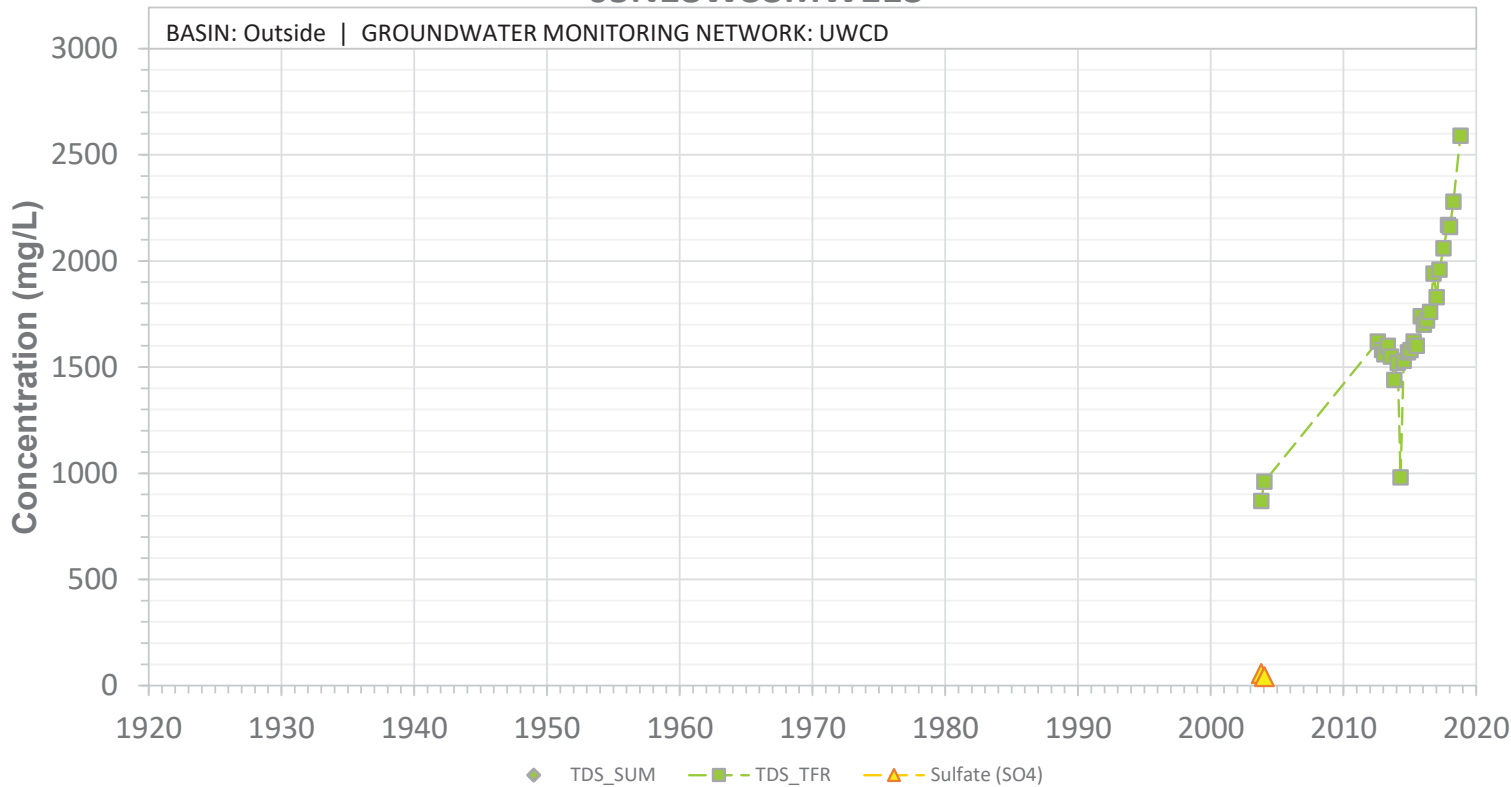
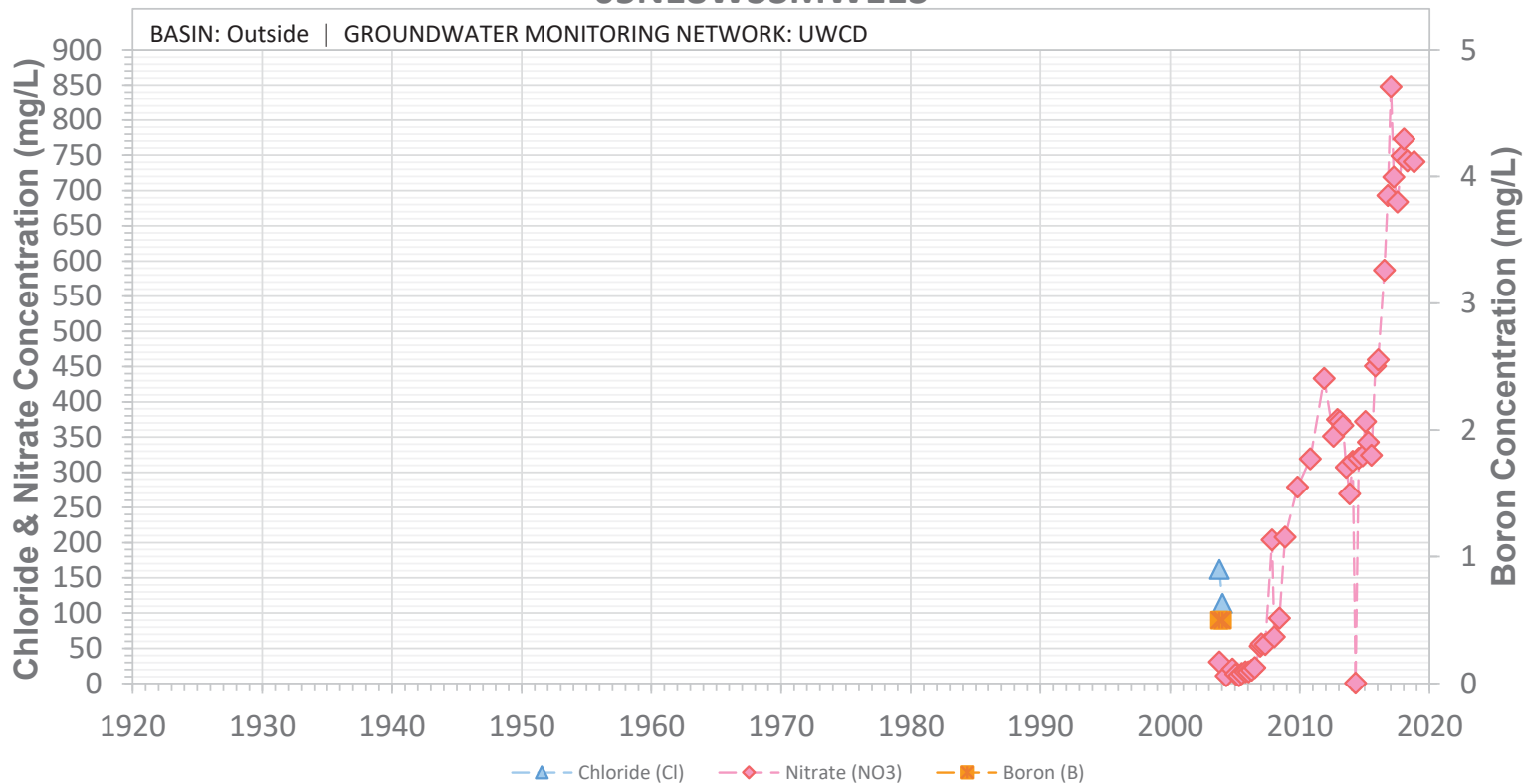


05N18W33MW113



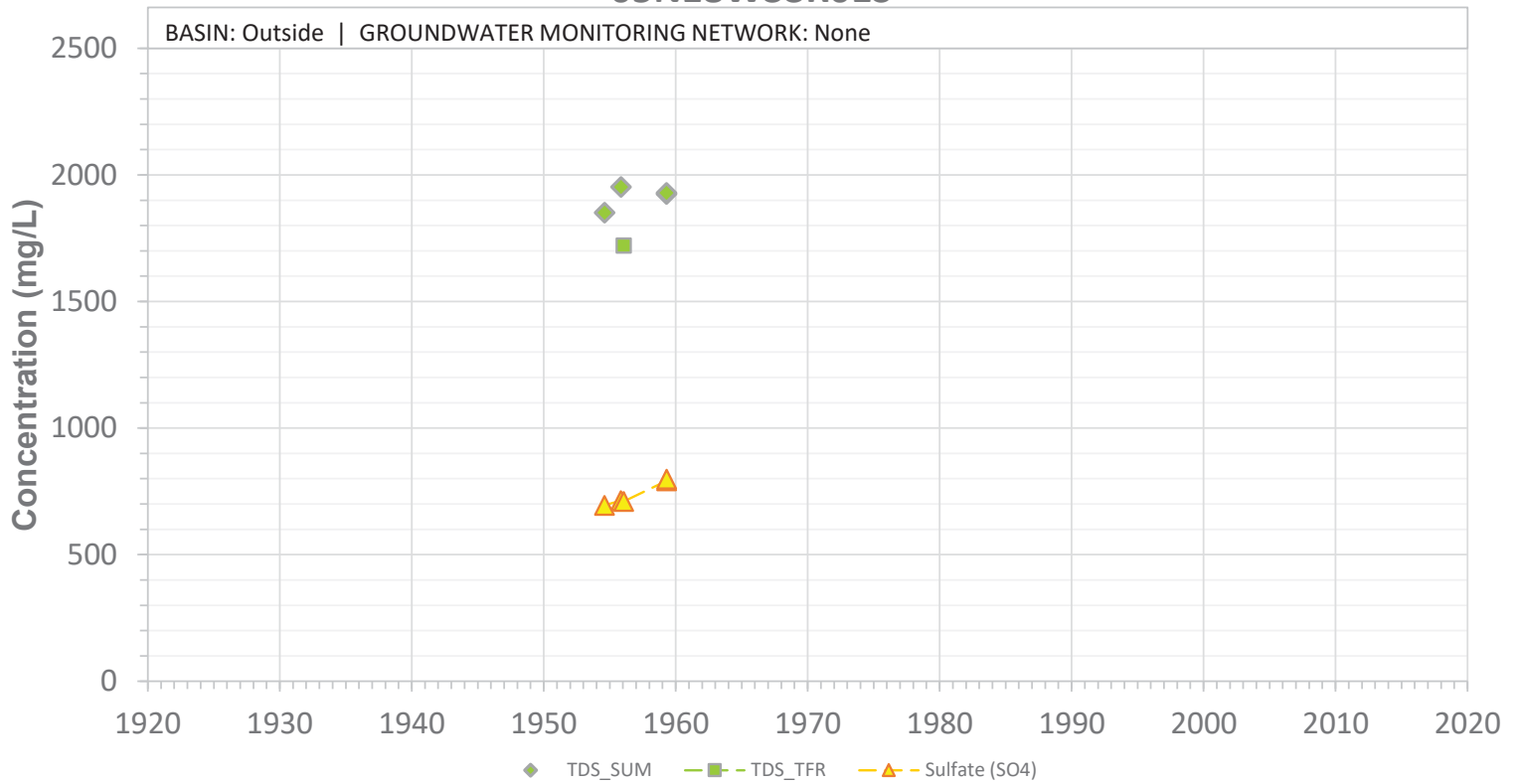
SCREEN: 30-90 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

05N18W33MW113



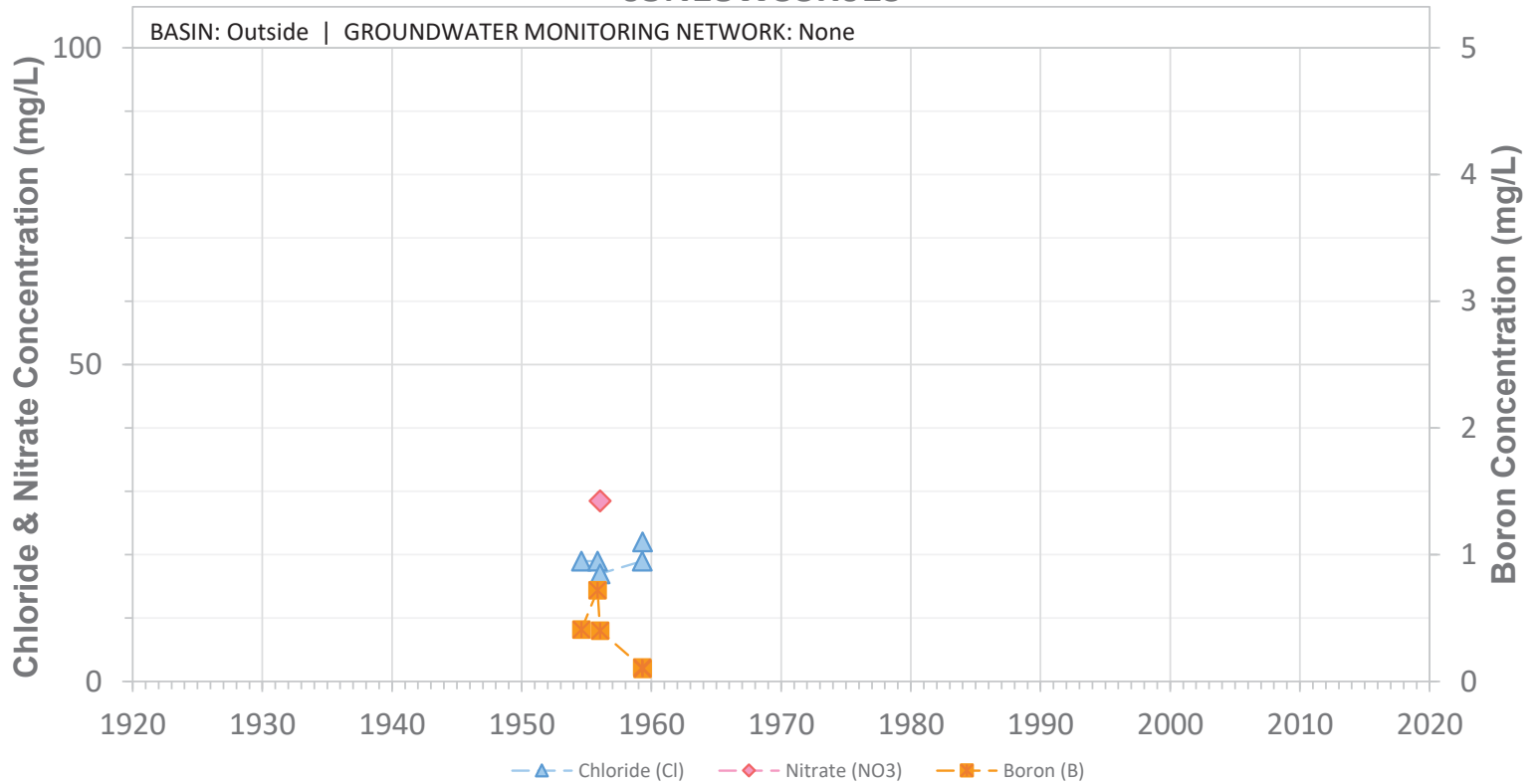
SCREEN: 30-90 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

05N18W33R01S



SCREEN: 159-279 ft bgs | CURRENT USE: Domestic | STATUS: Abandoned_HOLD

05N18W33R01S

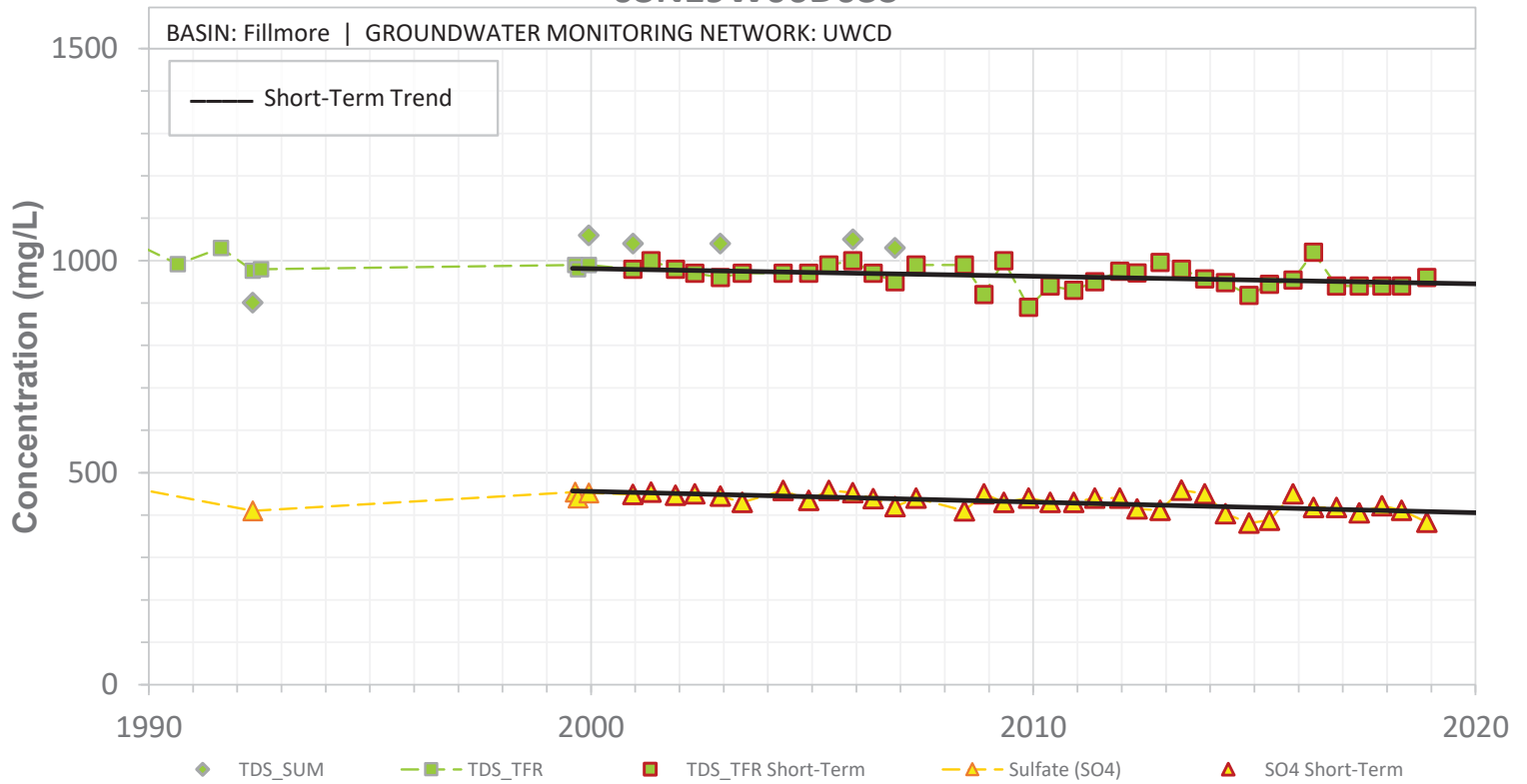


SCREEN: 159-279 ft bgs | CURRENT USE: Domestic | STATUS: Abandoned_HOLD

Appendix E

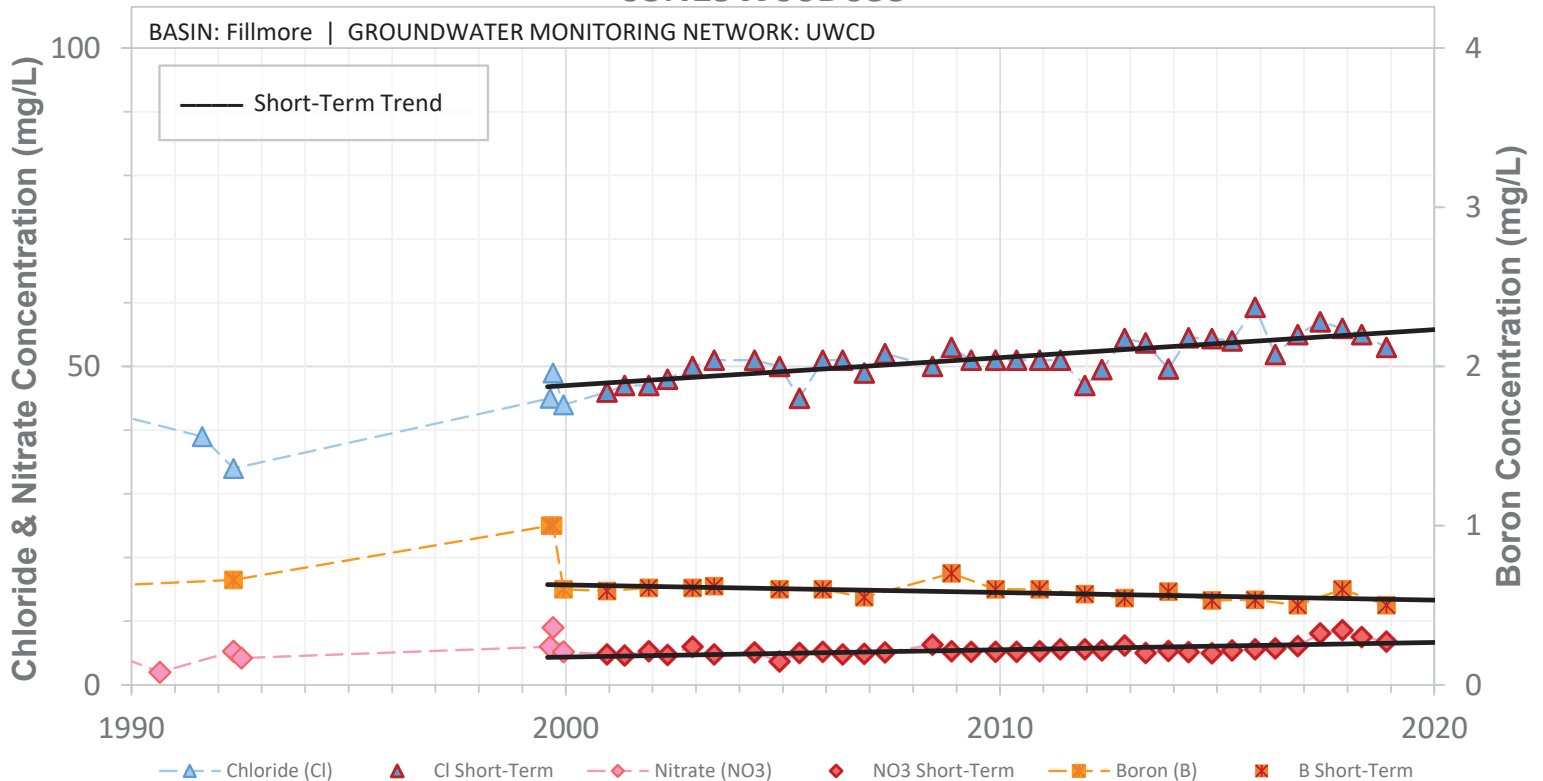
Select Groundwater Quality Time-Series

03N19W06D03S



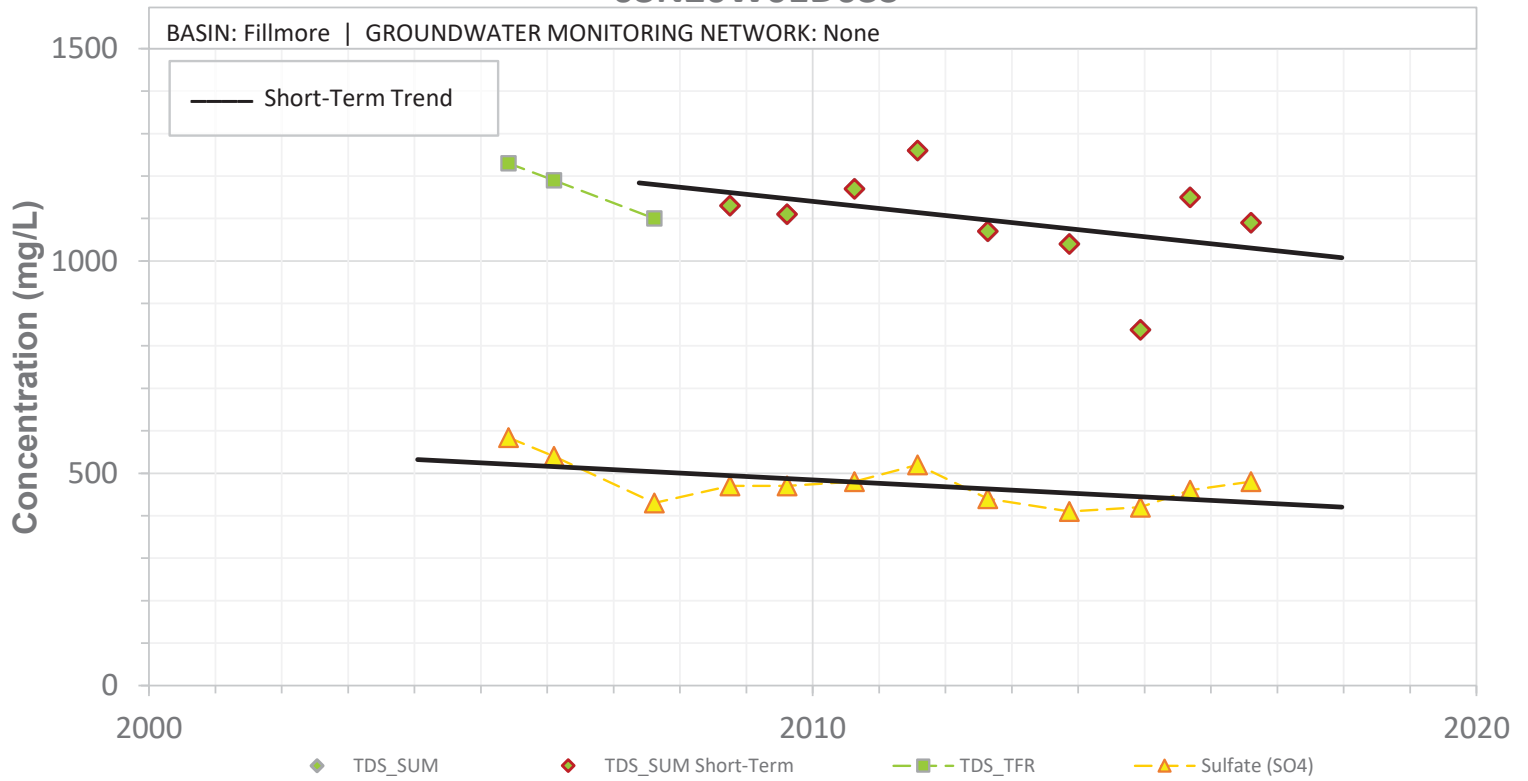
SCREEN: 184-400 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N19W06D03S



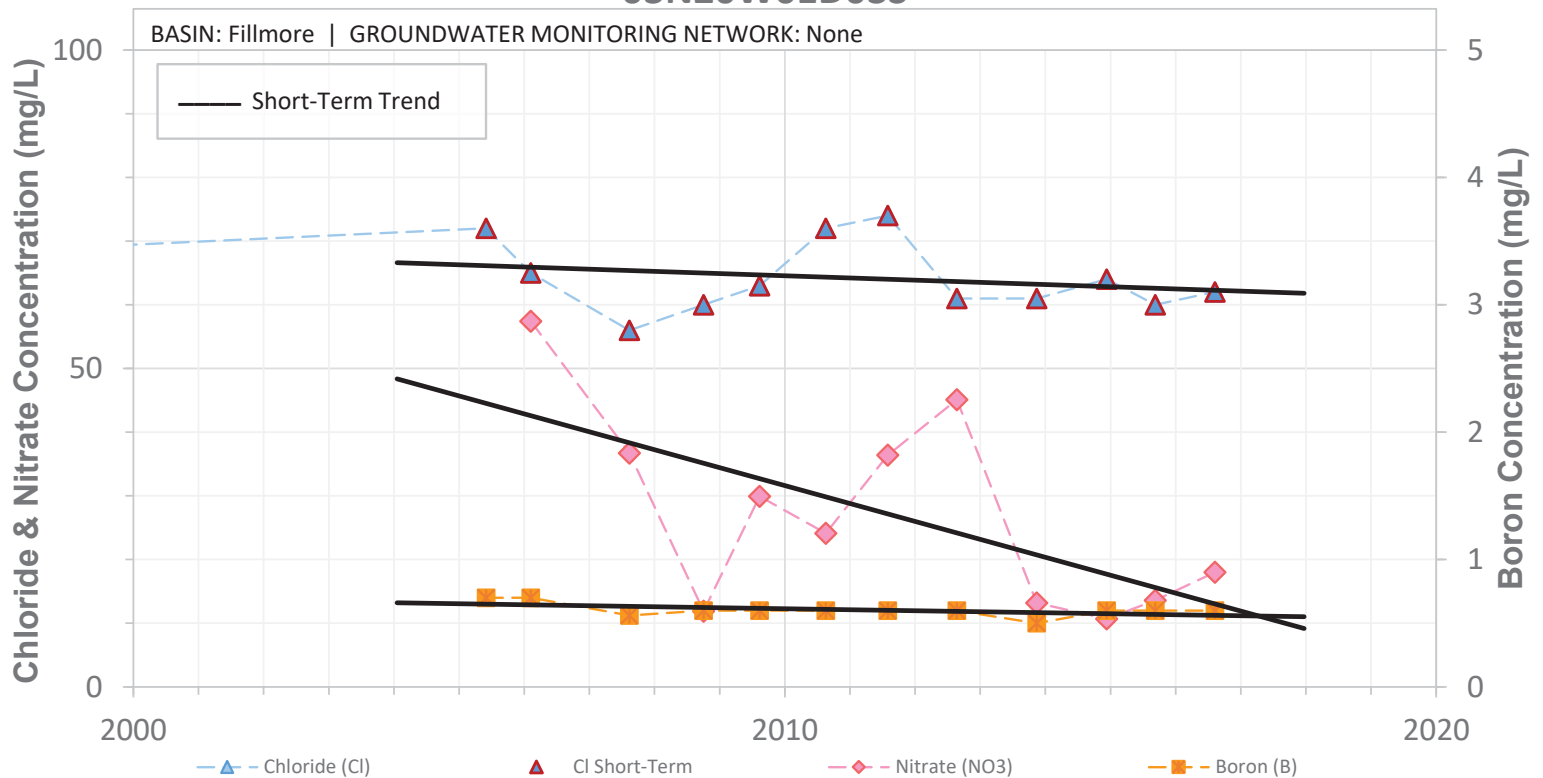
SCREEN: 184-400 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W01D03S



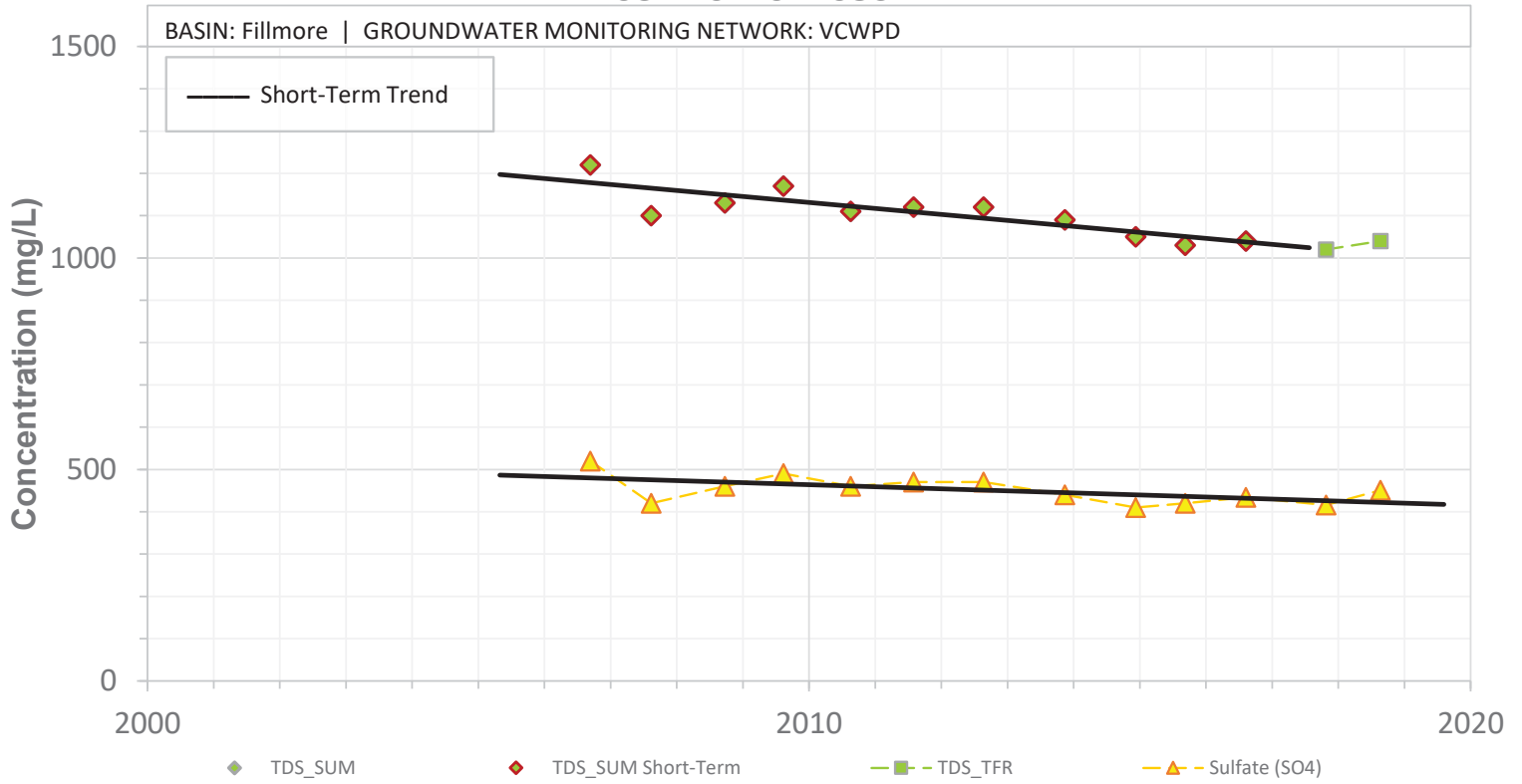
SCREEN: Unknown ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W01D03S



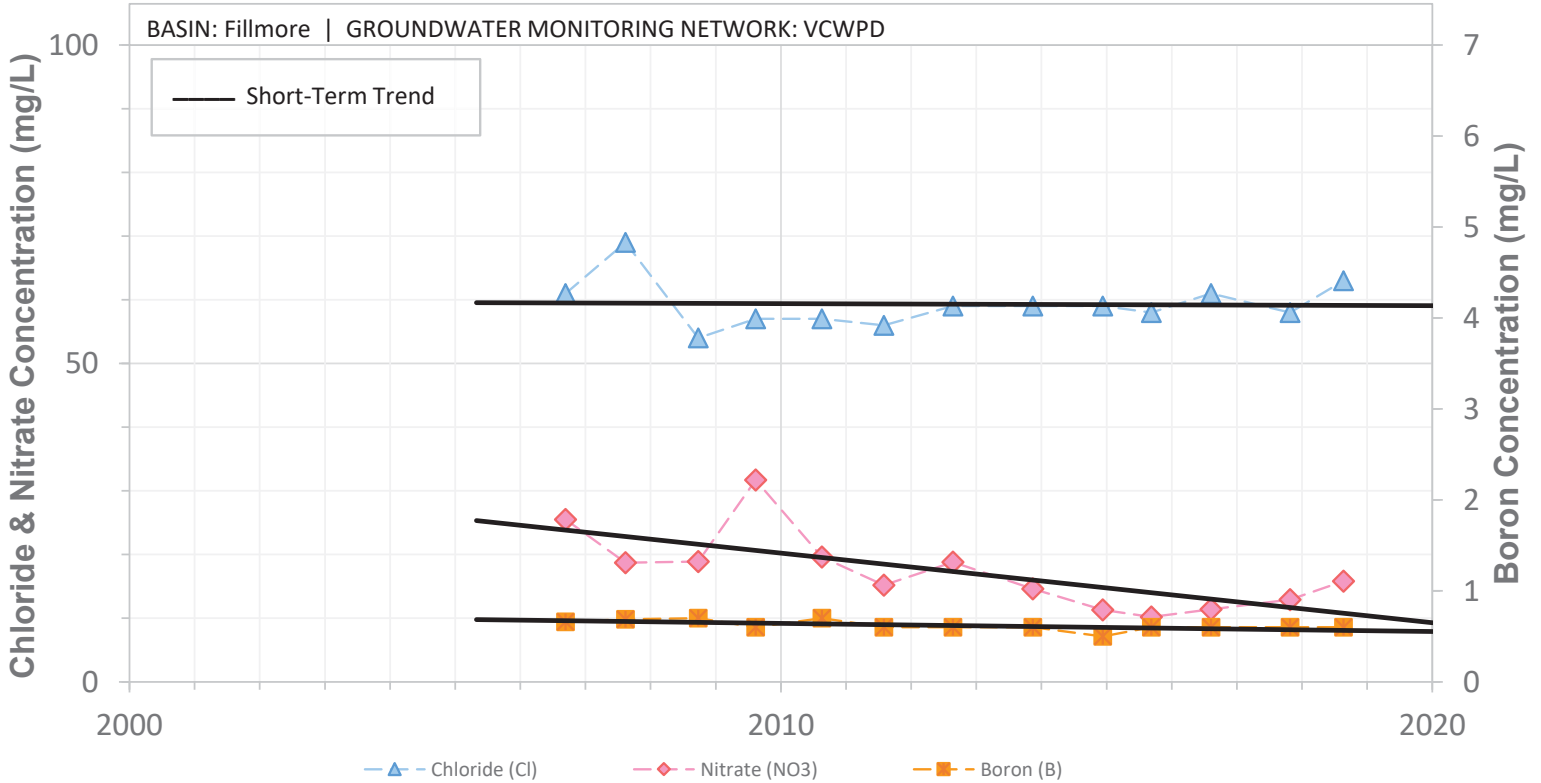
SCREEN: Unknown ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W01F05S



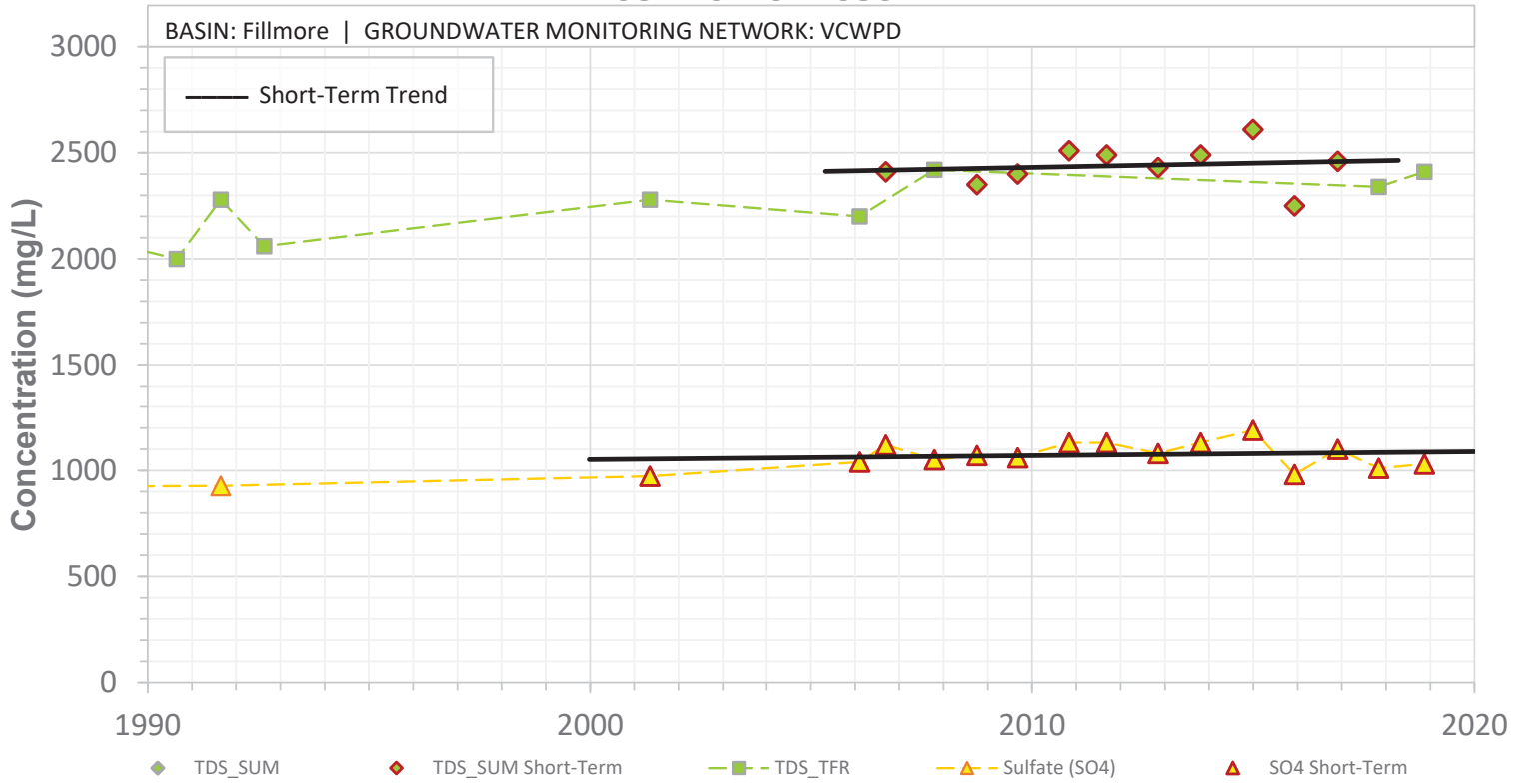
SCREEN: 100-200 ft bgs | CURRENT USE: Domestic | STATUS: Active

03N20W01F05S



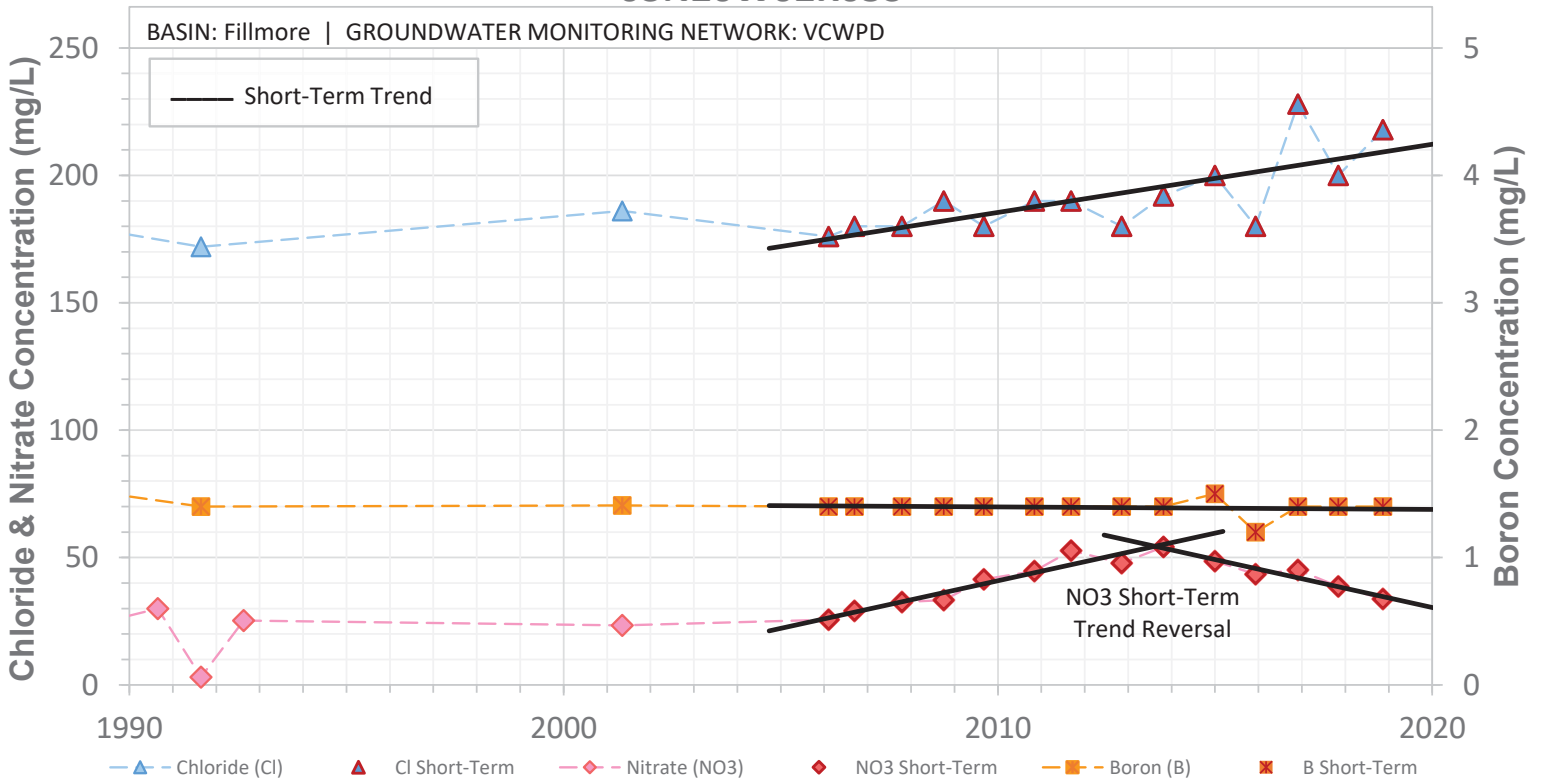
SCREEN: 100-200 ft bgs | CURRENT USE: Domestic | STATUS: Active

03N20W02R05S



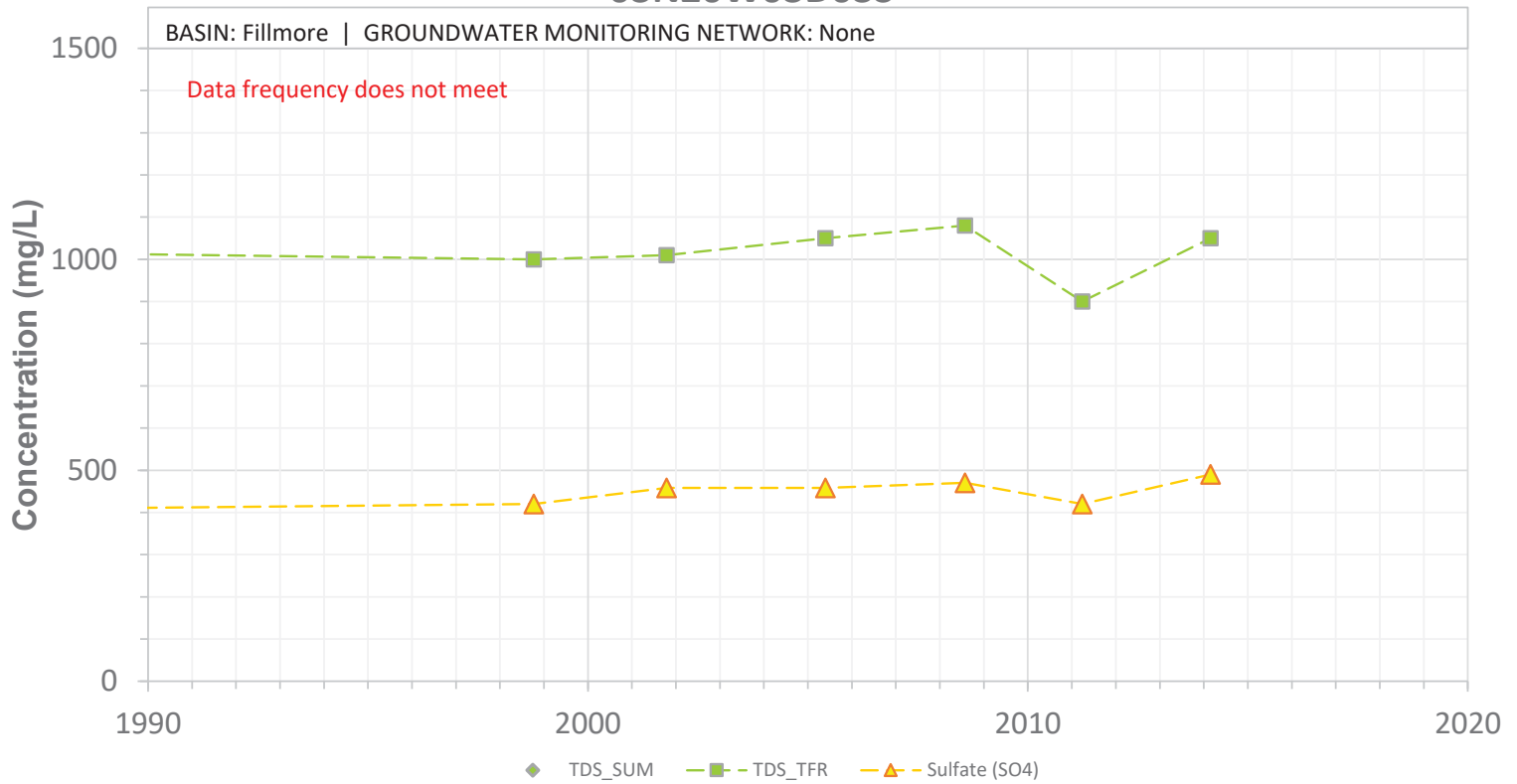
SCREEN: 93-133 ft bgs | CURRENT USE: Domestic | STATUS: Active

03N20W02R05S



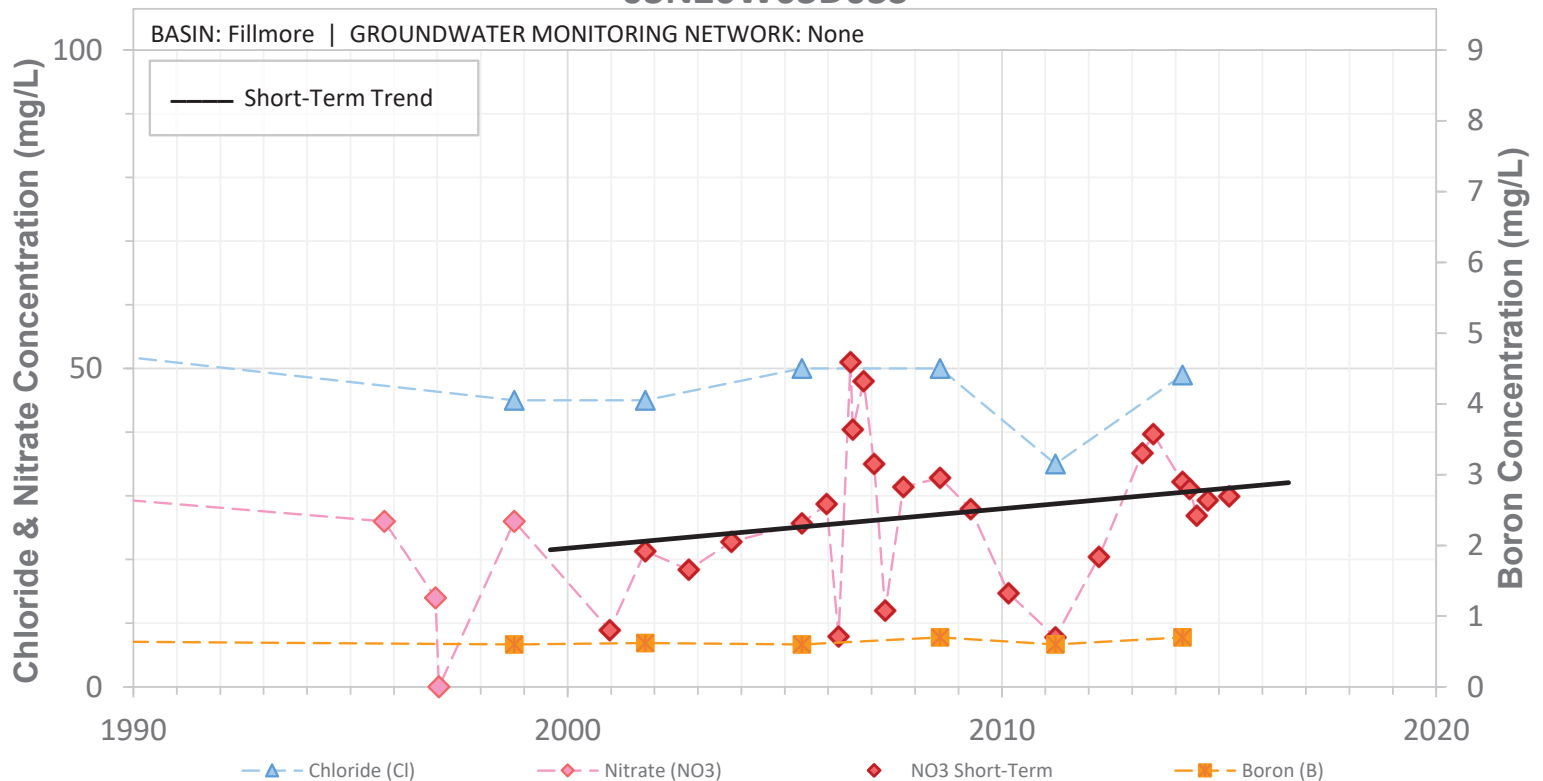
SCREEN: 93-133 ft bgs | CURRENT USE: Domestic | STATUS: Active

