

Las Posas Basin Plan Discussion Paper No. 10

Basin Plan Goals and Objectives (Intended to supersede “Basin Plan Goals” and “Implicit Assumptions” bullets), v. 1.0, February 23, 2011

As discussed during the January 26, 2011 Users Group meeting, we have been working to finalize the basin plan goals and “implicit assumptions” originally discussed during the March 2009 and March 2010 meetings, respectively. Comments on the above-described items were solicited during the January 26, 2011 User Group meeting.

After reviewing the goals and assumptions and your comments, talking with several of you, and reviewing planning documents for other basins, it became apparent that we should be formulating a set of goals and objectives instead of finalizing a set of goals and “implicit assumptions”. While this may sound like a subtle distinction to some of you, I think you will see the importance as we work on the basin plan. To move this forward, I drafted a set of proposed basin plan goals and objectives (see p.2). These goals and objectives are largely the product of distilling your comments on the goals and implicit assumption bullet lists. Although I have included those old bullet lists and your associated comments in this discussion paper as reference items, **I am suggesting that we move our focus toward the draft “Proposed Basin Plan Goals and Objectives” on p. 2 of this document.**

In this discussion paper you will find:

- **Proposed Basin Plan Goals and Objectives (please focus here) (p. 2)**
- Additional items provided for reference only:
 - Re-print of Disc. Paper No. 1 “proposed goals” bullets (p. 3)
 - Comments on proposed goals (pp. 4 - 6)
 - Re-print of Disc. Paper No. 6 “implicit assumption” bullets (p. 7)
 - Comments on “implicit assumptions” (pp. 8 - 9)
 - Other general stakeholder comments (p. 10)

In order to stay on schedule, the group needs to finalize the Proposed Basin Plan Goals and Objectives during the February 23, 2011 meeting or during a special meeting in late February / early March.

Please direct any questions/comments to Bryan Bondy at bryanb@unitedwater.org.

DRAFT
Proposed Basin Plan Goals and Objectives

Goal #1: Maintain a reliable groundwater supply of a quality suitable to the needs of the pumpers by implementing the most cost-effective and equitable institutional and physical solutions available.

Objective 1.1: Assess and document current and projected basin conditions (water quantity and quality), the effects of basin conditions on pumpers, and the associated controlling factors. The geographic variability of the above-listed items should be assessed and documented.

Objective 1.2: Identify data gaps and develop approaches for improving the hydrogeologic understanding of the basin to support future plan updates.

Objective 1.3: Operate the basin within its operational yield to sustain water levels, protect water quality, and ensure recoverability of water stored in the basin by CMWD.

Objective 1.4: Limit saline intrusion into the basin to the extent feasible. Where saline intrusion cannot be effectively controlled, develop alternative water quality management solutions.

Objective 1.5: Develop basin-wide, local, or user-specific projects that collectively help achieve operational yield and/or manage/improve water quality.

Objective 1.6: Develop a monitoring program, basin management objectives (performance metrics), and a flexible and adaptive management approach for responding in a predictable fashion to changing basin conditions. The above should provide an equitable distribution of burdens and be tailored to reflect actual conditions experienced by pumpers which varies throughout the basin. The above should address future potential increases in groundwater demand.

Goal #2: Maintain local control over basin management decisions to the maximum extent possible and facilitate local cooperation.

Objective 2.1: Develop a local, stakeholder-driven groundwater management approach as an alternative to other solutions, such as adjudication.

Objective 2.2: Develop and recommend equitable and cost-effective institutional and physical solutions (e.g. rules and projects) appropriate for addressing local, basin-specific groundwater management challenges.

Objective 2.3: Form a local advisory committee to review basin conditions, recommend management actions, and report to the FCGMA.

Objective 2.4: Maximize the effectiveness of basin management strategies through local cooperation and investment.

Objective 2.5: Monitor and assess basin plan performance and communicate status to the stakeholders.

