August 26, 2020

**Via U.S. Mail and E-Mail**
**InstreamFlows@waterboards.ca.gov**

Ann Marie Ore, Program Manager
State Water Resources Control Board
Division of Water Rights
Water Quality Certification and Public Trust Section
P.O. Box 100
Sacramento, CA 95812-0100

**Subject:** **Comments of Casitas Municipal Water District on Draft Data Compilation Report for the Development of Groundwater-Surface Water and Nitrogen Transport Models of the Ventura River Watershed (Ventura River Watershed Models)**

Dear Ms. Ore:

The Casitas Municipal Water District (Casitas) provides drinking water to approximately 70,000 people and 6,000 acres of agriculture within the District's boundaries. This critical service is provided to residents, farms, businesses, and other retail water providers through the storage of water in Lake Casitas as well as local groundwater wells. For over 15 years, Casitas has implemented a Fisheries Program completing several projects that improve habitat conditions for endangered steelhead trout, including construction of a state-of-the-art fish ladder at Robles Diversion Facility.

Casitas respectfully submits the enclosed technical comments on the July 2020 Draft Data Compilation Report (Data Report) for Development of the Ventura River Watershed Models.

1. **Mira Monte Well Data:** The Data Report incorrectly states (on page 14) that Casitas extraction from Mira Monte well in 2012-2013 and 2017 are identified as a data gap. However, Mira Monte Well extraction data has been provided to the Water Board for those years, as shown in Table 2.2 of the Data Report.

2. **Casitas Ojai Basin Wells:** Casitas acquired the Golden State Water Company (GSWC) in June 2017. The GSWC served the Ojai customers for over 85 years, with a long history of groundwater pumping. The 2017 acquisition included several groundwater wells, with some wells over 45 years old and in need of rehabilitation and replacement. The wells acquired by GSWC were unable to produce their original design capacity of 4,404 acre-feet per year (AFY) and average Ojai wellfield production from 1994-2016 was about 1,800 AFY, as reflected in the Data Report (Table 2.2). Casitas has made progress in improving the condition of the wells which are a critical municipal water supply, and requests the Water Board use the planned average production of 2,300 AFY as the basis of modeling assumption, given the condition of the wells when they acquired by Casitas in 2017, and the improvements that have been made since that time.

3. **Lake Casitas Storage Volume:** The Data Report incorrectly states (on page 39) the storage volume of Lake Casitas as 254,000 Acre-feet. Based on the most recent bathymetric survey dated March 2017, the storage capacity of Lake Casitas is 238,000 Acre-Feet.

4. **Hydrologic Response Unit:** On page 45, the Data Report assumes the average water service elevation for Lake Casitas as the basis of determining the Lake Hydrologic Response Unit. Casitas MWD suggests using the elevation-area-volume curves available from the March 2017 bathymetric survey to more accurately simulate the Hydrologic Response Unit at various lake levels.

5. **Robles Diversion Modeling Assumptions:** On page 45, the Data Report states that "the model will account for the Robles Diversion as an outflow from the Ventura River based on measured historical data" for the entire modeling period (October 1, 1993 through September 30, 2017).

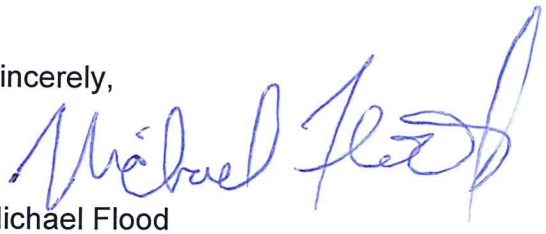
   The Data Report fails to acknowledge that the Robles Diversion Facility is now operated under a 2003 Non-Jeopardy Biological Opinion (BiOp) for Southern California Steelhead issued by the National Marine Fisheries Service. The NMFS BiOp provides criteria for operation of the Robles Fish Passage Facility that includes fish passage flows designed to mimic natural storm flows. These operating criteria are very complex but can be summarized as follows: During the fish passage season (January 1 – June 30), the flows released downstream of Robles Diversion Facility must be maintained at or above 50 cfs during the first 10 days of each migratory storm event, with ramp down schedules after large flow events. The required releases can be as high as 171 cfs. Between storms, Casitas cannot divert water until fish flows exceed 30 cubic feet per second. Operations outside the fish passage season revert back to historic Trial Operating Criteria (Casitas Municipal Water District, 1959), meaning flows up to 20 cfs are generally released downstream.

   The Water Board's approach to use historic diversion data prior to 2006 (and going back to 1993) as the basis of diversion modeling will not capture the required changes in operations that have occurred at the Robles Diversion Facility. Operations under the NMFS BiOp began in 2005, and the fish passage facility was constructed in 2006. With implementation of the NMFS Biop, Casitas reduced its water supply diversions

to provide for instream flows for steelhead trout, and it is critically important to recognize these changes in operations be included in the evaluation being conducted by the Water Board.

Casitas appreciates the Water Board's consideration of these comments. If you have any questions or would like additional clarification, please do not hesitate to contact me.

Sincerely,



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