03N20W03D03S



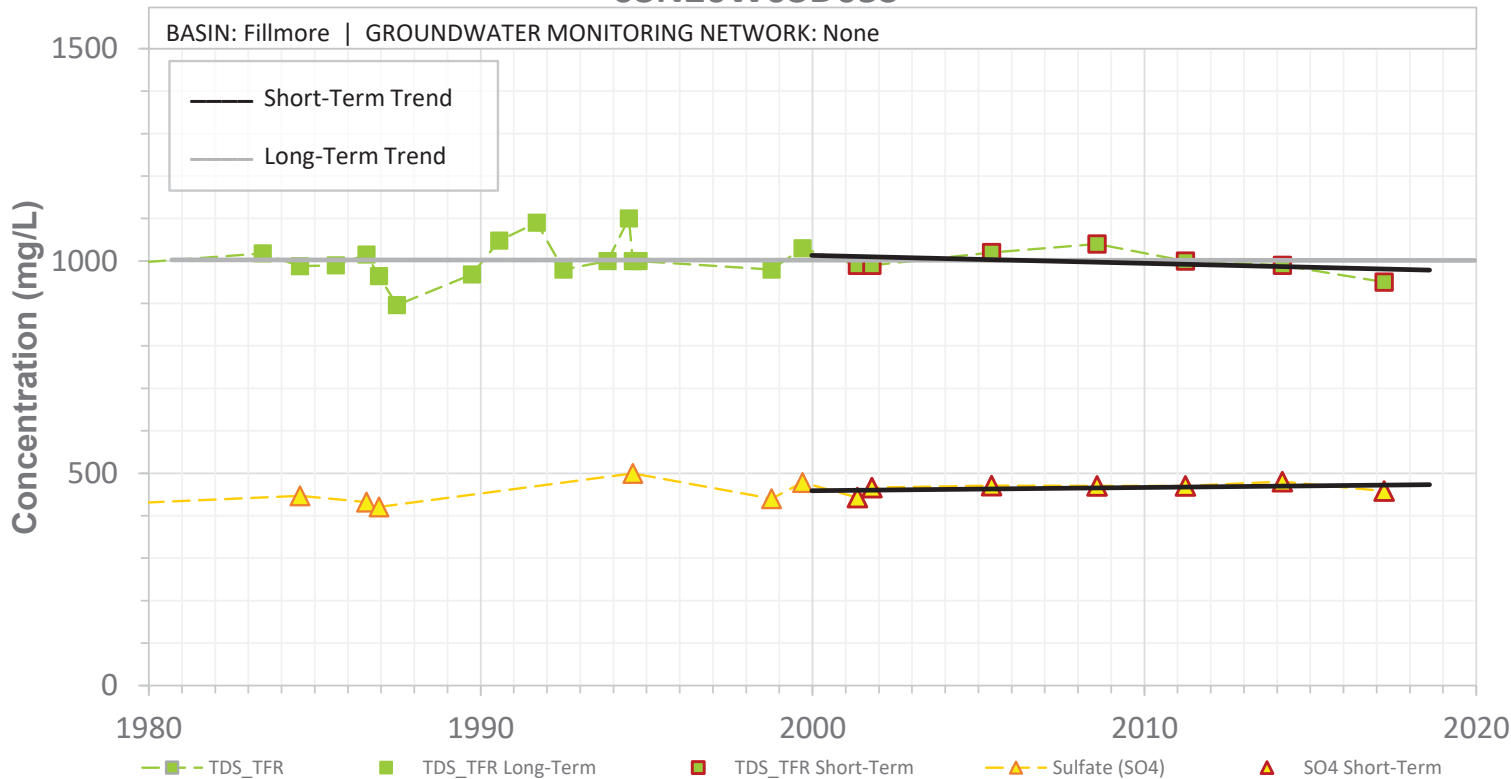
SCREEN: 102-397 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W03D03S



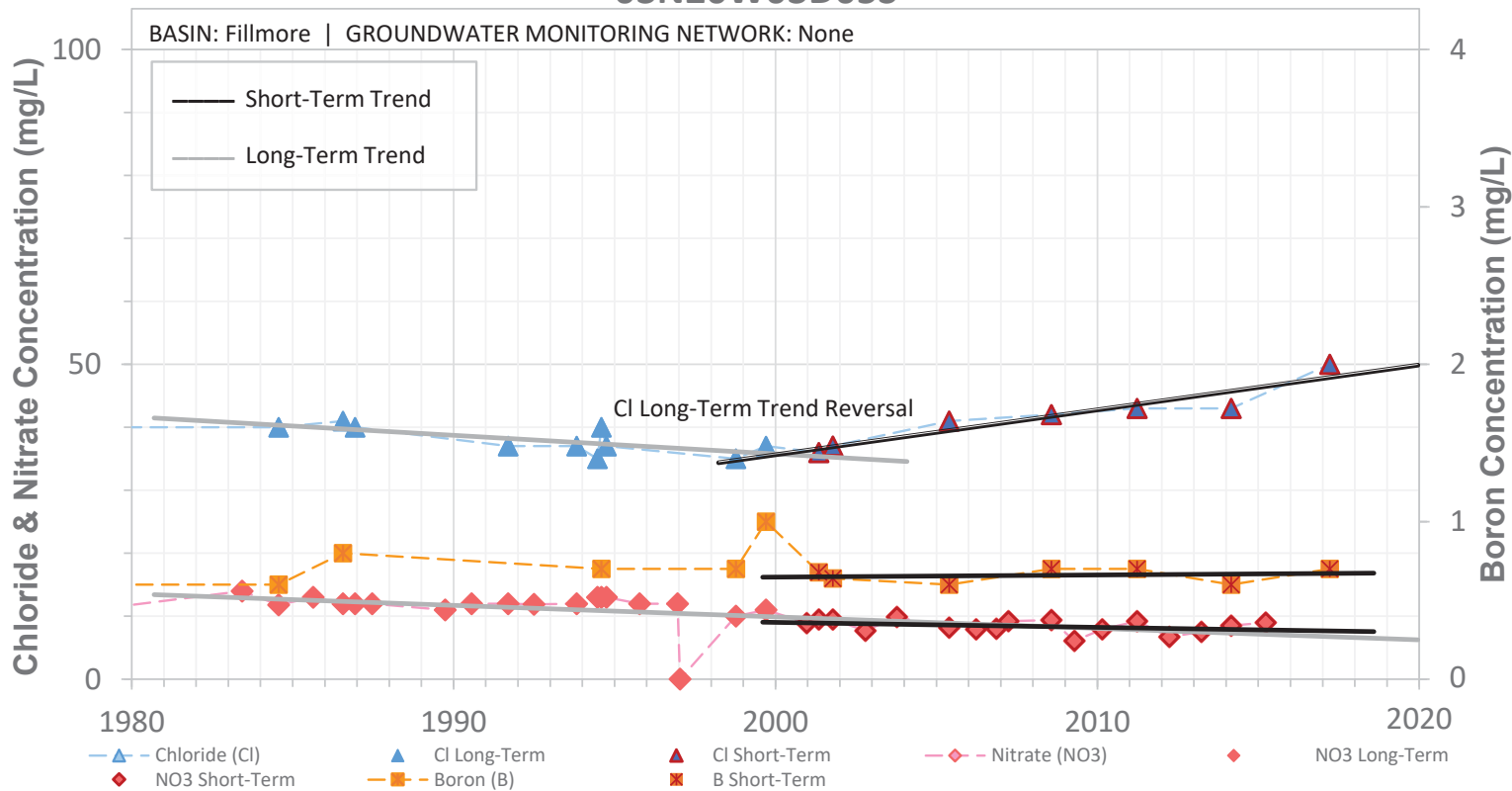
SCREEN: 102-397 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W03D05S



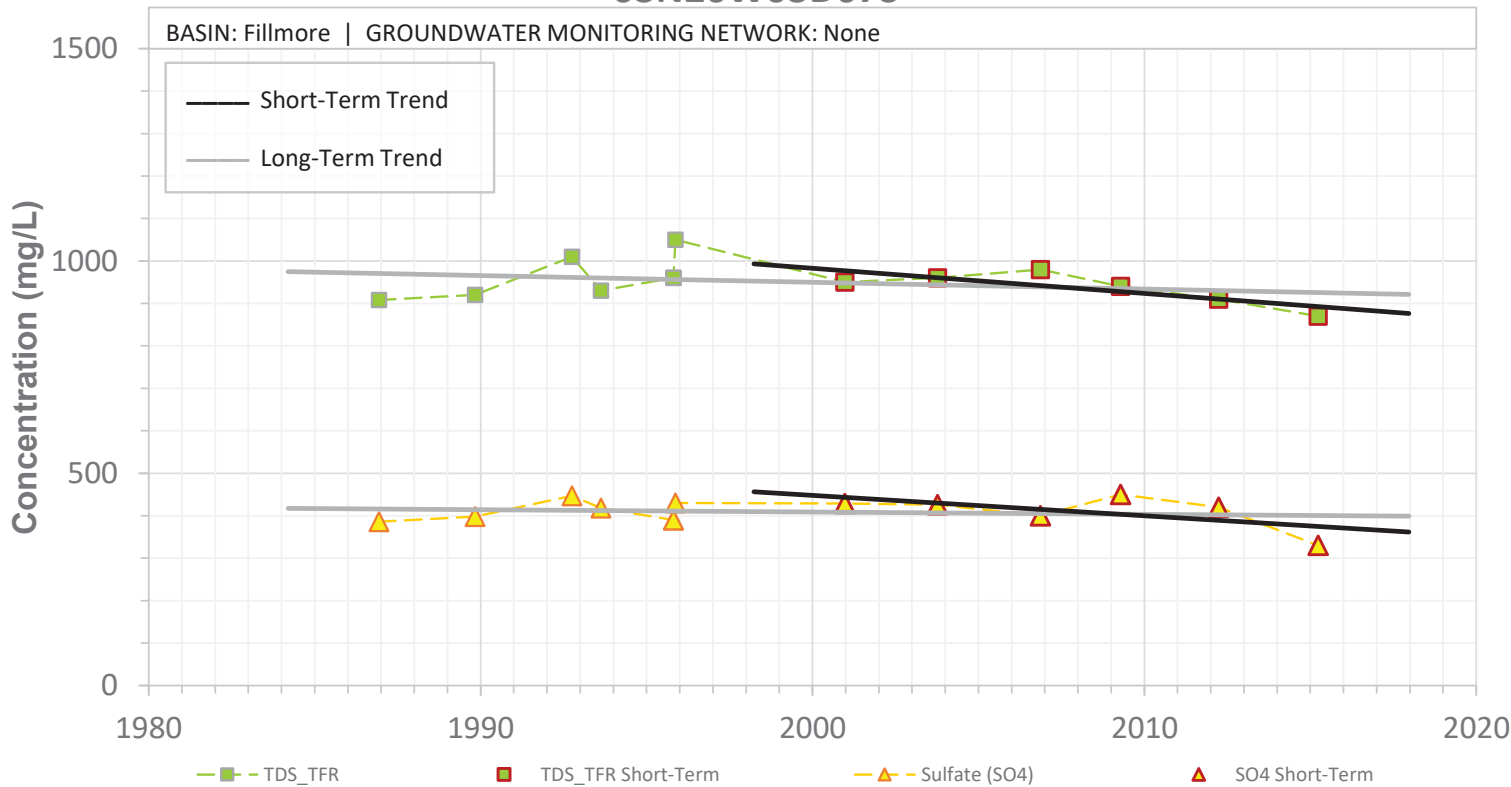
SCREEN: 274-436 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W03D05S



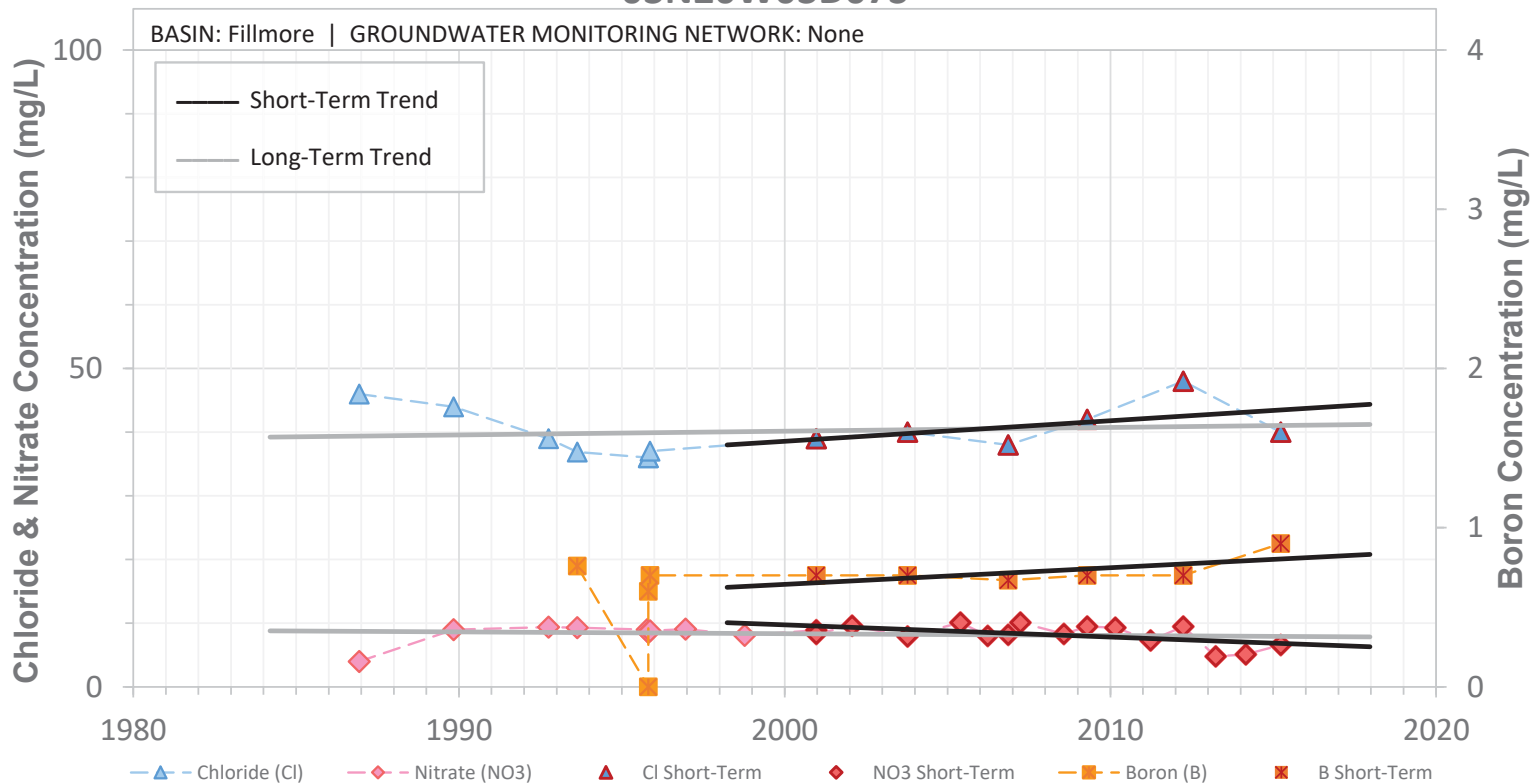
SCREEN: 274-436 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W03D07S



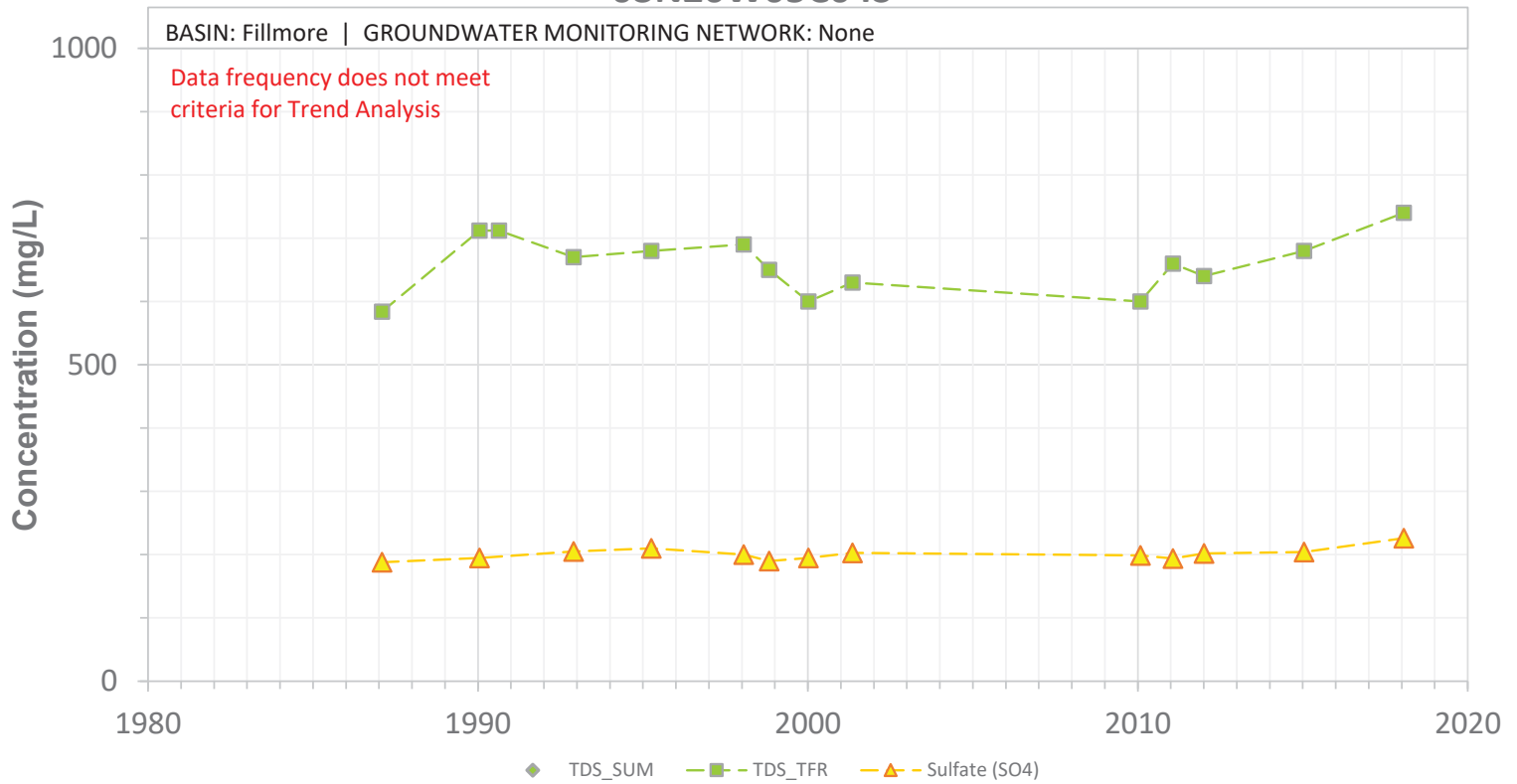
SCREEN: 224-484 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W03D07S



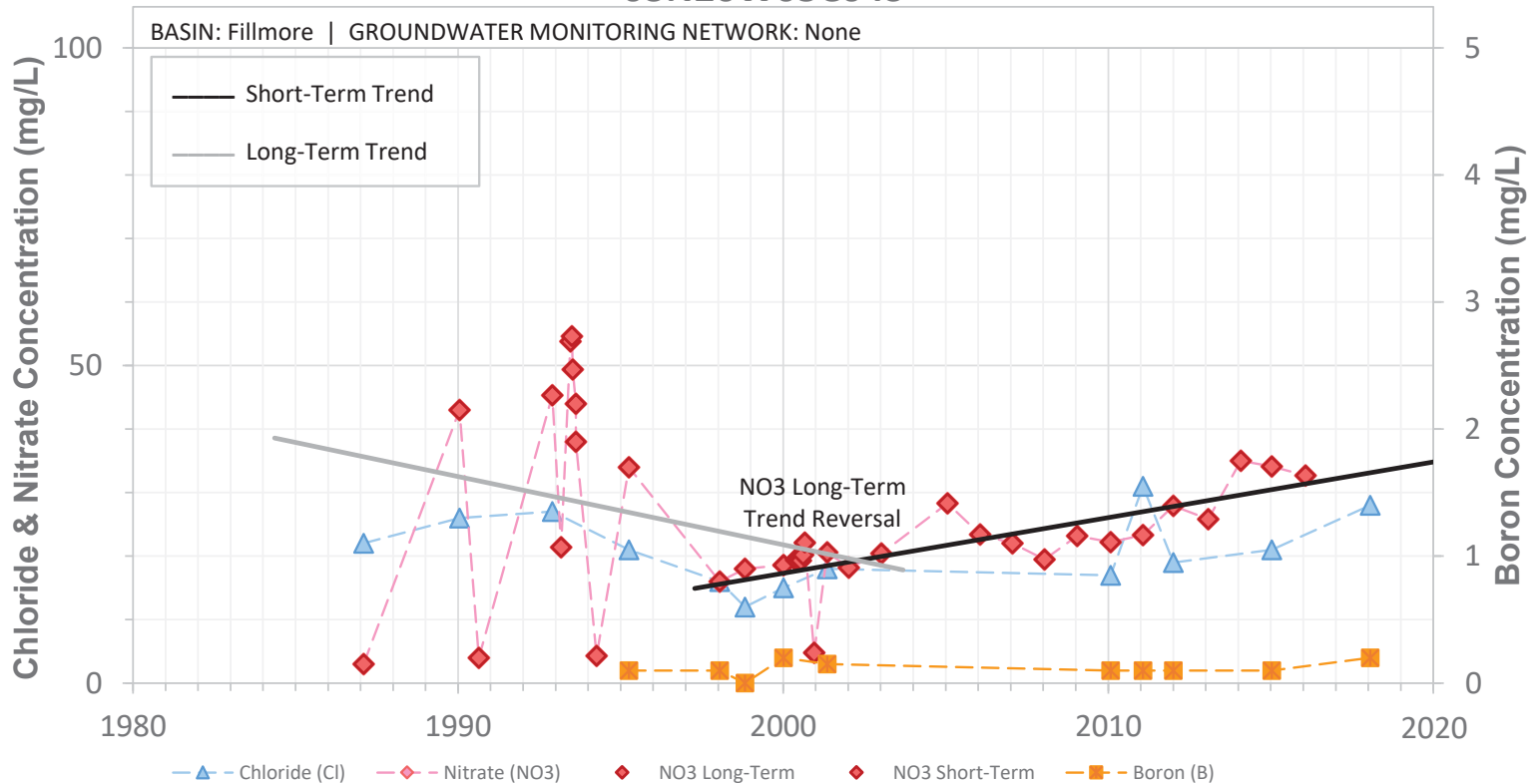
SCREEN: 224-484 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W05C04S



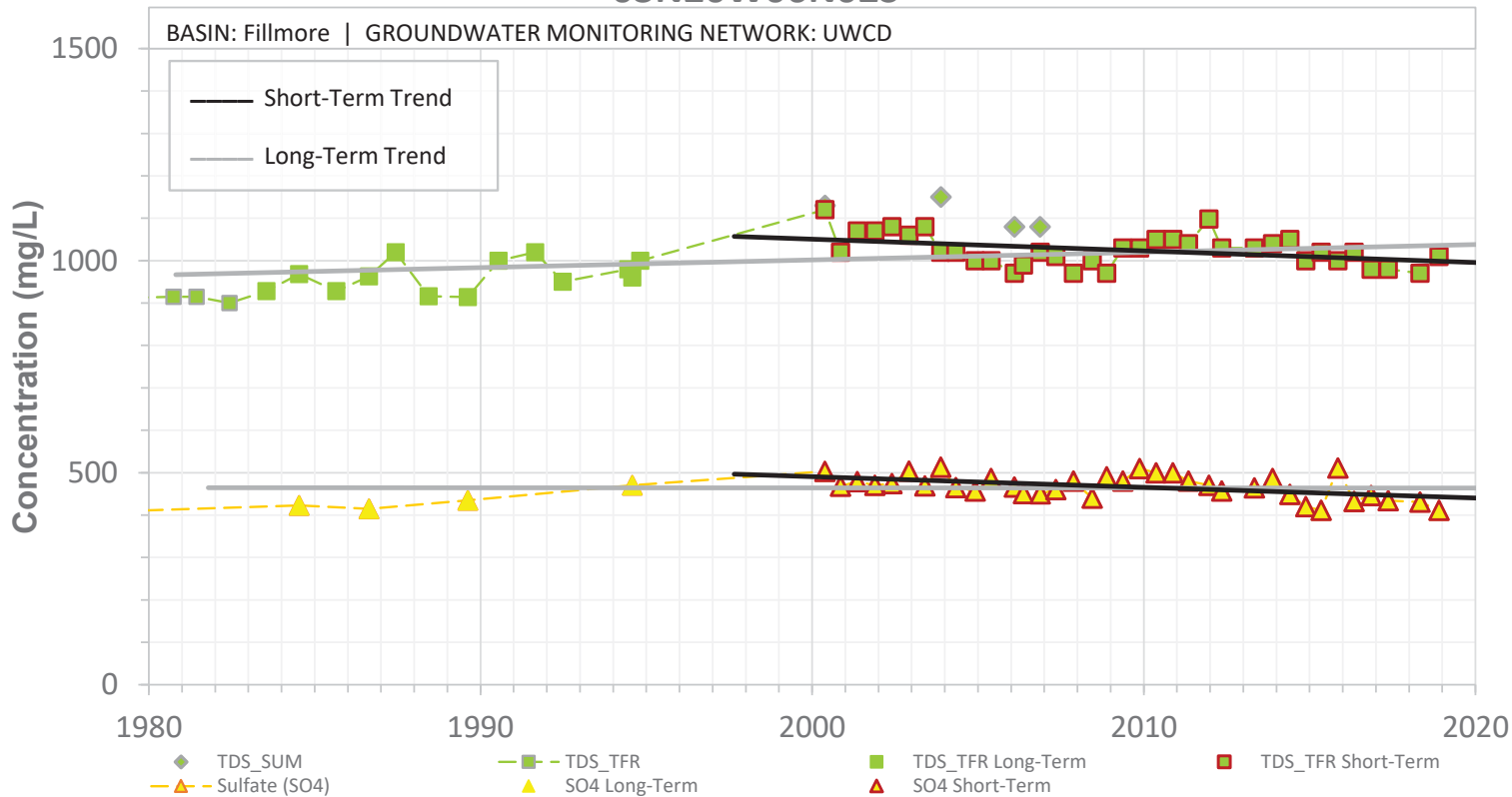
SCREEN: 221-362 ft bgs | CURRENT USE: Domestic | STATUS: Active

03N20W05C04S



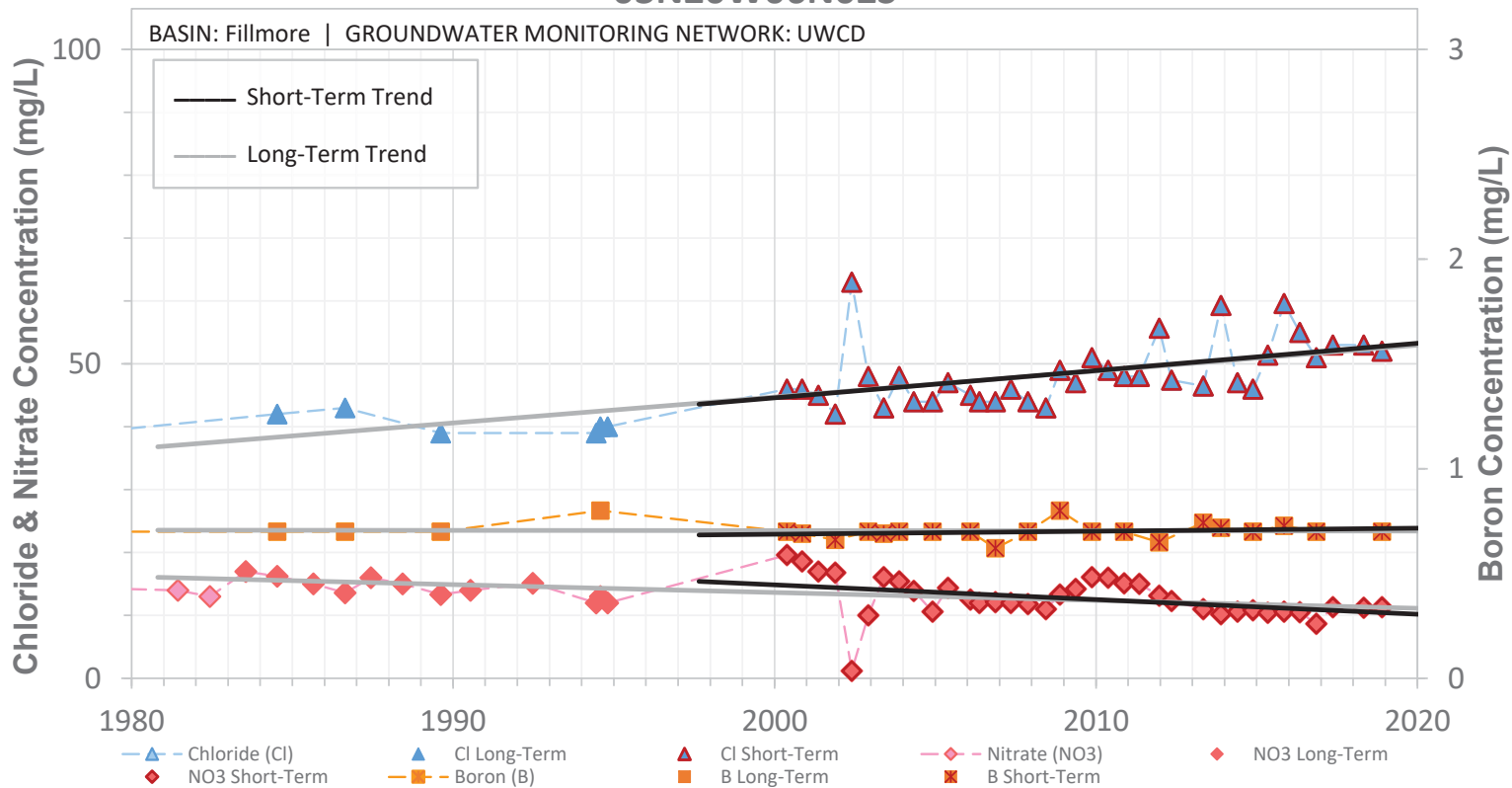
SCREEN: 221-362 ft bgs | CURRENT USE: Domestic | STATUS: Active

03N20W06N02S



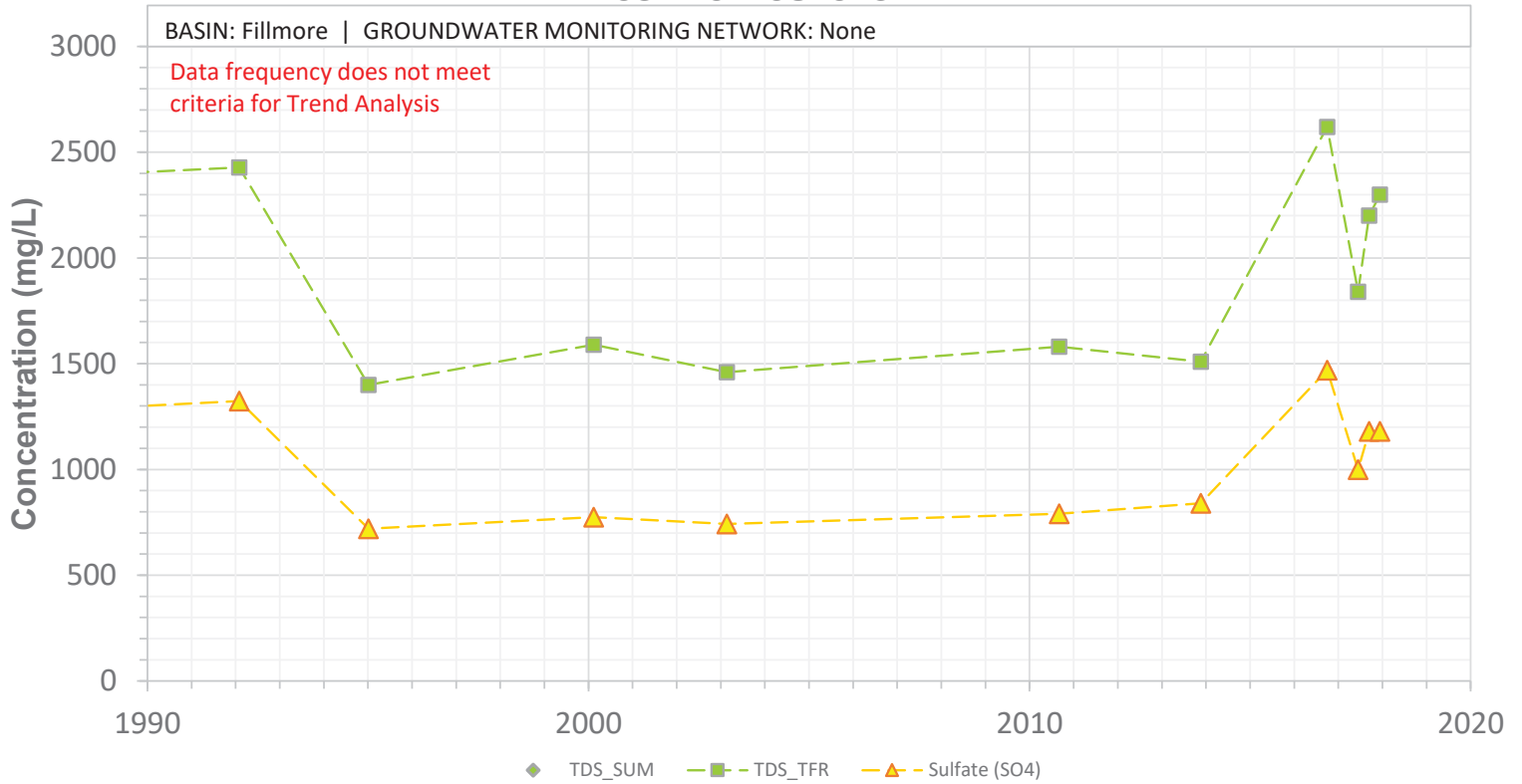
SCREEN: 240-350 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W06N02S



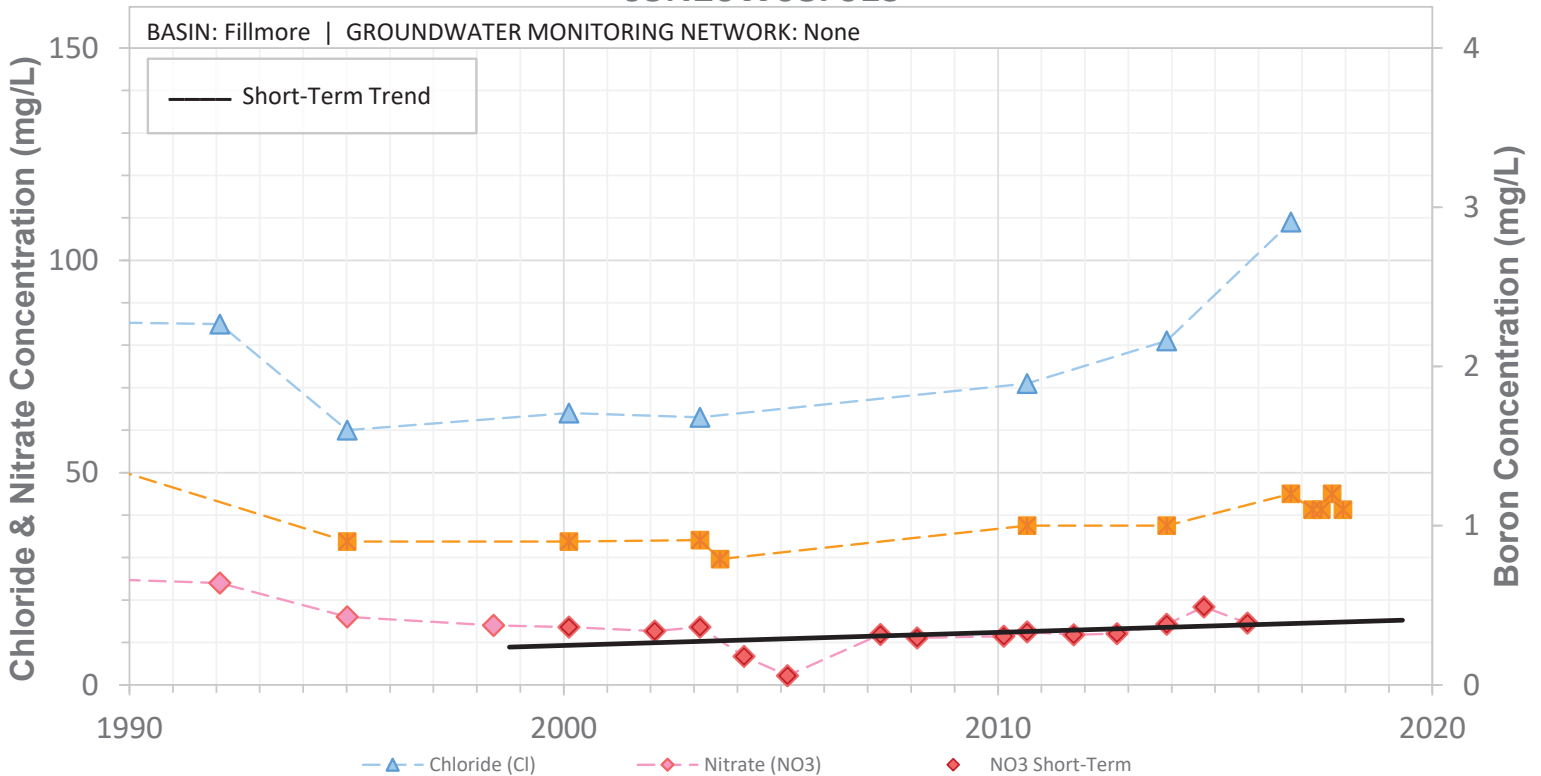
SCREEN: 240-350 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W08F01S



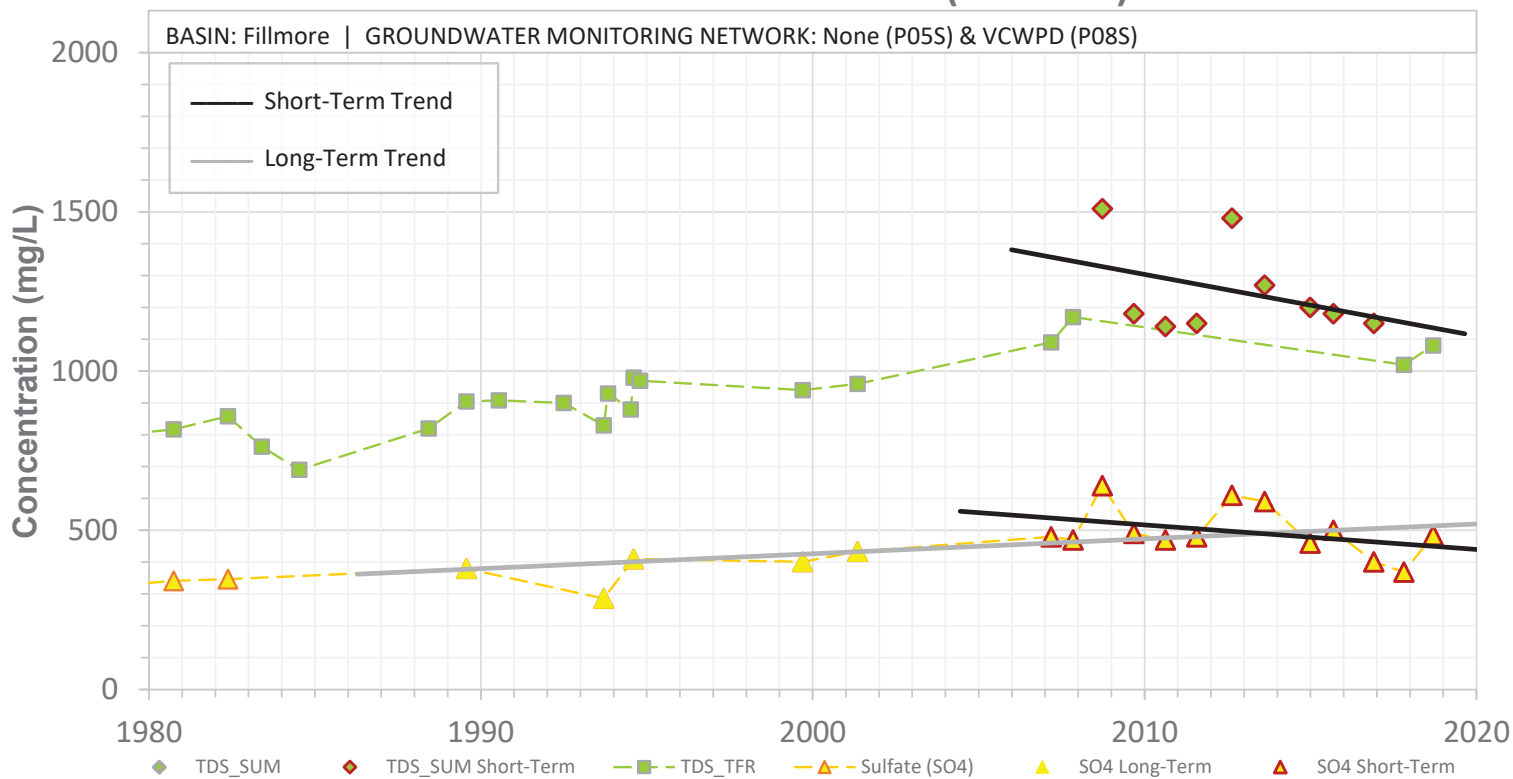
SCREEN: 100-152 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N20W08F01S



SCREEN: 100-152 ft bgs | CURRENT USE: Agricultural | STATUS: Active

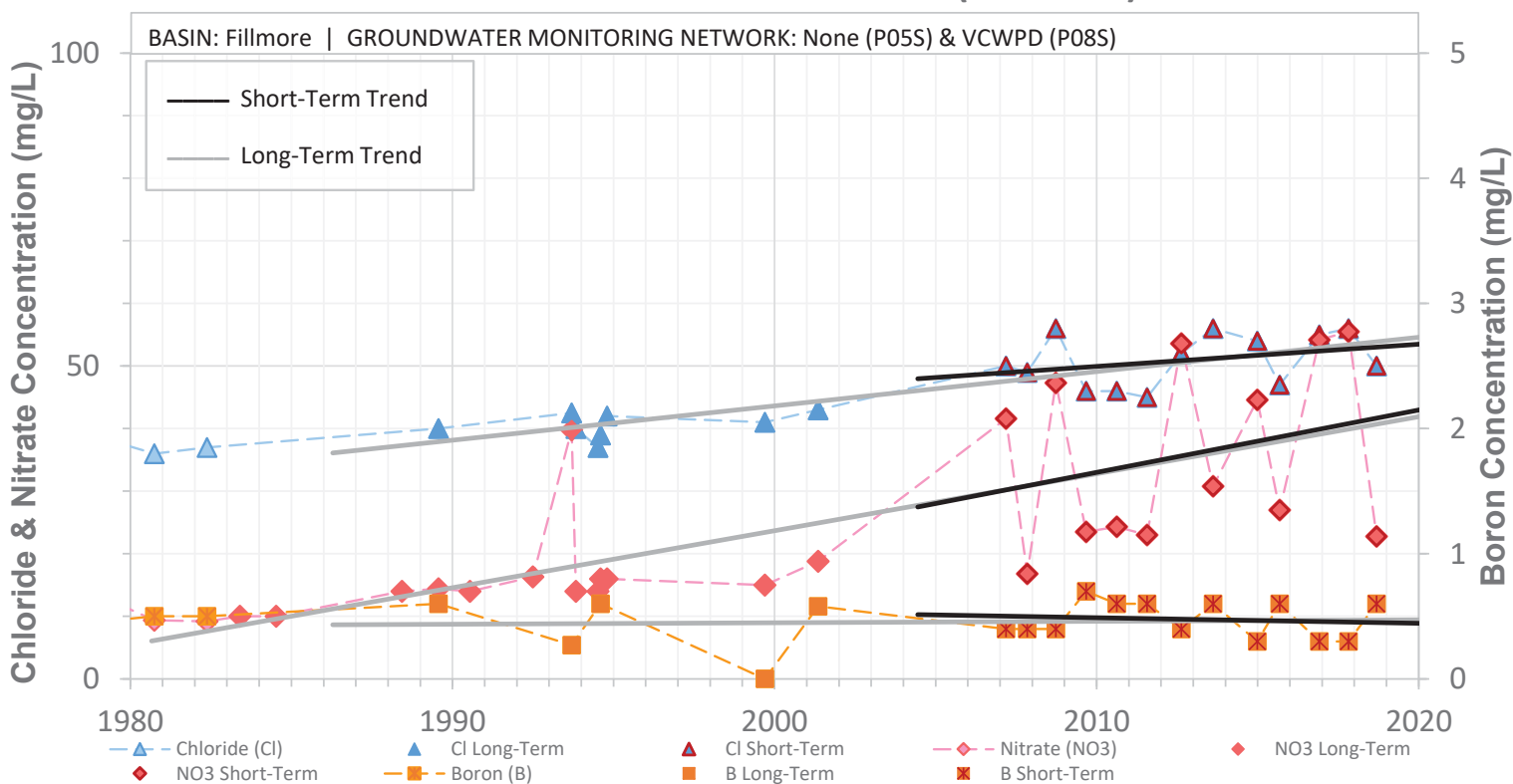
03N21W01P05S & 03N21W01P08S (Combine)



03N21W01P05S SCREEN: 180-380 ft bgs | CURRENT USE: Agricultural | STATUS: Active | PERIOD of RECORD: 1975-2001

03N21W01P08S SCREEN: 160-260 ft bgs | CURRENT USE: Agricultural | STATUS: Active | PERIOD of RECORD: 1993, 2007-2018

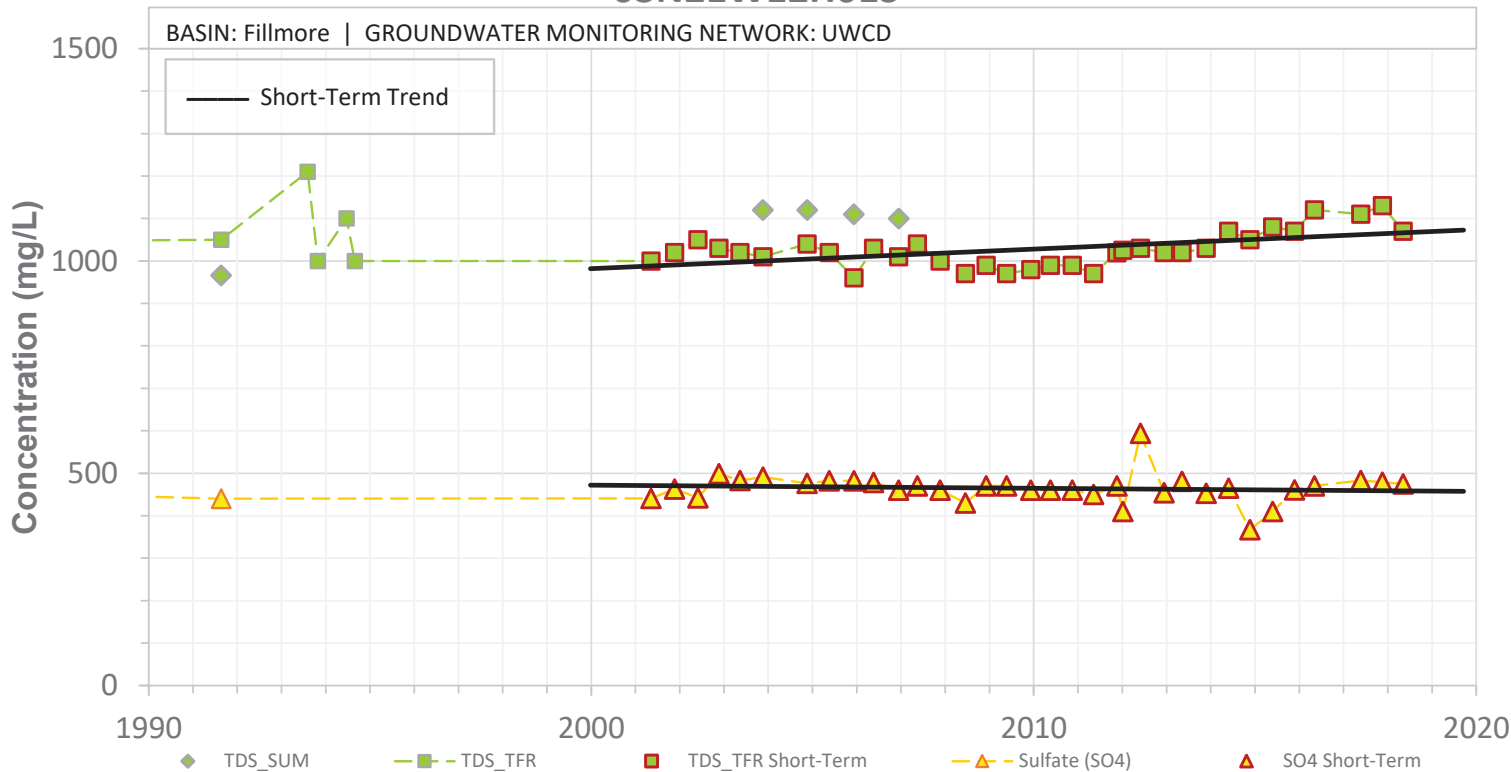
03N21W01P05S & 03N21W01P08S (Combine)



03N21W01P05S SCREEN: 180-380 ft bgs | CURRENT USE: Agricultural | STATUS: Active | PERIOD of RECORD: 1975-2001

