the Native community in planning the GSP. Camrosa will continue to include the Native community in all its pertinent public communications, and welcomes their feedback during the development of the groundwater sustainability plan.
- **Disadvantaged communities, including, but not limited to, those served by private domestic wells or small community water systems:** N/A. No area overlaying the Camrosa Management Area is considered a disadvantaged community.

- **Entities listed in Section 10927 that are monitoring and reporting groundwater elevation in all or a part of a groundwater basin managed by the GSA:** Camrosa will be the agency responsible for monitoring and reporting groundwater elevations in the Camrosa Management Area.

Camrosa staff welcomes feedback from the state and any of the agencies or organizations listed here on and during the development of the GSP.

Should the Department of Water Resources require anything further prior to the acceptance of this notification of Camrosa Water District's election as the groundwater sustainability agency for the portion of the Pleasant Valley Groundwater Basin outside the boundaries of the Fox Canyon Groundwater Management Agency, please address your concerns to Ian Prichard, Water Resource Manager, care of Camrosa Water District.

Sincerely,



Tony Stafford, General Manager

Cc: Tim Ross, California Department of Water Resources, Southern Region
Chris Bonds, California Department of Water Resources, Sacramento

Encl.:

Attachment 1—Resolution establishing Camrosa as GSA

Attachment 2—Resolution establishing FCGMA as GSA

Attachment 3—Resolution and map establishing FCGMA boundaries

Attachment 4—Camrosa Water District governance structure

Attachment 5—SMP Alignment