“Proposed Goals” Bullets (*To be superseded by items on p. 2*)

(Reprinted from LP Basin Plan Draft Disc. Paper No. 1 - March 2009)

- A. Develop a safe yield groundwater management plan that keeps pumpers on the basin.
 - + Provide for the sustainable operation of the Calleguas Aquifer Storage and Recovery Program.
 - + Develop and reclaim saline groundwater in the South and East Las Posas Basins to supplement existing groundwater supplies.
 - + Protect water quality.

- B. Integrate Las Posas Basin groundwater management within a regional context that includes inflows from Simi Valley and rising groundwater in the Northern Pleasant Valley Basin, and is consistent with the Salts TMDL.

Comments on Proposed Goals

Stakeholder	Item	Comment
CMWD	A & B	The proposed basin plan goals should be simplified to just two core goals: (1) Balance pumping with basin operational yield and (2) protect water quality. (Note: operation yield includes native and non-native water recharge sources)
CMWD	A, 1 st sub bullet	This is not a goal, it is an objective. This objective will be achieved by operating with the basin yield.
CMWD	A, 2 nd sub bullet	This is not a goal; it is one of several possible management strategies.
CMWD	B	Although the basin plan will likely identify management strategies that overlap with the Salts TMDL implementation activities of upstream and downstream stakeholders, these items are not basin plan goals.
ZMWC	A	<p>Zone certainly supports, in concept, the development of a “safe yield basin specific management plan,” but the purpose of such a plan must be stated with greater specificity than merely “keep[ing] pumpers on the basin.” In our view, the goals must include the following:</p> <ol style="list-style-type: none"> 1. To assess the current and projected condition of the basin in terms of both water quantity and quality, and to determine the basin’s safe yield. 2. To assess uniformity or lack of uniformity of the presumed overdraft condition in wells and aquifers throughout the East and West Las Posas Basins and thereby identify areas that may be hydrogeologically at greater or lesser risk. We note that many of Zone’s wells do not exhibit signs of overdraft, and it appears that at least in the shallower aquifer around the Zone basin, water levels have not been going down over time. In our view, regulation should respond to actual conditions as experienced by users. 3. To assess the causes of documented overdraft conditions, including user-related and management causes as well as causes unrelated to allocations or use patterns. 4. To assess deterioration in water quality in specific areas of the basin, determine causes of deteriorating quality (e.g., the Simi and Moorpark water infiltration), and document the effect on individual users as well as the basin’s groundwater supply generally.

Stakeholder	Item	Comment
		<p>5. To consider short-term and long-term water needs of each user, including the potential need of agricultural users to change crops and potentially increase irrigation. The agricultural industry has invested many millions of dollars in infrastructure and in the development of orchard and berry crops over the past century, and particularly in the past forty years. An acceptable plan will consider the economic consequences and provide predictability that agriculture's investment is safe for the long term.</p> <p>6. To assess potential future increases in demand for the basin's groundwater, including from sources such as development of hillside areas for agriculture, assess the projected impacts on current users, and consider a policy for accommodating additional users. In general, we do not think the plan should have the effect of requiring Zone as an entity to reduce water usage to accommodate non-shareholders who want to initiate new agricultural development.</p> <p>7. To review and analyze alternative feasible solutions to identified deficits in both quantity and quality, including both basin-wide solutions and user-specific solutions. Agriculture has benefited from technology that monitors and calibrates irrigation need and usage for maximum efficiency. Credit should be given for that investment and use. We are not aware of any comparable effort by municipal users to implement conservation methods. At the same time, municipal users have access to State Water and potentially could reduce reliance on groundwater so that it could be conserved for users who do not have the State Water option.</p> <p>8. To develop an equitable distribution of the burdens of the plan, including potential changes in allocations and the imposition of costs and responsibilities going forward, taking into consideration such factors as the condition of each user's wells and extraction facilities, the amount of water each user requires, sources available to each user, and the impacts of each user's activity. On this point, we think that all discussions about the operation of the Calleguas Aquifer Storage and Recovery Program must be within the context of the stated objectives of that program, which are to provide an emergency source of supply while protecting overlying pumpers. The long-term sustainability of the ASR Program cannot be at the expense of other users in the basin. It is seemingly inconsistent to require agricultural users, who have been operating on the</p>