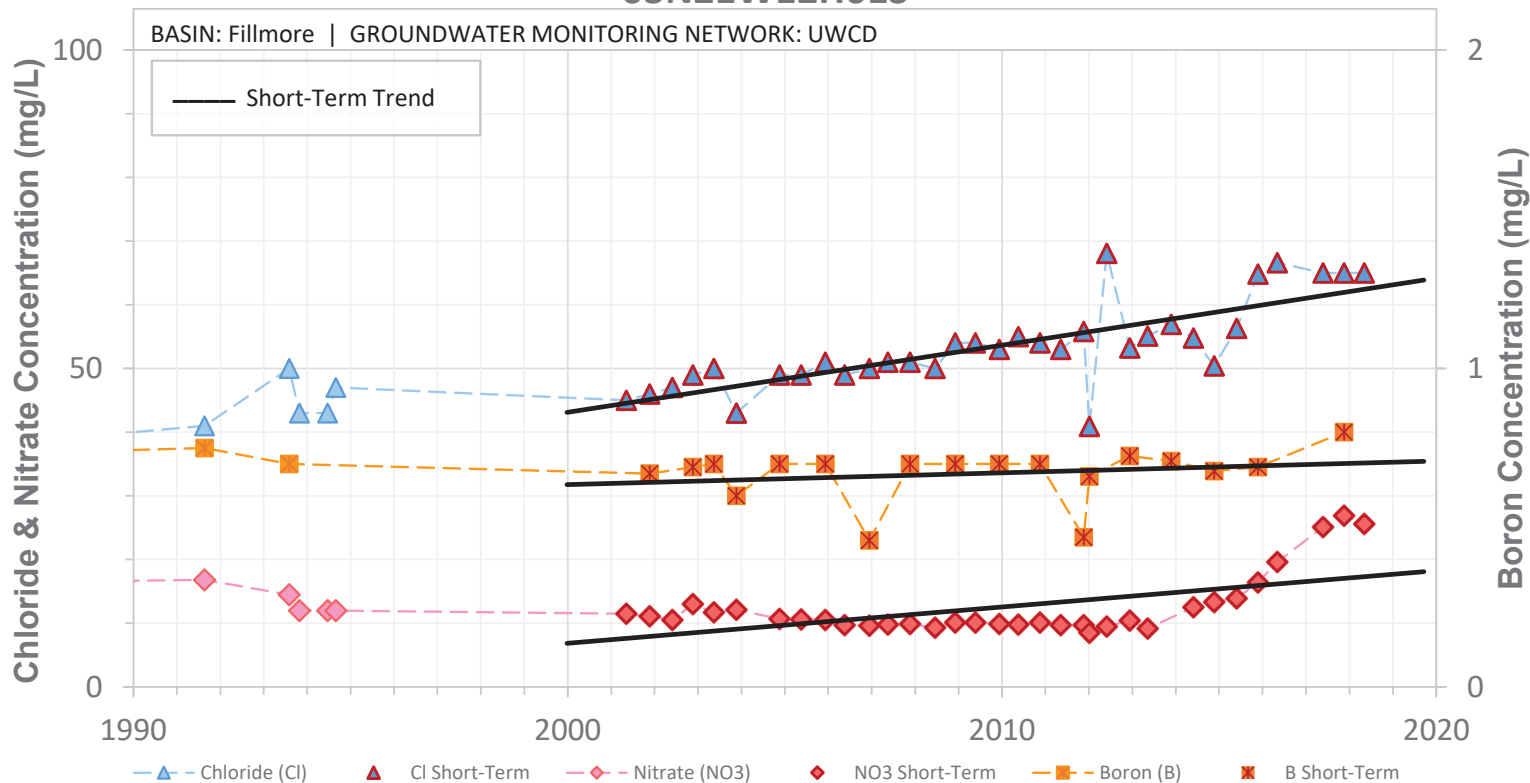
03N21W01P08S SCREEN: 160-260 ft bgs | CURRENT USE: Agricultural | STATUS: Active | PERIOD of RECORD: 1993, 2007-2018

03N21W12H01S



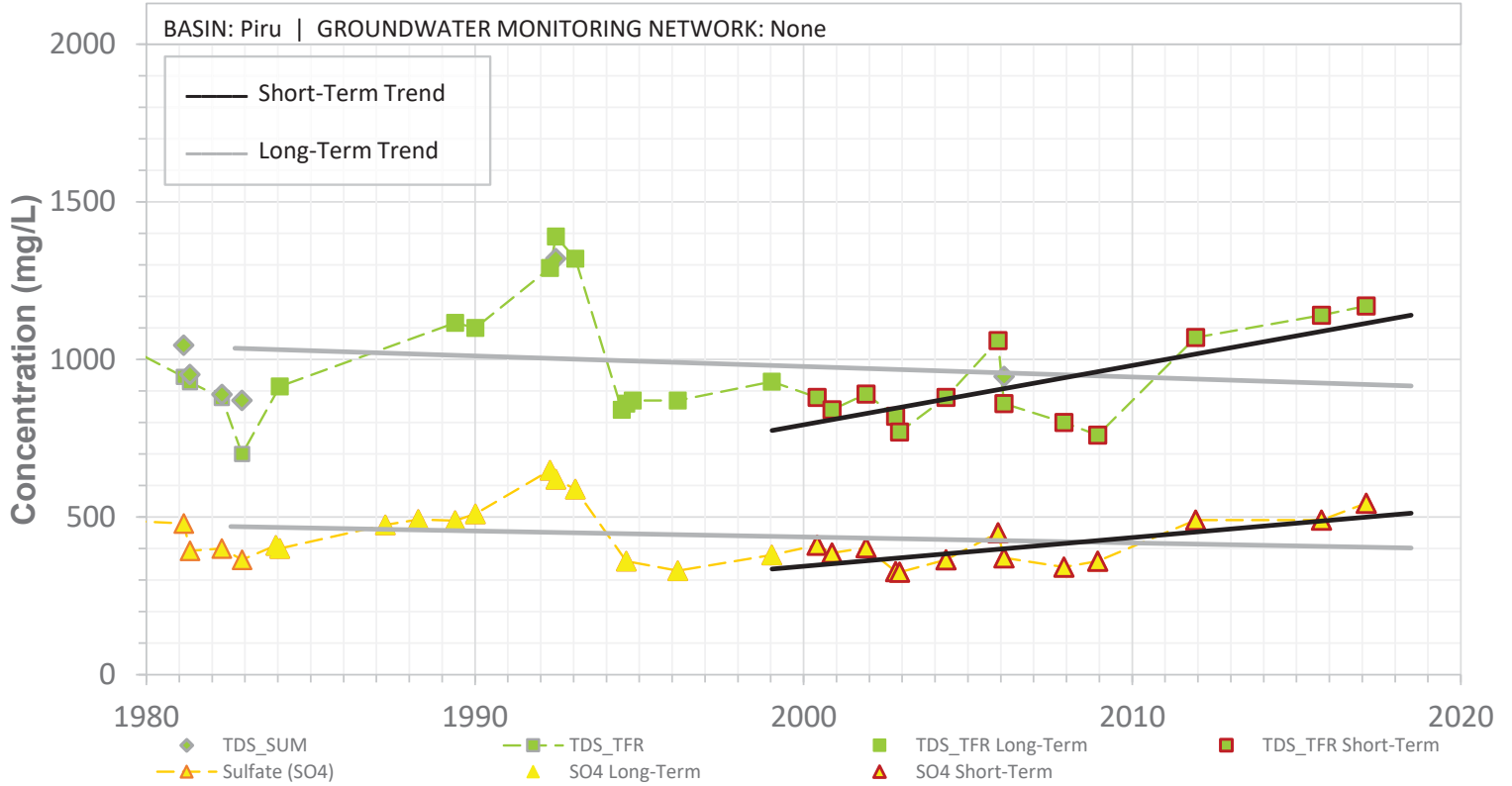
SCREEN: 74-150 ft bgs | CURRENT USE: Agricultural | STATUS: Active

03N21W12H01S



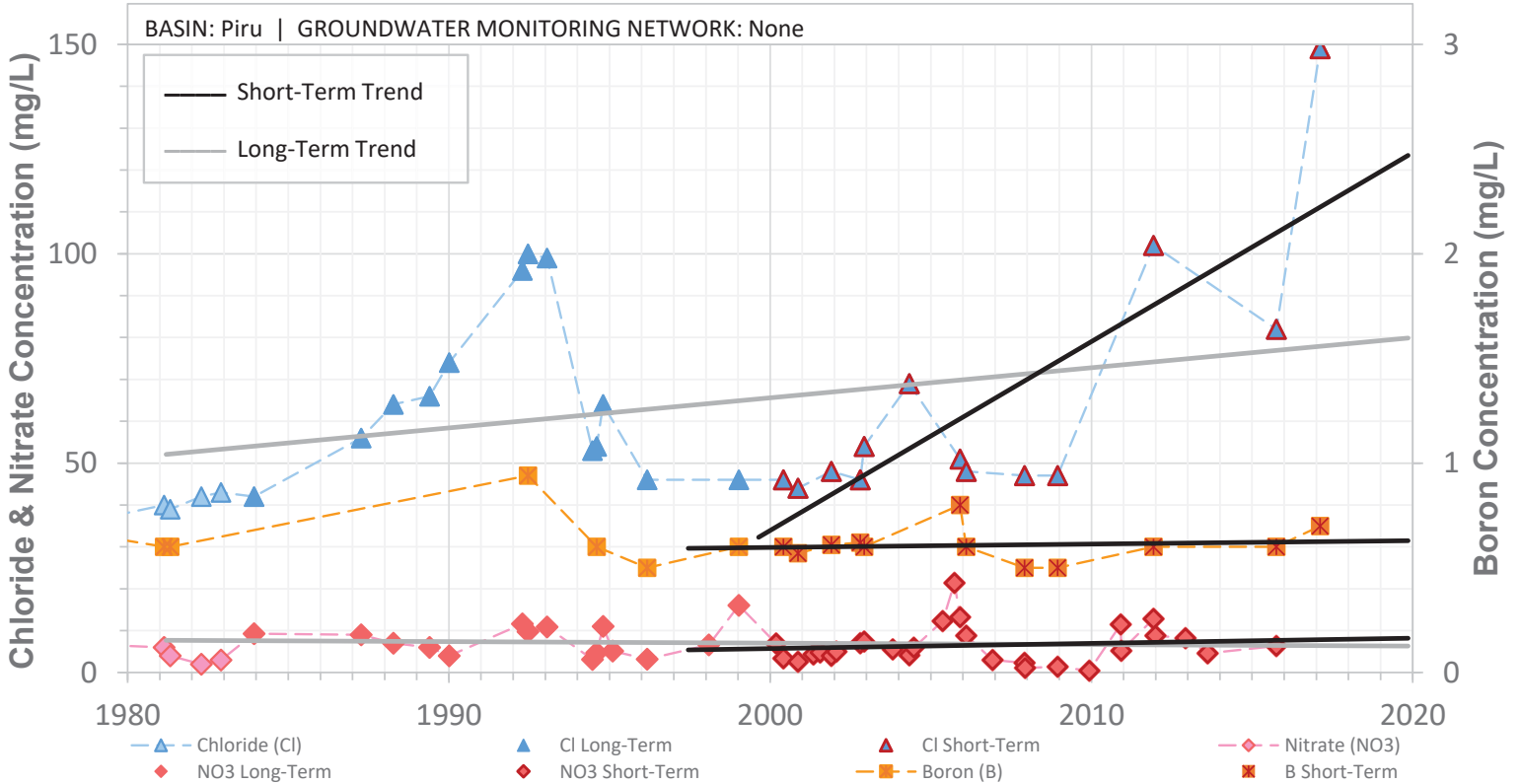
SCREEN: 74-150 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W20M01S



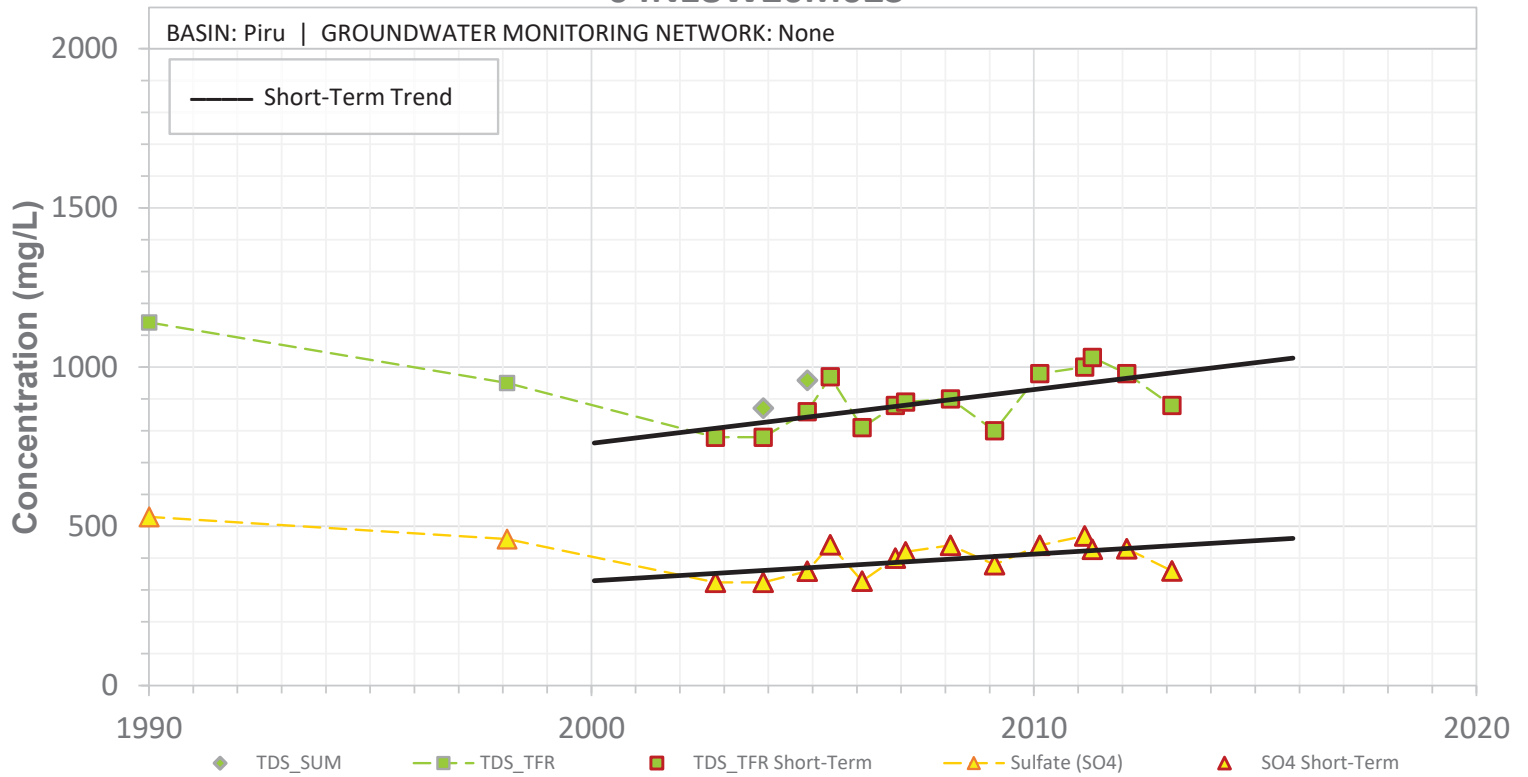
SCREEN: 220-420 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N18W20M01S



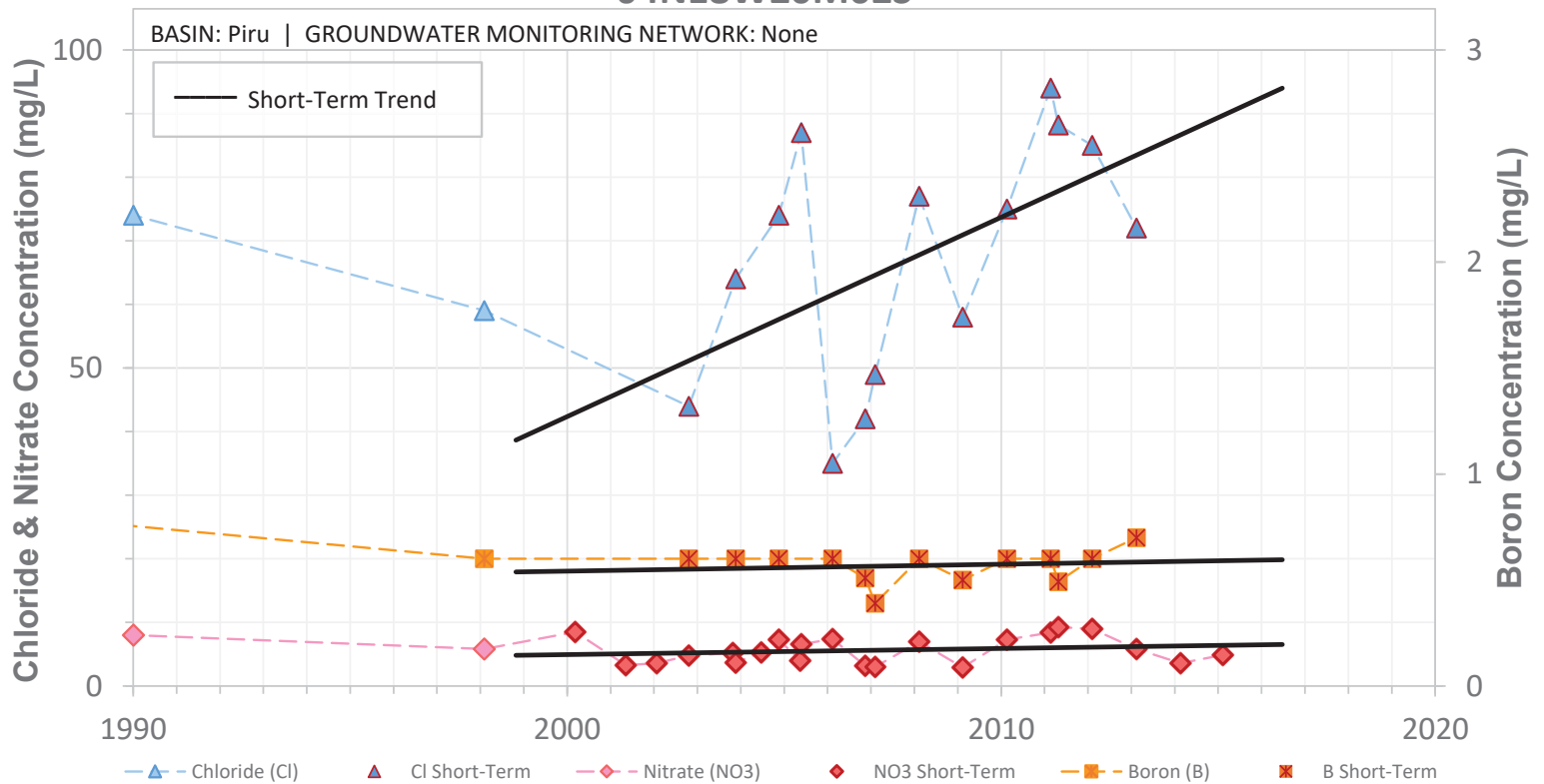
SCREEN: 220-420 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N18W20M02S



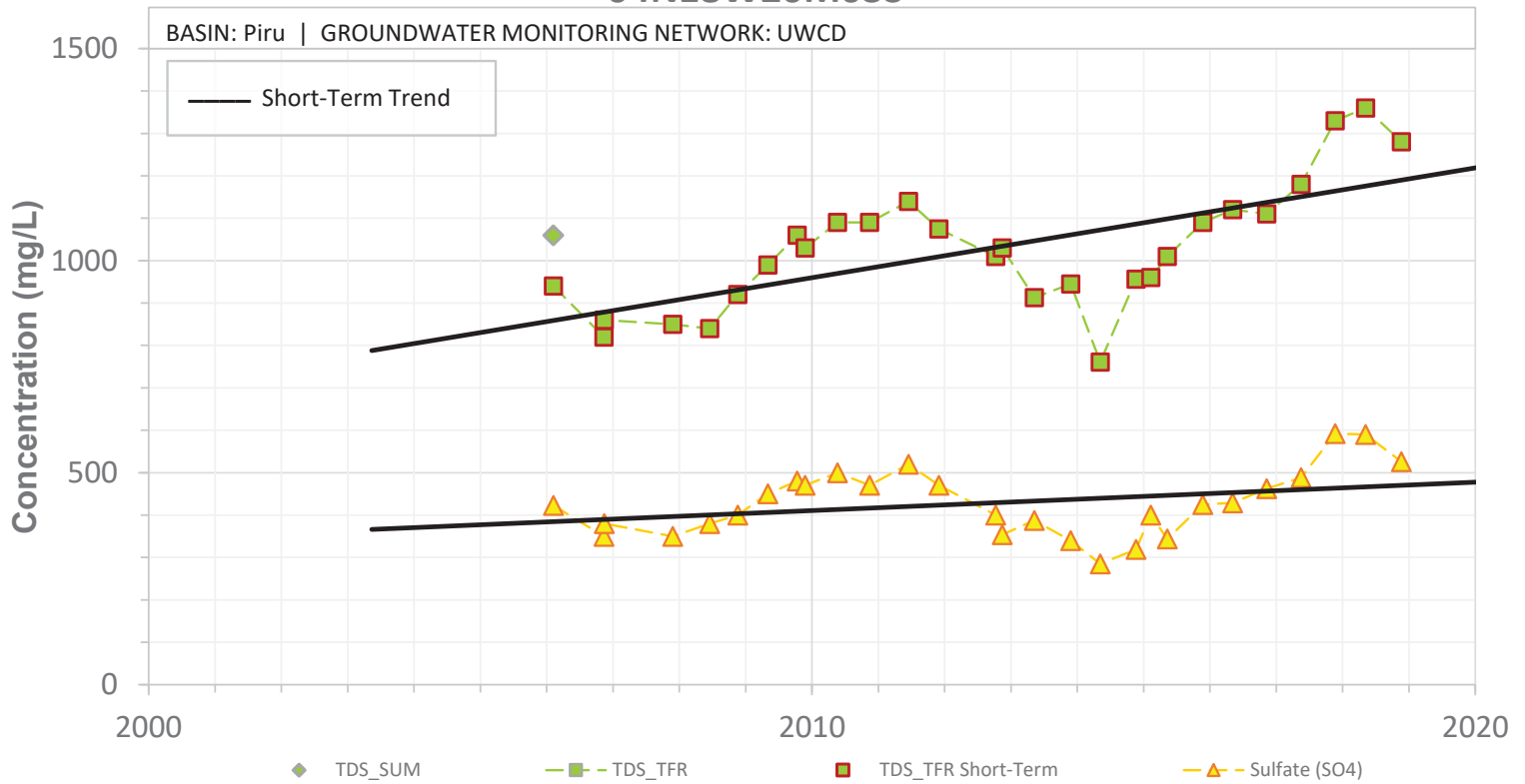
SCREEN: 160-369 ft bgs | CURRENT USE: Domestic | STATUS: Destroyed

04N18W20M02S



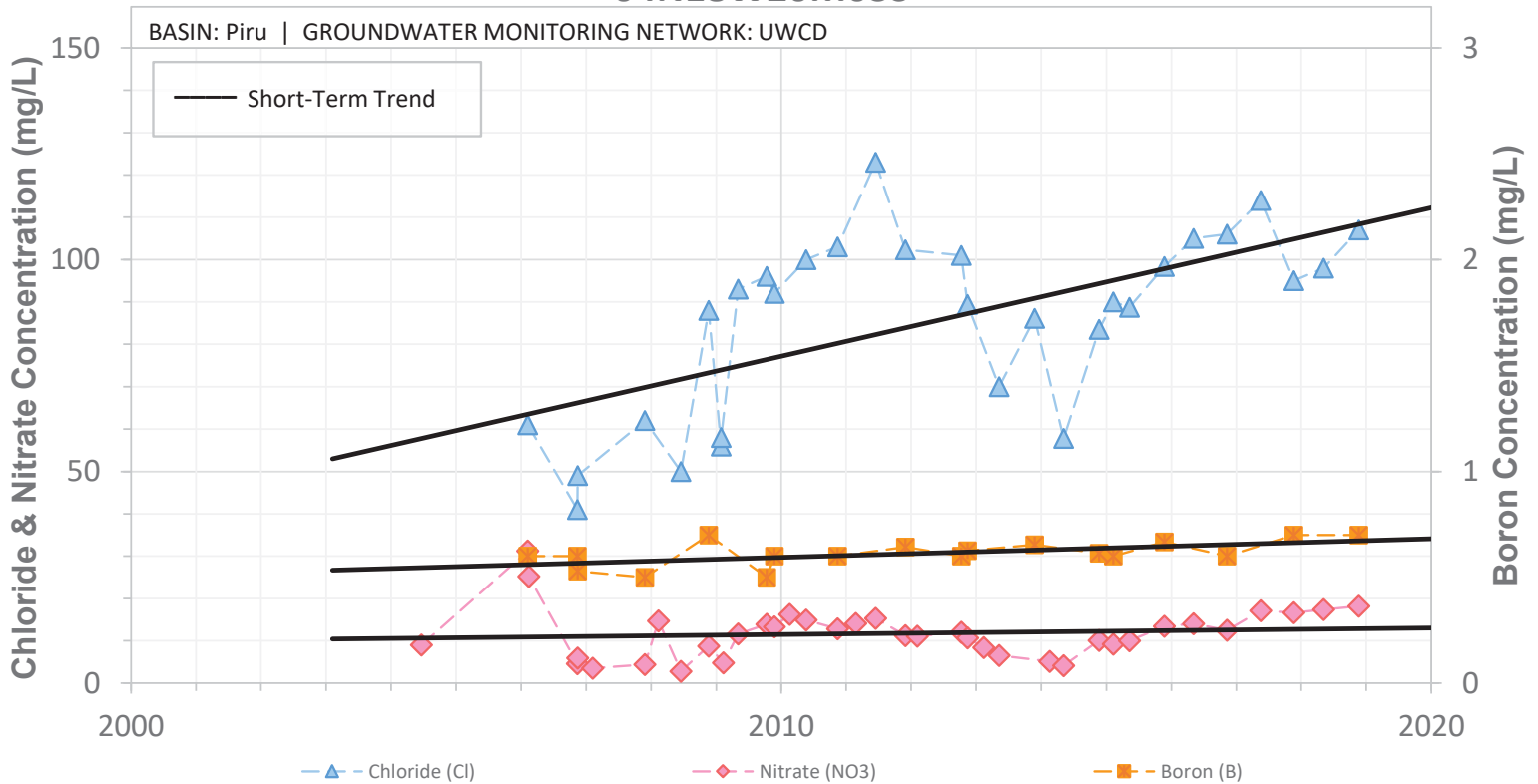
SCREEN: 160-369 ft bgs | CURRENT USE: Domestic | STATUS: Destroyed

04N18W20M03S



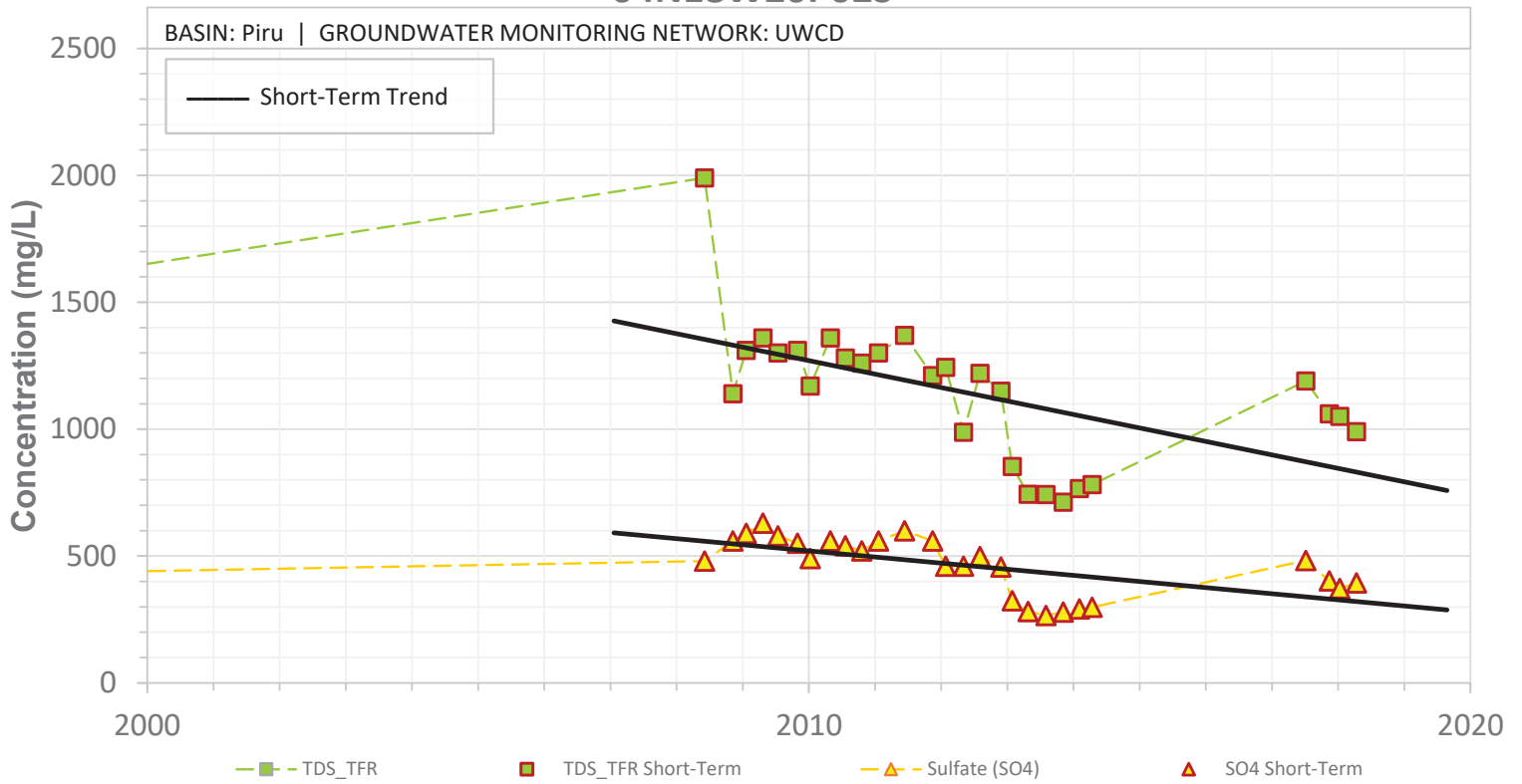
SCREEN: 160-450 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N18W20M03S



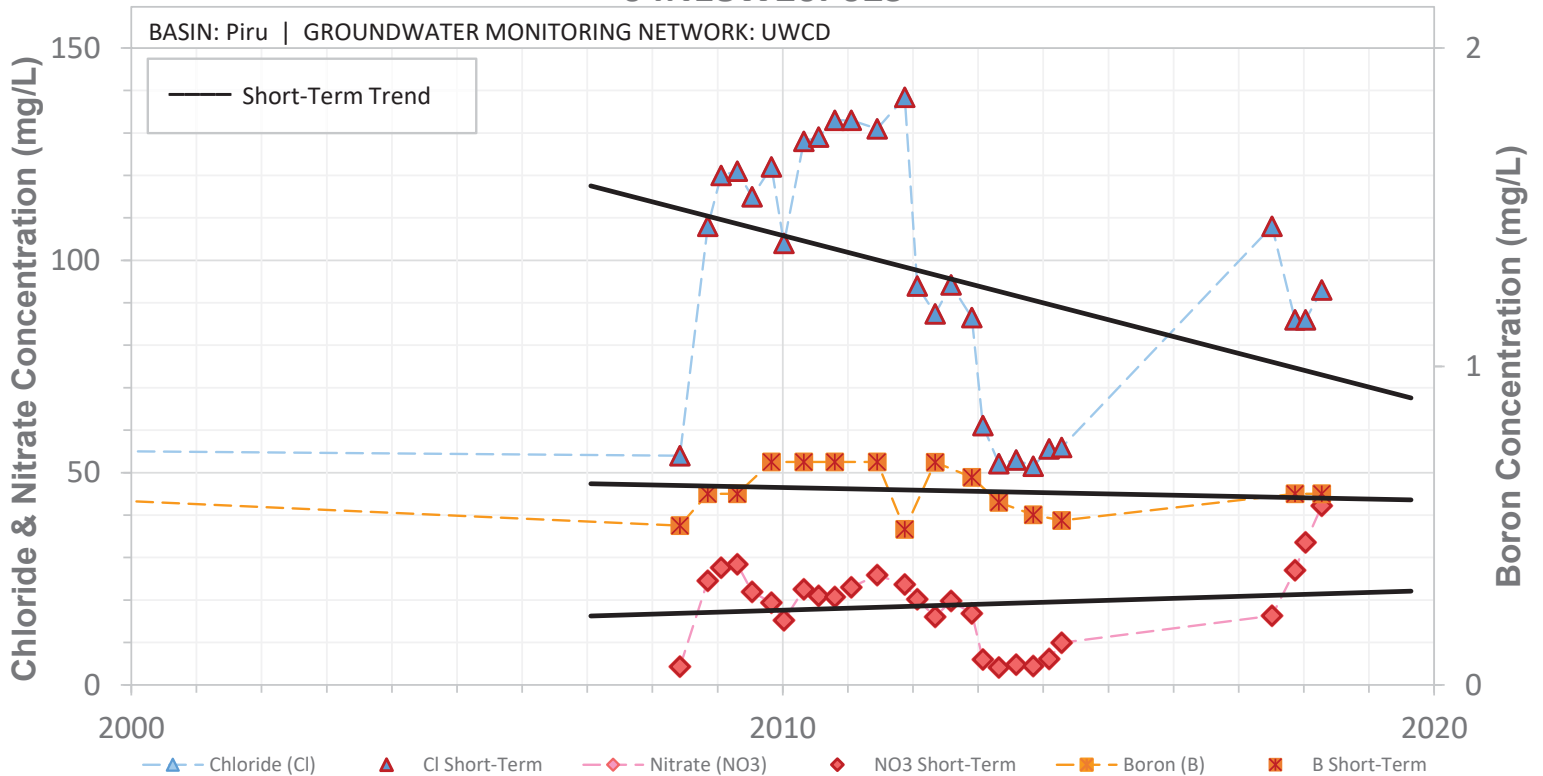
SCREEN: 160-450 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N18W20P02S



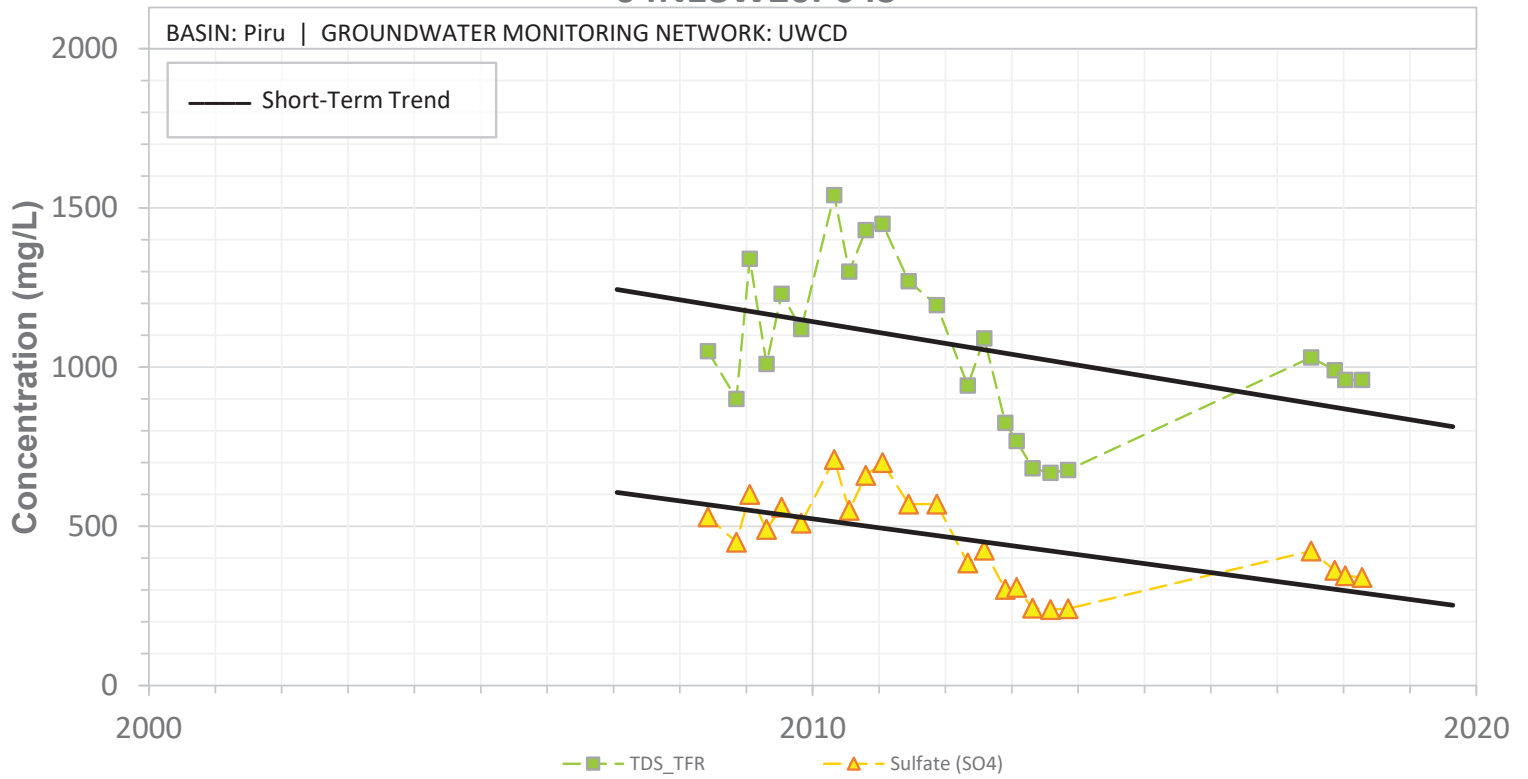
SCREEN: 137-177 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W20P02S



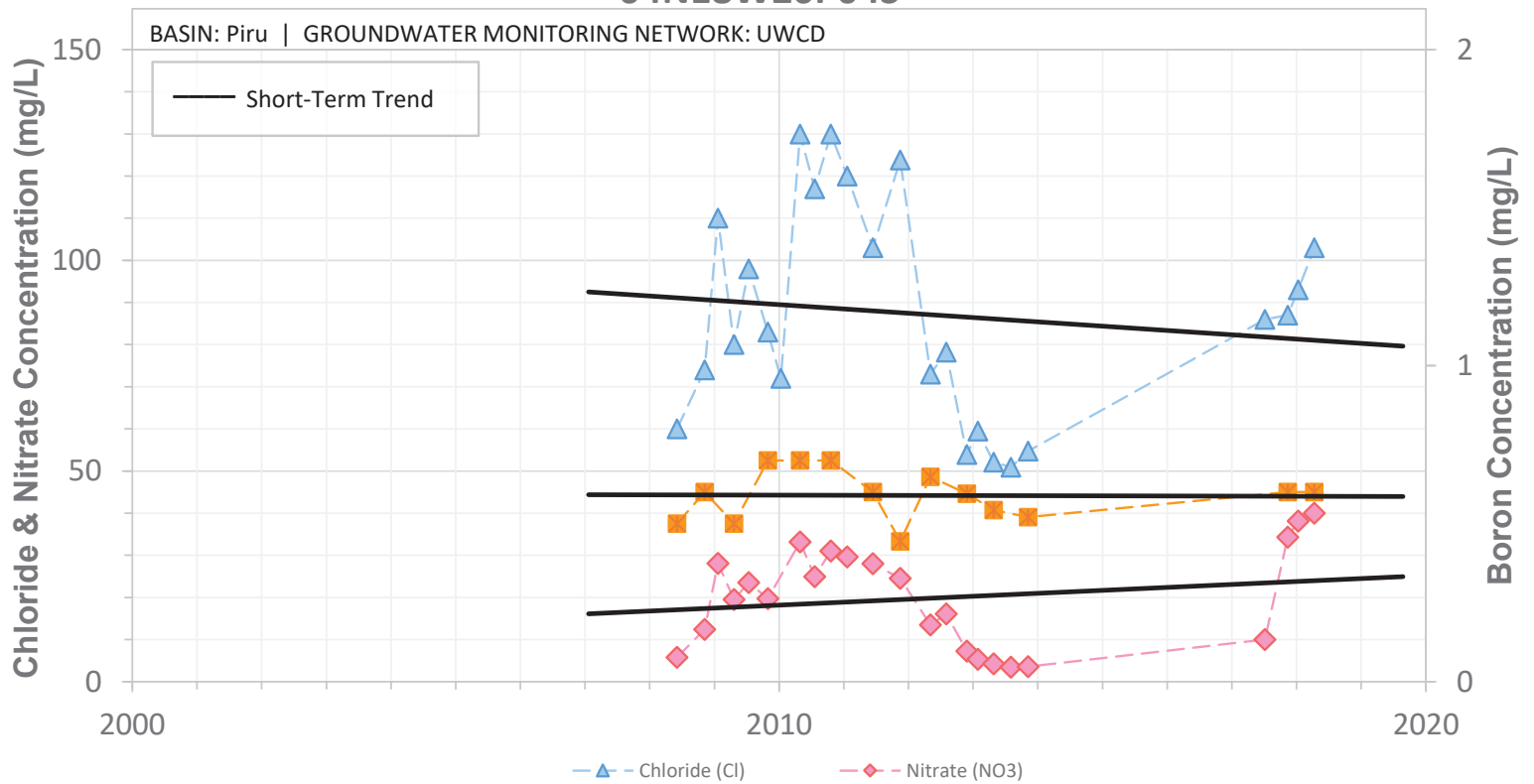
SCREEN: 137-177 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W20P04S



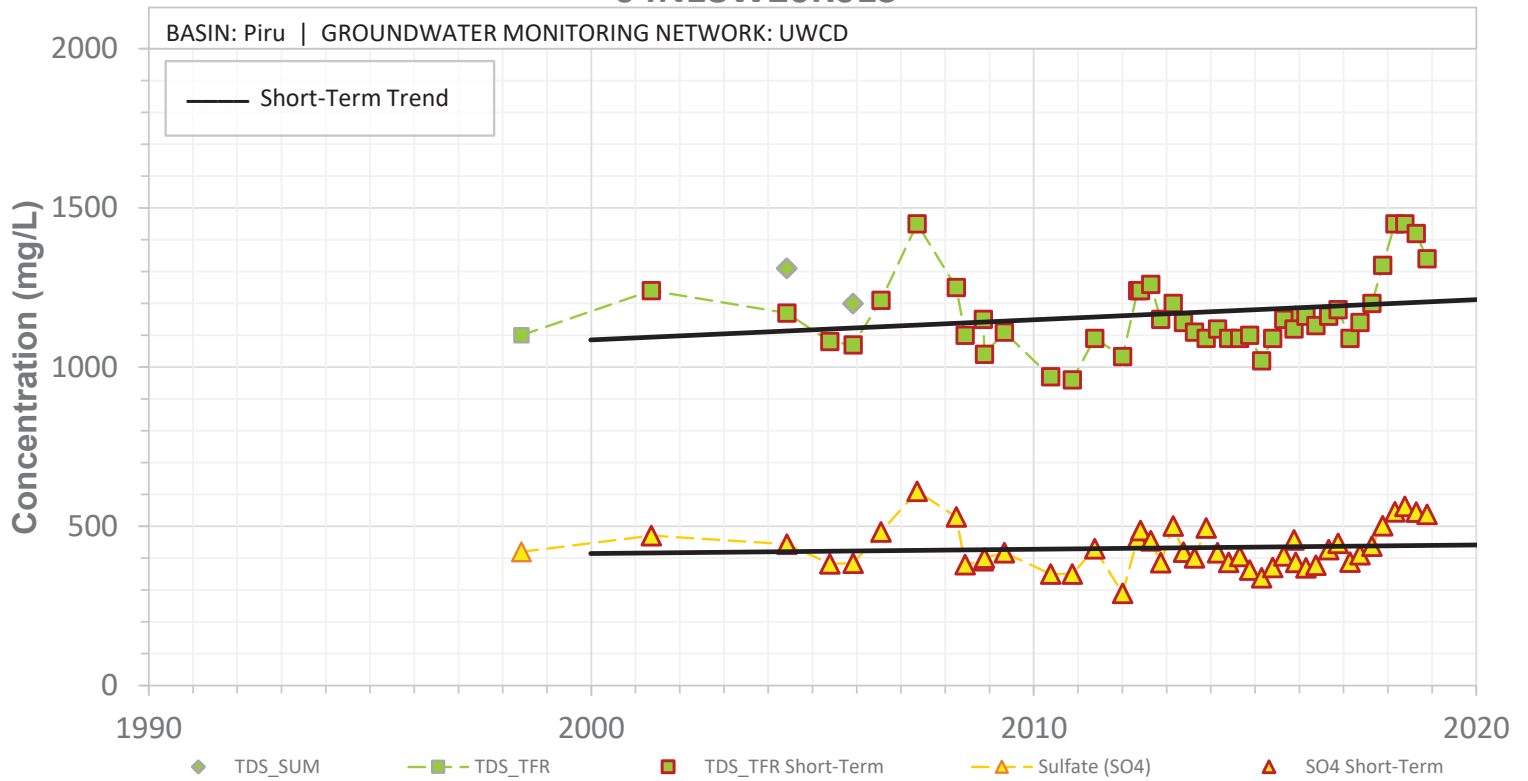
SCREEN: 100-140 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W20P04S



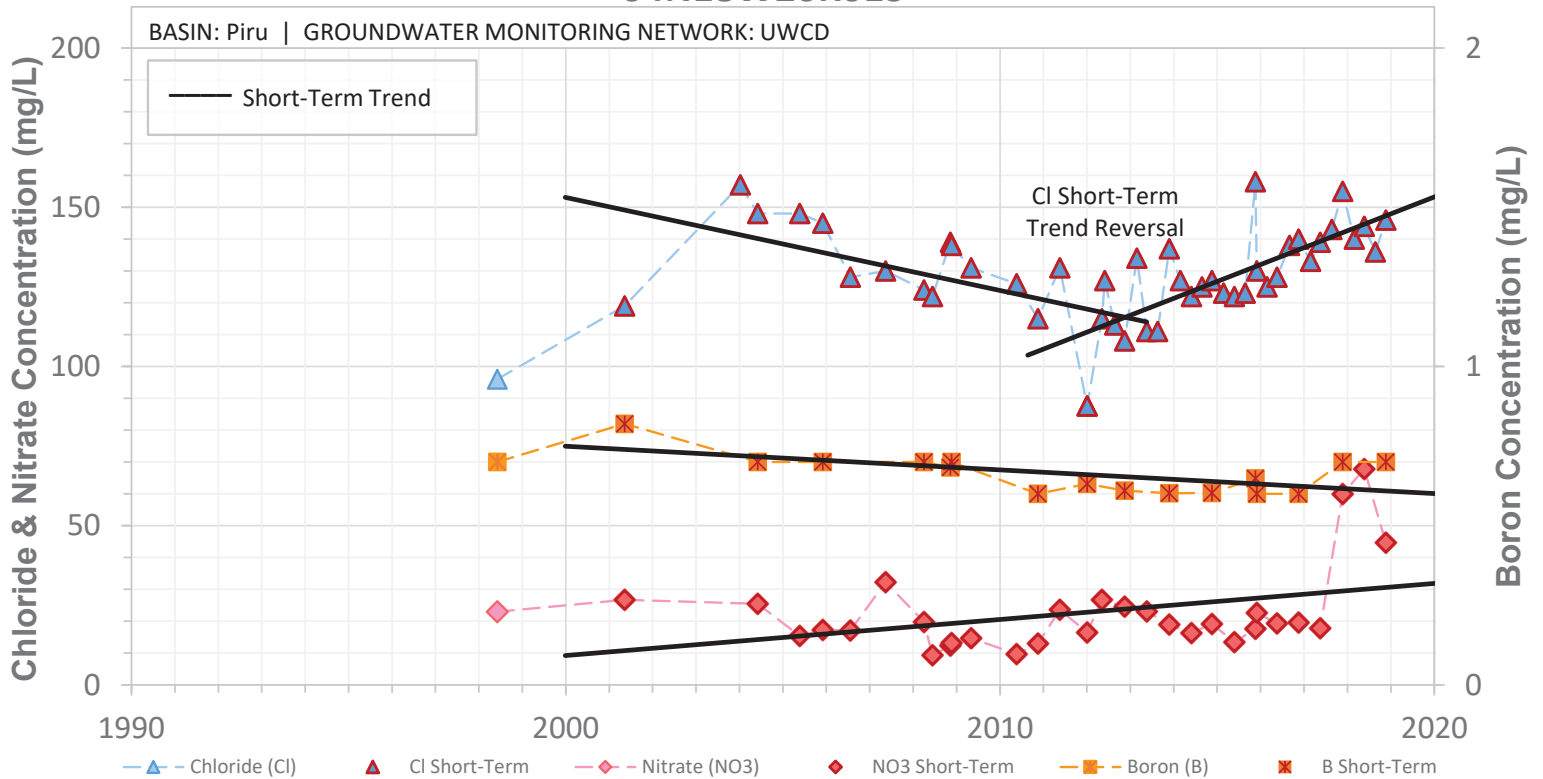
SCREEN: 100-140 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W20R01S



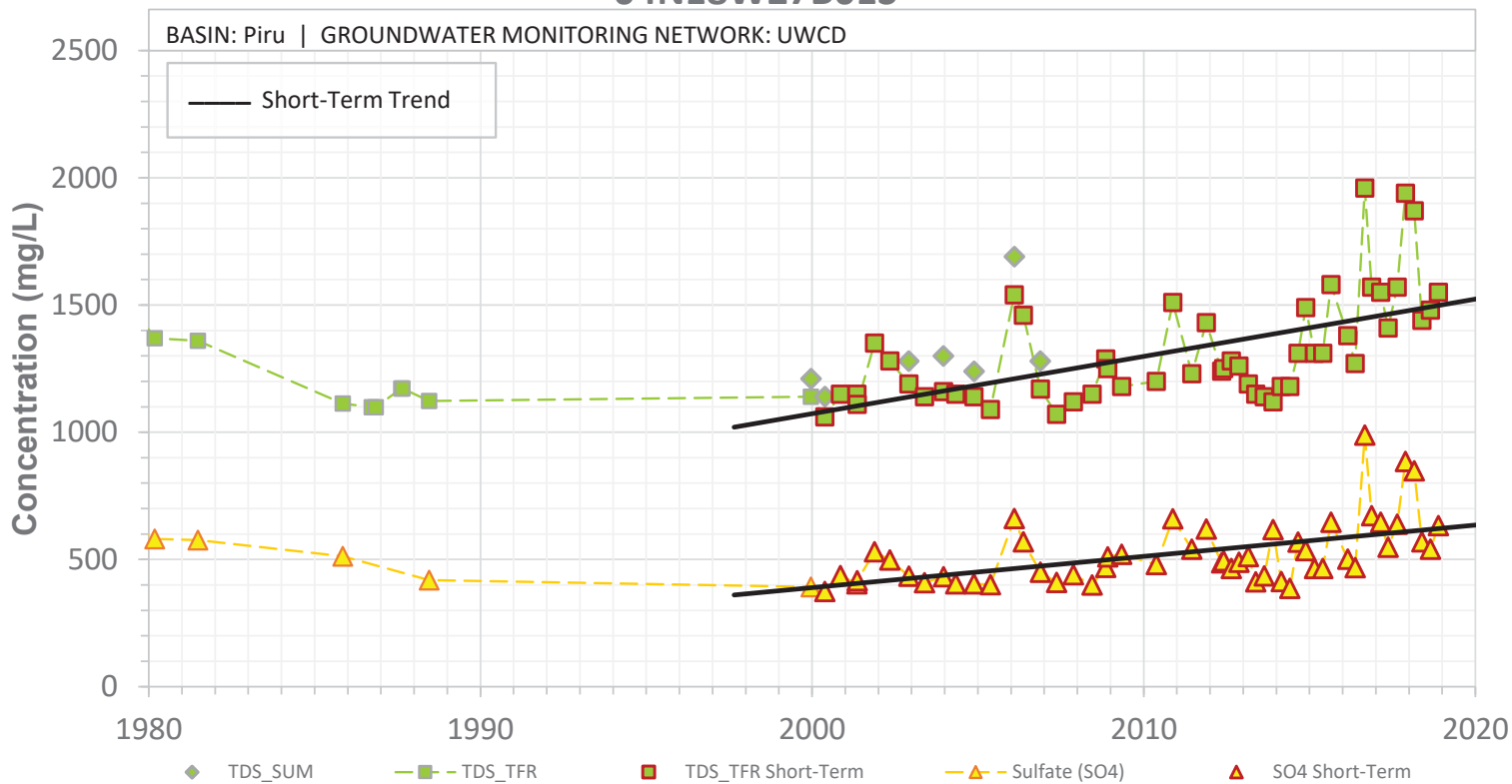
SCREEN: 190-319 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W20R01S



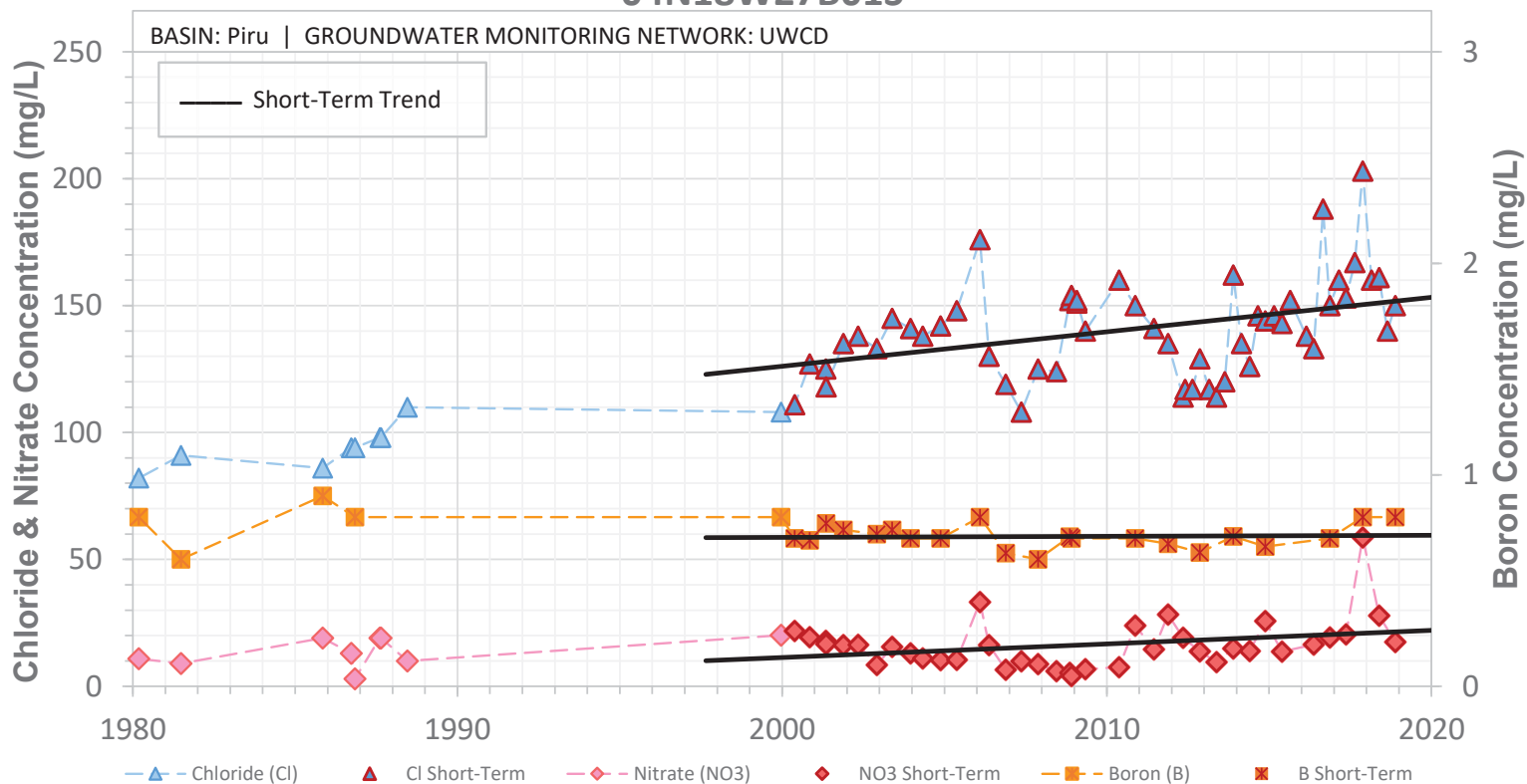
SCREEN: 190-319 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W27B01S



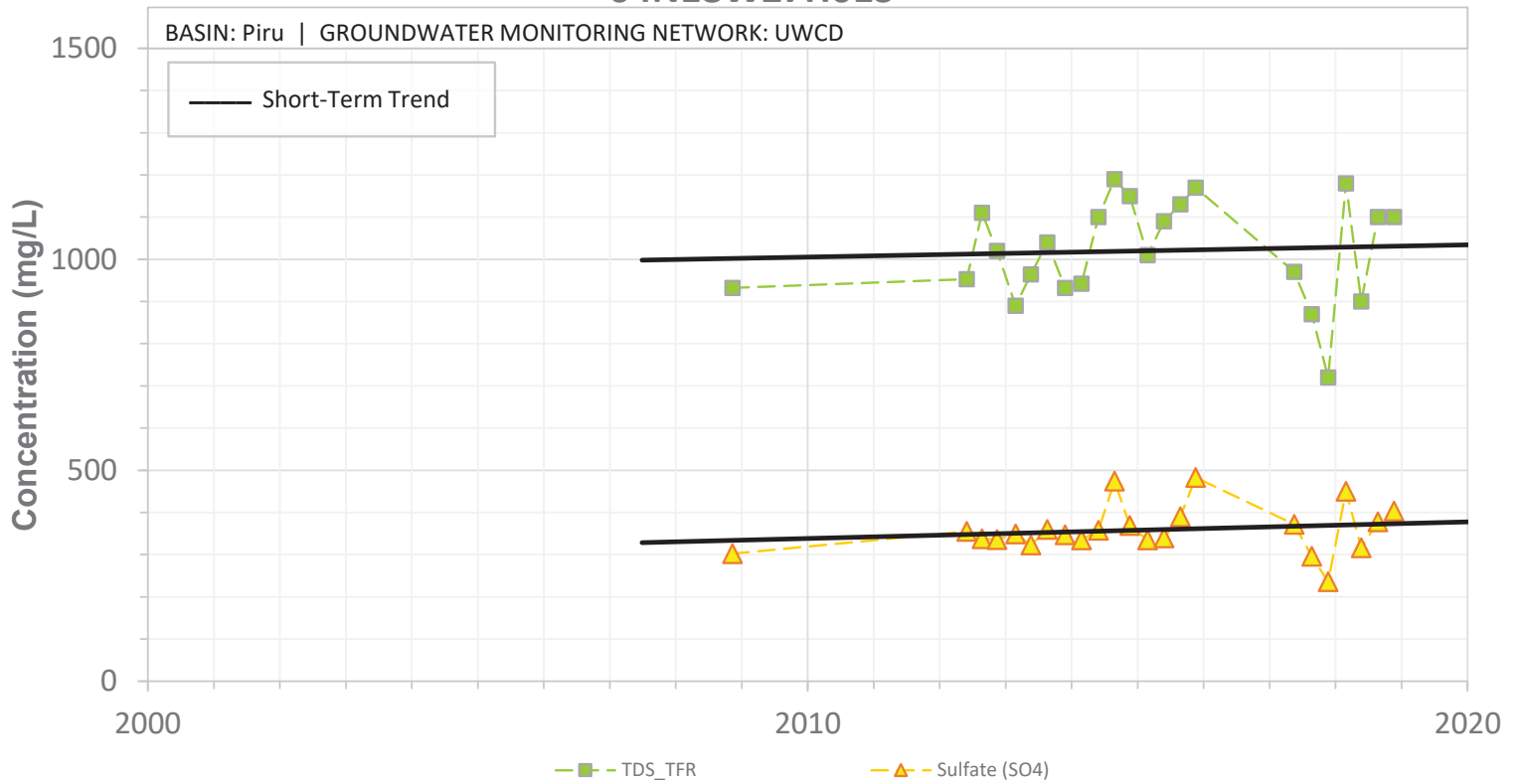
SCREEN: 156-280 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N18W27B01S



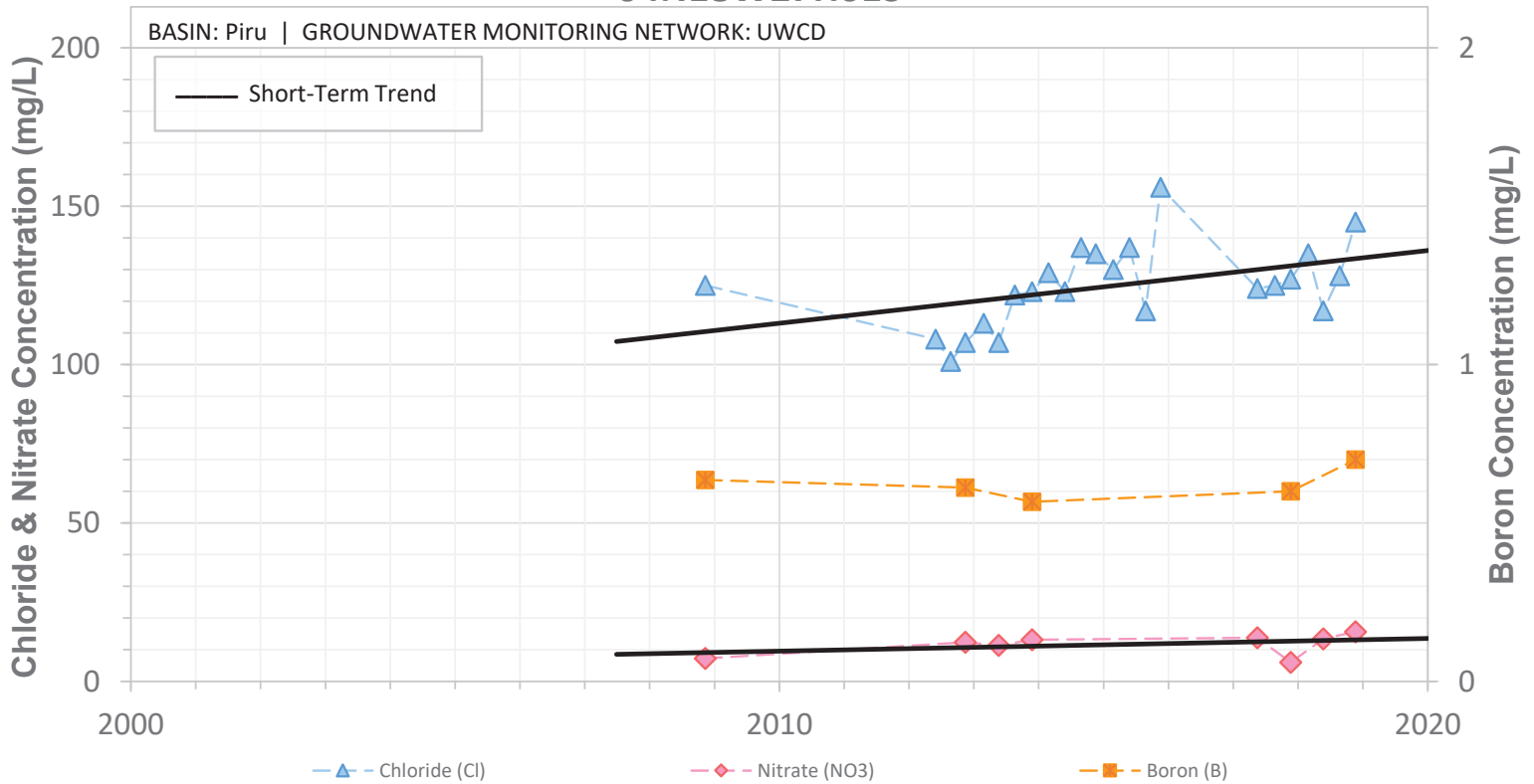
SCREEN: 156-280 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N18W27H01S



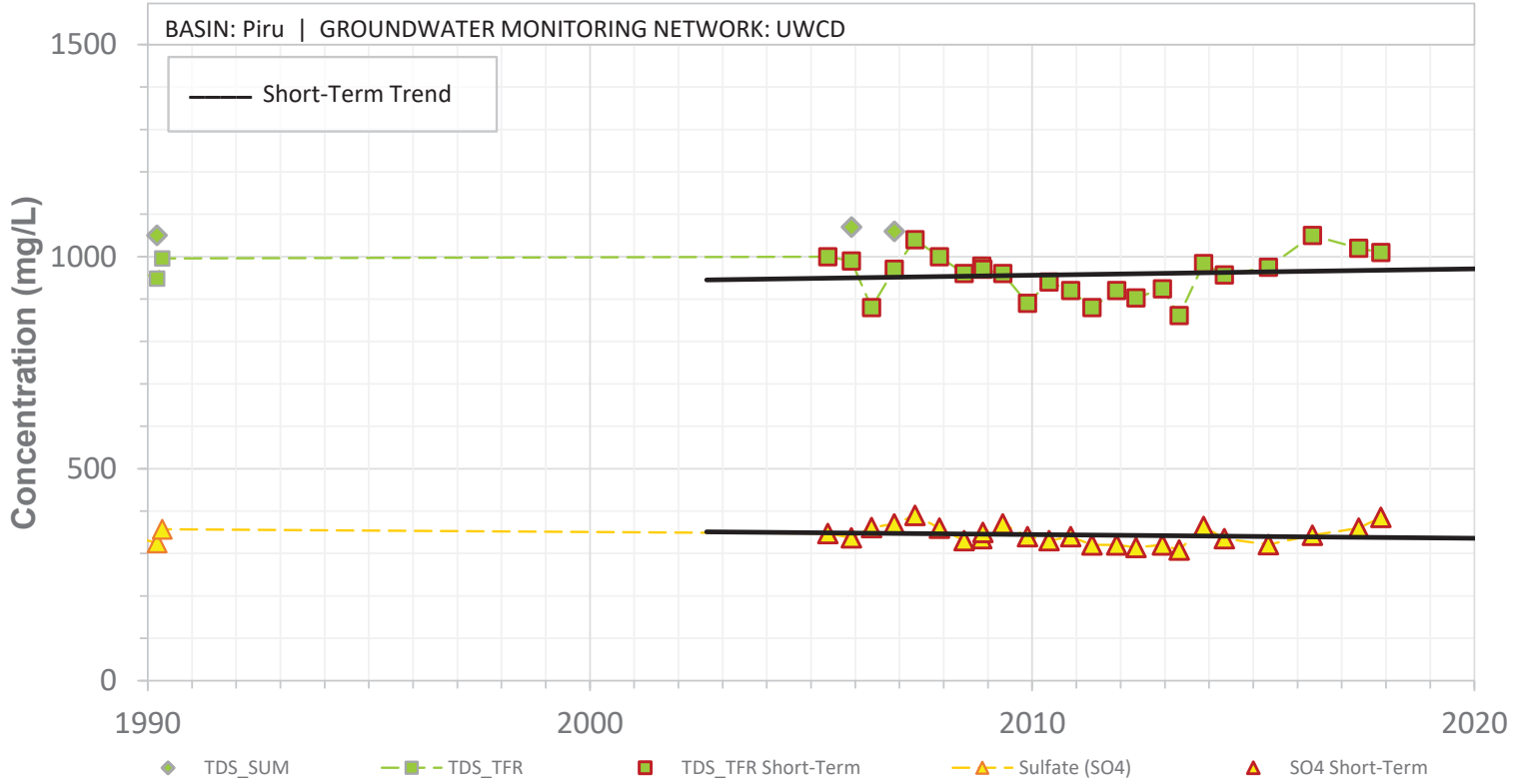
SCREEN: 40-120 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W27H01S



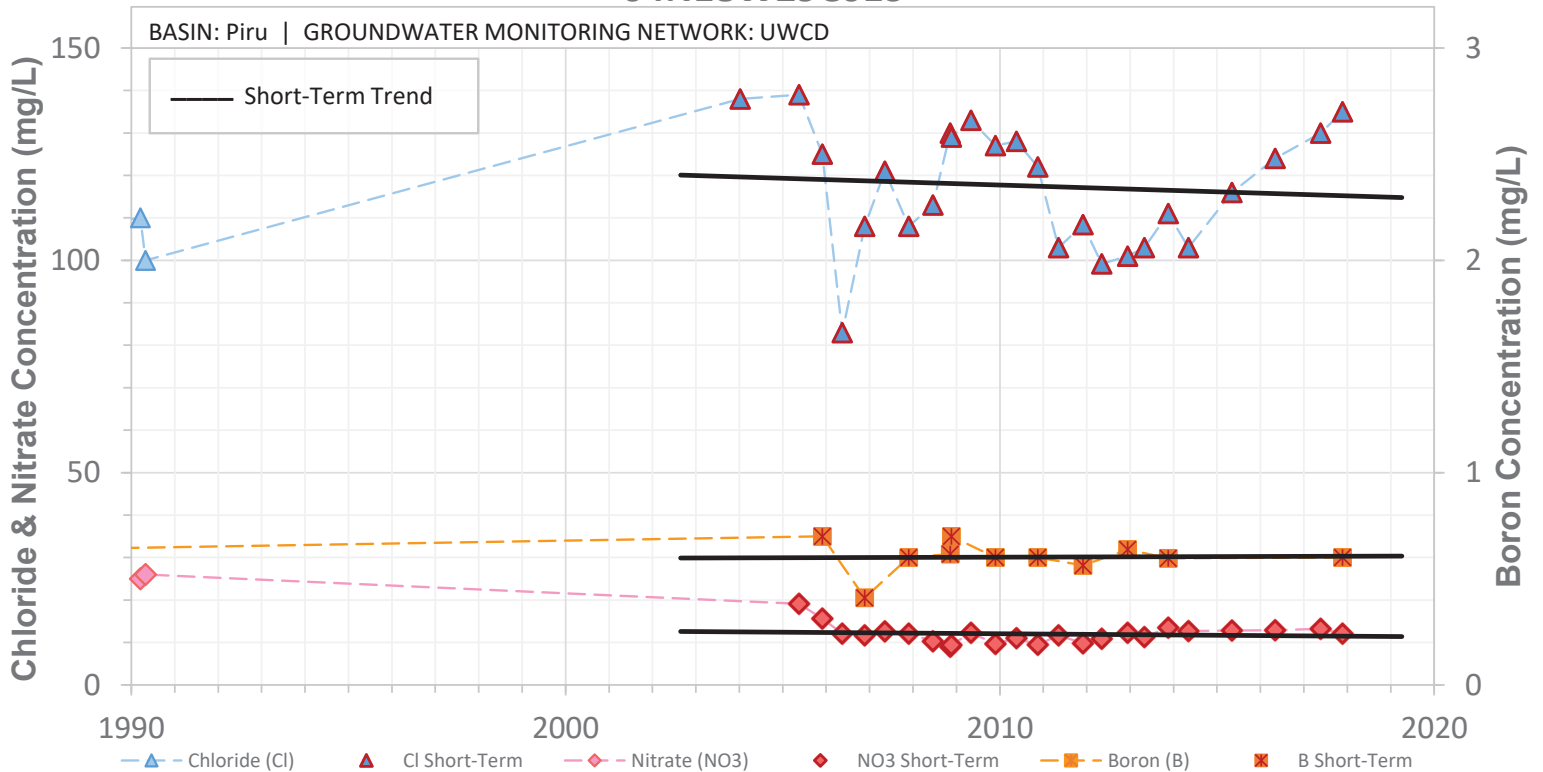
SCREEN: 40-120 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W29C01S



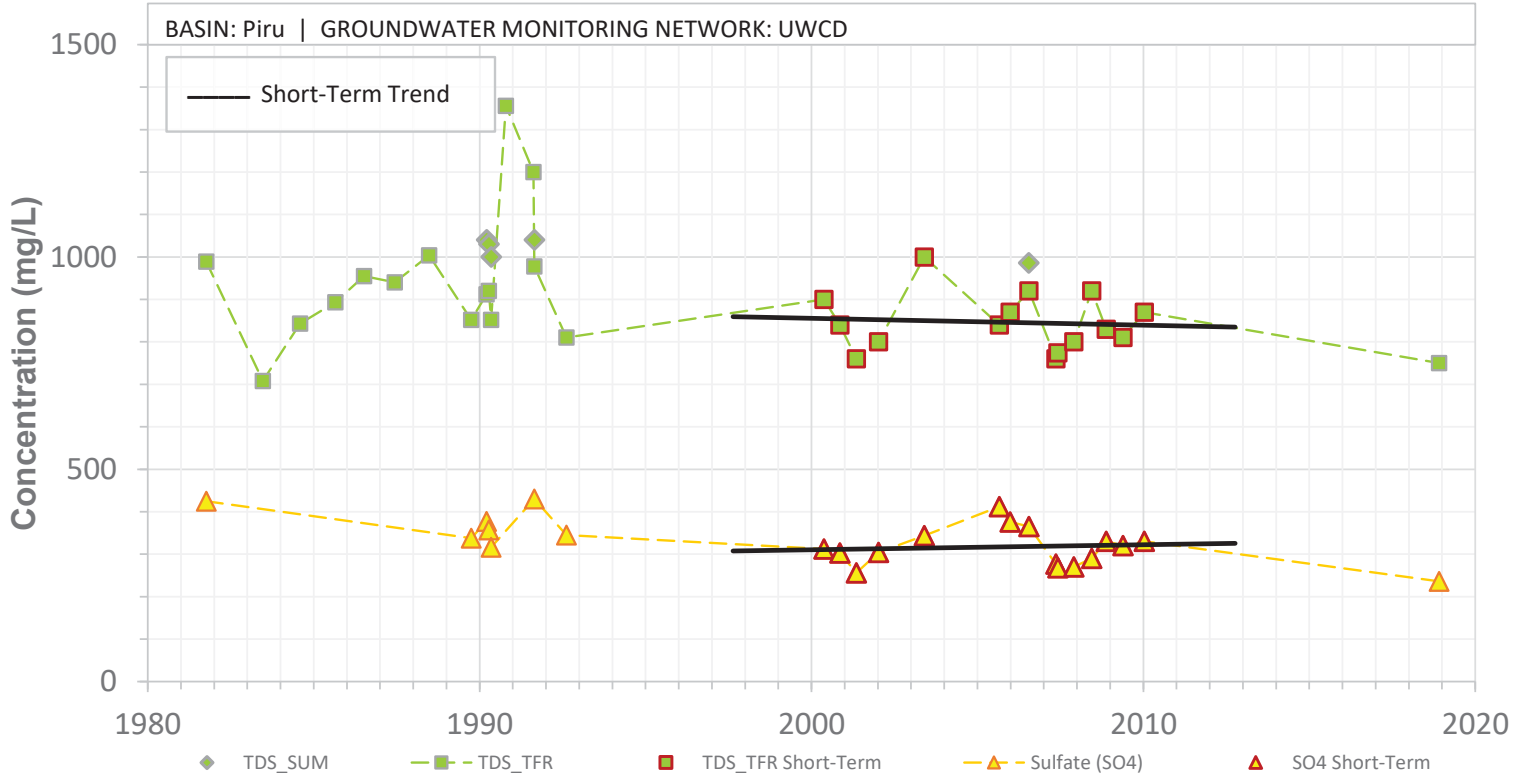
SCREEN: 356-500 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W29C01S



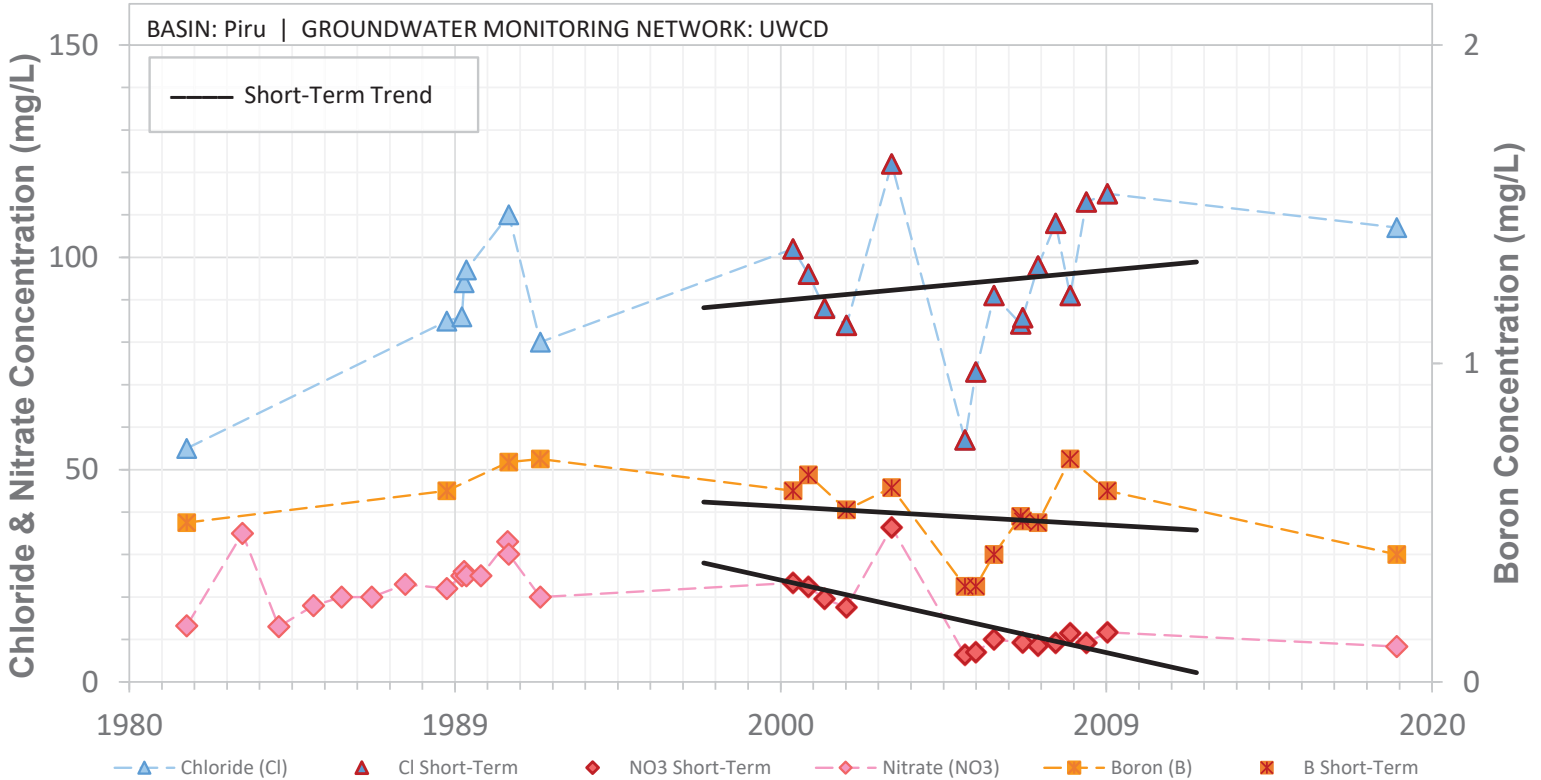
SCREEN: 356-500 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W29F01S



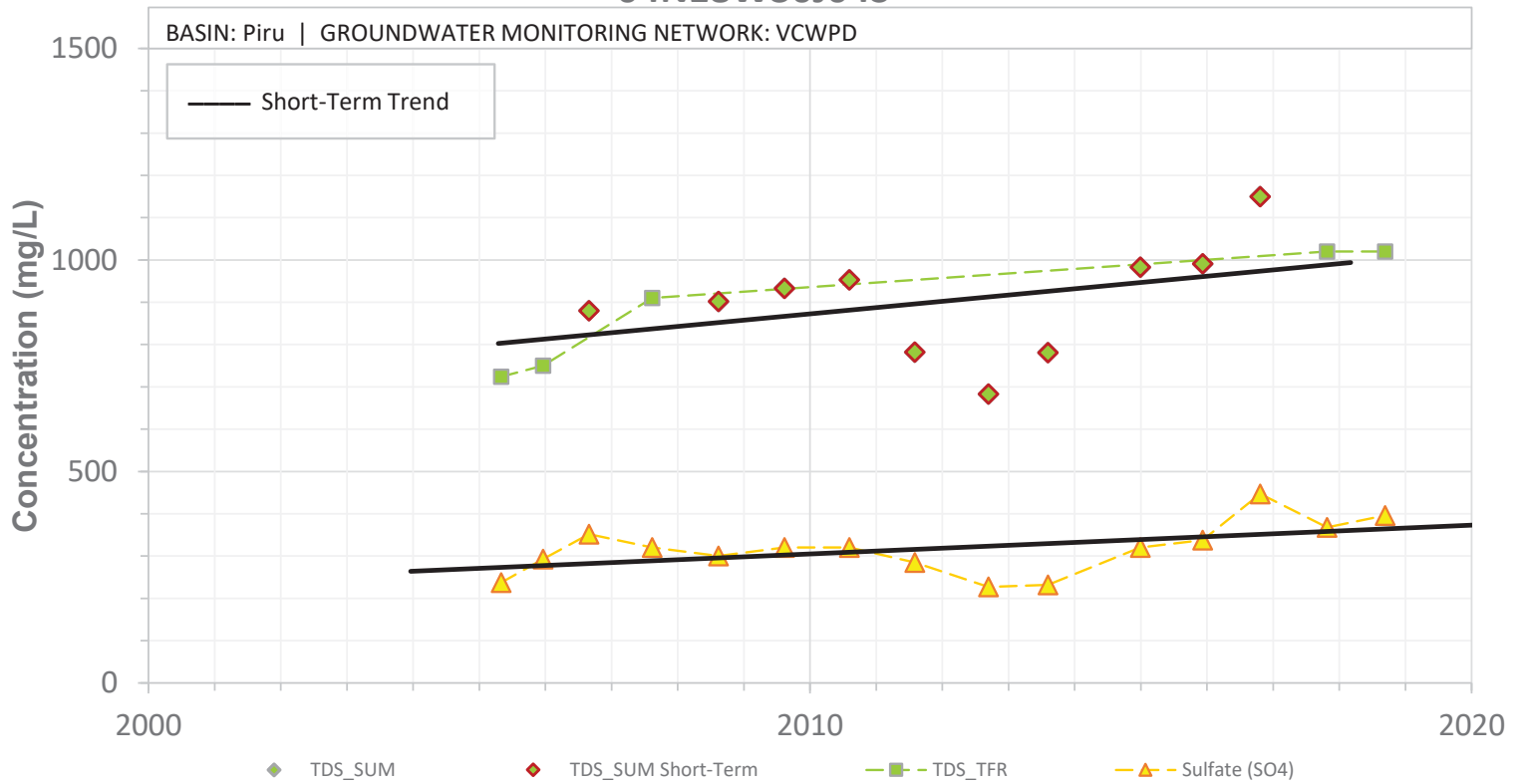
SCREEN: 110-275 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W29F01S



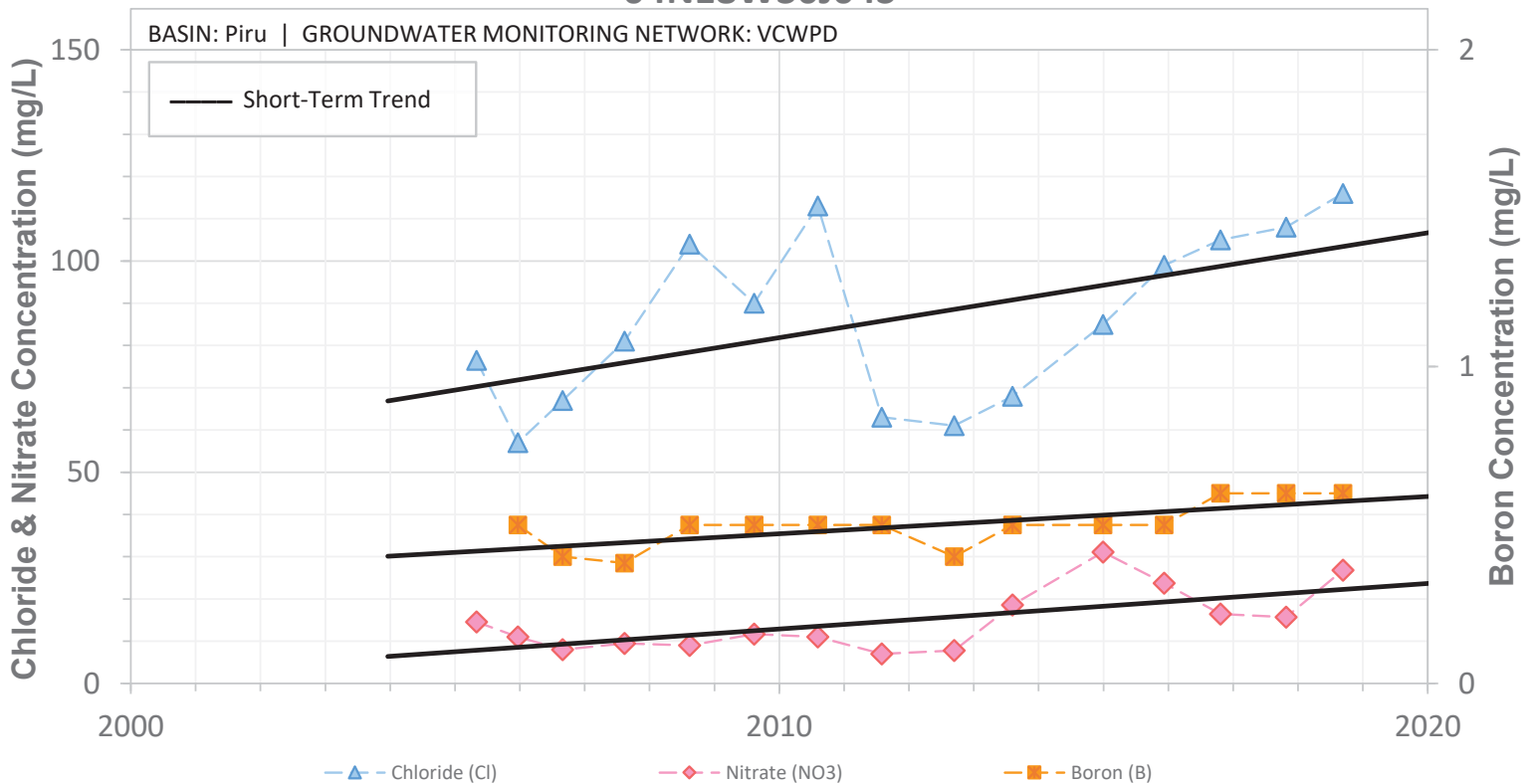
SCREEN: 110-275 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N18W30J04S



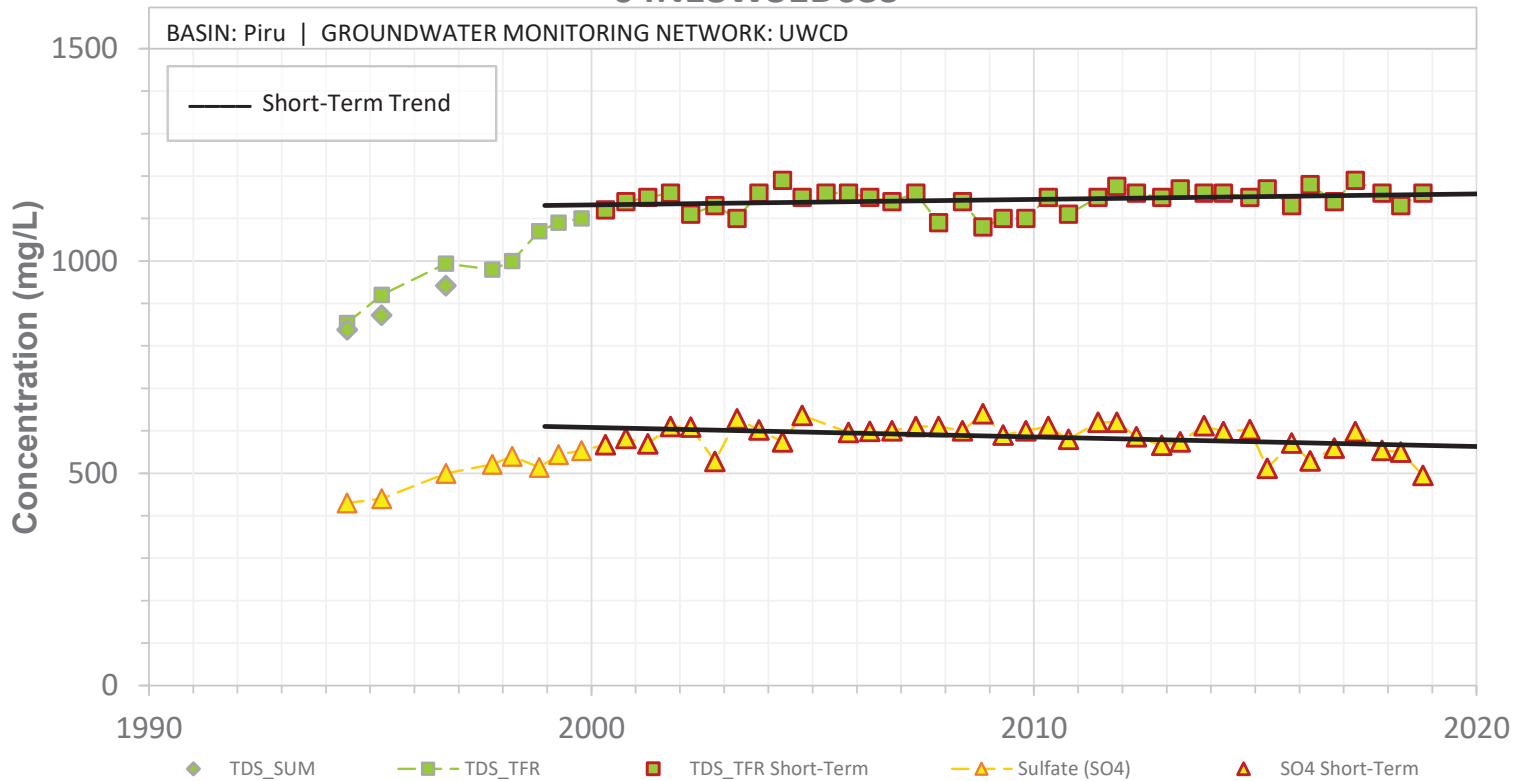
SCREEN: 79-250 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N18W30J04S



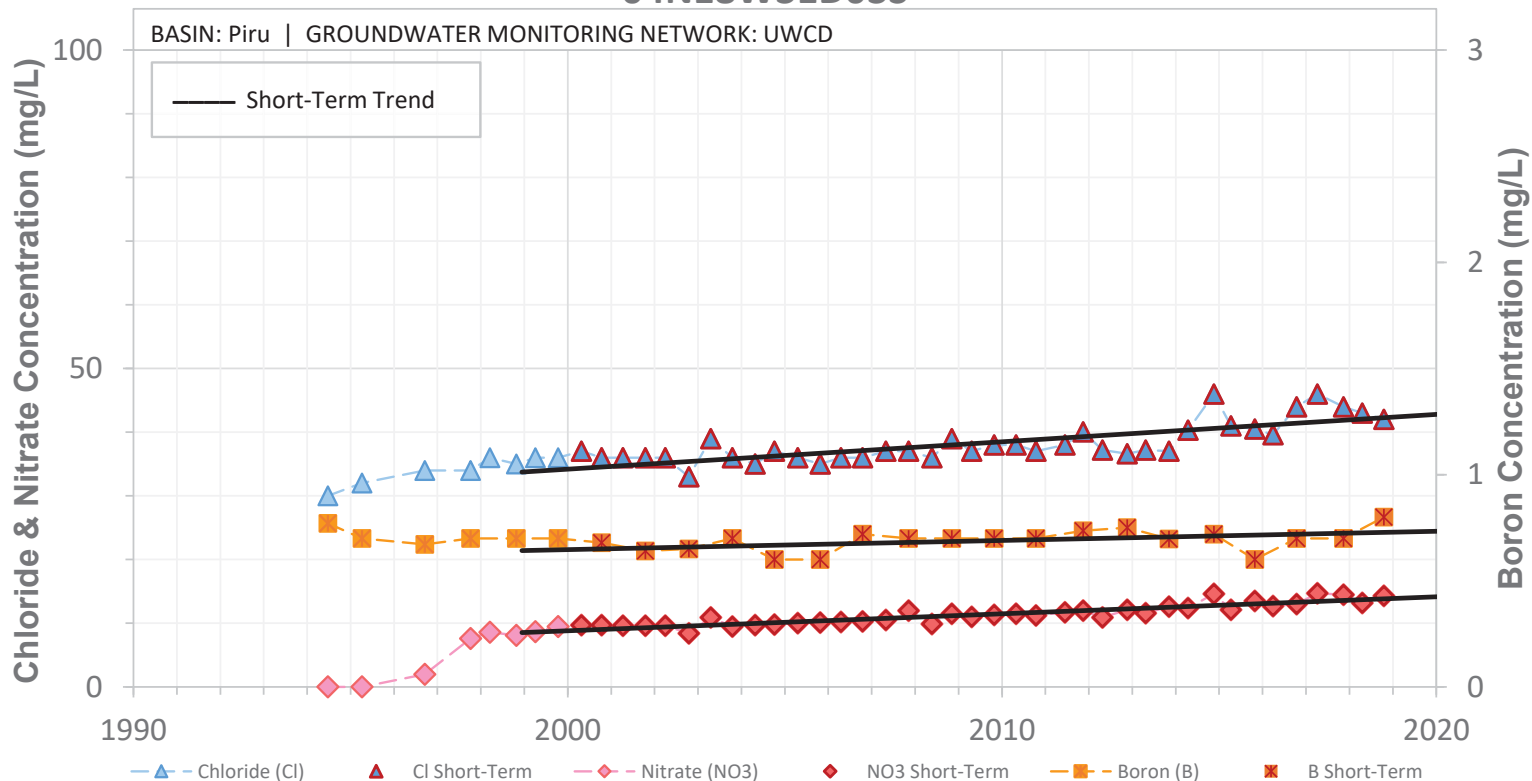
SCREEN: 79-250 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N18W31D03S



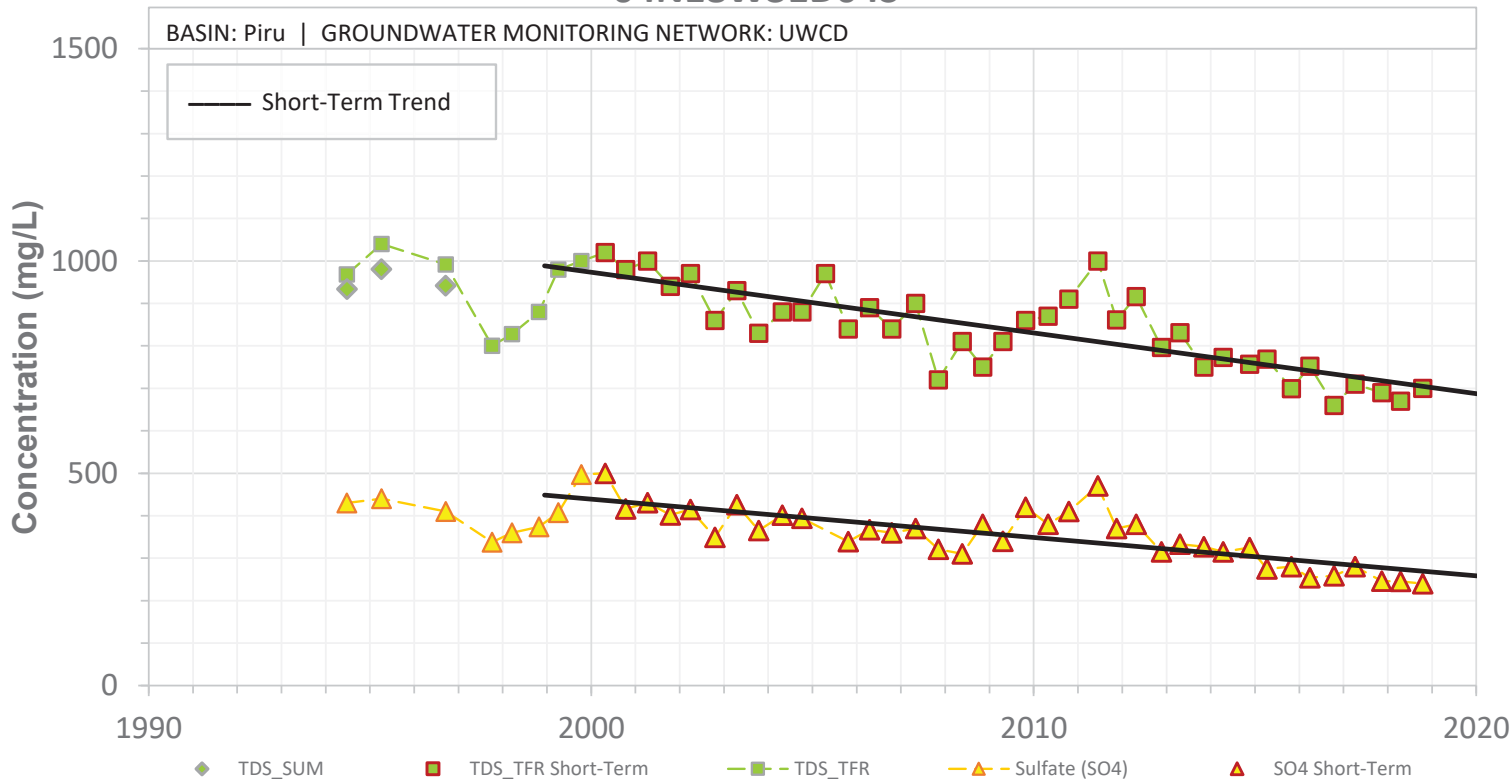
SCREEN: 590-610 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D03S



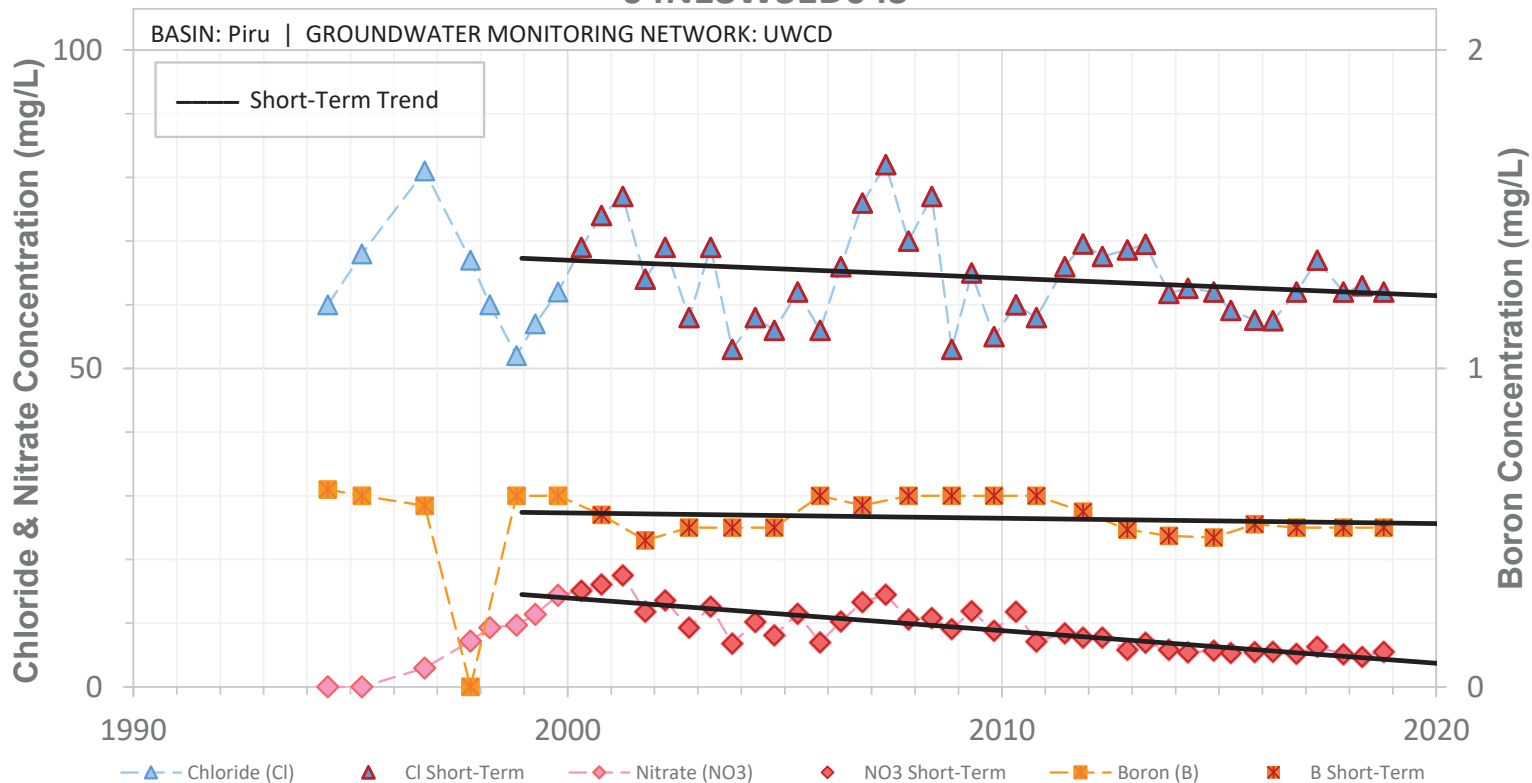
SCREEN: 590-610 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D04S



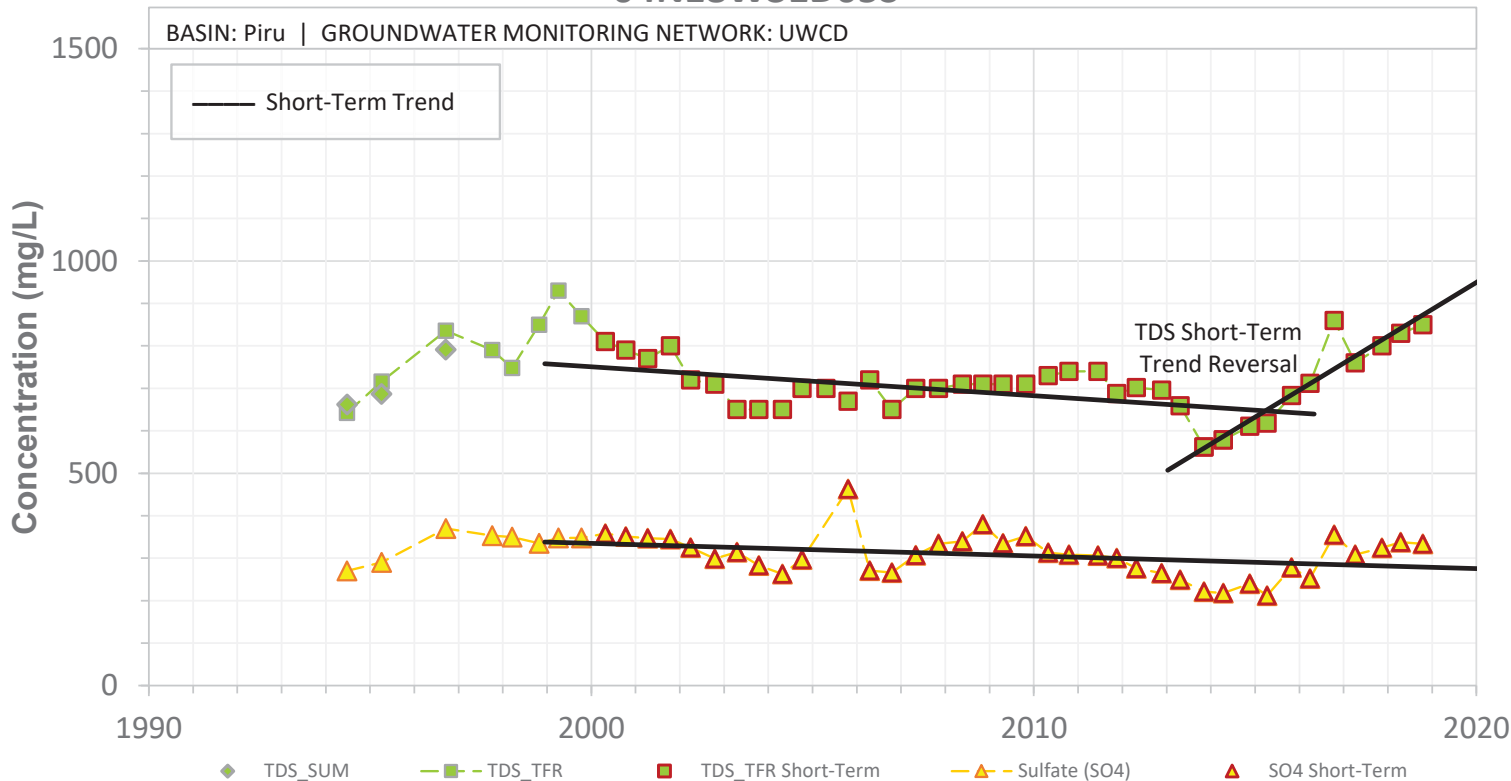
SCREEN: 310-330 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D04S