Stakeholder	Item	Comment
		land for decades, to reduce pumping in order to protect a project whose operating criteria requires that it protect those same overlying pumpers. It also appears reasonable to us that the Calleguas ASR Project should receive credits that relate to those specific aquifers in which it has injected water rather than obtaining credits within the broader region of the GMA.
ZMWC	B	We think it is premature to set as a rigid “goal” the accommodation of “Simi Valley inflows and rising groundwater in the Northern Pleasant Valley Basin, consistent with the Salts TMDL” or to accept as an assumption that “Las Posas stakeholders have a continuing interest in maintaining current inflows from the Simi Basin as part of the water balance.” While some of Zone’s Board members generally think that any water, even if salinated, is worth having, the quantity/quality trade-offs have not been fully explored. Zone is willing to consider participation in a desalination project if we are satisfied that every option has been explored and after we have sufficient data to inform our shareholders on the potential long-term benefit to them.

Implicit Assumptions (*To be superseded by items on p. 2*)

(Re-printed from LP Basin Plan Draft Disc. Paper No. 6 - March 2010)

- A. The existing groundwater management approach of historical allocations, efficiency allocations, credits, and expansion of groundwater use has overallocated the sustainable yield of high quality groundwater. The status-quo groundwater management approach is unsustainable.
- B. Cooperative regional alternative management approaches offer potentially greater benefits than if each interested party pursues its narrow self-interest.
- C. Due to the complexity of the geological setting, the influence of imported water, and water quality considerations; the technical basis for understanding the hydrology of the basins is continuing to develop. Management alternatives will necessarily be based on the best available information, but will require an adaptive approach.
- D. The protection of water quality and the adopted salts TMDL will require investment in the reclamation of brackish groundwater.
- E. Agricultural enterprise requires flexibility in its use of water resources in response to climatic variability and as a cost component in its business decisions.
- F. Las Posas stakeholders have a continuing interest in maintaining current inflows from the Simi Basin as part of the water balance.
- G. A transition period to sustainable yield is preferred to allow for adaptation of water use by all parties.
- H. Are there other implicit assumptions that are critical to management alternatives?

Comments on Implicit Assumptions

Stakeholder	Item	Comment
CMWD	D	This item presupposes a particular management strategy. Suggested revision: <i>“The Regional Board has adopted a Salts TMDL which requires progress toward achieving a salts balance between imports and exports to achieve water quality objectives.”</i>
CMWD	E	Suggested revision: <i>“Agricultural and M&I pumpers require flexibility...”</i>
CMWD	F	Suggested revision: <i>“Las Posas stakeholders have a continuing interest in maintaining current inflows from the Simi Basin to maintain the current water balance provided that the negative impacts of the water quality degradation can be mitigated.”</i>
CMWD	H	Please add: <i>“One of the objectives is to create a predicable context for the management of water resources by both agricultural and M&I interests.”</i>
WWD 1&19	All	The language should be simplified.
WWD 1&19	B	Suggested revision: <i>“Cooperative regional alternative management approaches offer potentially greater benefits than if each interested party pursues its narrow self-interest.”</i>
WWD 1&19	F	We have a different view. Simi Valley should not continue its high salt content discharges as they continue to degrade the basin. Other options should be considered.
ZMWC	All	Based upon what we see as the central goals of this planning effort, we think it is not productive to rely upon a set of “implicit assumptions” as stated. Goals should rest upon data and analysis, not “assumptions,” and any common understandings should be made “explicit” rather than “implicit.”
ZMWC	A	While it may be true that the GMA’s allocation system, by itself, has not been sufficient to avoid a basin-wide overdraft, we do not think it can be said that this particular management approach has failed or that it effectively caused the overdraft. The causes of overdraft are far more complex than “overallocation” and the impacts are varied throughout the basin. We anticipate that acceptable solutions will be multi-faceted.
ZMWC	B	While we agree that “cooperative regional alternative management approaches offer potentially greater benefits than if each interested party pursues its narrow self-interest,” in fact each user undeniably has a “self-interest” in the future of the basin based upon the user’s perception of its own needs and the conditions of the aquifers on which it relies. We do not think a “one size fits all” solution is a wise course to follow. Each