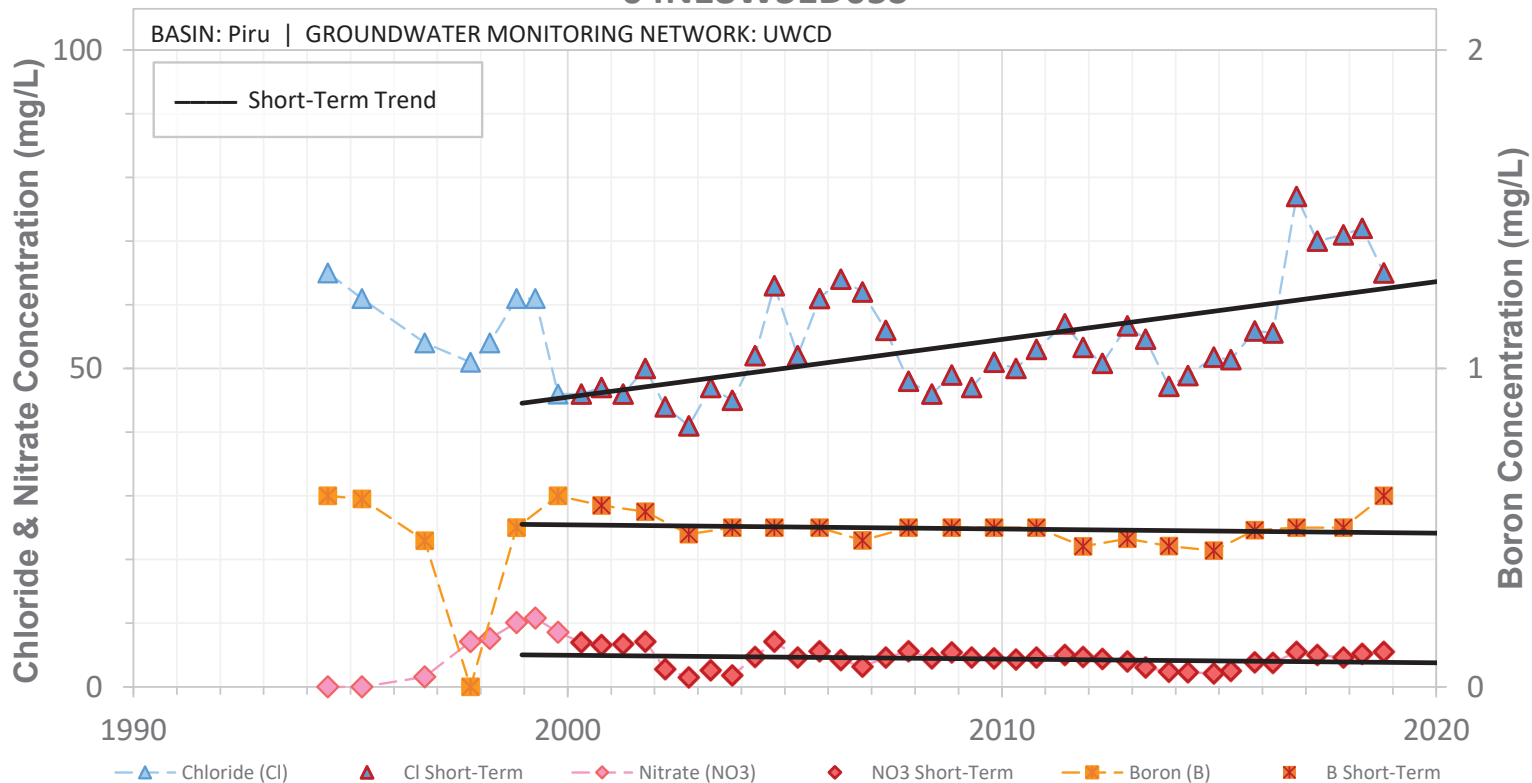
SCREEN: 310-330 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D05S



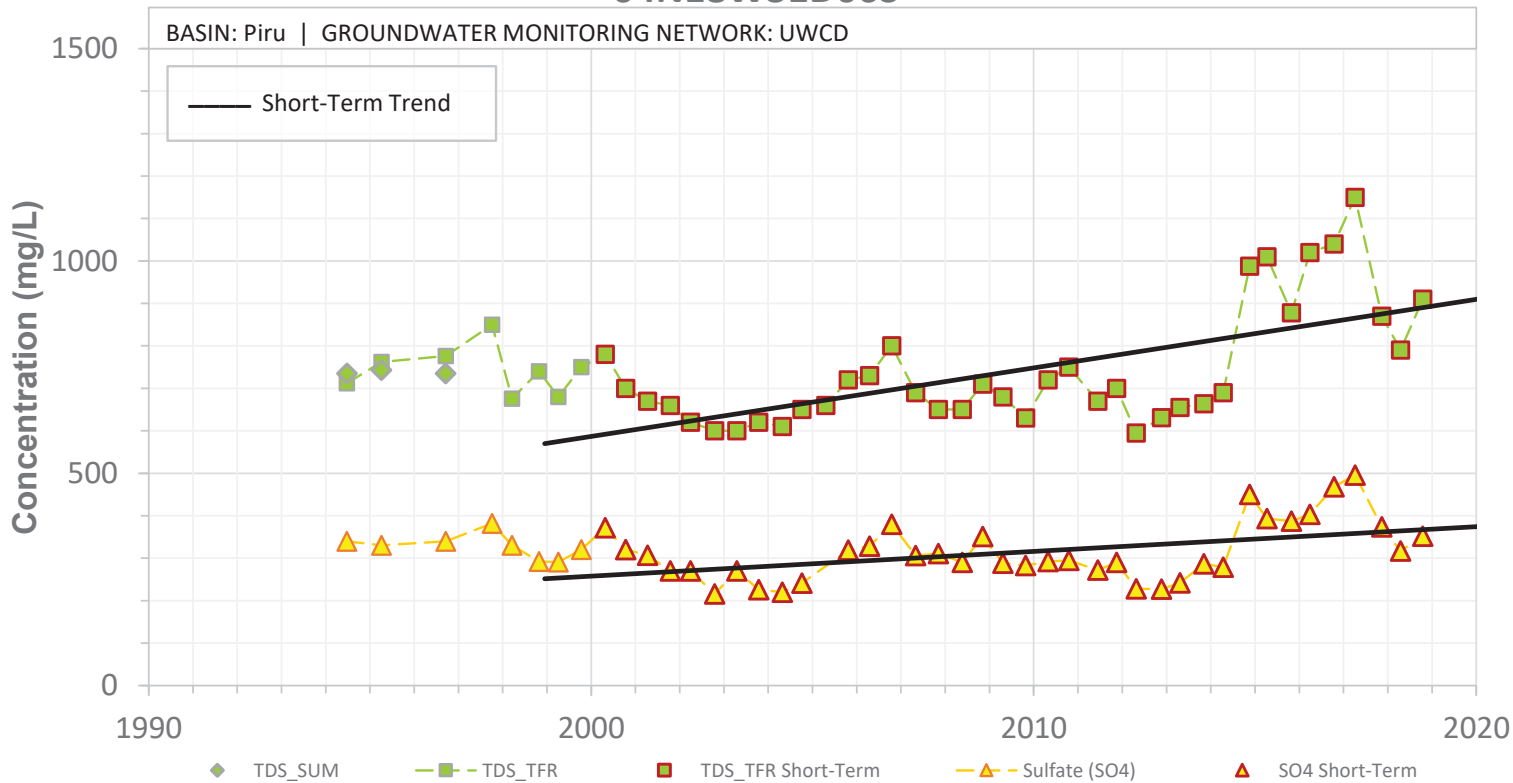
SCREEN: 220-240 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D05S



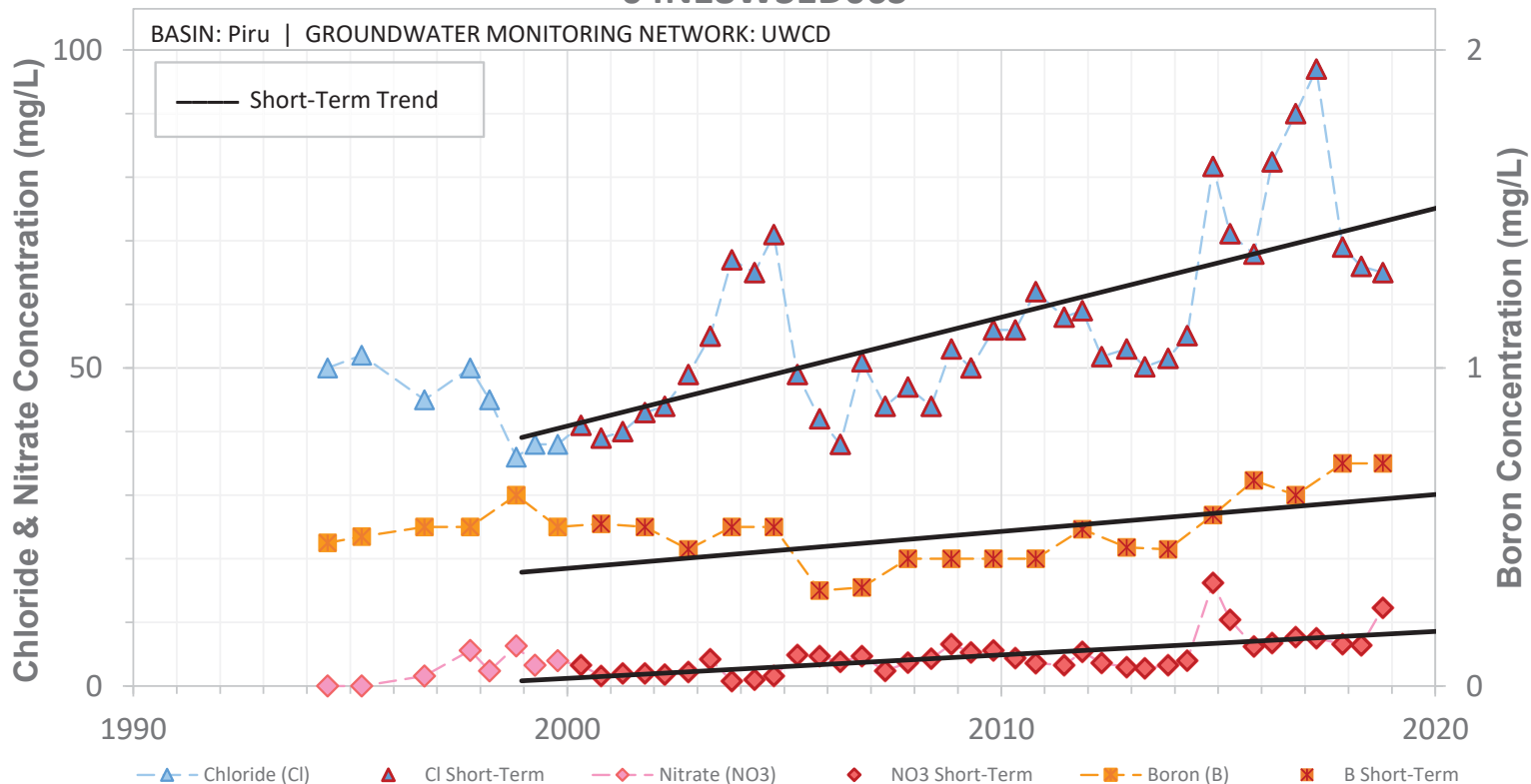
SCREEN: 220-240 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D06S



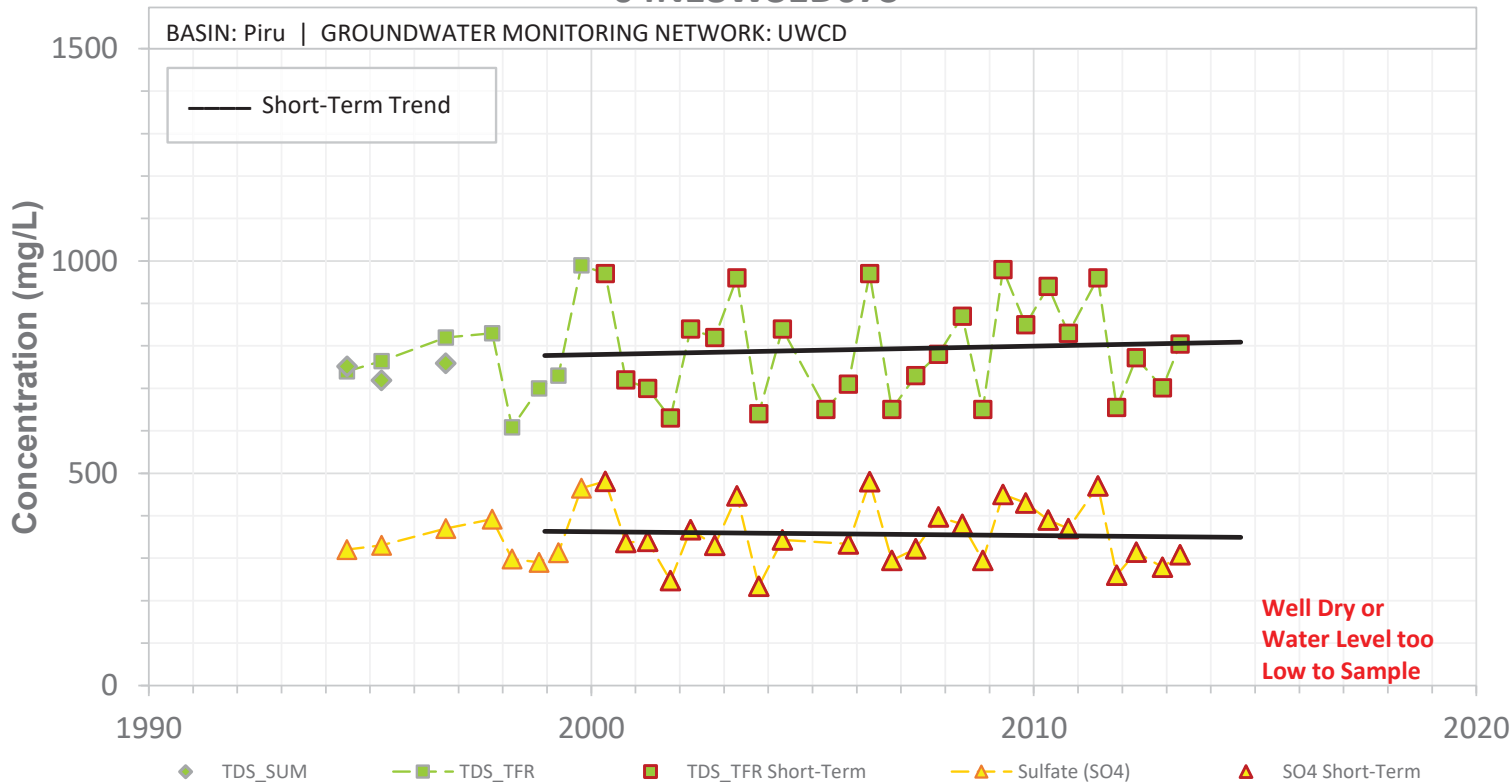
SCREEN: 140-160 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D06S



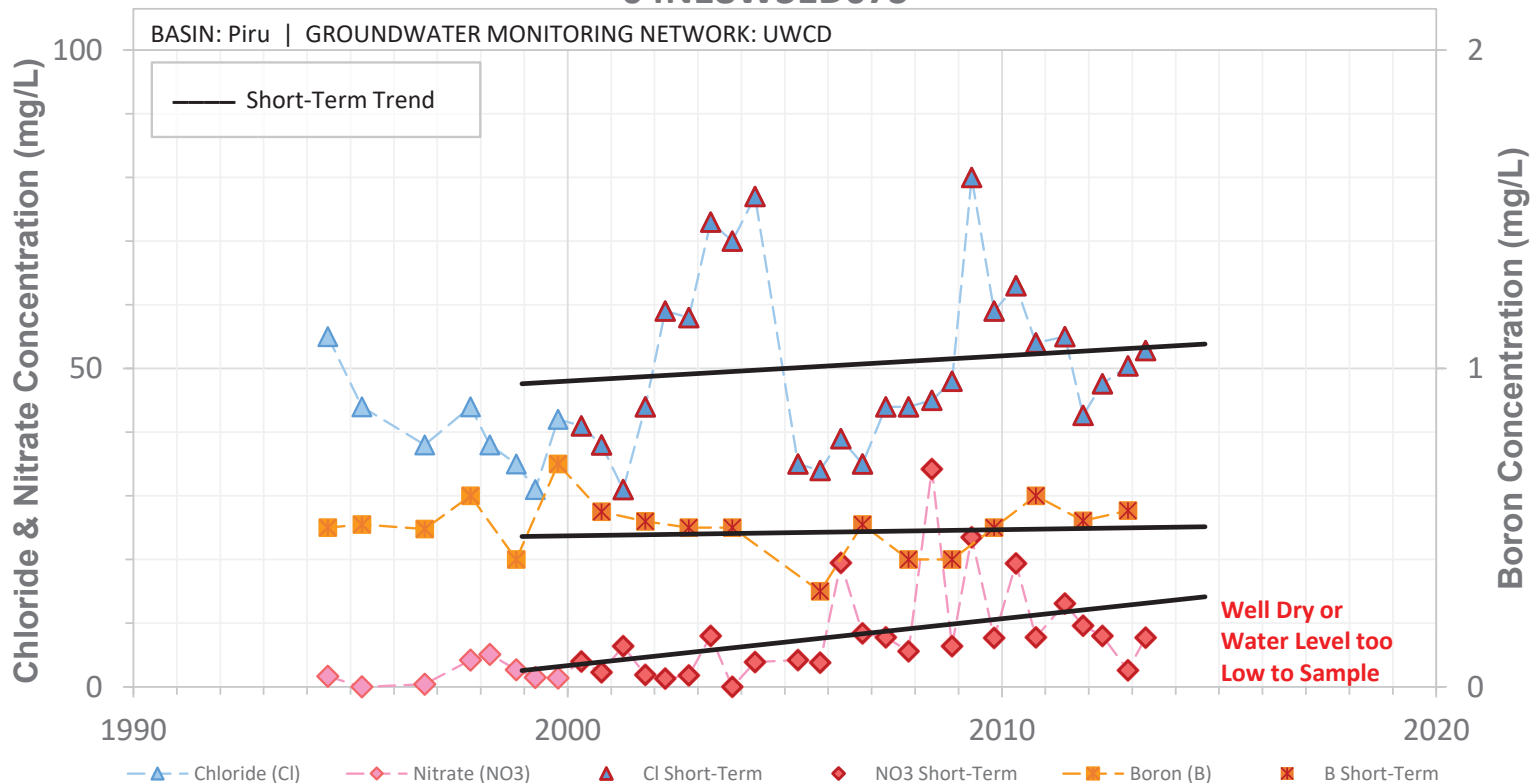
SCREEN: 140-160 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D07S



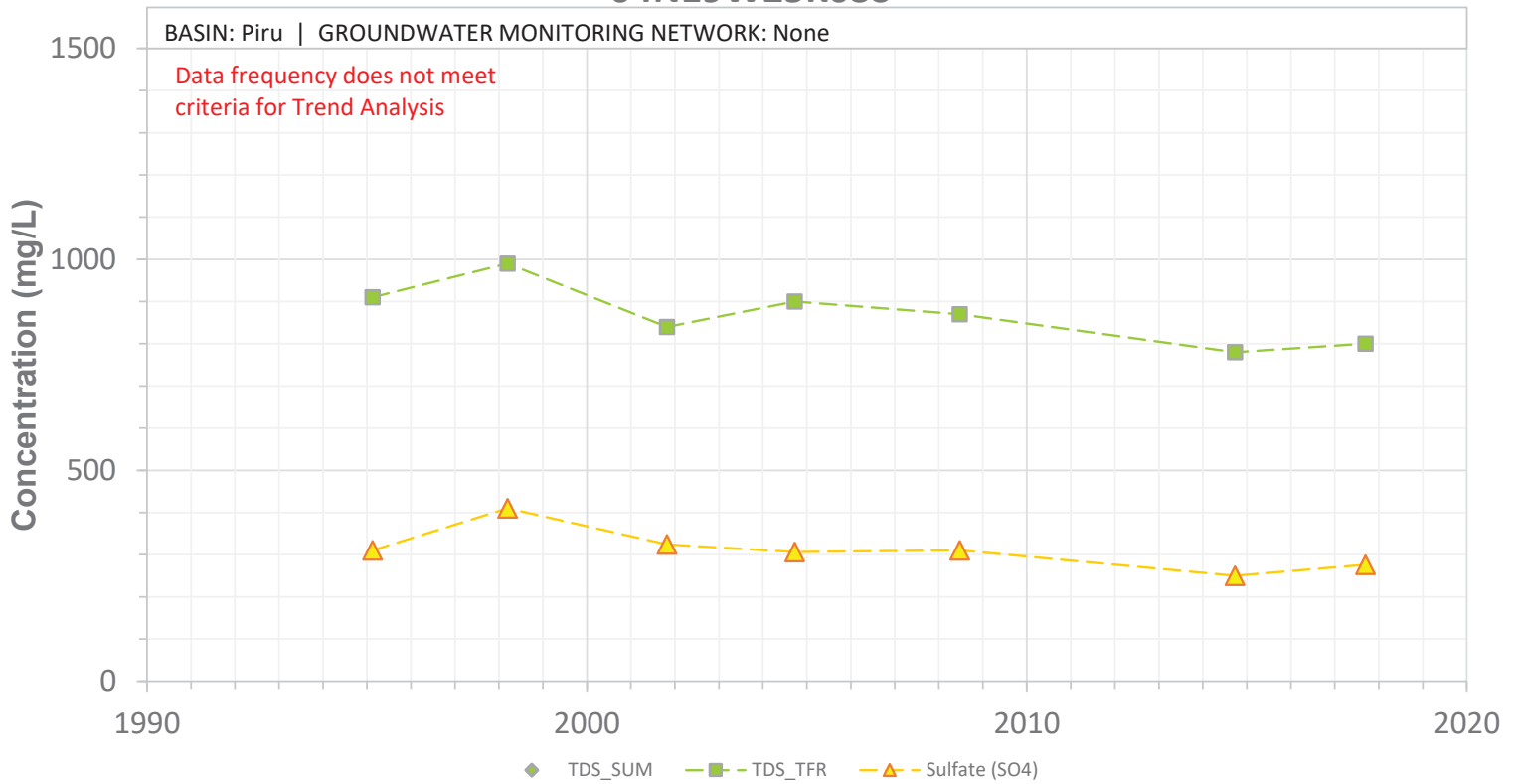
SCREEN: 50-70 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N18W31D07S



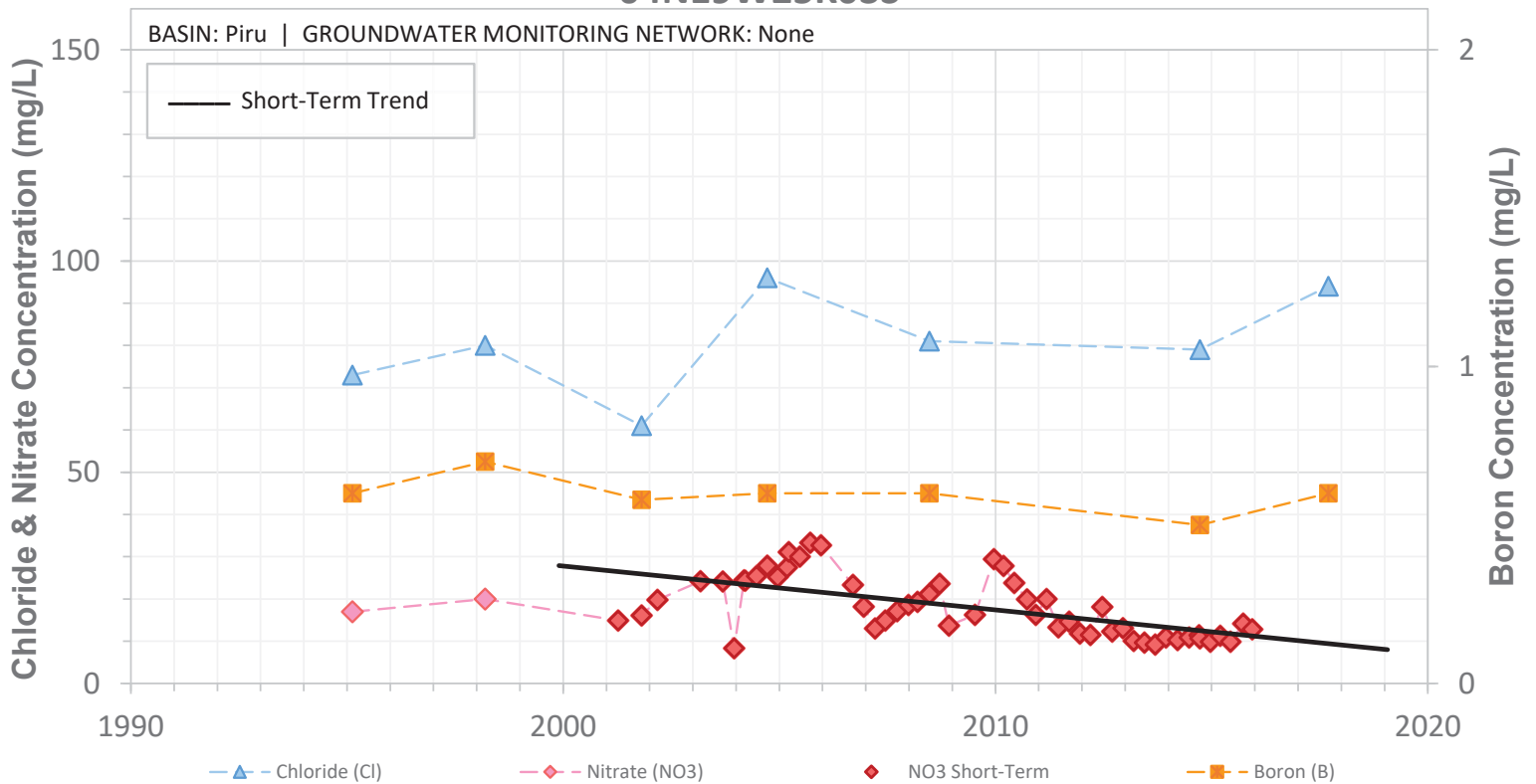
SCREEN: 50-70 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N19W25K03S



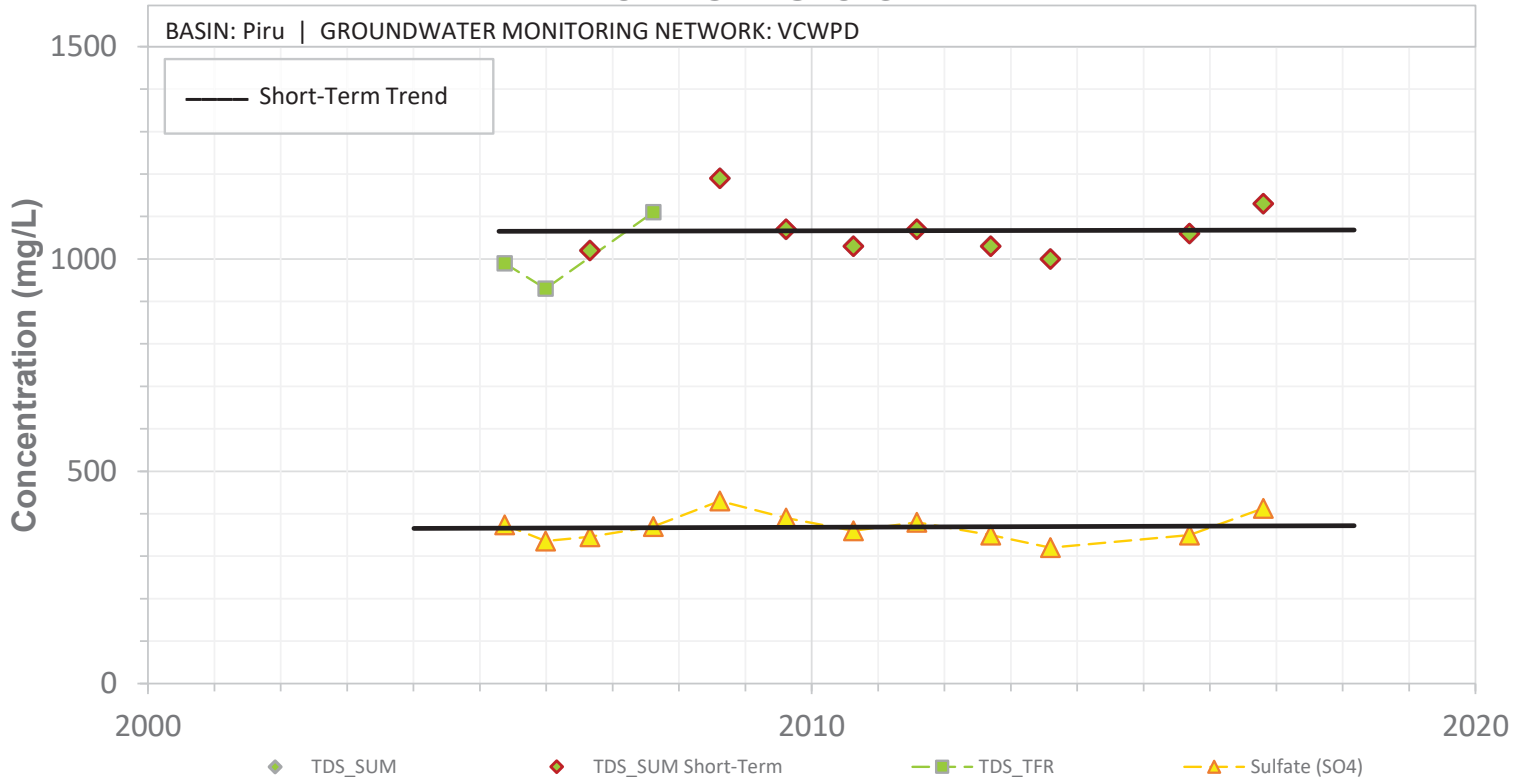
SCREEN: 400-480 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N19W25K03S



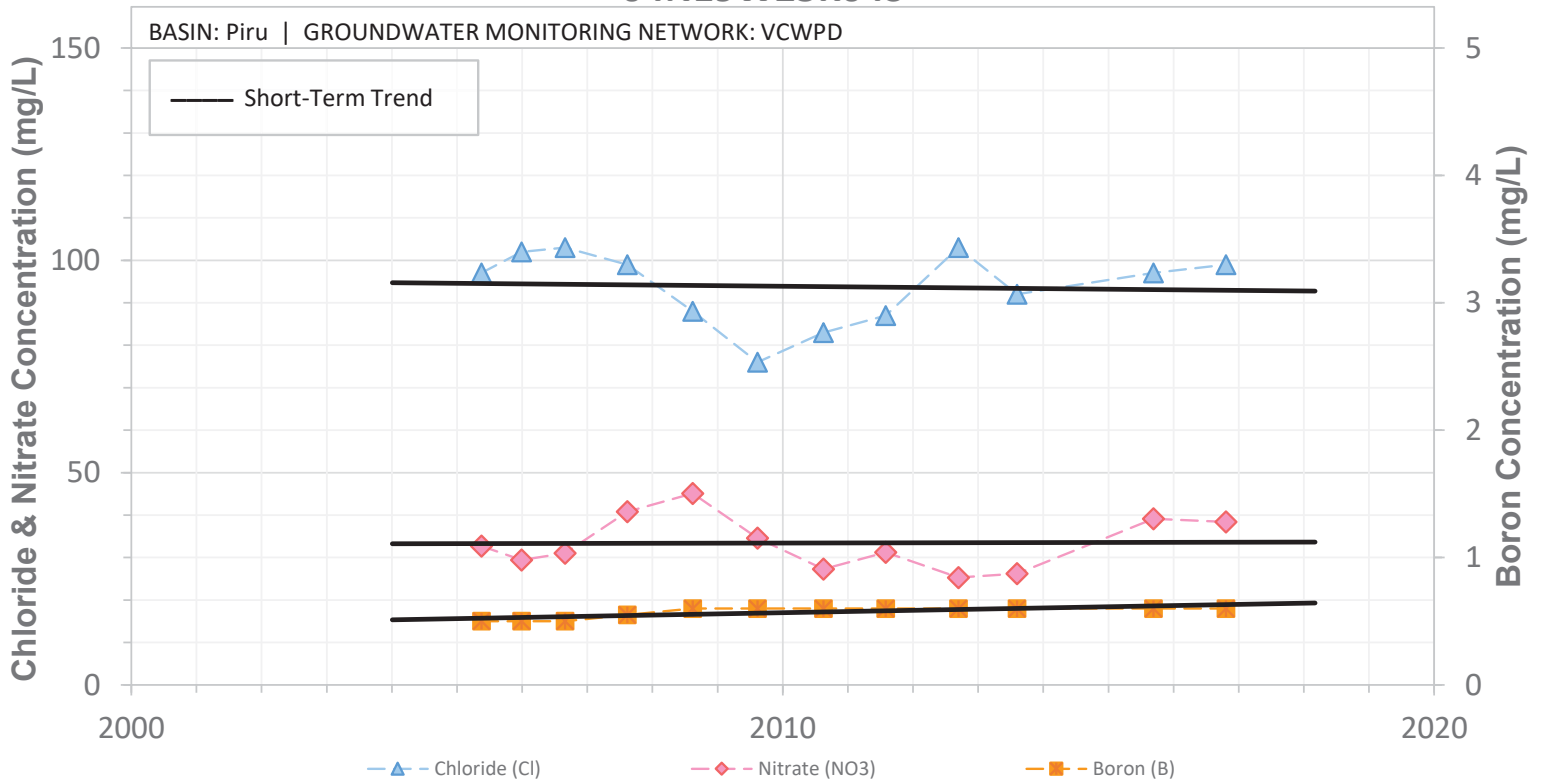
SCREEN: 400-480 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N19W25K04S



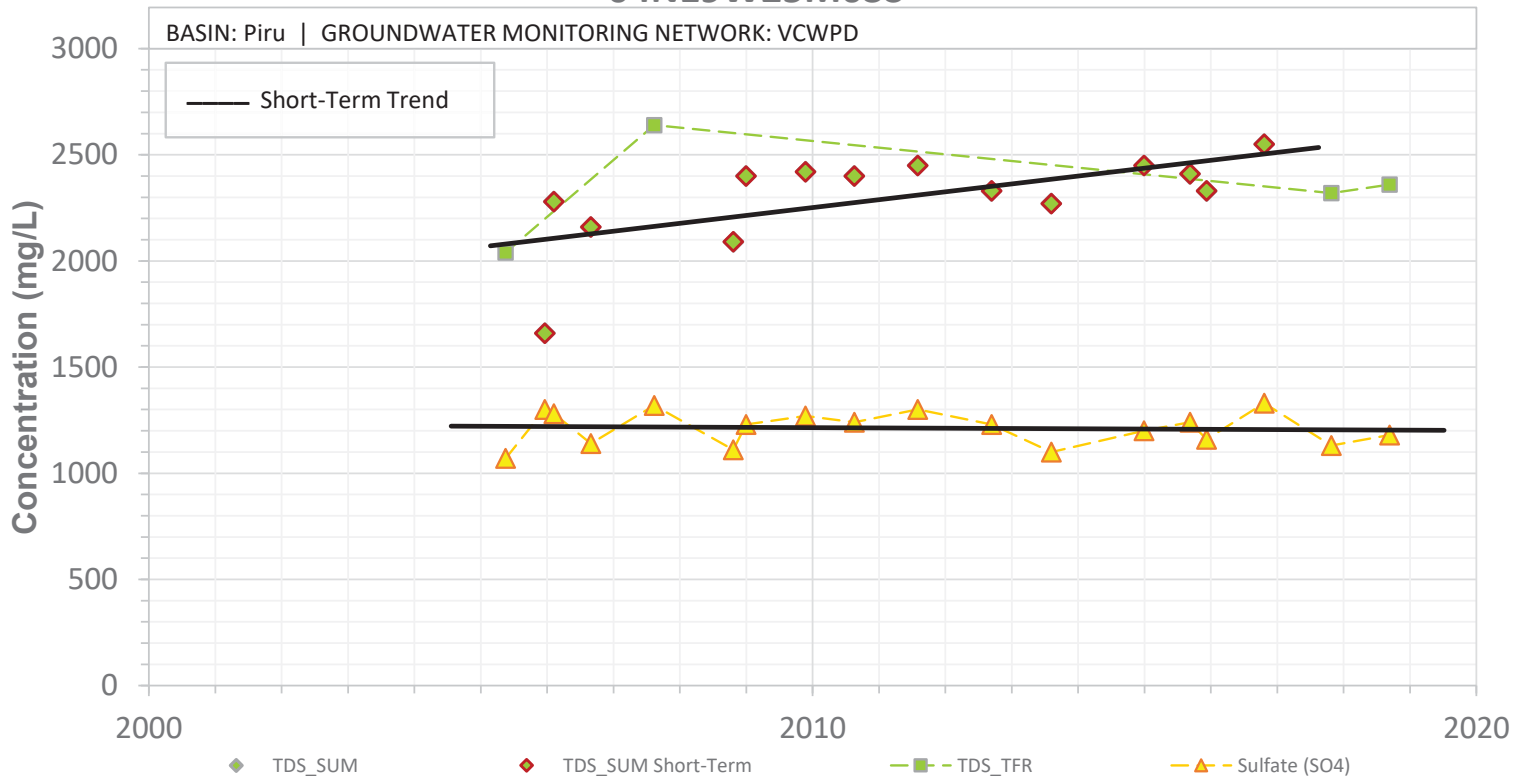
SCREEN: 220-370 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W25K04S



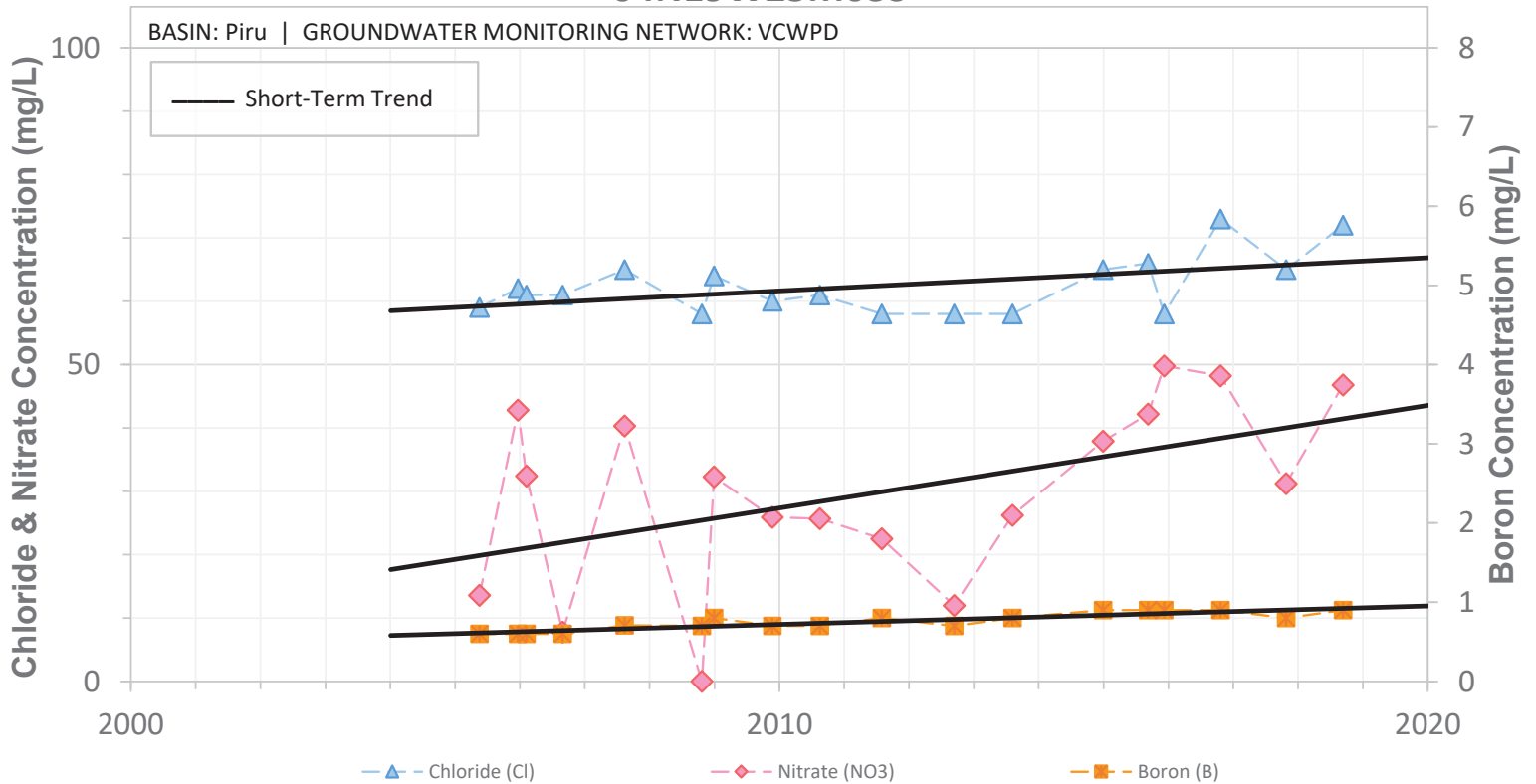
SCREEN: 220-370 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W25M03S



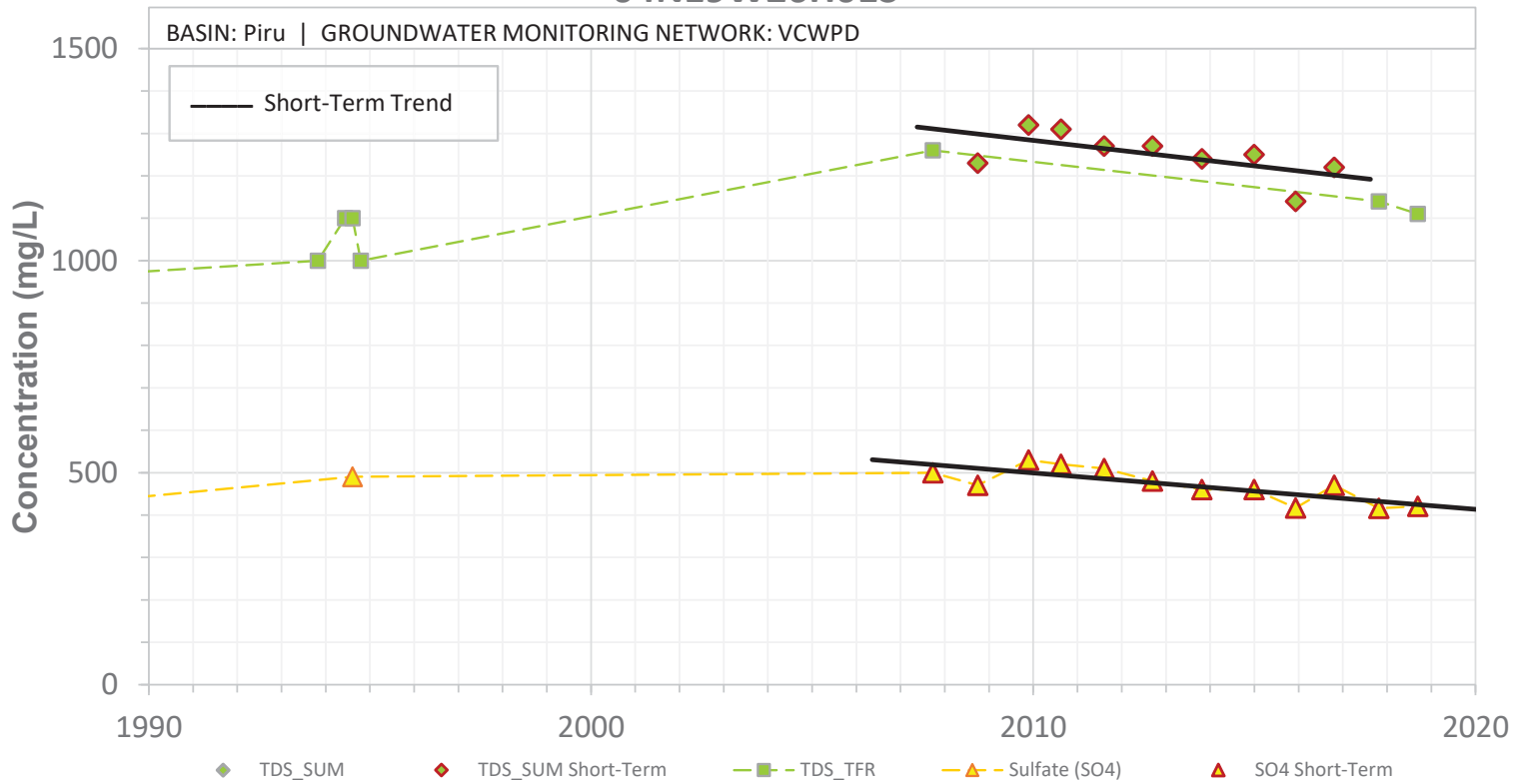
SCREEN: 210-250 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W25M03S



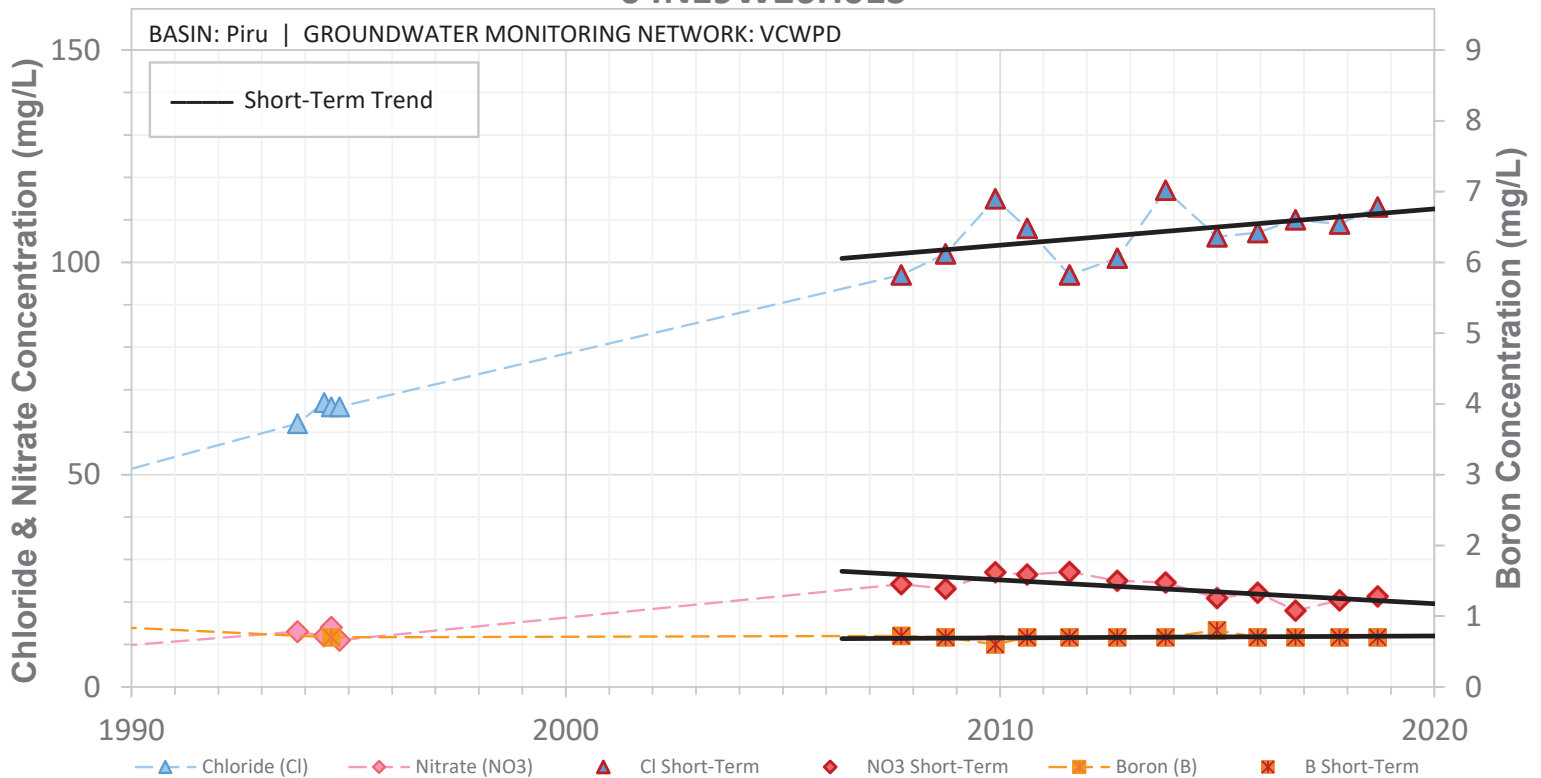
SCREEN: 210-250 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26H01S



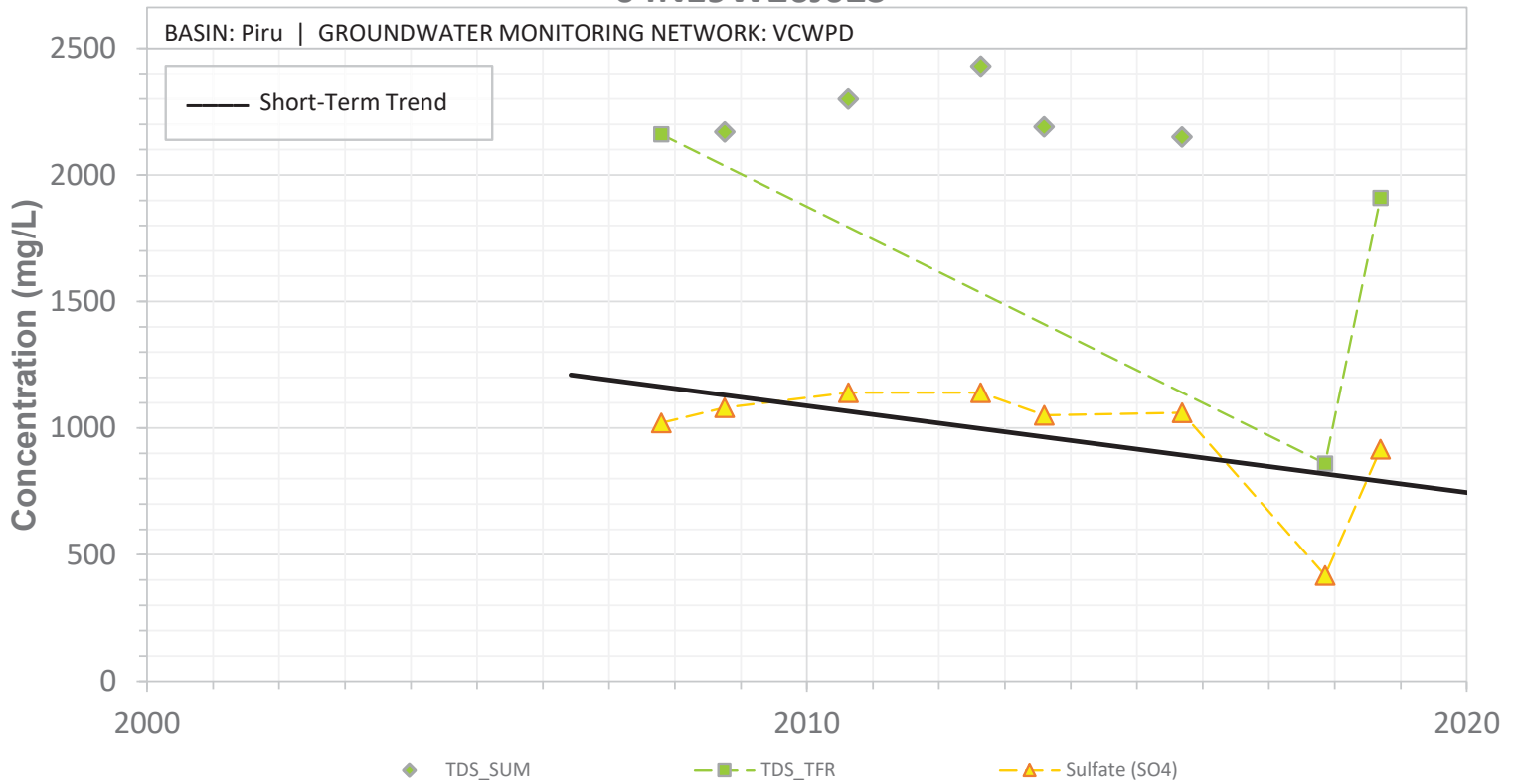
SCREEN: 568-612 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26H01S



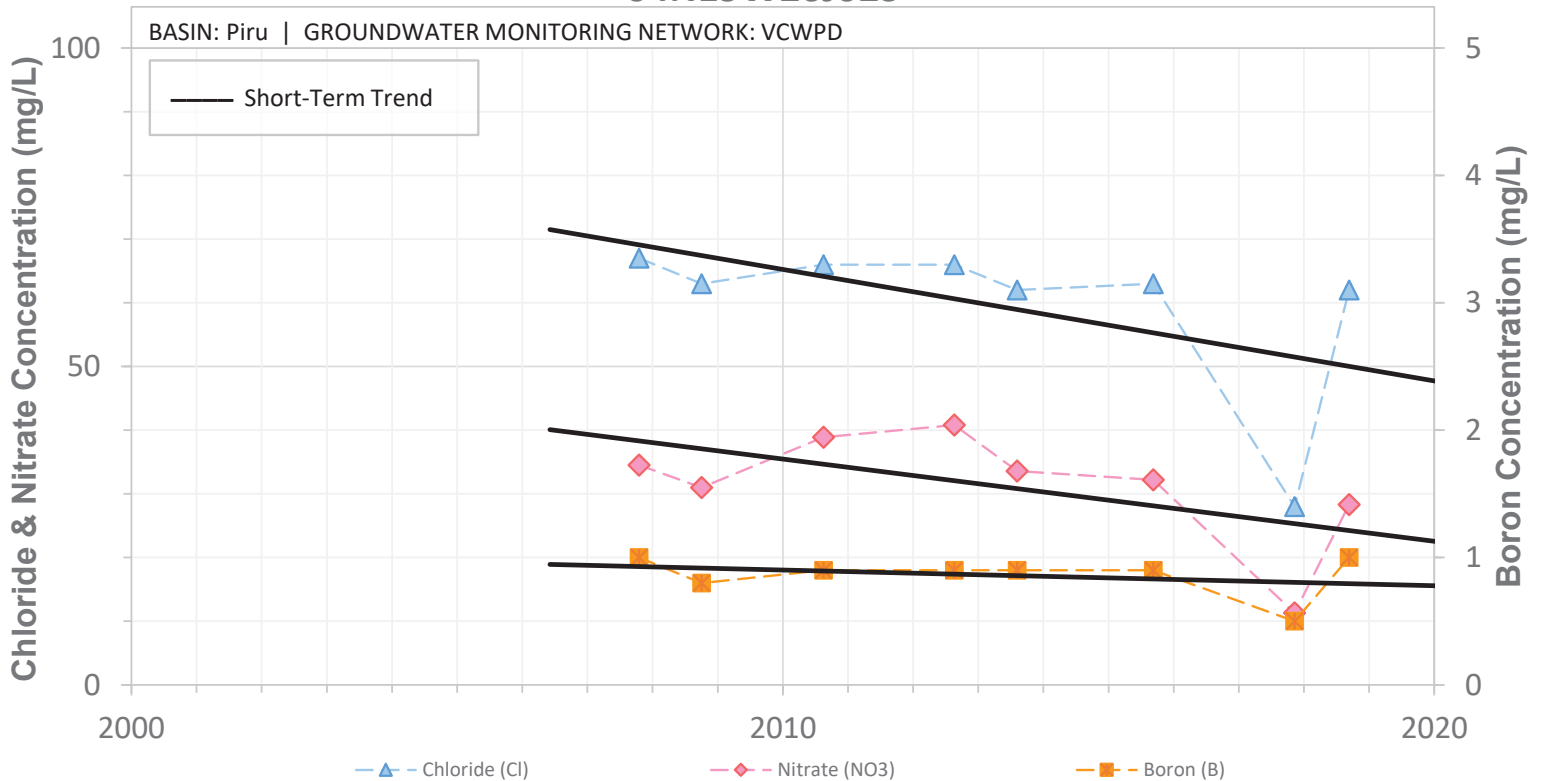
SCREEN: 568-612 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26J02S



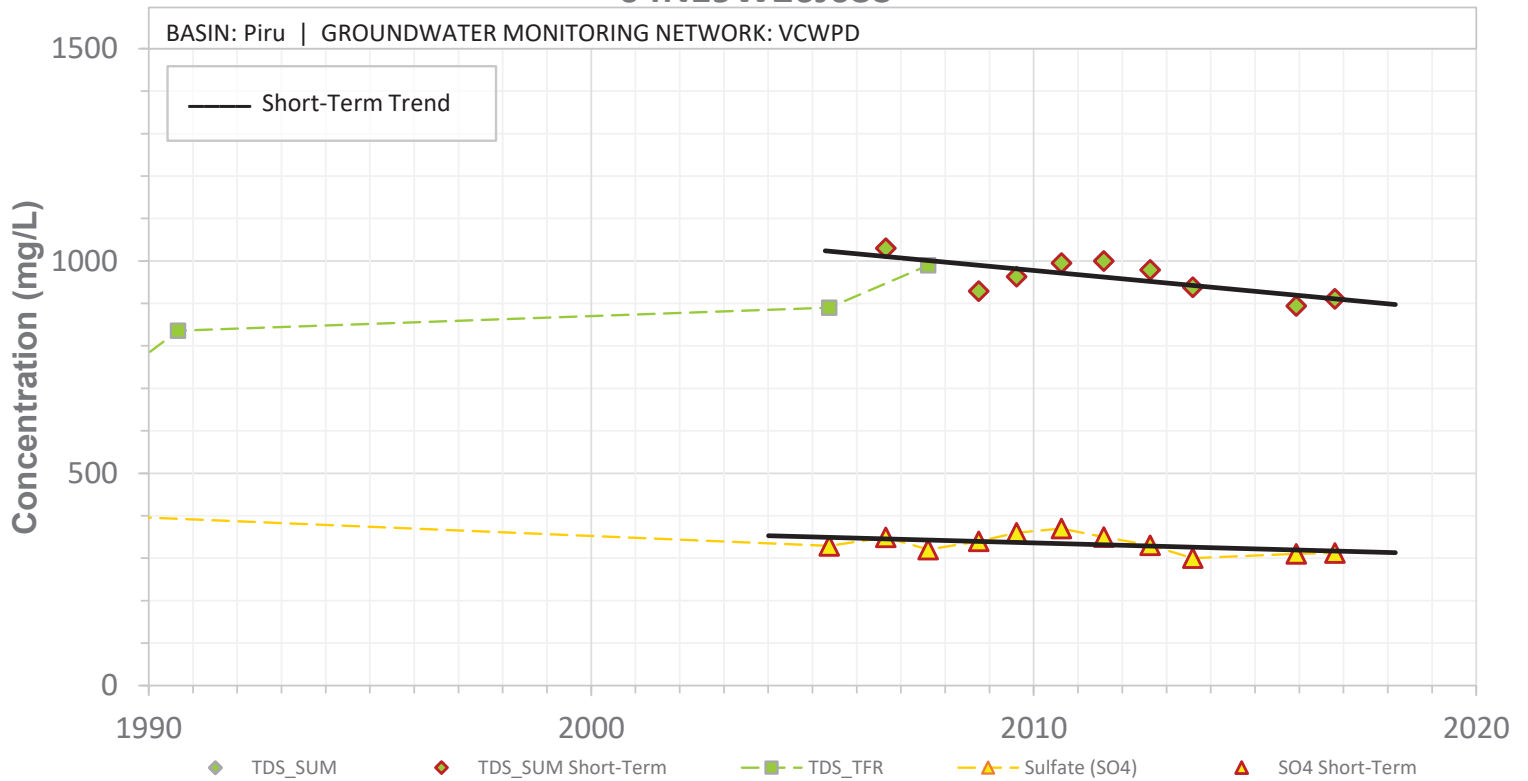
SCREEN: Unknown ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26J02S



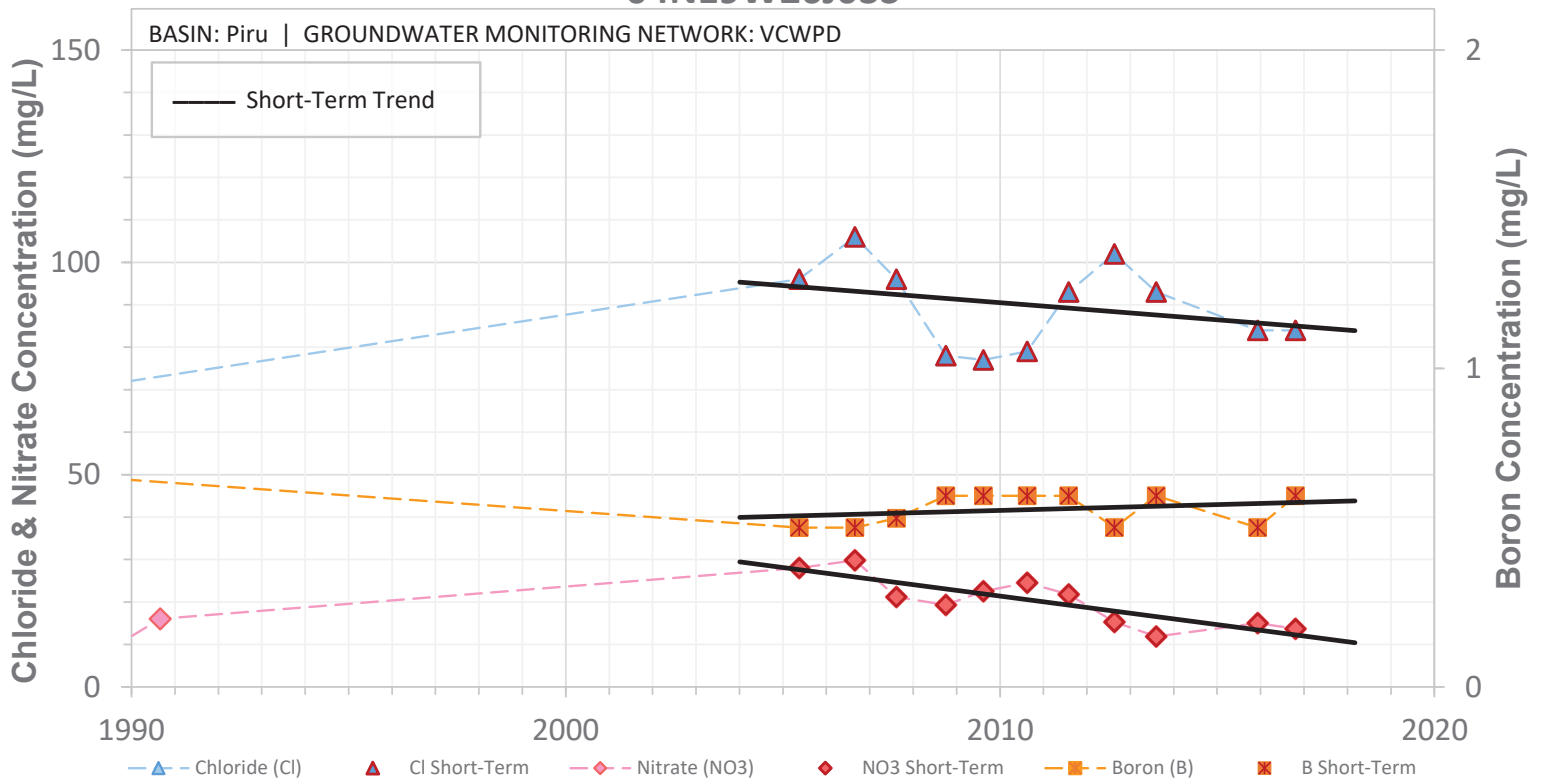
SCREEN: Unknown ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26J03S



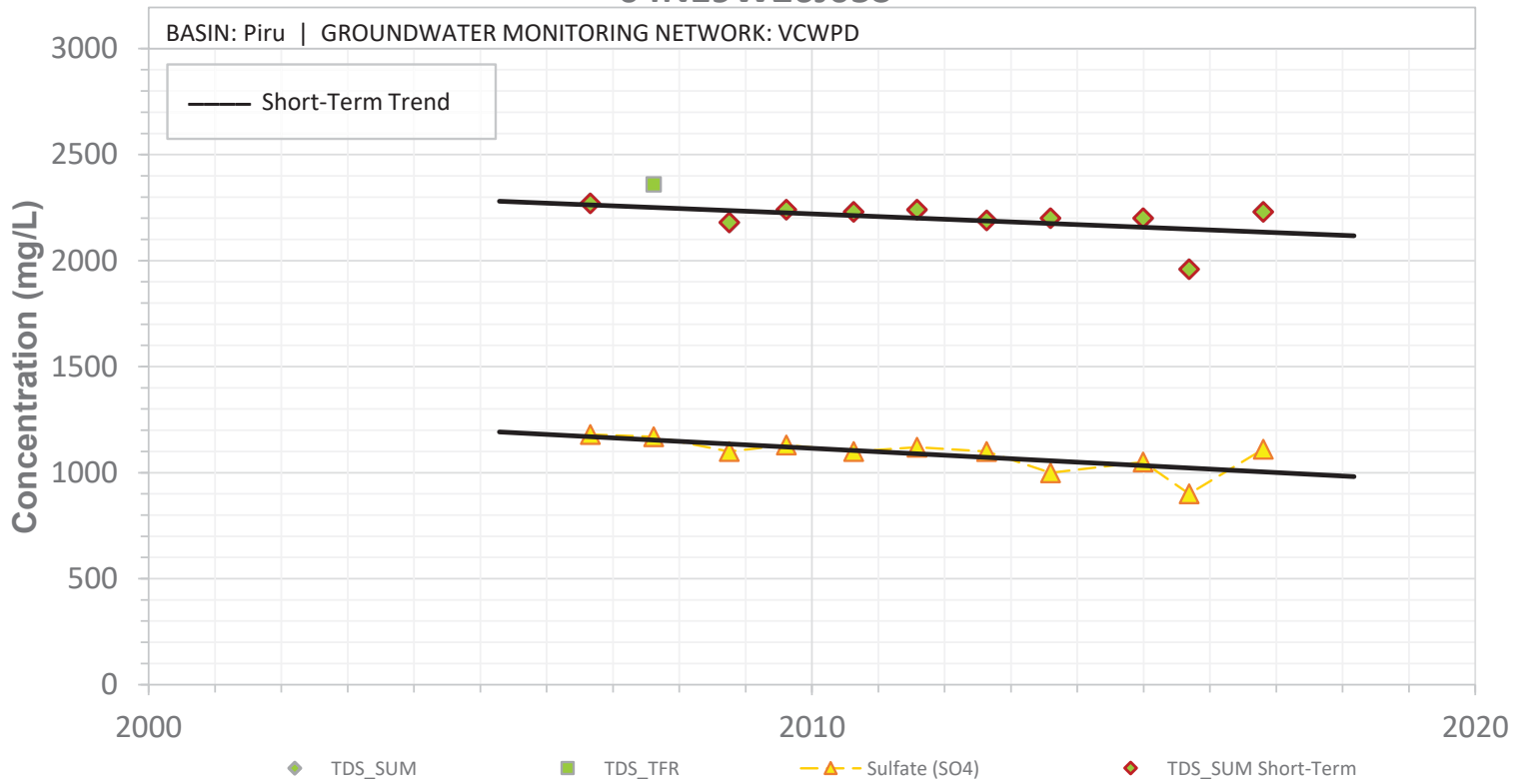
SCREEN: 400-650 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26J03S



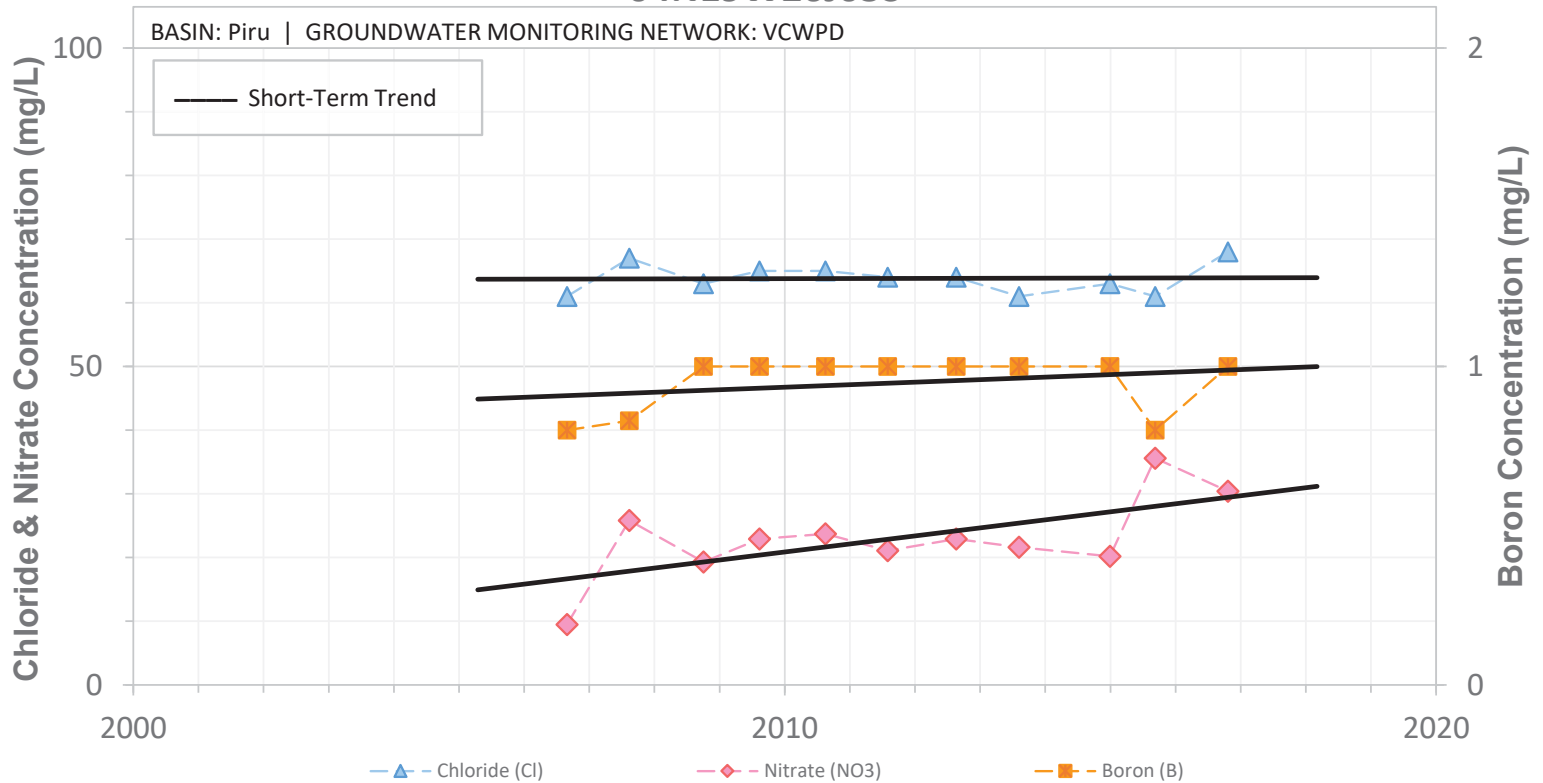
SCREEN: 400-650 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W26J05S



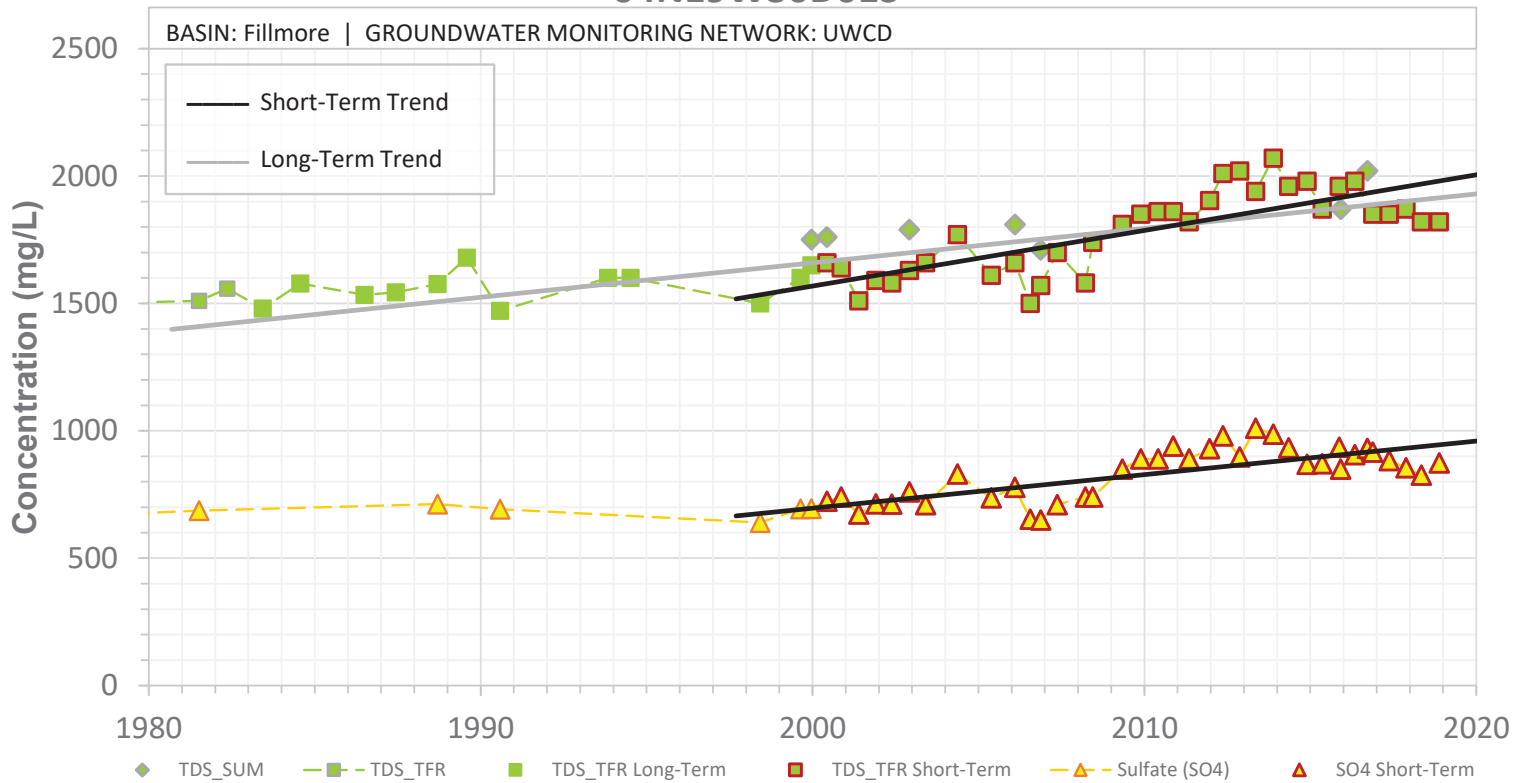
SCREEN: 200-250 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N19W26J05S



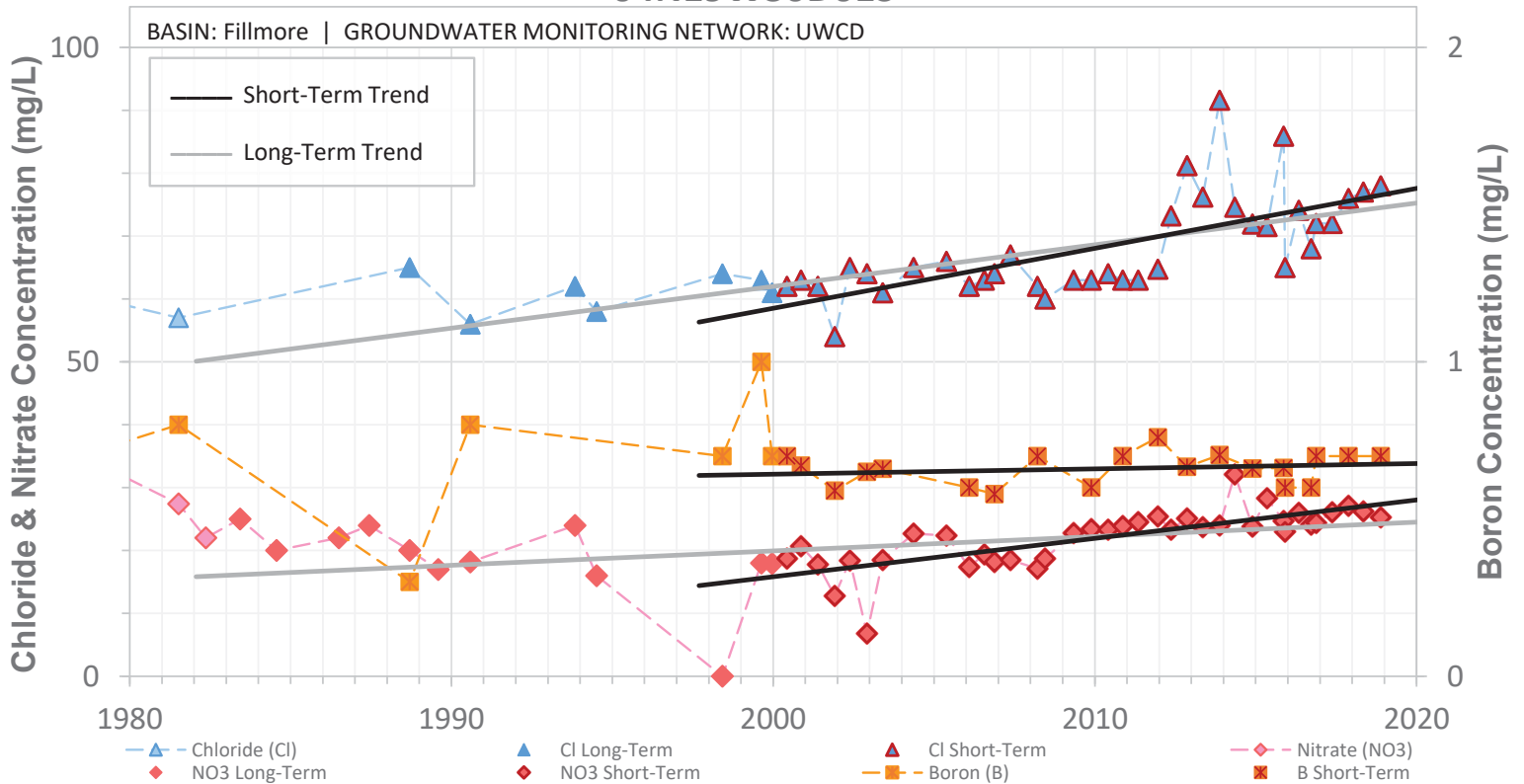
SCREEN: 200-250 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N19W30D01S



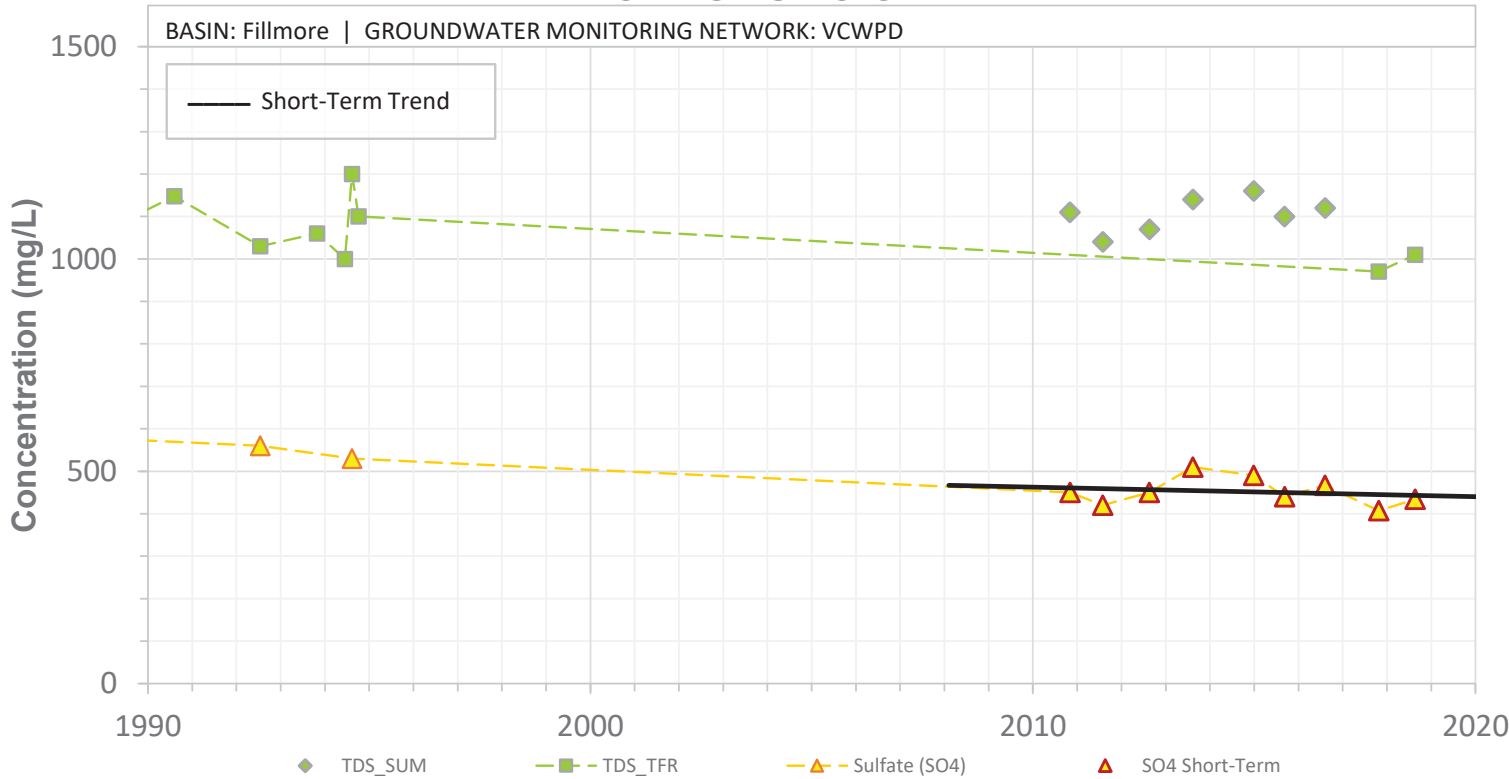
SCREEN: 60-380 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W30D01S



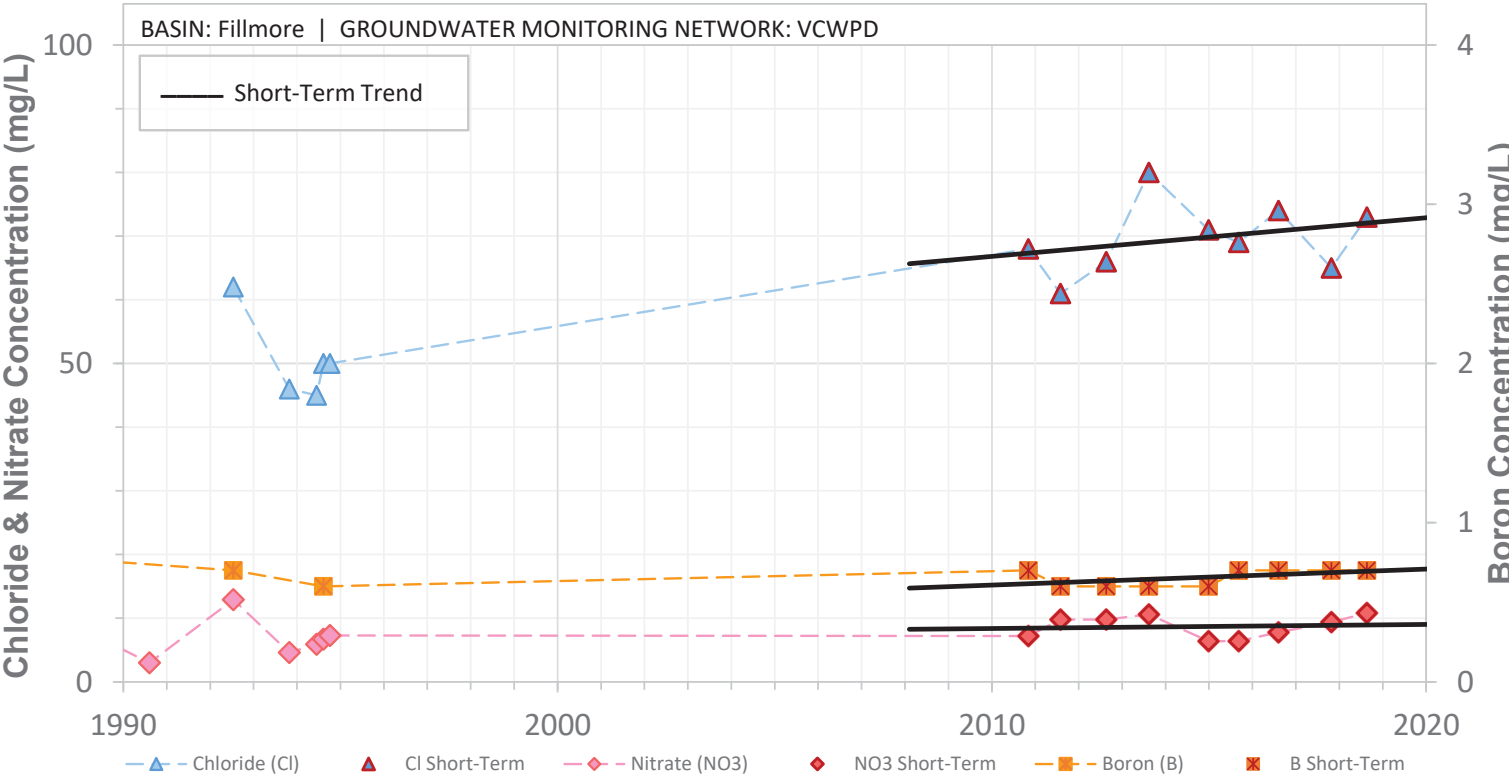
SCREEN: 60-380 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W31F01S



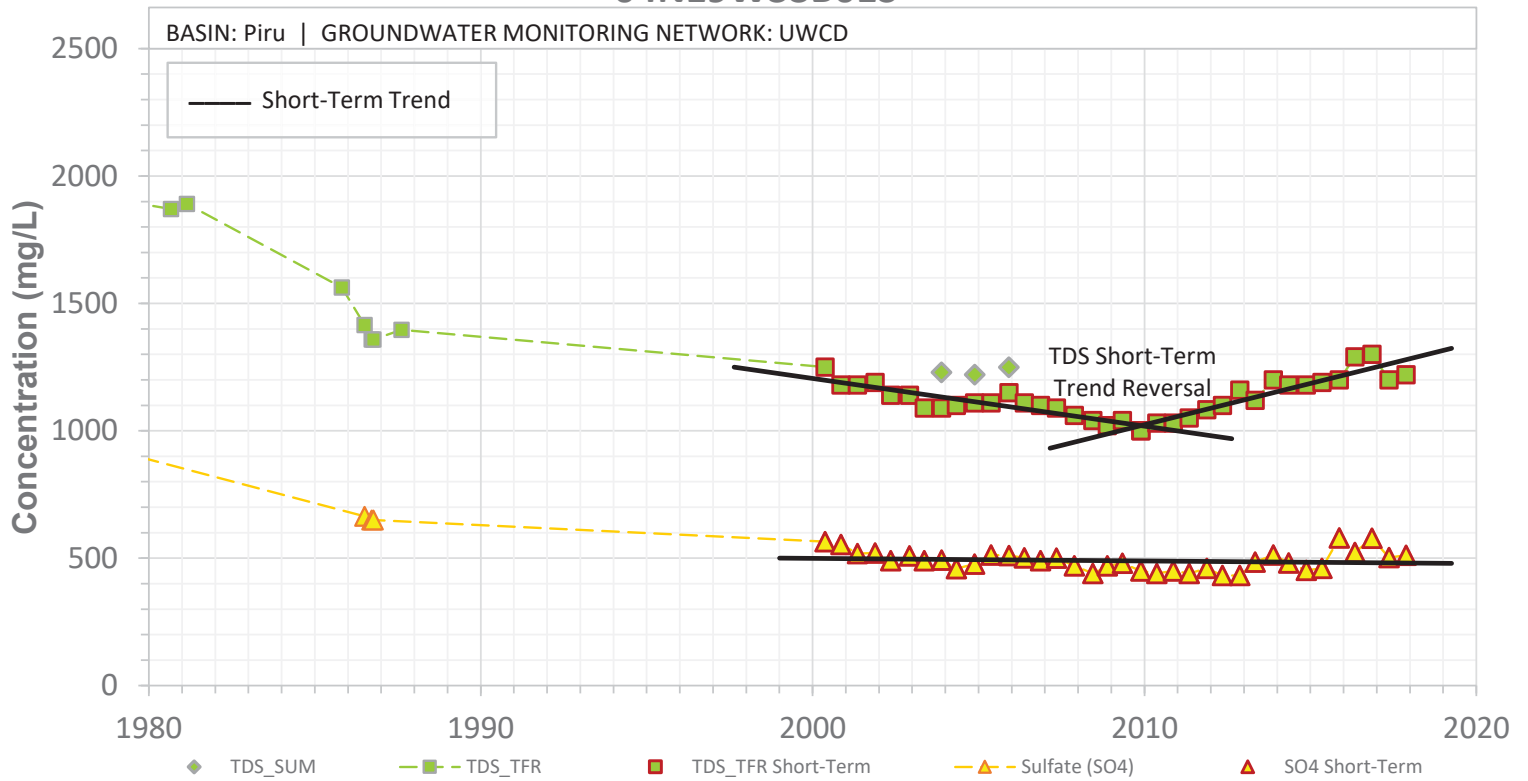
SCREEN: 60-100 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N19W31F01S



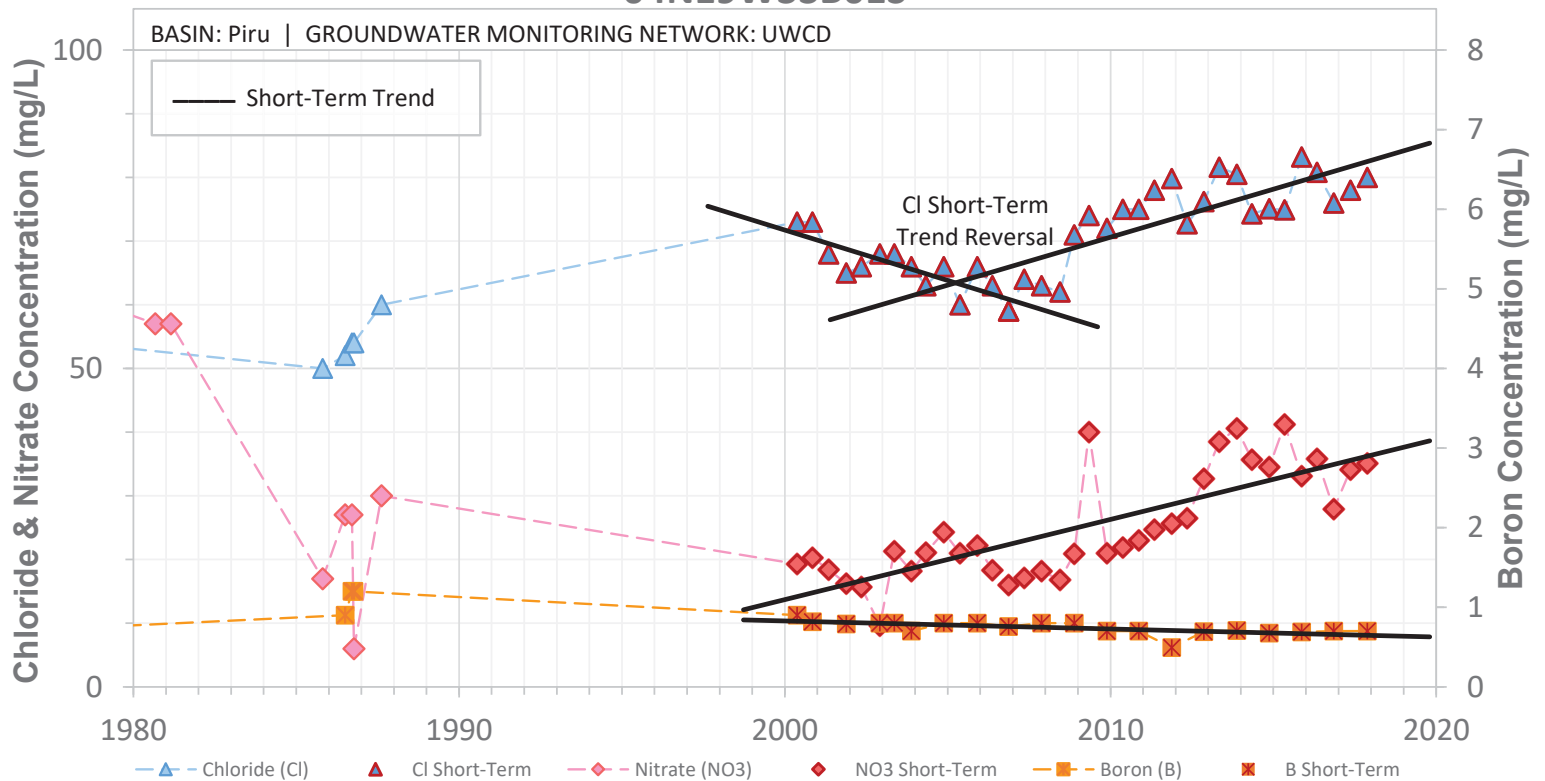
SCREEN: 60-100 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N19W33B01S



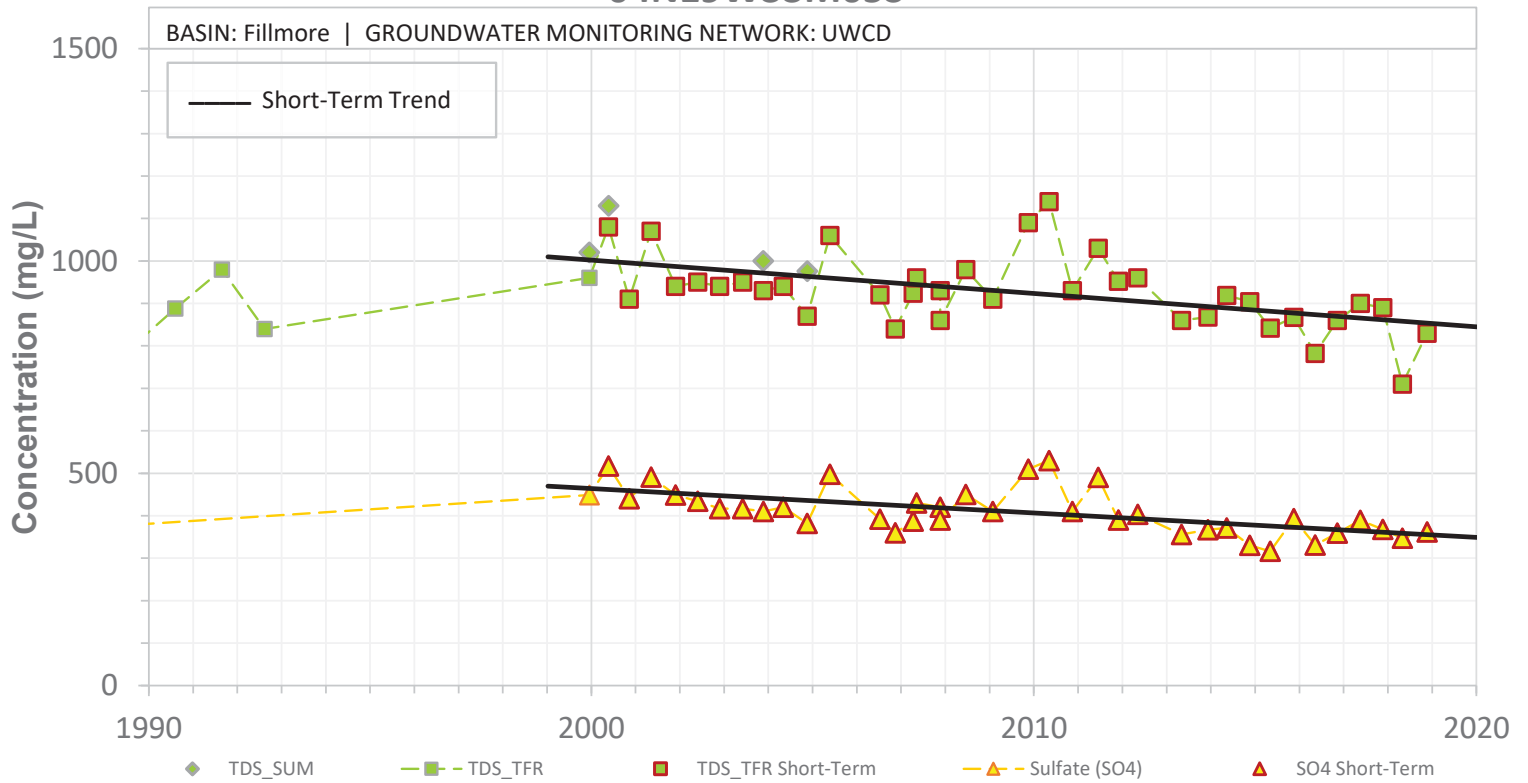
SCREEN: 206-306 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N19W33B01S



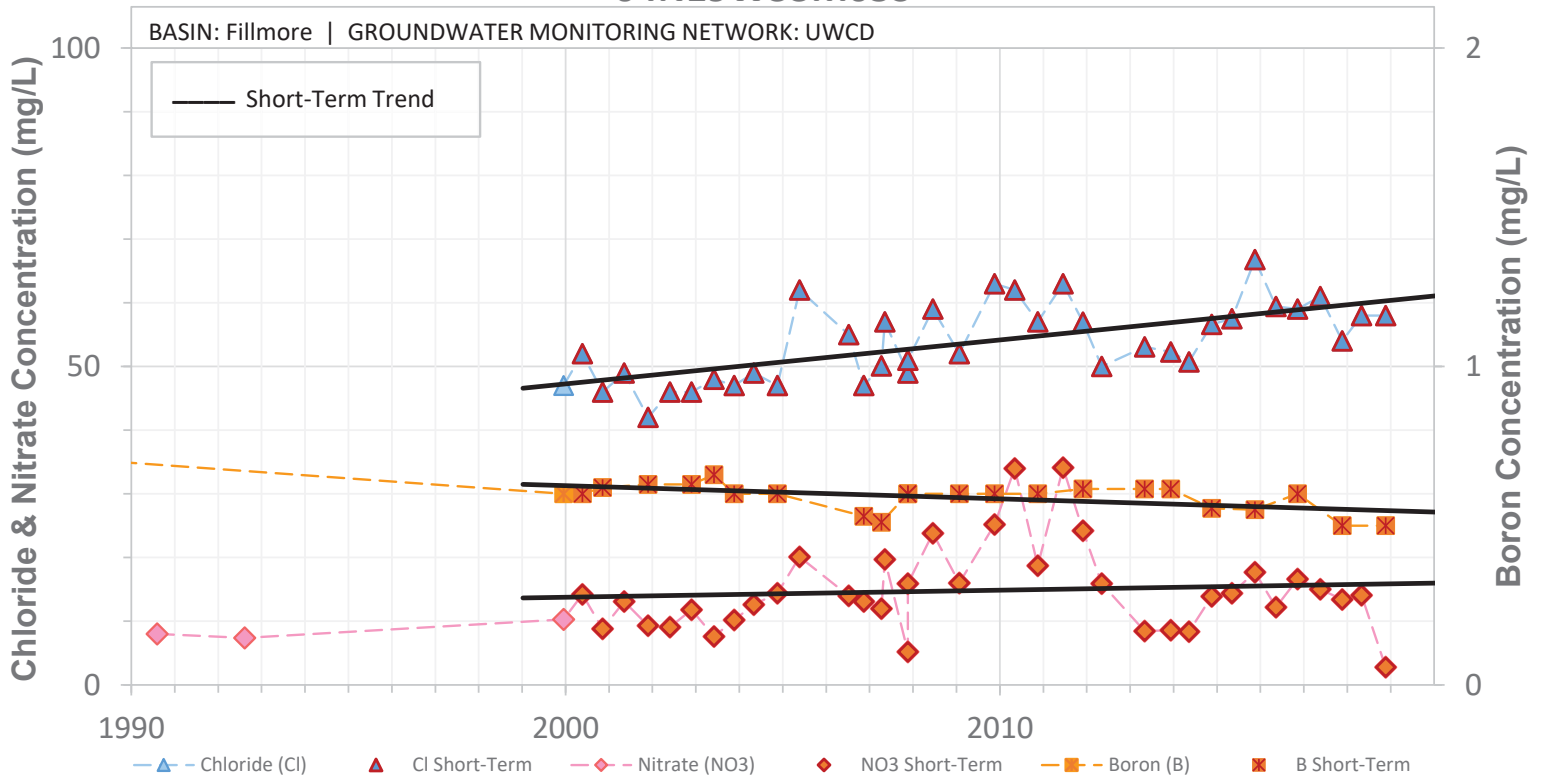
SCREEN: 206-306 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N19W33M05S



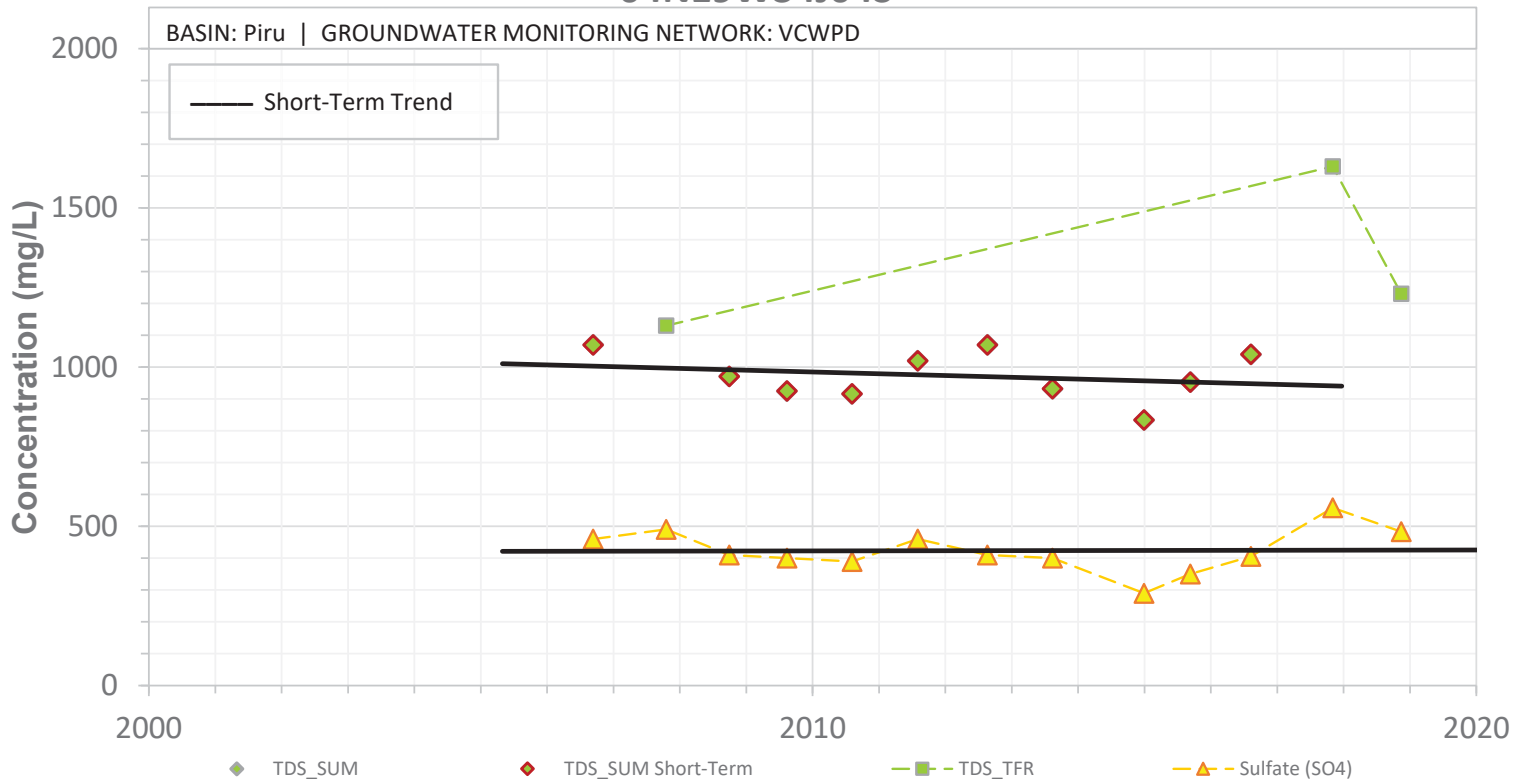
SCREEN: 37-107 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W33M05S