Stakeholder	Item	Comment
		user's circumstances must be considered (including recognition that users operate in different aquifers which have different hydrogeologic characteristics and conditions), along with their common interest in protecting and enhancing overall water resources for future use.
John Borchard	A	As I said at the last meeting I don't like this wording. The degradation of groundwater by Simi has resulted in less quality irrigation water being available. It also has caused us to drill deeper as the shallow water TDS has risen. As item A is worded it implies that current agricultural water management must be modified. With the addition of supplemental water from a desalter this would not be necessary. Had Simi complied with the TMDL requirements of the Clean Water Act this would not be necessary. So the assumption should be that Agriculture is sustainable with the desalter to clean up Simi's mess and with Simi's compliance. I do agree that, even with these changes, there is a physical limit to recharge from rainfall, from the Forebay, and from Simi. I'm not sure what that number is or how to impose it. Nevertheless when a layman reads item A as written, his logical conclusion is that agriculture is using too much which is not necessarily so ... unless we go back to rangeland. Try that on the county assessor and tax collector.
John Borchard	B	If you like A, then rewrite B to say that all domestic users must purchase their water form Calleguas ... beginning with Ventura County Waterworks Dist. See what I mean about how things are worded?
John Borchard	H	It occurs to me that, "back to historical usage," perhaps all "new" uses, such as new VCWW customers since 1985 should pay higher water rates; maybe newly planted lands should pay higher rates; maybe all water rates should be tiered; maybe, maybe, maybe..... I don't want to sound narrowly self-interested but the reality is that I'm using less water per acre than ever (depending on rainfall and temperature), stressing the trees more than ever, salting up the soil more than ever, and paying more for the water than ever. There is an economic breaking point. The county leaders want its open spaces to be green -- I do too -- but there's a price for that. Most of the kids don't want to farm anymore because the hours are too long and the pay too short (per hour) compared to city jobs. I worked about 72 hour weeks most of my life so it kind of burns me when some bureaucrat tells me that I'm using more than my share of the water.

General Comments Not Directly Related to the Goals and Implicit Assumptions

Stakeholder	Comment
DNWC	From Del Norte's perspective, however, it does not seem that it has sufficient scientific or political tie to the present Basin issues to justify its participation in the Las Posas Basin Specific Plan. Del Norte asks that the western border of the Plan area be the political boundary separating Calleguas and United.
ZMWC	Finally, while you caution that these items "are not intended to say anything about or foreshadow the management strategies that [we] will be developing over the next several months," in fact the goals and the stated assumptions establish the framework for planning and ultimately set the course for the group's decision-making. We think it is premature to limit the scope of the planning effort. The group will move toward consensus around particular goals, objectives, and programs for implementation when individual assumptions and perceptions are either confirmed or disproven by data. Until then, the primary focus of the effort should be to expand, rather than contract, the consideration of alternatives.
ALPMWC	While I agree with the "basic plan goal" and the concept of the "implicit assumptions", as I mentioned previously, the constraints to the stakeholders should be applied according to the availability of the resources at each individual well site and the effect of the drawdown on the basin as a whole, as it is clear that every well has its own effect on the overall supply.
CMWC	Conservation is not the solution, developing supplemental supplies is. Having said that, we need to explore approaches for ensuring that supplemental supplies are not used to simply replace imported supplies.
Hopkins GW Consulting	May want to include a) assumption about future regulations not changing that much and that b) assumption that FCGMA will support increased pumping strategies for poor quality water capture.
Fugro	As I mentioned at the last meeting that I attended it seems to me that a paramount need to manage the Las Posas basin and the ASR program is a credible water balance of the basin and sub-basins under current conditions of water supply, use, and disposal. Without an understanding of the recharge and discharge components and knowledge of the safe yield under current conditions, management strategies can only be guessed at. Once a water balance is developed and the components of recharge and discharge under an appropriate base period are determined, a numerical groundwater flow model and particle tracking model is a must to look at the various scenarios of water supply, storage (either injection of in lieu), and how such components of future recharge in the sub-basins (say for example if and when and in what magnitude Simi Valley begins to reclaim wastewater for beneficial reuse) could affect groundwater flow and water quality concerns. Good luck in your efforts. Fugro has successfully developed large regional groundwater models for a number of agencies over the last 20 years and I would be happy to discuss them with you at your convenience.