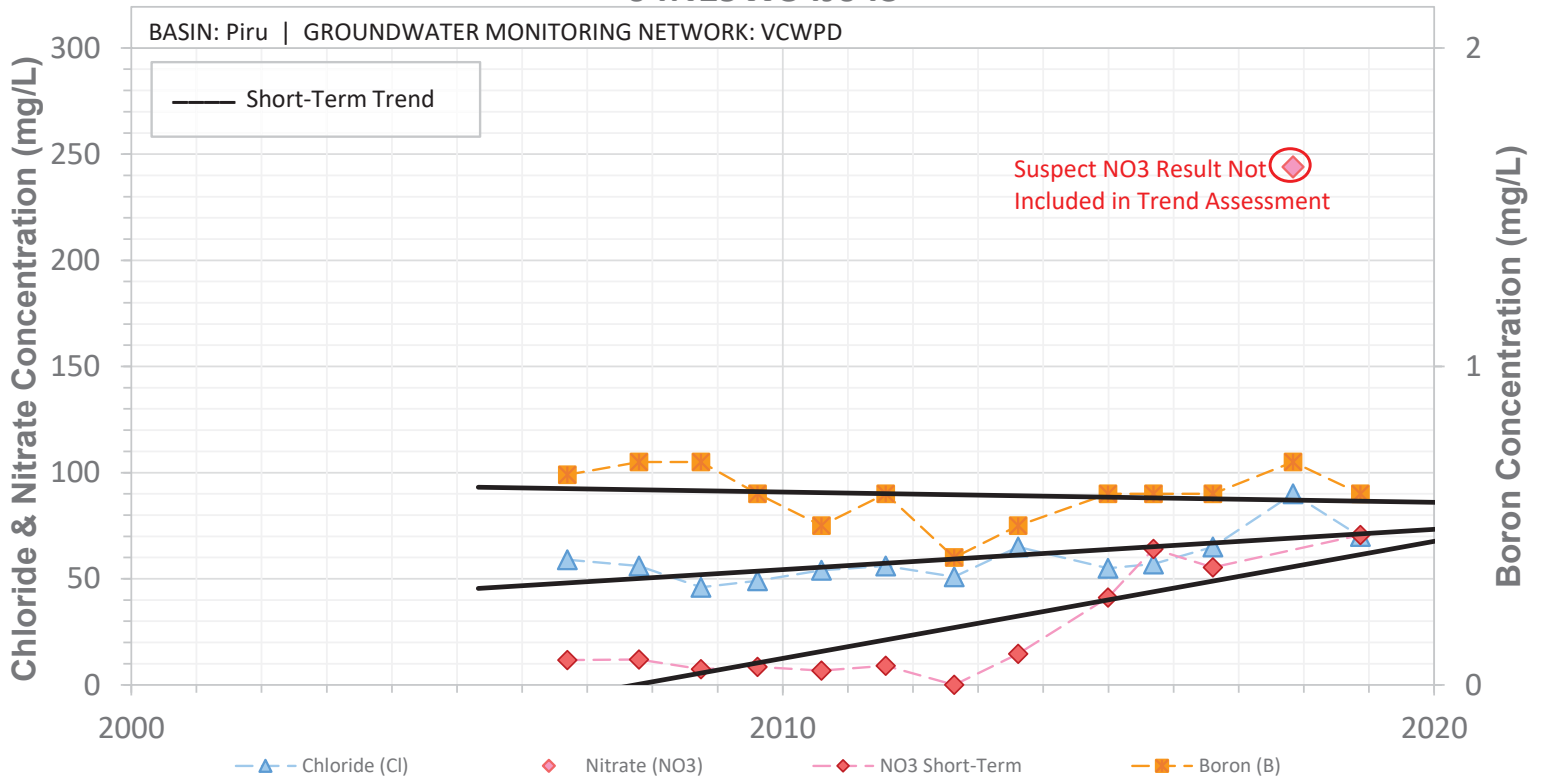
SCREEN: 37-107 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W34J04S



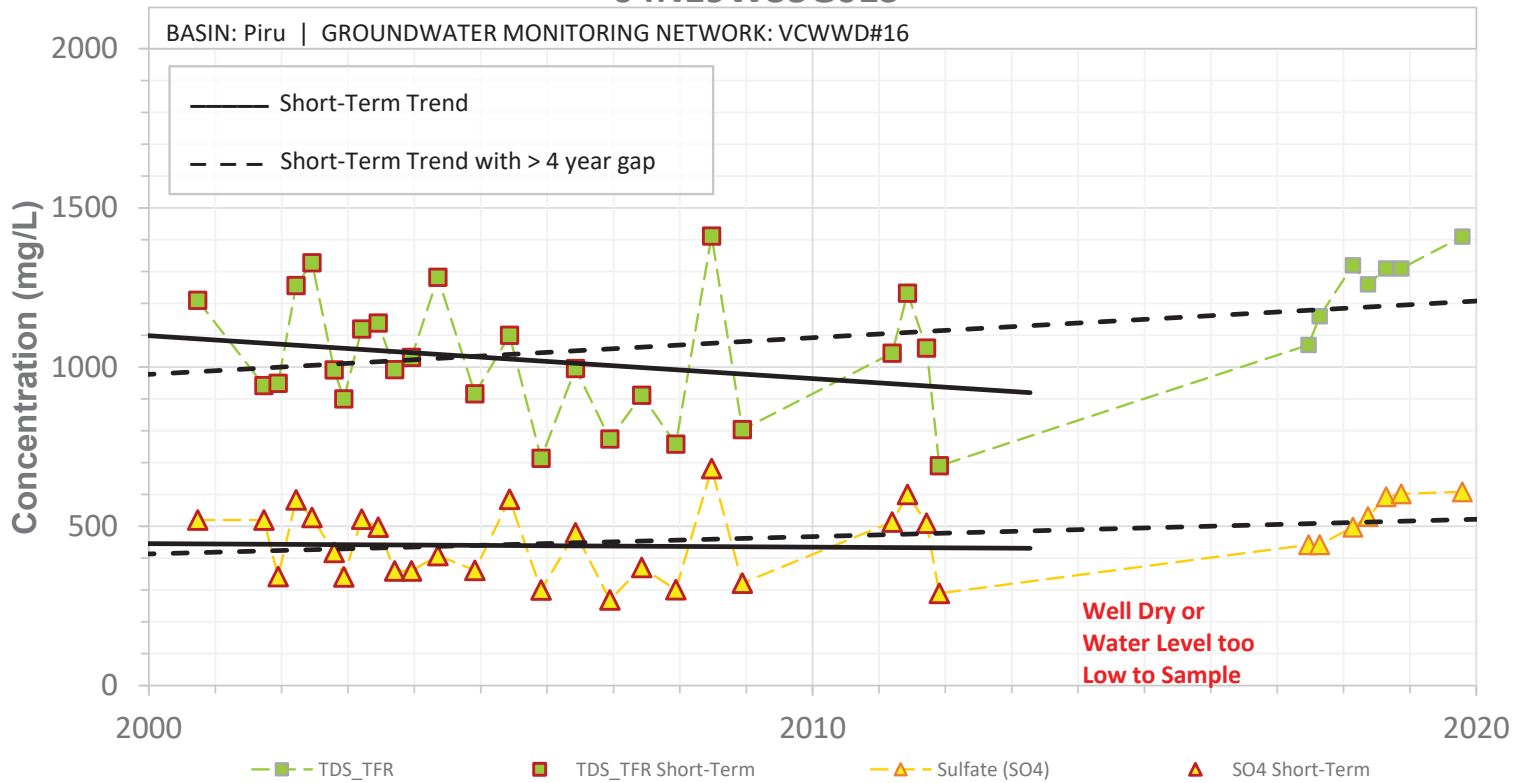
SCREEN: 60-160 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W34J04S



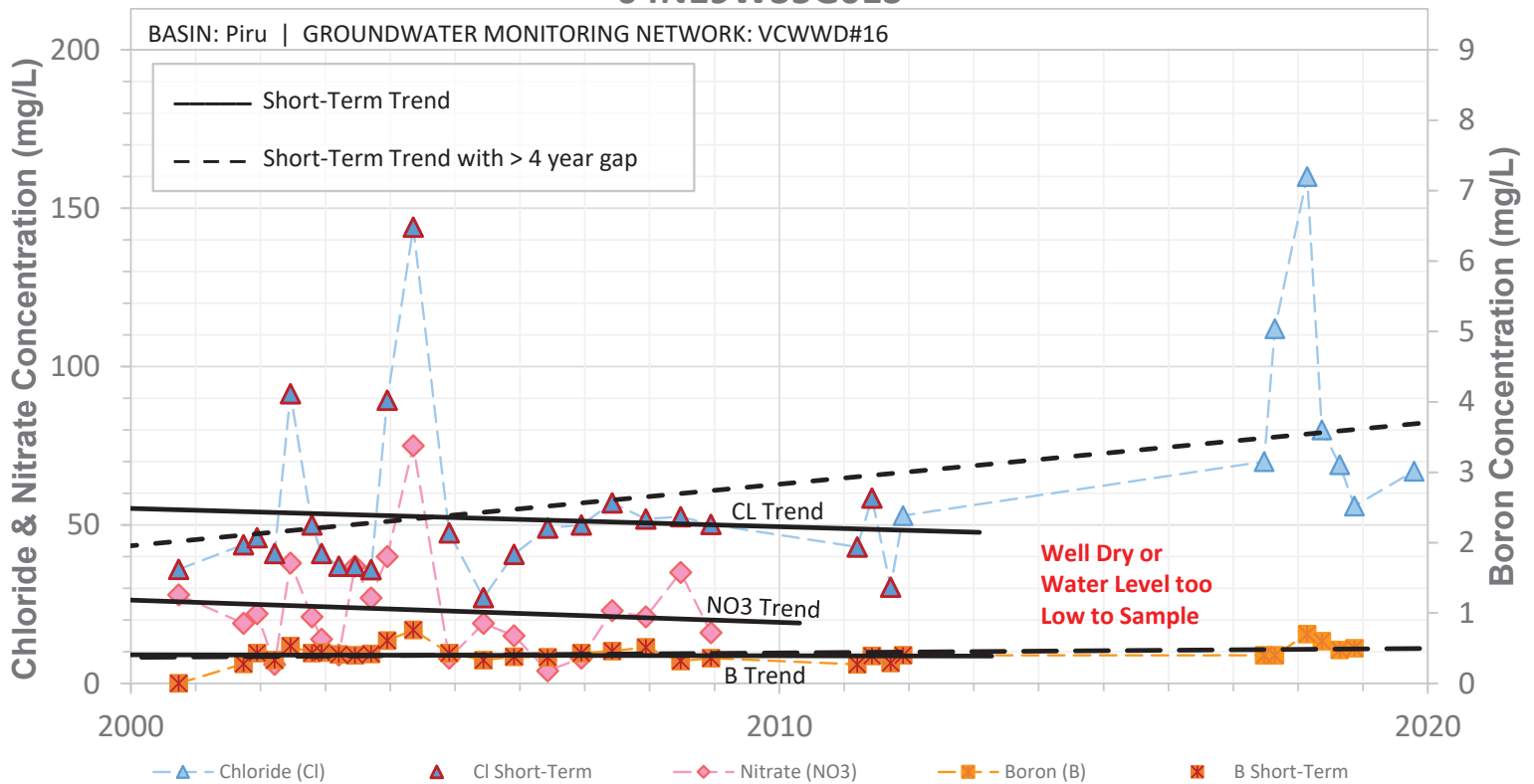
SCREEN: 60-160 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N19W35G01S



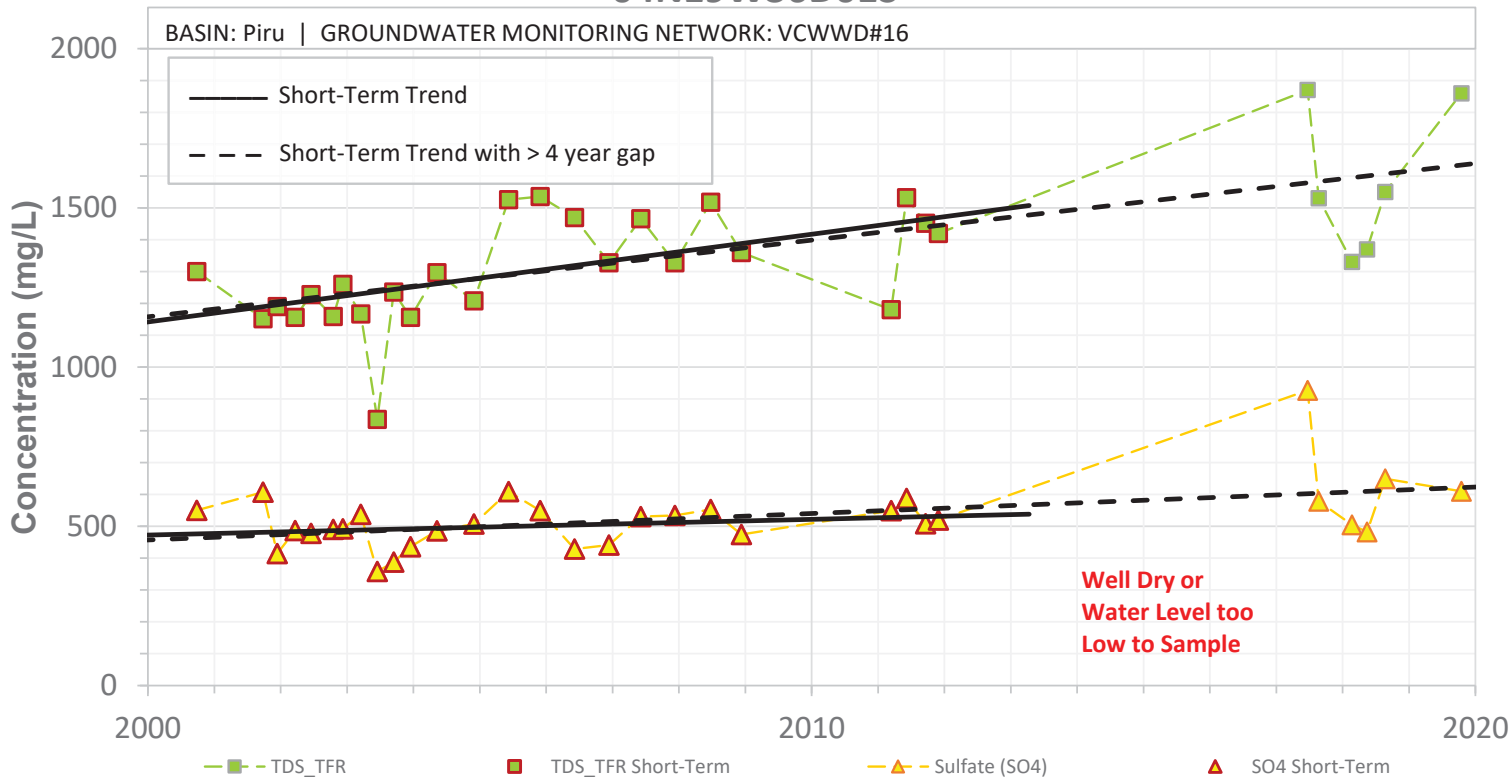
SCREEN: 24-79 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N19W35G01S



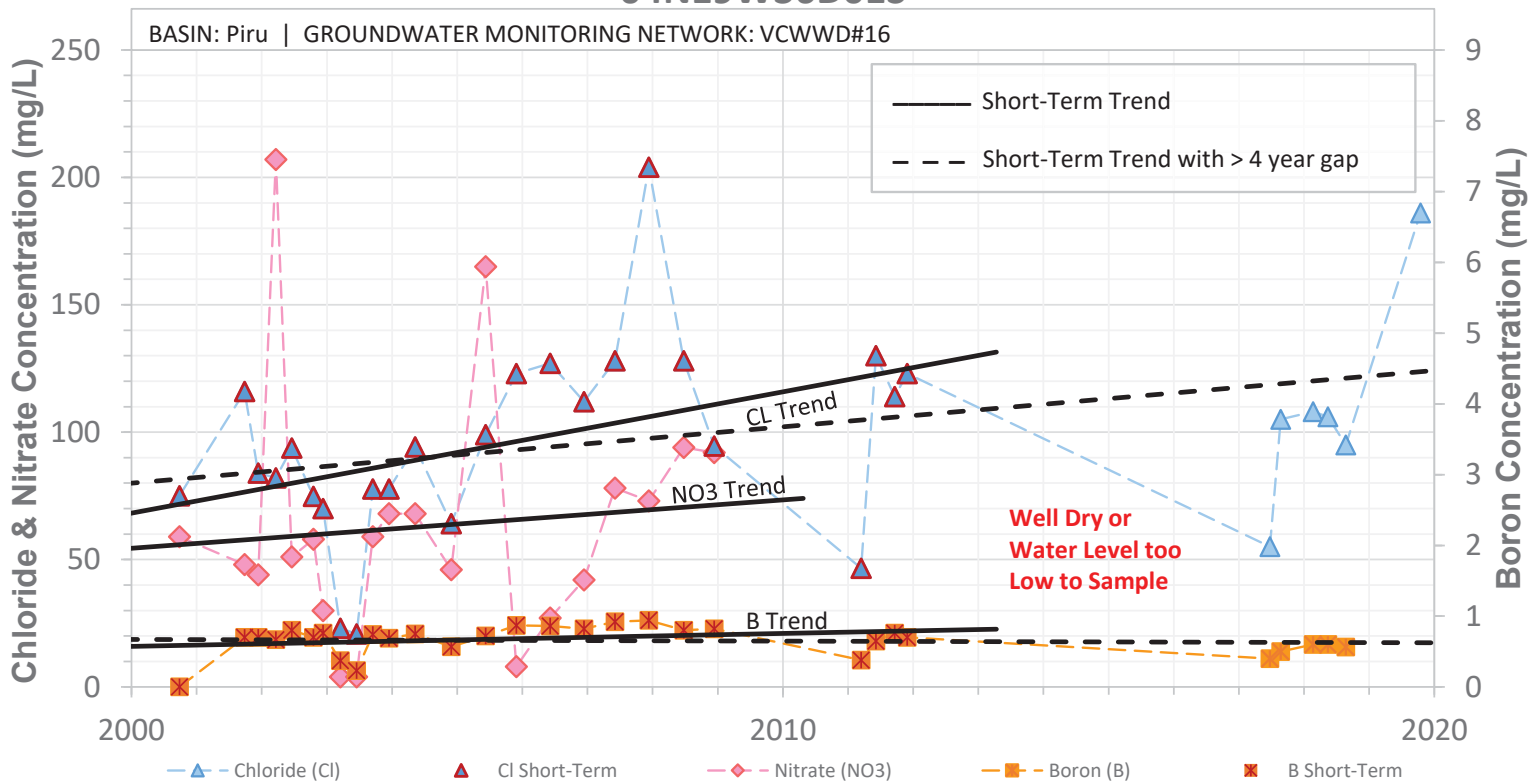
SCREEN: 24-79 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N19W36D01S



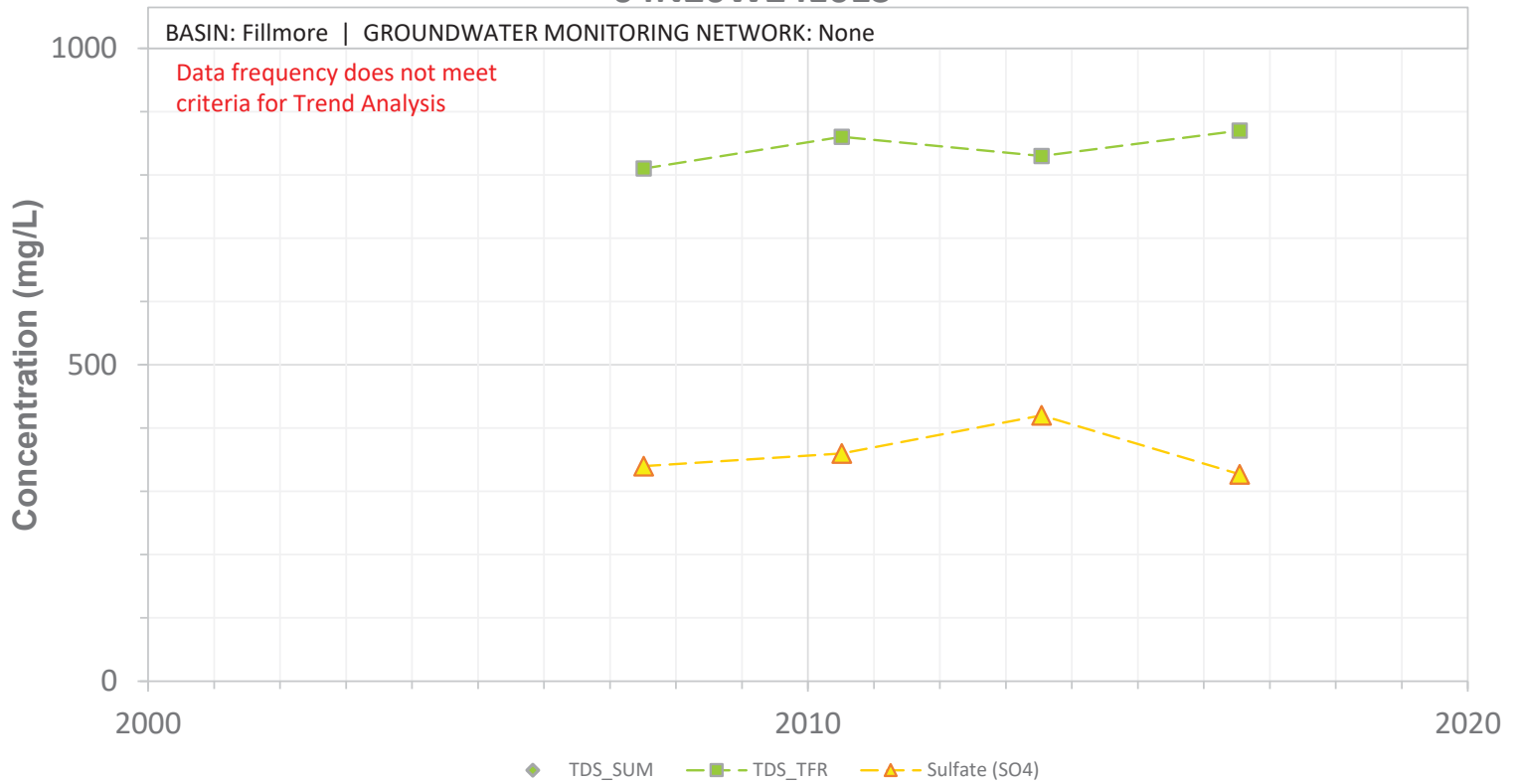
SCREEN: 18-73 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N19W36D01S



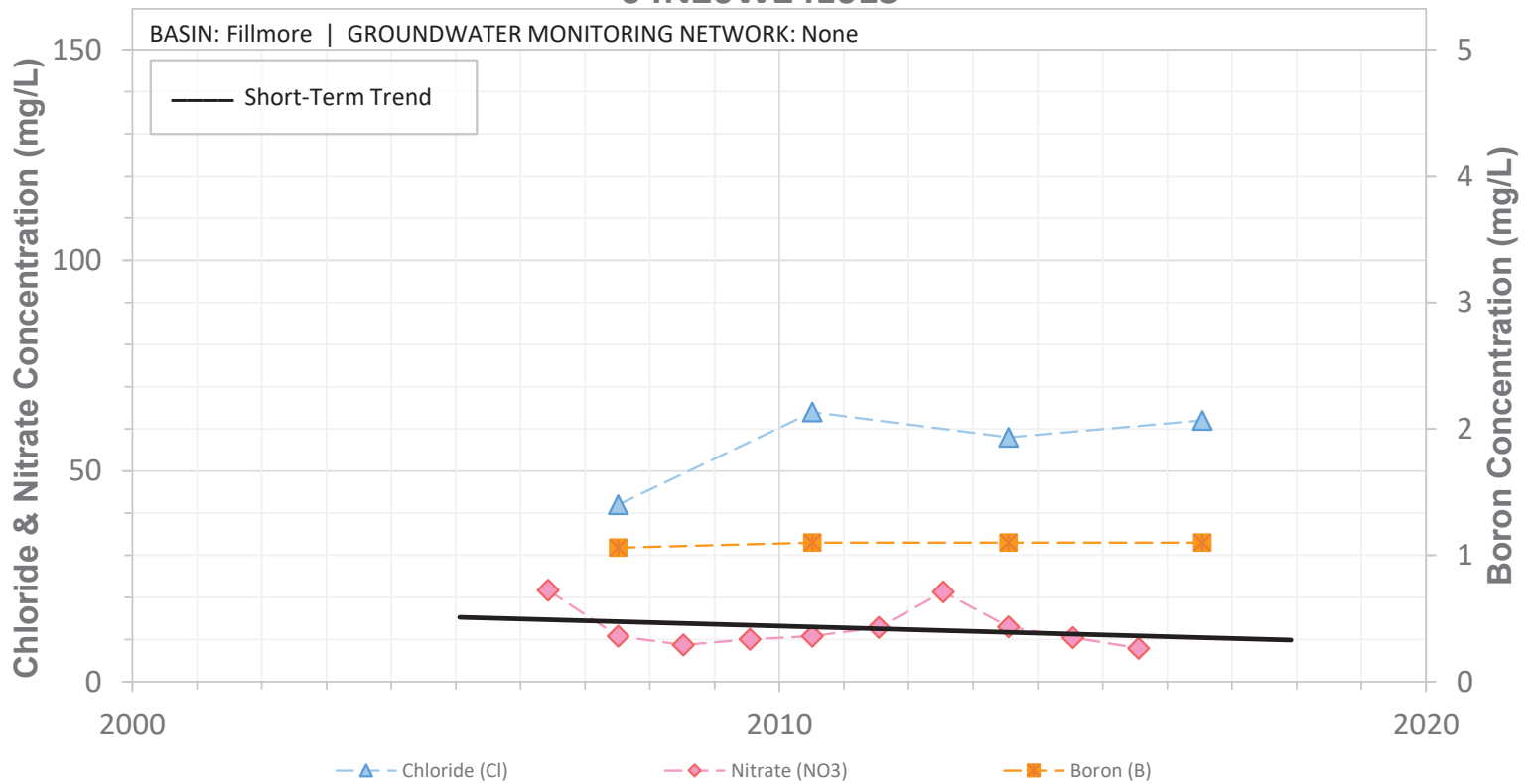
SCREEN: 18-73 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N20W24E01S



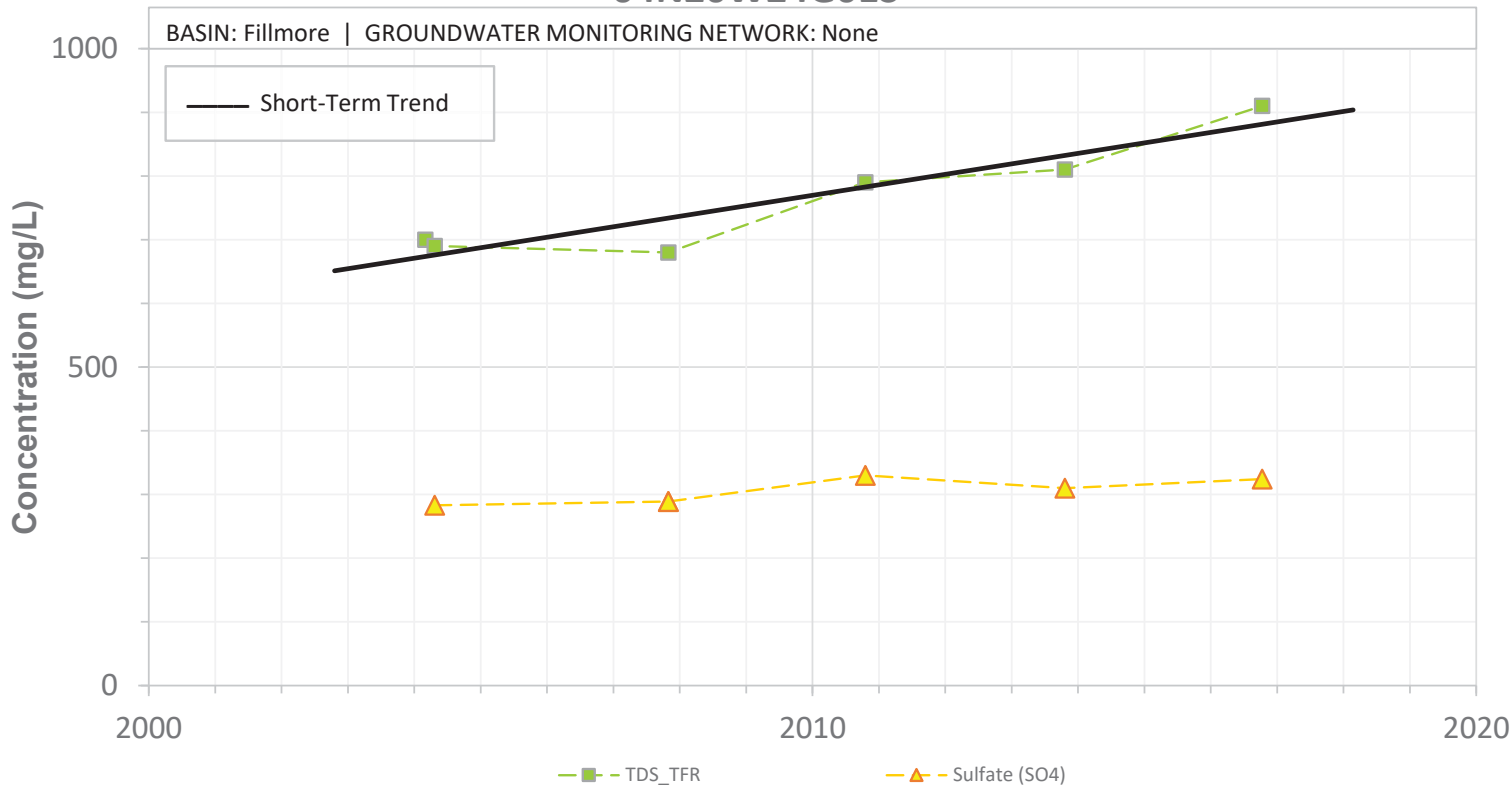
SCREEN: 80-500 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N20W24E01S



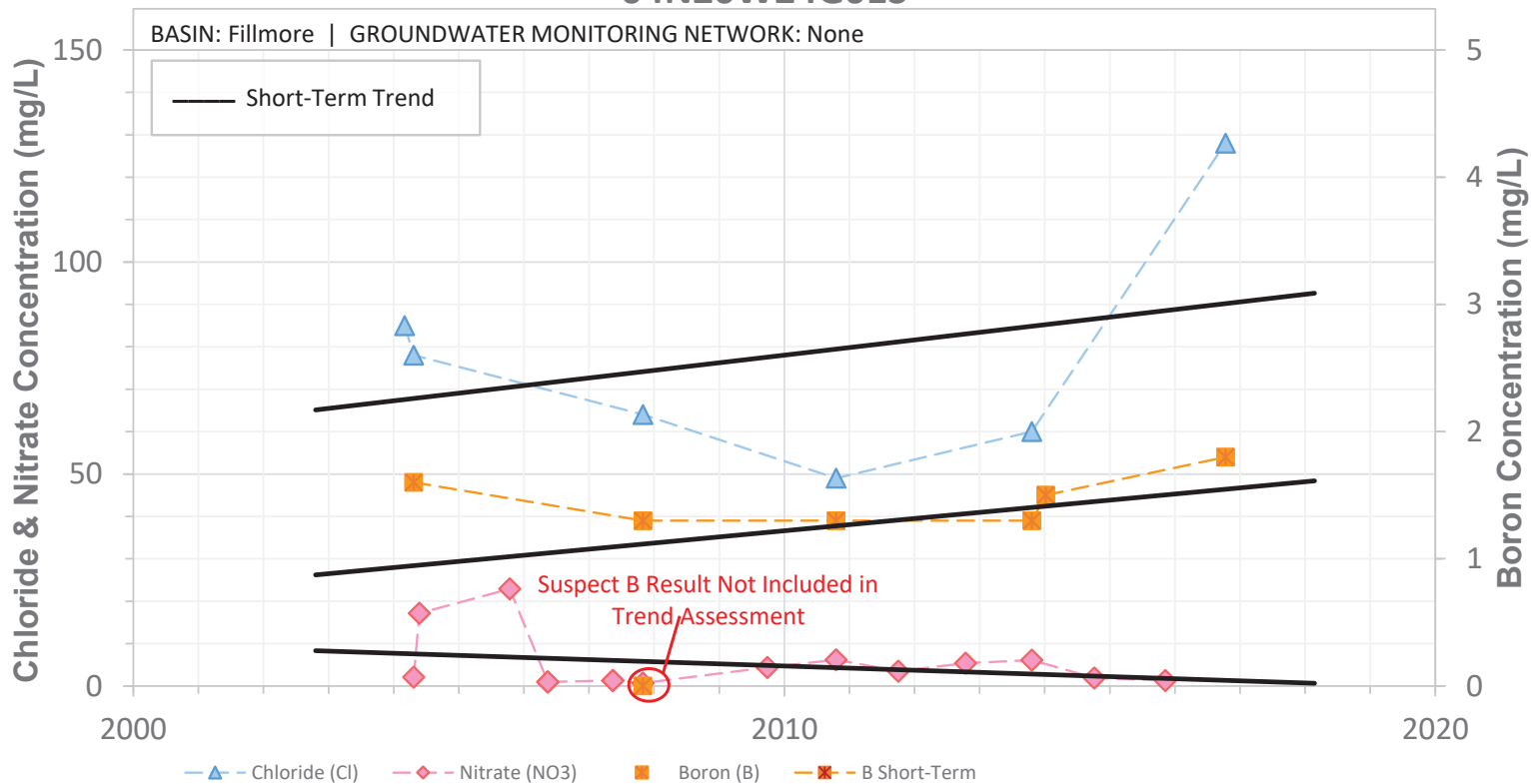
SCREEN: 80-500 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N20W24G01S



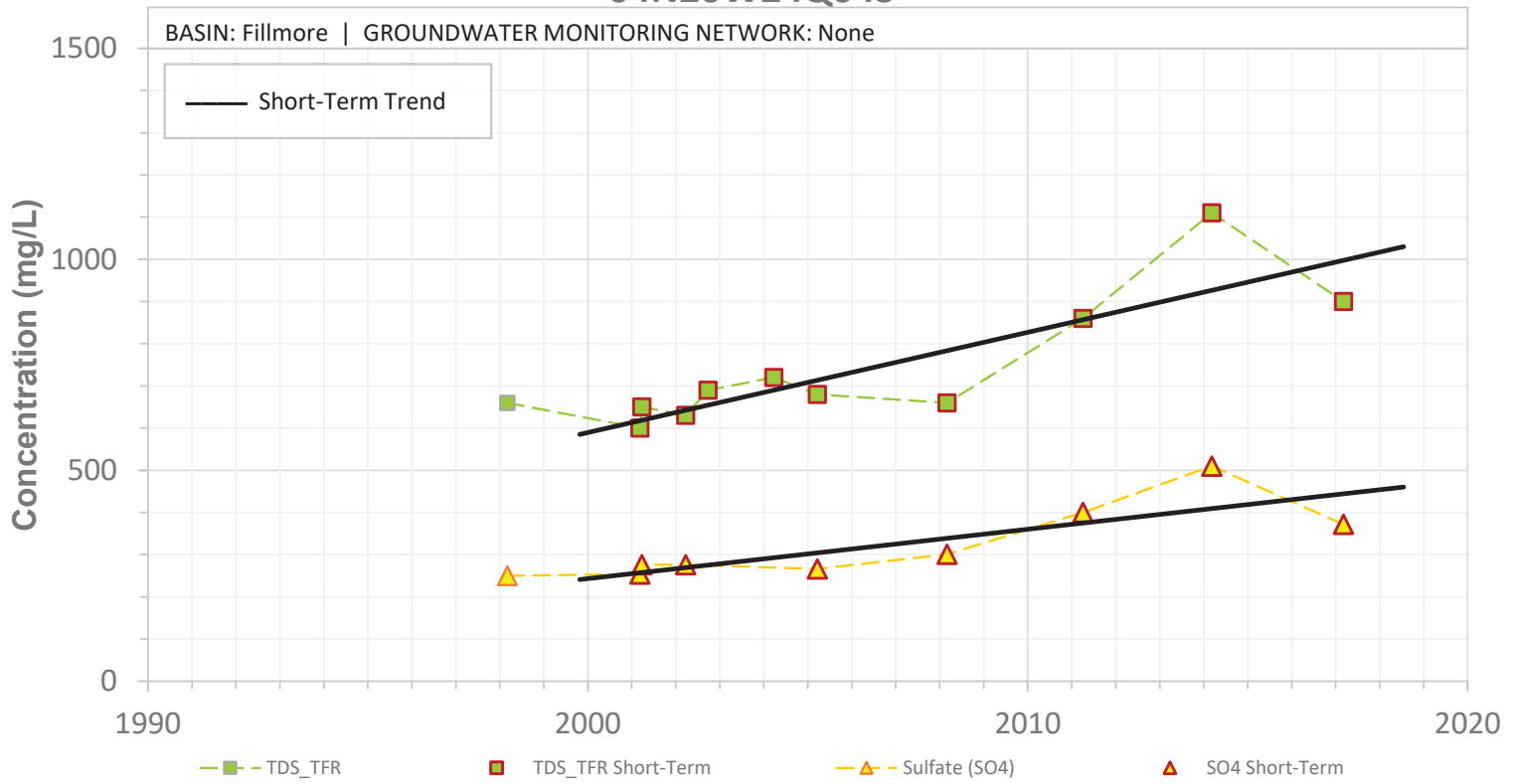
SCREEN: 100-260 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N20W24G01S



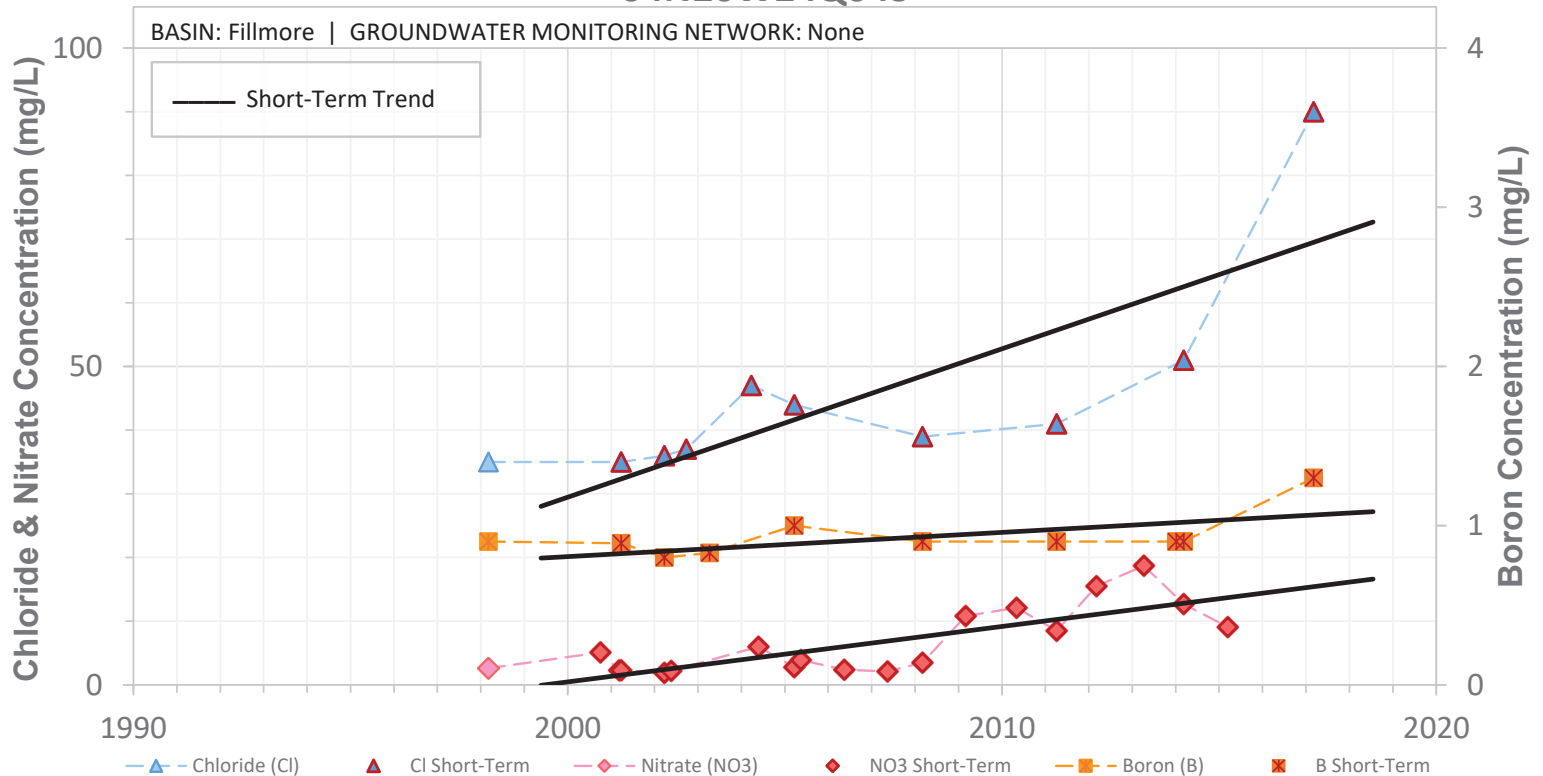
SCREEN: 100-260 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N20W24Q04S



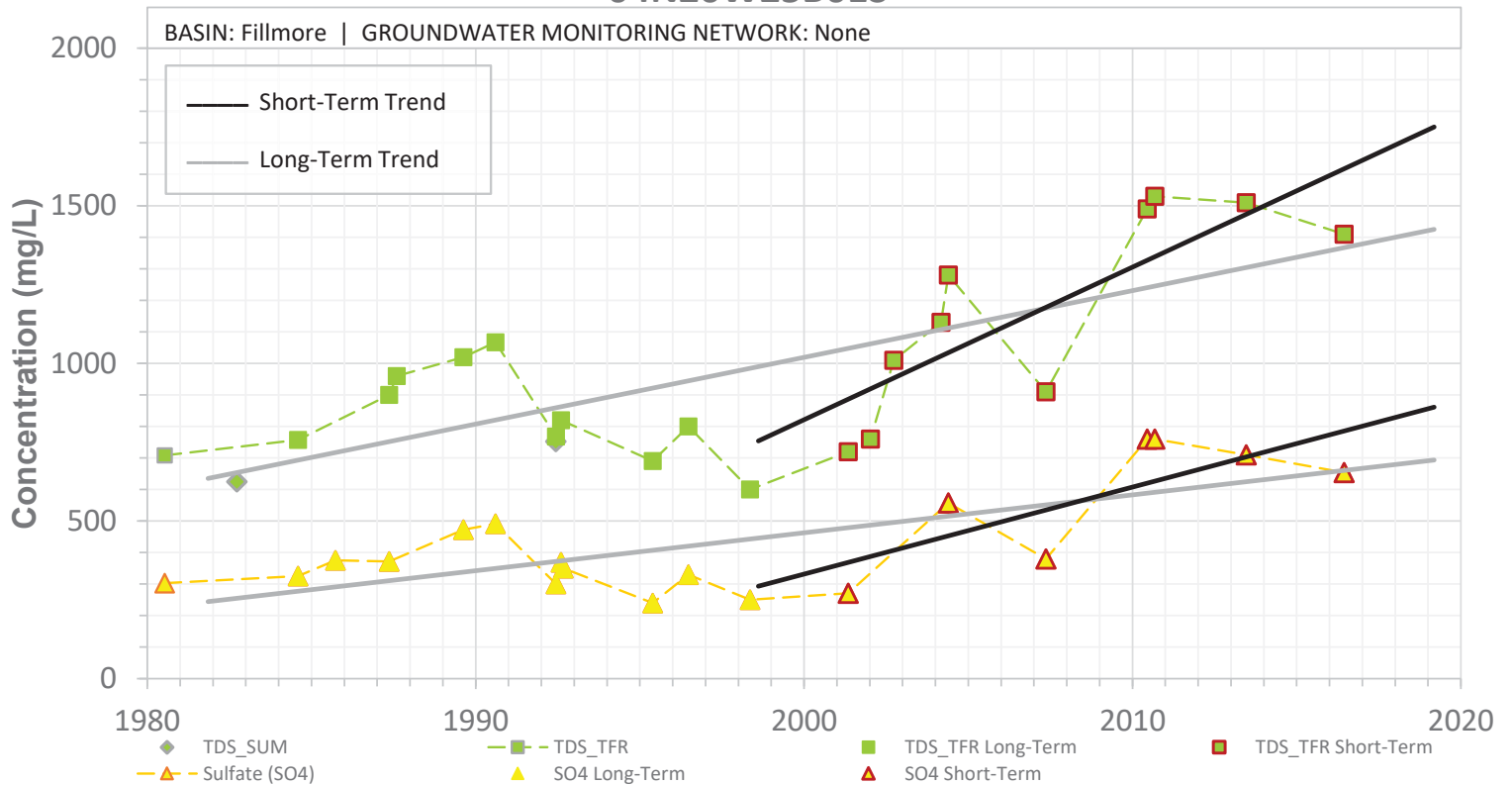
SCREEN: 90-300 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N20W24Q04S



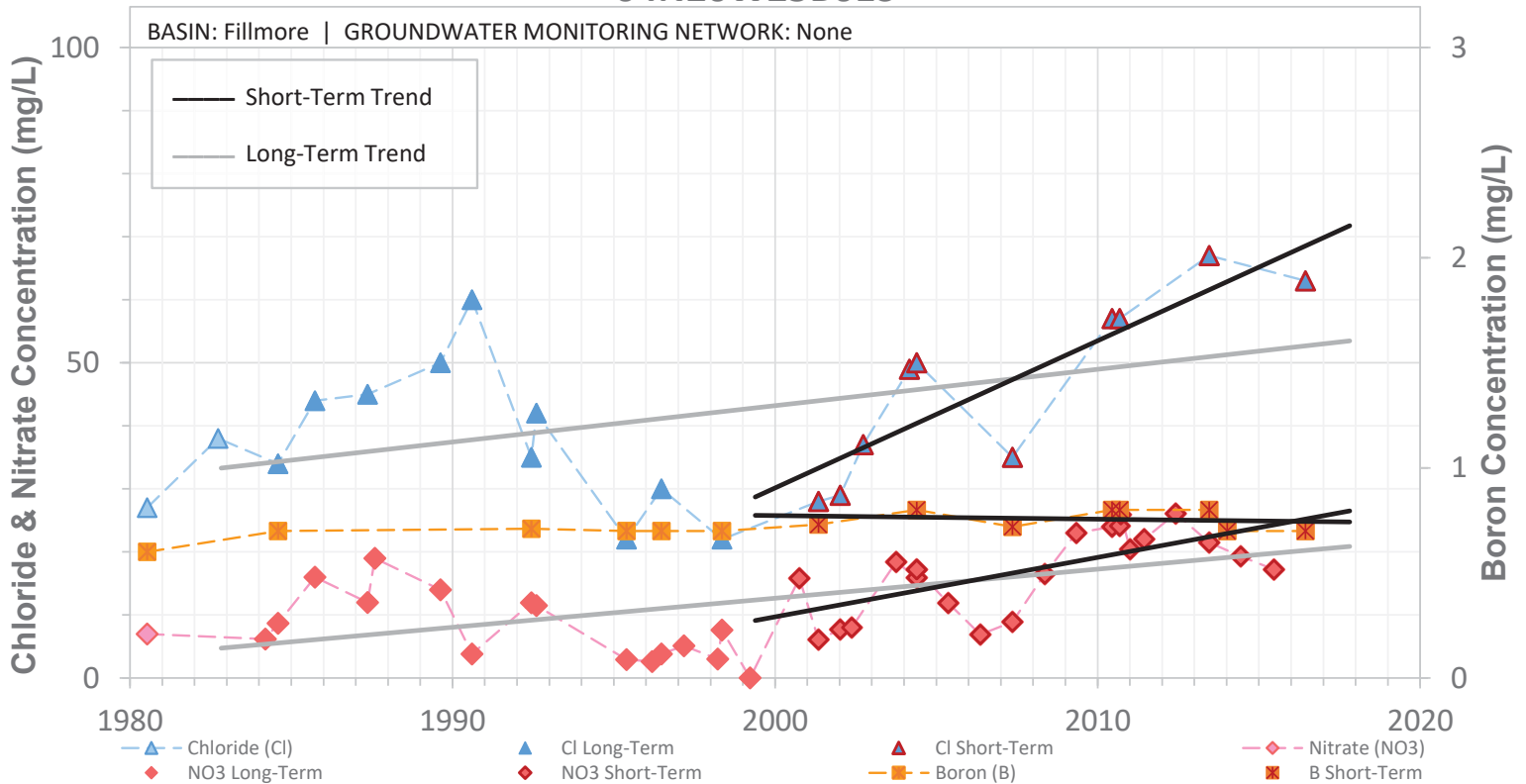
SCREEN: 90-300 ft bgs | CURRENT USE: Municipal | STATUS: Active