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United Water
Conservation District

DEL NORTE WATER COMPANY

P. O. Box 4065
Ventura, CA 93007
Telephone: (805) 647-1092 • FAX: (805) 647-2805

February 11, 2011

Bryan Bondy, P.G., C.H.G.
Associate Hydrogeologist
United Water Conservation District
106 North 8th Street
Santa Paula, California 93060

Re: Proposed Las Posas Basin Plan

Dear Bryan:

I write to comment upon your e-mail of February 7, 2011 soliciting comments on the "basin plan goals" and "implicit assumptions" for the Las Posas Basin.

I am the President of the Del Norte Water Company (the "Del Norte"), a mutual water company existing since 1910, with a service area of approximately 2,500 acres in the West Las Posas Valley. Our service area is completely within the United Water Conservation District ("United"). The eastern border of the Del Norte Boundary and the United Boundary is the western border of Calleguas Municipal Water District ("Calleguas"). Del Norte has drilled, developed and maintained irrigation water wells along Los Angeles Avenue, opposite the entrance to Saticoy Country Club on Highway 118. These wells are located in the Oxnard Forebay. Del Norte also maintains a small well which is known within Del Norte as the "Green Hills Well", which is presently dedicated for Del Norte's domestic water system. That well is located on the Mesa. The Green Hills Wells draws its water from the Fox Canyon aquifer. The Del Norte wells on Los Angeles Avenue draw water from the Fox Canyon and Oxnard aquifers.

Water which Del Norte extracts for irrigation purposes comes from the wells on Los Angeles Avenue. It is our understanding that no activity in the (1) East Las Posas Basin, or (2) even the West Las Posas Basin, east of the United/Calleguas boundary, is or could be affected by Del Norte's extractions in the Oxnard Forebay the Basin Plan you are working toward. Simply, we are geographically too far apart from the problem area which the Basin Plan which is the subject of your current work.

As to the water which we extract for domestic purposes, we understand from U.S.G.S. work performed in the 1990's, when they were modeling the Basin, our Green Hills Well was in different formations from other wells to the east of the United/Calleguas boundary line and reacted differently from those wells.

In sum, there is no scientific nexus of which we are aware that requires the Del Norte Water Company service area to be connected to the portions of the Las Posas Basin which your plan concerns.

Bryan Bondy, P.G., C.HG.
Associate Hydrogeologist
United Water Conservation District
February 11, 2011
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We have considered whether there is a political nexus which would mandate Del Norte participation in the Las Posas Basin Plan. We are not persuaded there is one. Zone Water Company to our east has long been within the boundaries of the Calleguas Municipal Water District. Del Norte's service area has always been within United's boundaries. Del Norte pays annual United assessments. The boundary between the two has been the grant line between the Del Norte and Las Posas Land Grants. This historic political division has existed for decades without, to our knowledge, any jurisdictional friction between the parties. It would seem to be a logical boundary for the Las Posas Basin Specific Plan.

Your proposed Basin Plan area would extend all the way to Los Angeles Avenue. As laid out above, Del Norte does not believe that including Del Norte's service area in the plan has any scientific basis in the underlying geologic structure. Likewise, it has no historical/political basis. We suggest the logical western termination of the district is the grant line separating Calleguas and United. Del Norte requests you to consider this as you go forward.

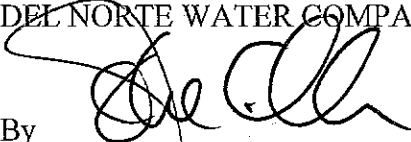
Del Norte reiterates that it wants to continue its role as a good neighbor and a responsible member of the Las Posas Valley agricultural community. Del Norte is in favor of reasonable and fair restrictions for excessive water use. Del Norte will oppose any actions or activities which constitute ground water degradation or which permit continuing or additional overdraft of portions of the Basin which are presently overdrafted. Del Norte is concerned about expansion of groundwater use on properties not presently served and it will support a process which allows the interests of the various stakeholders to be expressed before expansion is permitted. Del Norte believes the Basin should be brought to safe yield as any good steward of the land should.

From Del Norte's perspective, however, it does not seem that it has sufficient scientific or political tie to the present Basin issues to justify its participation in the Las Posas Basin Specific Plan. Del Norte asks that the western border of the Plan area be the political boundary separating Calleguas and United.

Very truly yours,

DEL NORTE WATER COMPANY

By


JOHN C. ORR

JCO:mjr

FEB 17 2011

United Water
Conservation District

February 15, 2011

Mr. Bryan Bondy, P.G., C.HG.
Associate Hydrogeologist
United Water Conservation District
106 N. 8th Street
Santa Paula, CA 93060

Re: Comments on Proposed Goals and Implicit Assumptions
Las Posas Basin Users Group

Dear Bryan:

You have asked the Las Posas Basin Users Group to respond to certain Proposed Goals (reprinted from Las Posas Basin Plan Draft Discussion Paper No. 1 - March 2009) and Implicit Assumptions (reprinted from Las Posas Basin Plan Draft Discussion Paper No. 6 - March 2010). In particular, you have asked members of the group to consider whether the goals and assumptions, as stated, "capture the group's beliefs about why it makes sense to write a basin-specific management plan and the key things folks are looking for in the plan, including the plan goals." Your purpose is to verify consensus on core goals "so we all understand (and agree on) where we are heading with this effort." You have asked for agreement or disagreement with each statement and for our identification of anything that does not belong or is missing. We appreciate the opportunity to respond.

Given your request for a response no later than February 15, 2011, the Zone Mutual Water Company Board of Directors has not had an opportunity to meet as a Board for purposes of reviewing the two stated goals along with the several "implicit assumptions." However, several members of the Zone Board and its General Manager, all of whom regularly participate in the Users Group, have discussed the proposed goals and assumptions, and we would like to offer comments that we hope will be helpful as you prepare for the February 23, 2011 meeting.

While we do not want to diminish the effort to date, we find the stated goals incomplete, and we do not agree with all of the assumptions. Zone certainly supports, in concept, the development of a "safe yield basin specific management plan," but the purpose of such a plan must be stated with greater specificity than merely "keep[ing] pumpers on the basin." In our view, the goals must include the following:

1. To assess the current and projected condition of the basin in terms of both water quantity and quality, and to determine the basin's safe yield.

2. To assess uniformity or lack of uniformity of the presumed overdraft condition in wells and aquifers throughout the East and West Las Posas Basins and thereby identify areas that may be hydrogeologically at greater or lesser risk. We note that many of Zone's wells do not exhibit signs of overdraft, and it appears that at least in the shallower aquifer around the Zone basin, water levels have not been going down over time. In our view, regulation should respond to actual conditions as experienced by users.
3. To assess the causes of documented overdraft conditions, including user-related and management causes as well as causes unrelated to allocations or use patterns.
4. To assess deterioration in water quality in specific areas of the basin, determine causes of deteriorating quality (e.g., the Simi and Moorpark water infiltration), and document the effect on individual users as well as the basin's groundwater supply generally.
5. To consider short-term and long-term water needs of each user, including the potential need of agricultural users to change crops and potentially increase irrigation. The agricultural industry has invested many millions of dollars in infrastructure and in the development of orchard and berry crops over the past century, and particularly in the past forty years. An acceptable plan will consider the economic consequences and provide predictability that agriculture's investment is safe for the long term.
6. To assess potential future increases in demand for the basin's groundwater, including from sources such as development of hillside areas for agriculture, assess the projected impacts on current users, and consider a policy for accommodating additional users. In general, we do not think the plan should have the effect of requiring Zone as an entity to reduce water usage to accommodate non-shareholders who want to initiate new agricultural development.
7. To review and analyze alternative feasible solutions to identified deficits in both quantity and quality, including both basin-wide solutions and user-specific solutions. Agriculture has benefited from technology that monitors and calibrates irrigation need and usage for maximum efficiency. Credit should be given for that investment and use. We are not aware of any comparable effort by municipal users to implement conservation methods. At the same time, municipal users have access to State Water and potentially could reduce reliance on groundwater so that it could be conserved for users who do not have the State Water option.

8. To develop an equitable distribution of the burdens of the plan, including potential changes in allocations and the imposition of costs and responsibilities going forward, taking into consideration such factors as the condition of each user's wells and extraction facilities, the amount of water each user requires, sources available to each user, and the impacts of each user's activity. On this point, we think that all discussions about the operation of the Calleguas Aquifer Storage and Recovery Program must be within the context of the stated objectives of that program, which are to provide an emergency source of supply while protecting overlying pumpers. The long-term sustainability of the ASR Program cannot be at the expense of other users in the basin. It is seemingly inconsistent to require agricultural users, who have been operating on the land for decades, to reduce pumping in order to protect a project whose operating criteria requires that it protect those same overlying pumpers. It also appears reasonable to us that the Calleguas ASR Project should receive credits that relate to those specific aquifers in which it has injected water rather than obtaining credits within the broader region of the GMA.

We think it is premature to set as a rigid "goal" the accommodation of "Simi Valley inflows and rising groundwater in the Northern Pleasant Valley Basin, consistent with the Salts TMDL" or to accept as an assumption that "Las Posas stakeholders have a continuing interest in maintaining current inflows from the Simi Basin as part of the water balance." While some of Zone's Board members generally think that any water, even if salinated, is worth having, the quantity/quality trade-offs have not been fully explored. Zone is willing to consider participation in a desalination project if we are satisfied that every option has been explored and after we have sufficient data to inform our shareholders on the potential long-term benefit to them.

Based upon what we see as the central goals of this planning effort, we think it is not productive to rely upon a set of "implicit assumptions" as stated. Goals should rest upon data and analysis, not "assumptions," and any common understandings should be made "explicit" rather than "implicit." We want to point specifically to the limitations of two assumptions:

- While it may be true that the GMA's allocation system, by itself, has not been sufficient to avoid a basin-wide overdraft, we do not think it can be said that this particular management approach has failed or that it effectively caused the overdraft. The causes of overdraft are far more complex than "overallocation" and the impacts are varied throughout the basin. We anticipate that acceptable solutions will be multi-faceted.

Mr. Bryan Bondy, P.G., C.HG.
February 15, 2011
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- While we agree that “cooperative regional alternative management approaches offer potentially greater benefits than if each interested party pursues its narrow self-interest,” in fact each user undeniably has a “self-interest” in the future of the basin based upon the user’s perception of its own needs and the conditions of the aquifers on which it relies. We do not think a “one size fits all” solution is a wise course to follow. Each user’s circumstances must be considered (including recognition that users operate in different aquifers which have different hydrogeologic characteristics and conditions), along with their common interest in protecting and enhancing overall water resources for future use.

Finally, while you caution that these items “are not intended to say anything about or foreshadow the management strategies that [we] will be developing over the next several months,” in fact the goals and the stated assumptions establish the framework for planning and ultimately set the course for the group’s decision-making. We think it is premature to limit the scope of the planning effort. The group will move toward consensus around particular goals, objectives, and programs for implementation when individual assumptions and perceptions are either confirmed or disproven by data. Until then, the primary focus of the effort should be to expand, rather than contract, the consideration of alternatives.

We hope that these comments are helpful. We will attend the Users Group meeting on February 23, 2011 and look forward to the discussion.

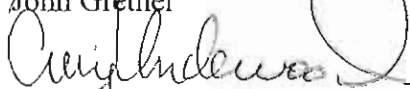
Very truly yours,




Carol Schoen



John Grether



Craig Underwood



John Borchard