04N20W25B01S



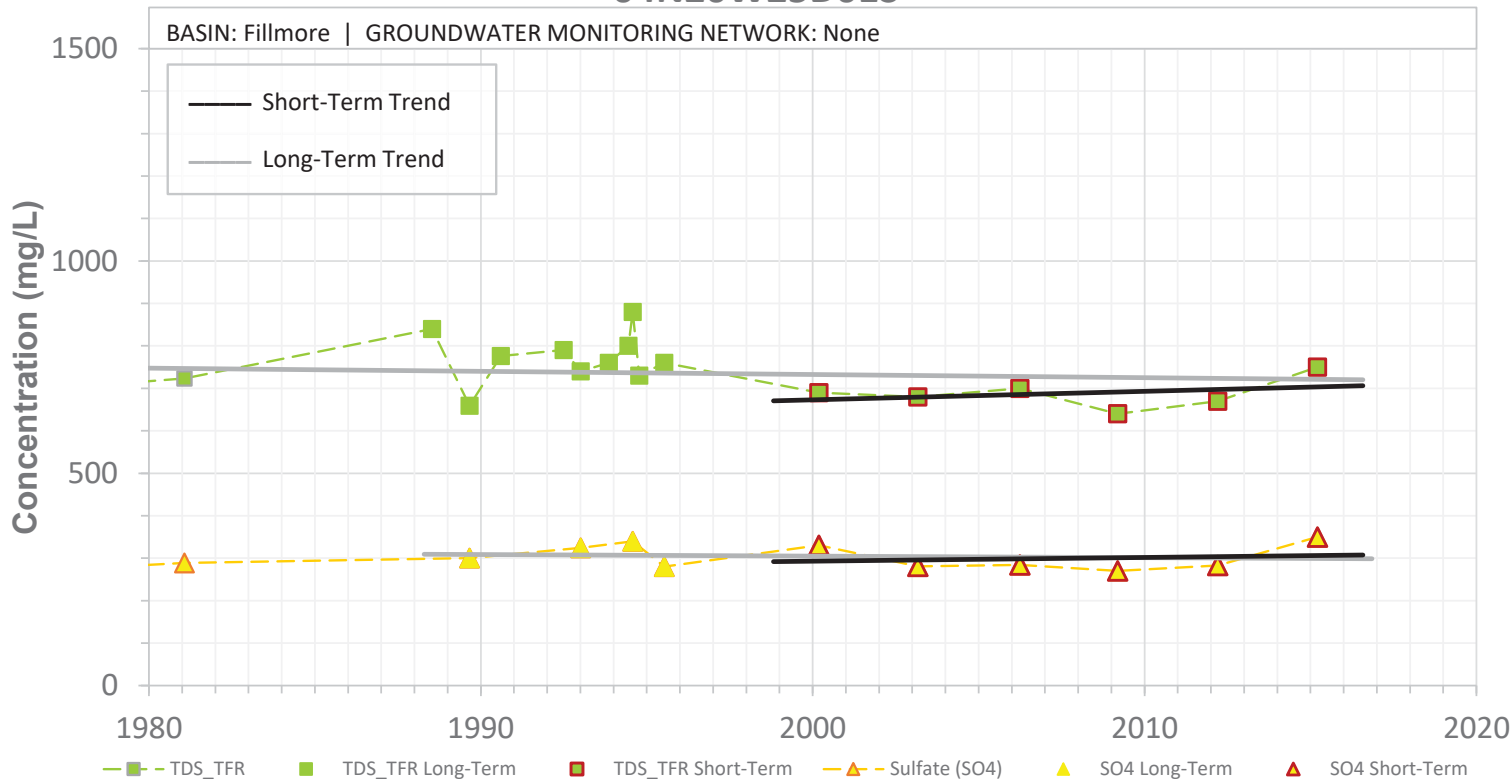
SCREEN: 50-280 ft bgs | CURRENT USE: Municipal | STATUS: Abandoned_HOLD

04N20W25B01S



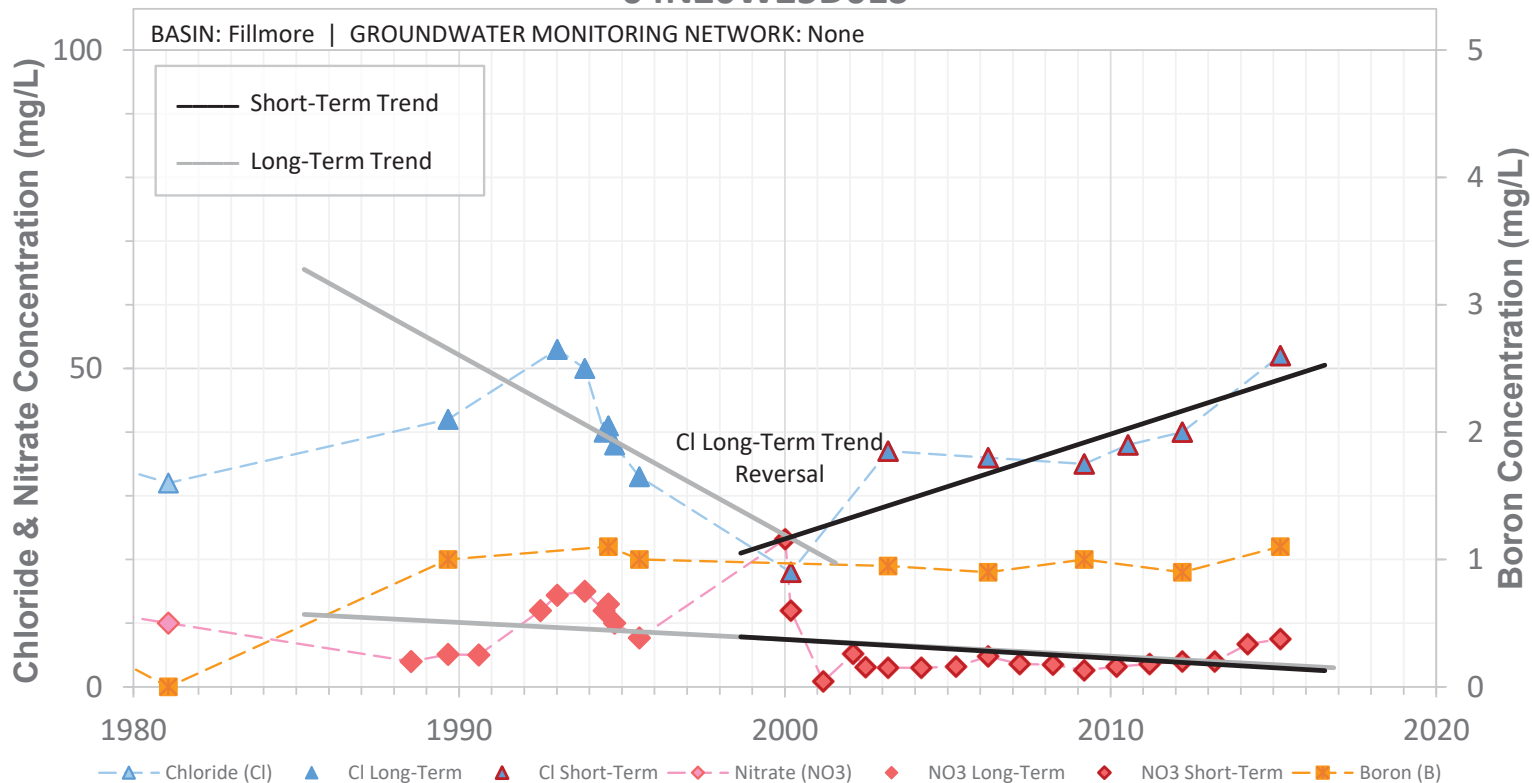
SCREEN: 50-280 ft bgs | CURRENT USE: Municipal | STATUS: Abandoned_HOLD

04N20W25D01S



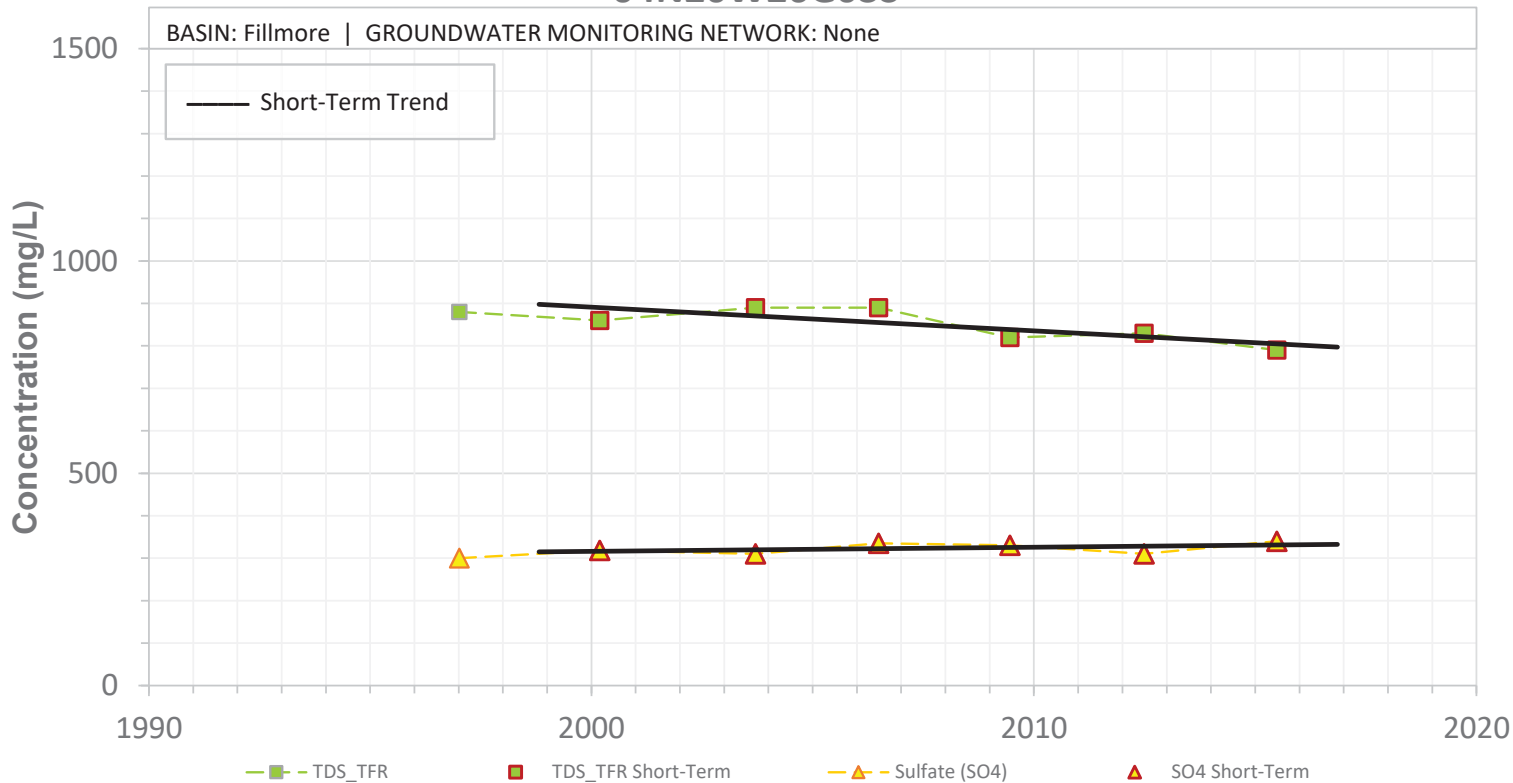
SCREEN: 67-187 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N20W25D01S



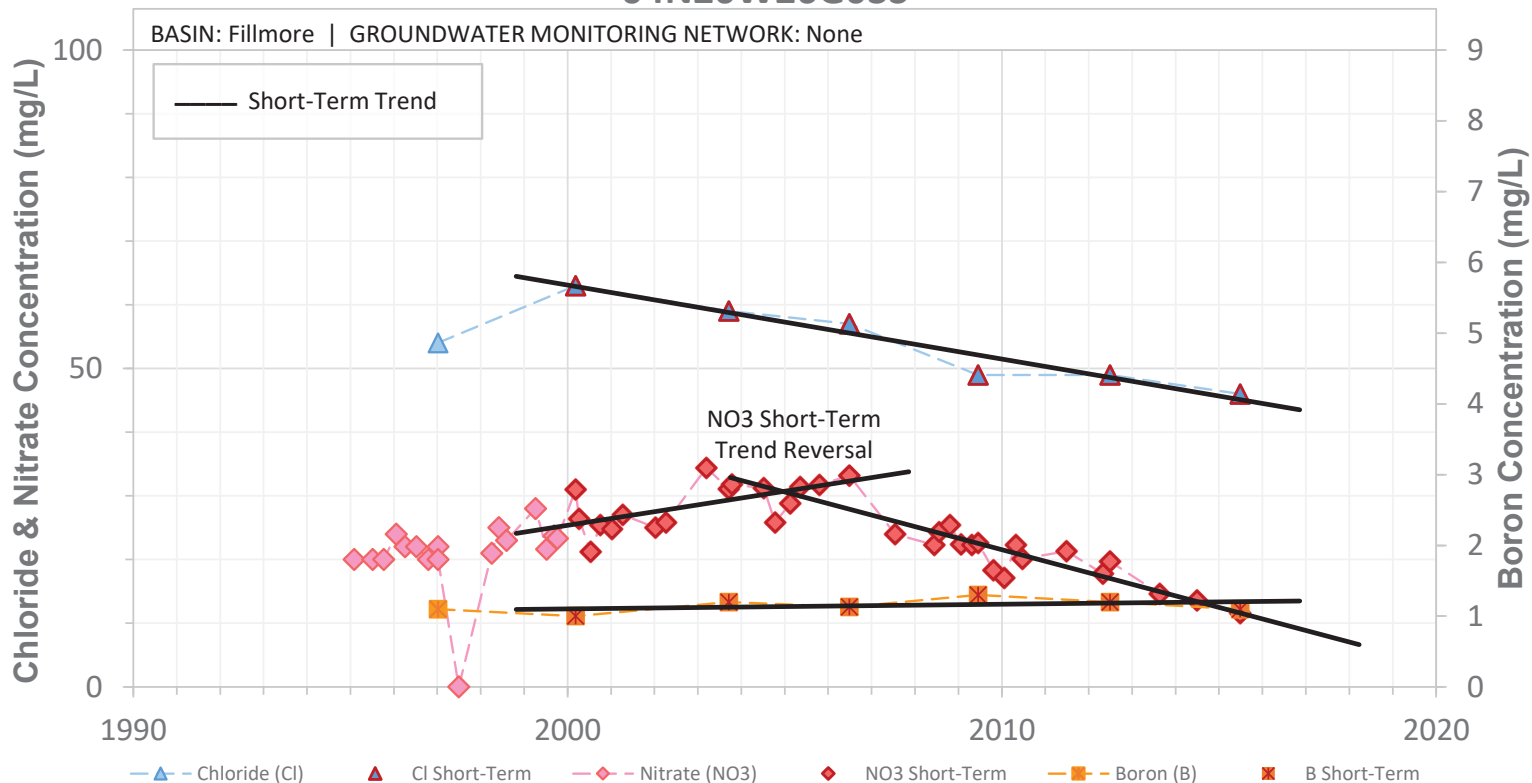
SCREEN: 67-187 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N20W26G03S



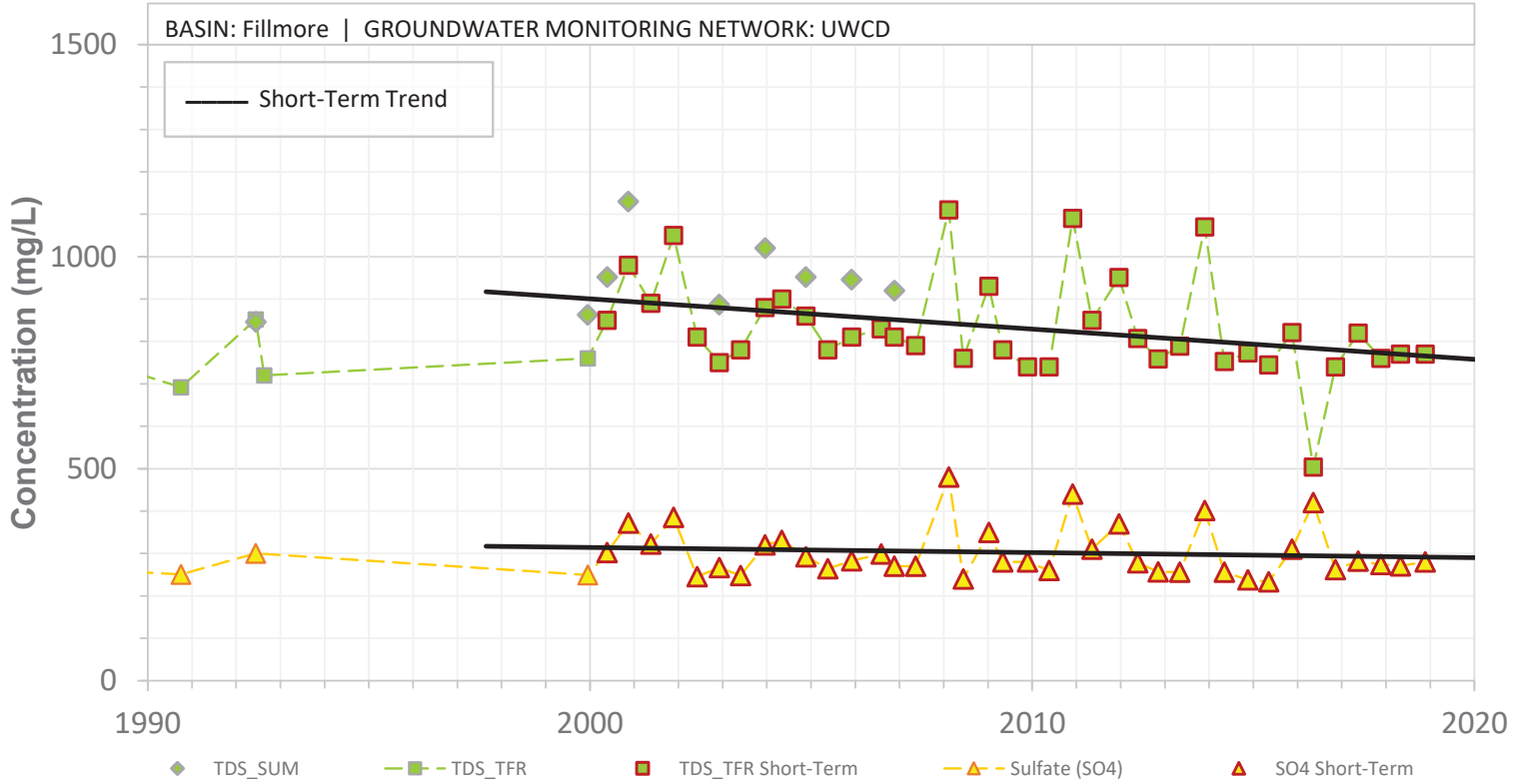
SCREEN: 294-374 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N20W26G03S



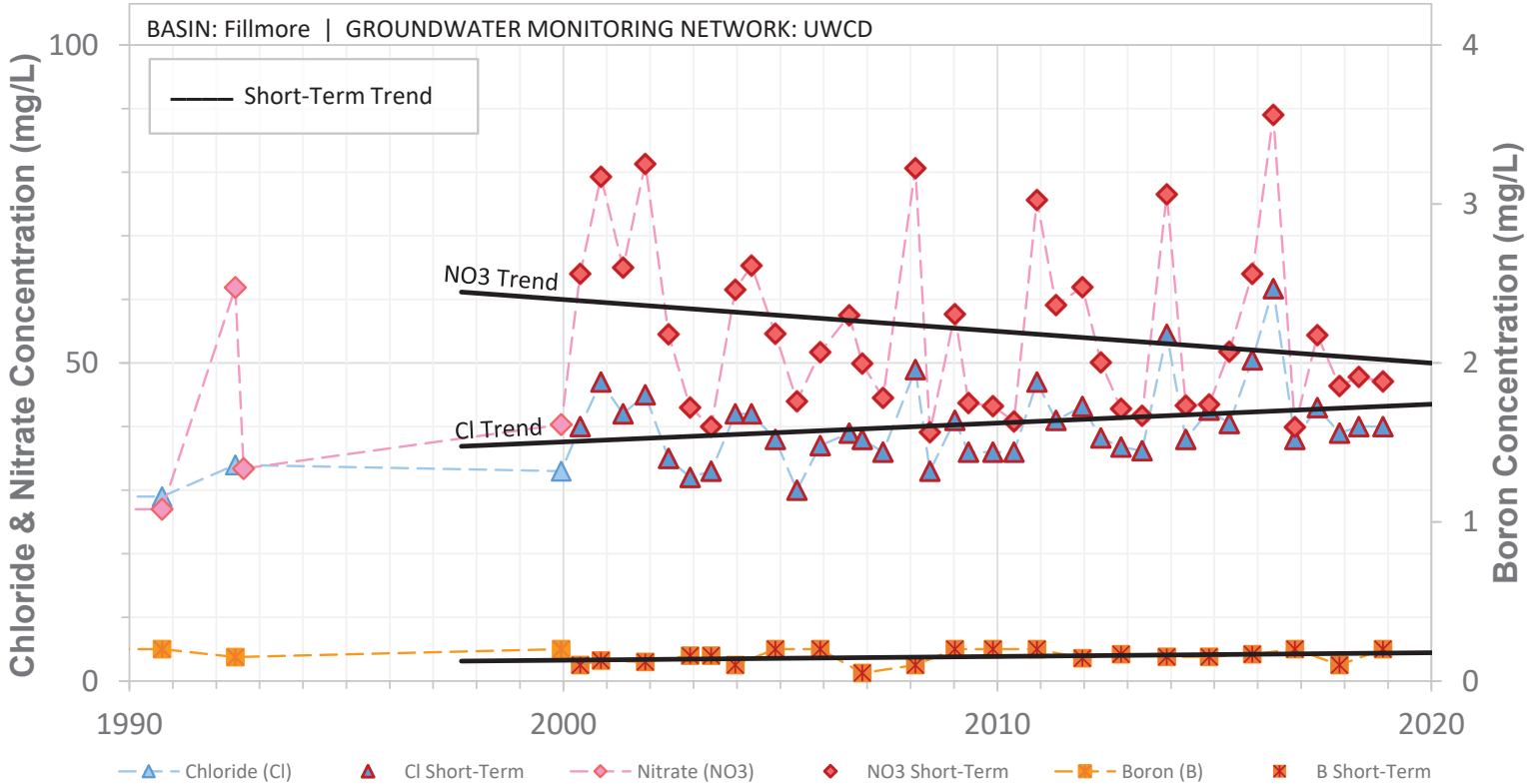
SCREEN: 294-374 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N20W33C03S



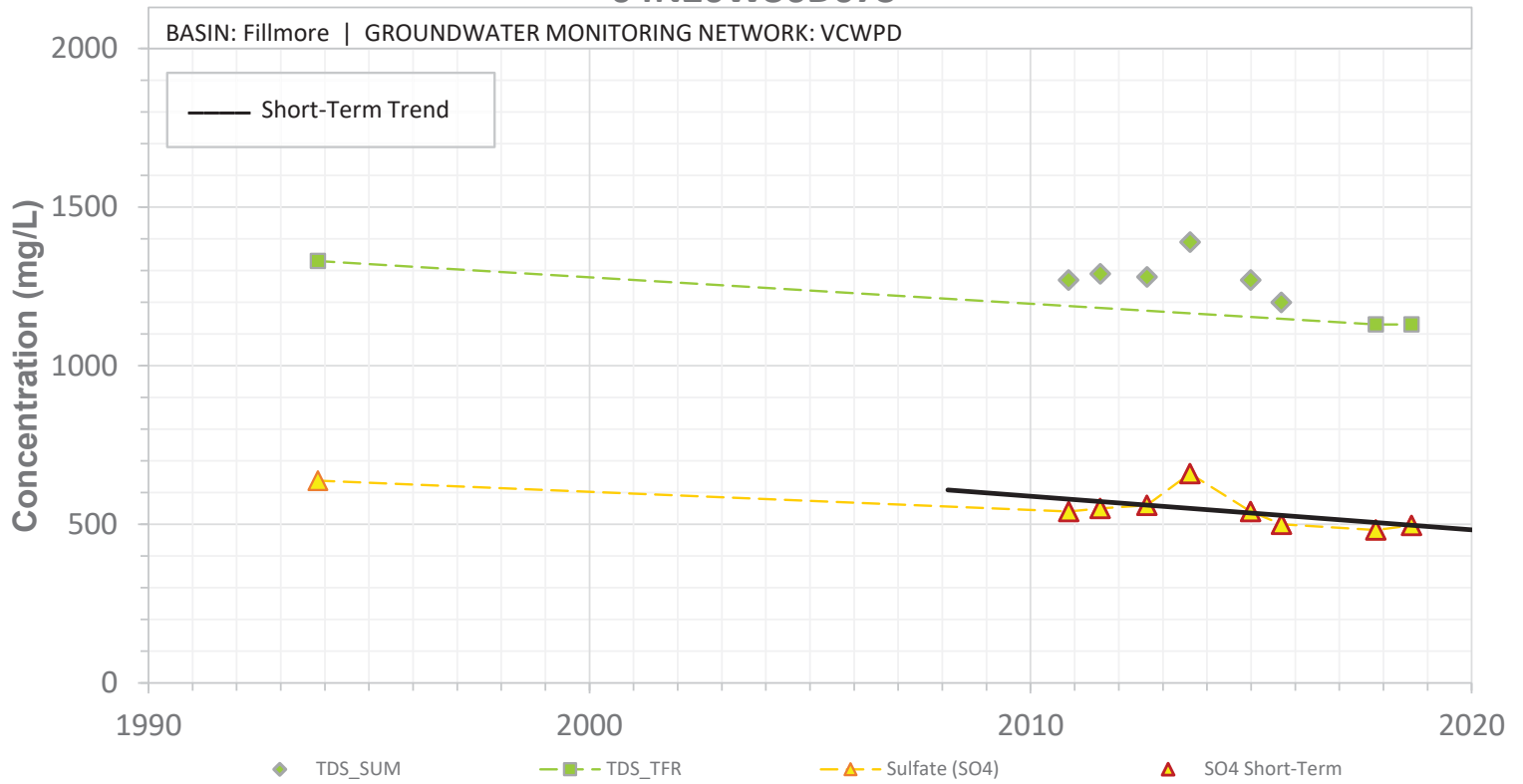
SCREEN: 470-700 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N20W33C03S



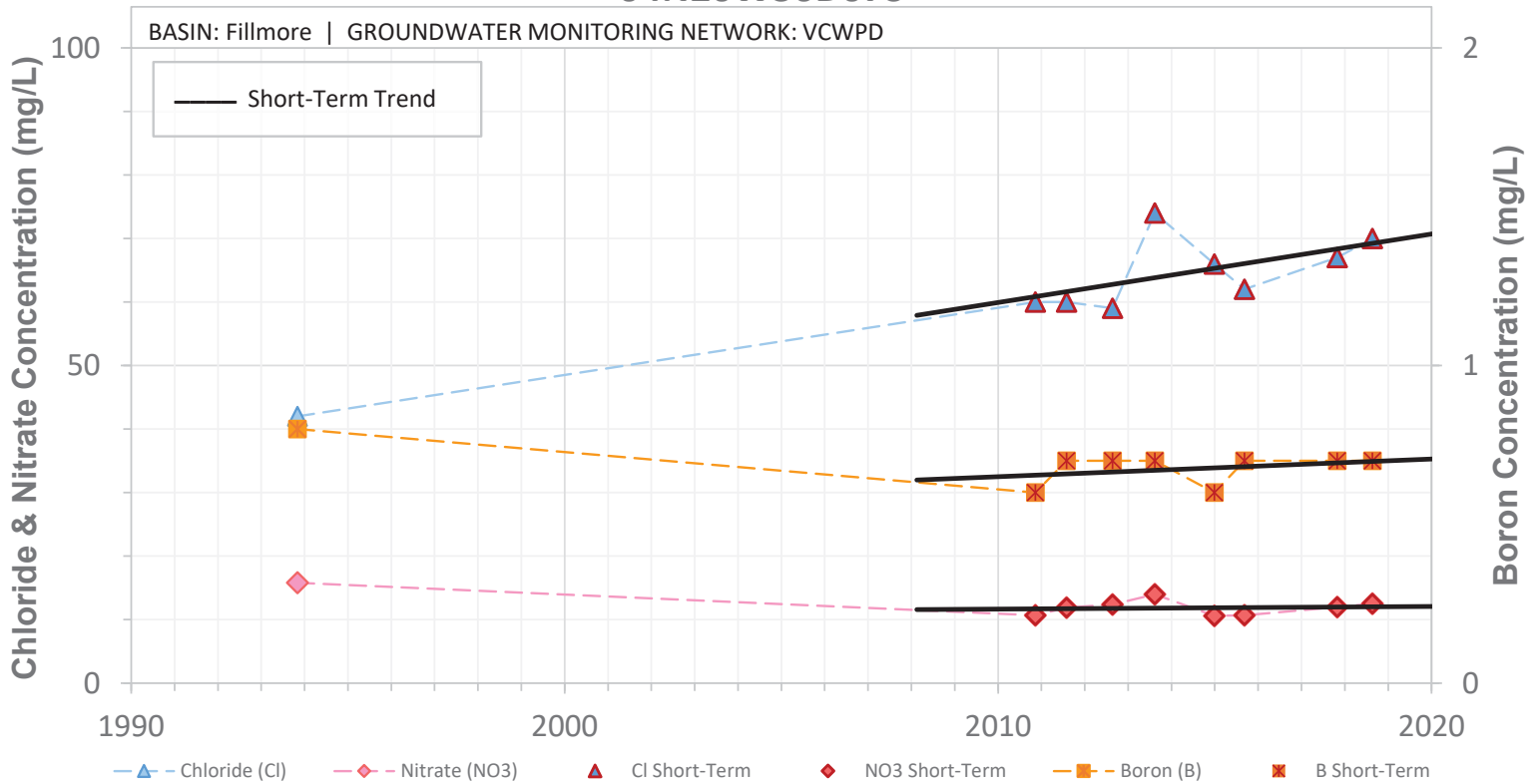
SCREEN: 470-700 ft bgs | CURRENT USE: Agricultural | STATUS: Active

04N20W36D07S



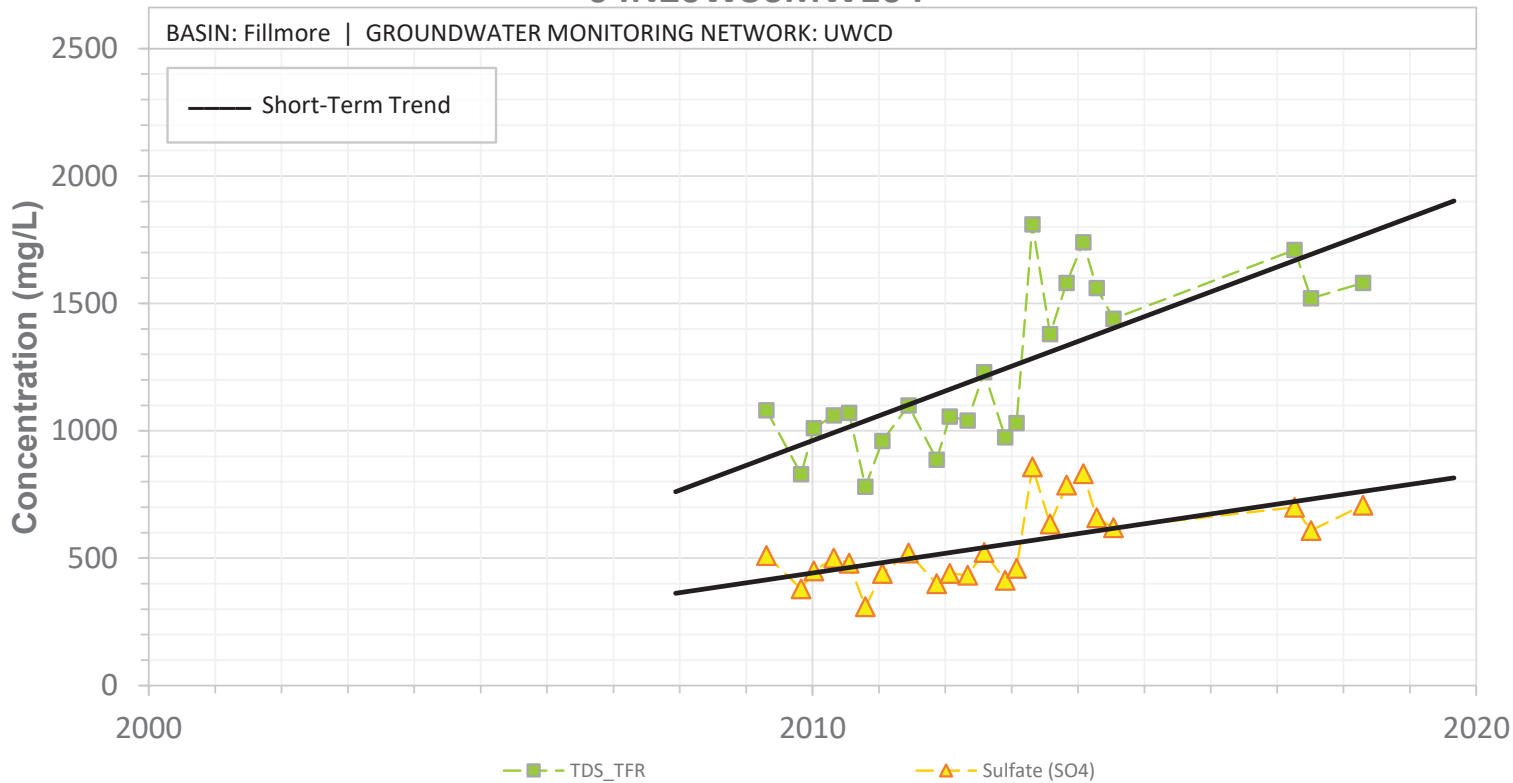
SCREEN: 120-280 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N20W36D07S



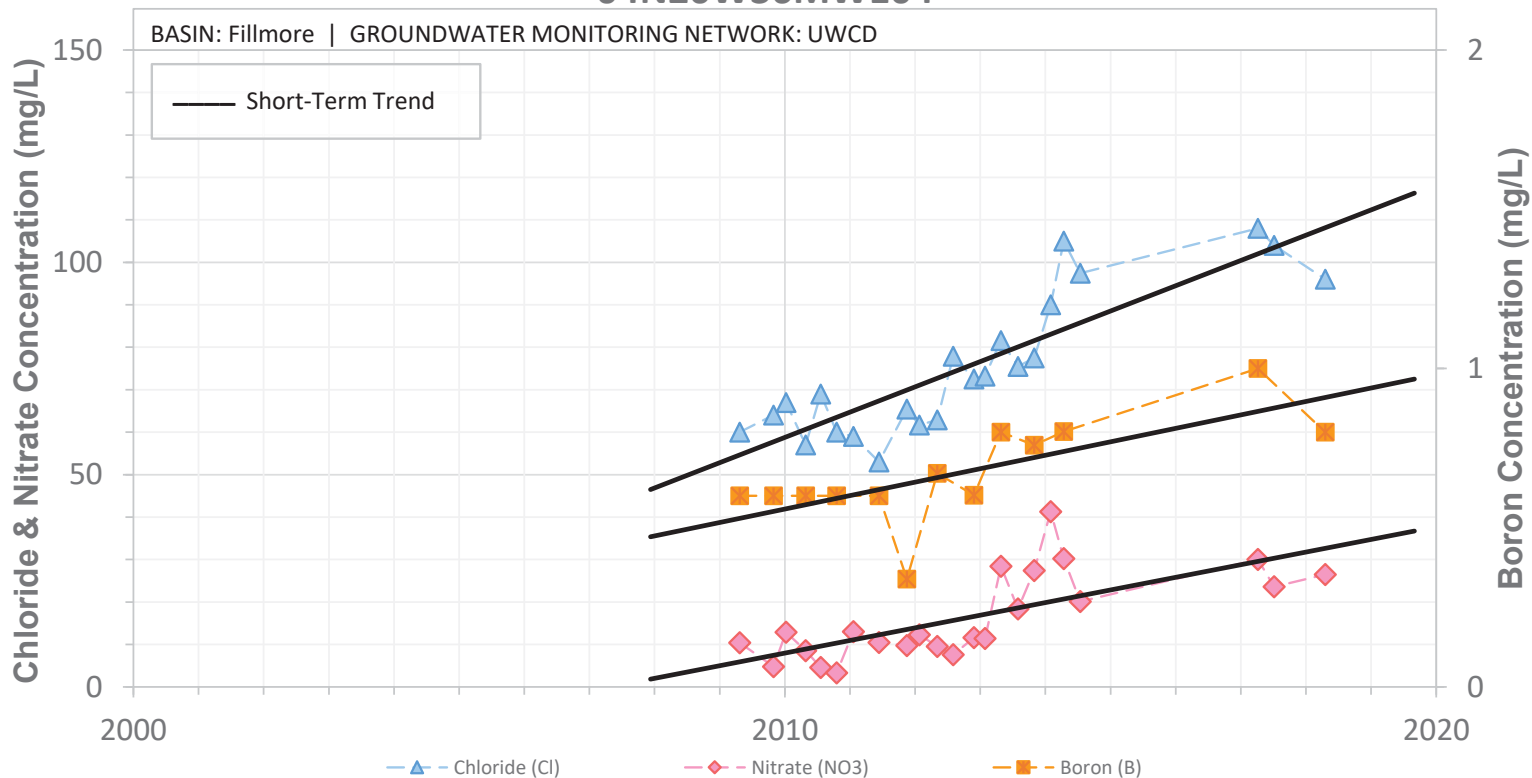
SCREEN: 120-280 ft bgs | CURRENT USE: Domestic | STATUS: Active

04N20W36MW104



SCREEN: 10-40 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

04N20W36MW104

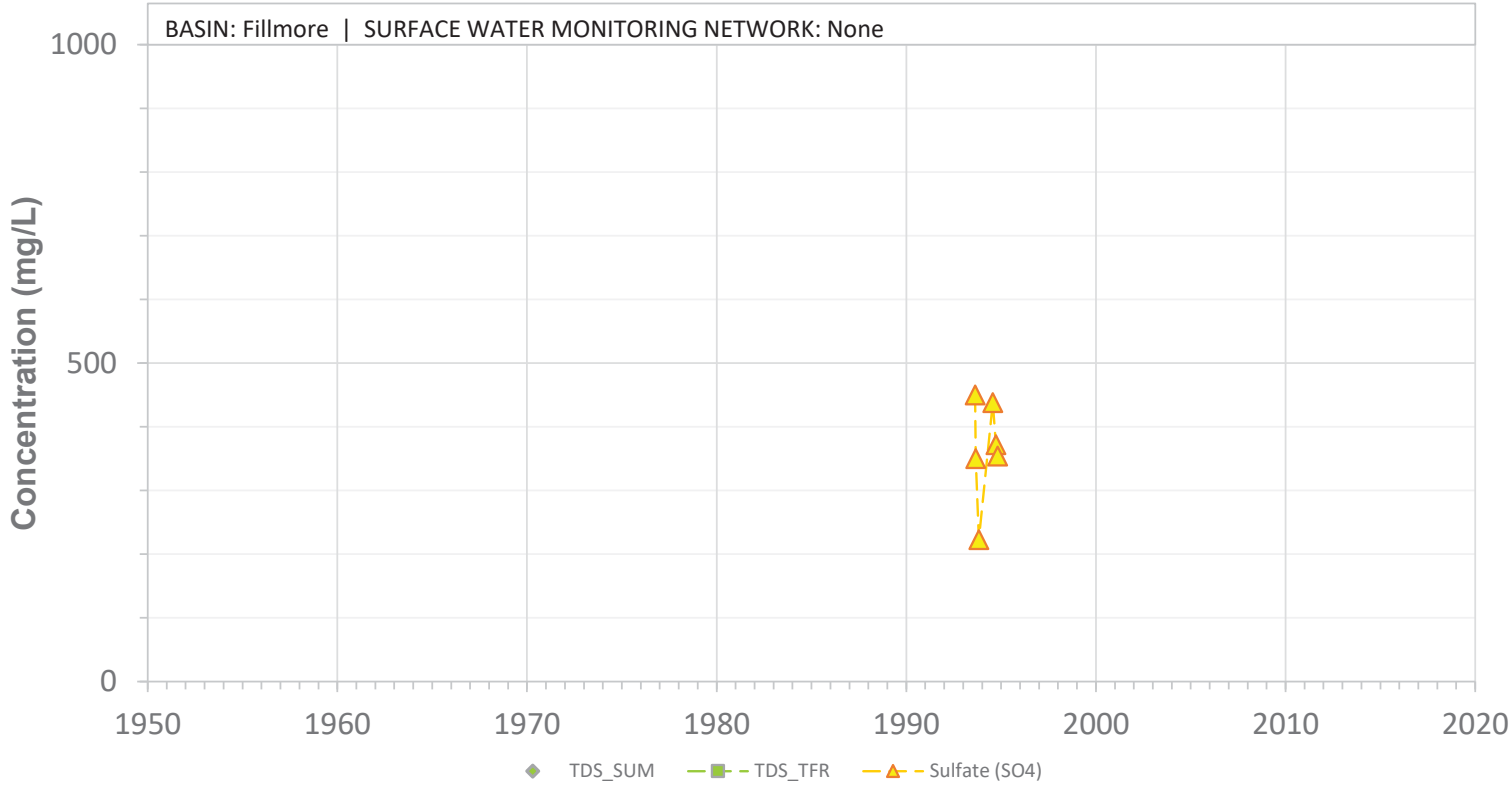


SCREEN: 10-40 ft bgs | CURRENT USE: Monitoring | STATUS: Unknown

Appendix F

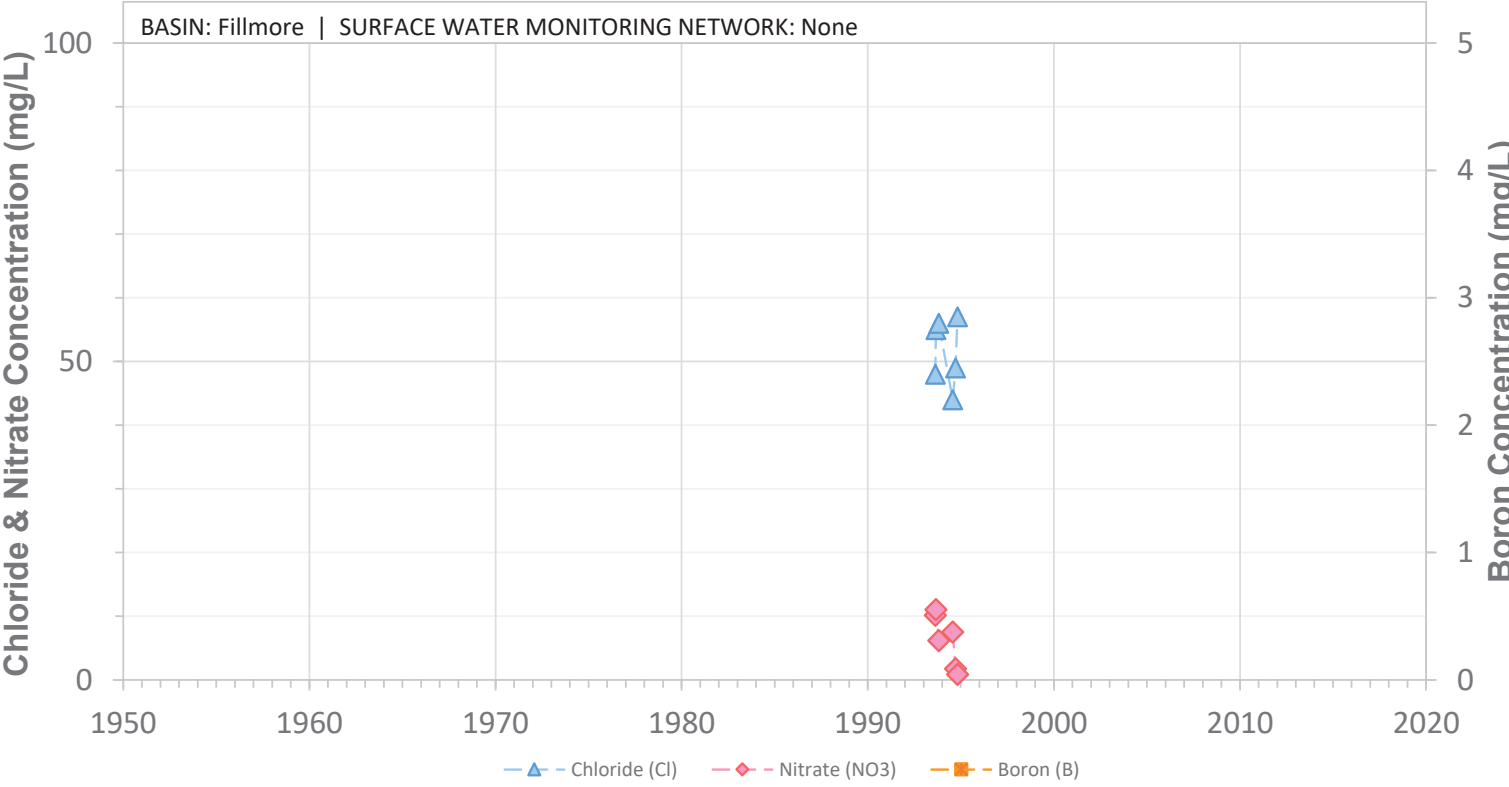
Surface Water Quality Time-Series Graphs

03N20W05SW1



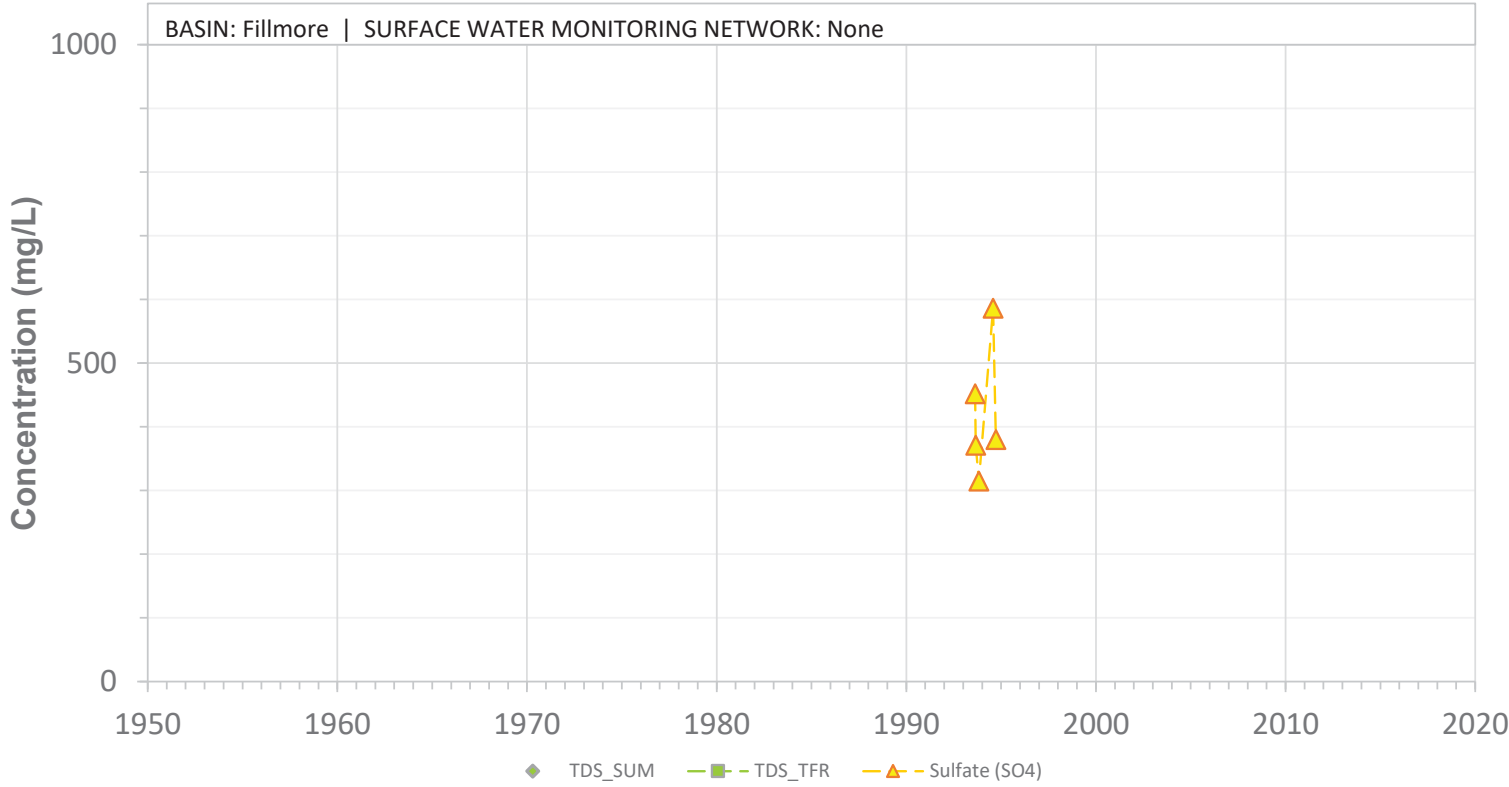
SURFACE WATER SAMPLING SITE NAME: Santa Clara River upstream of Richardson Diversion

03N20W05SW1



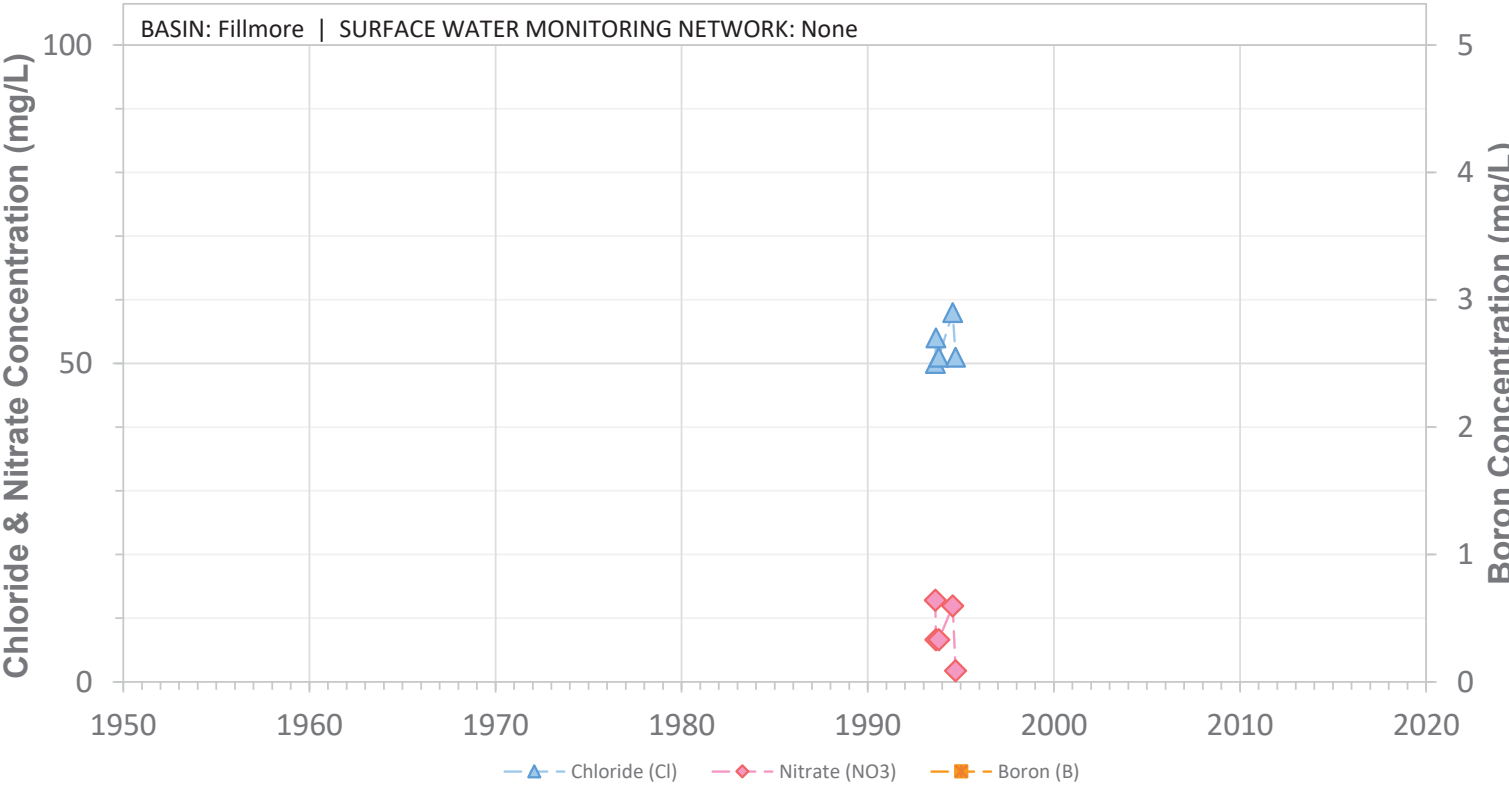
SURFACE WATER SAMPLING SITE NAME: Santa Clara River upstream of Richardson Diversion

03N20W07SW1



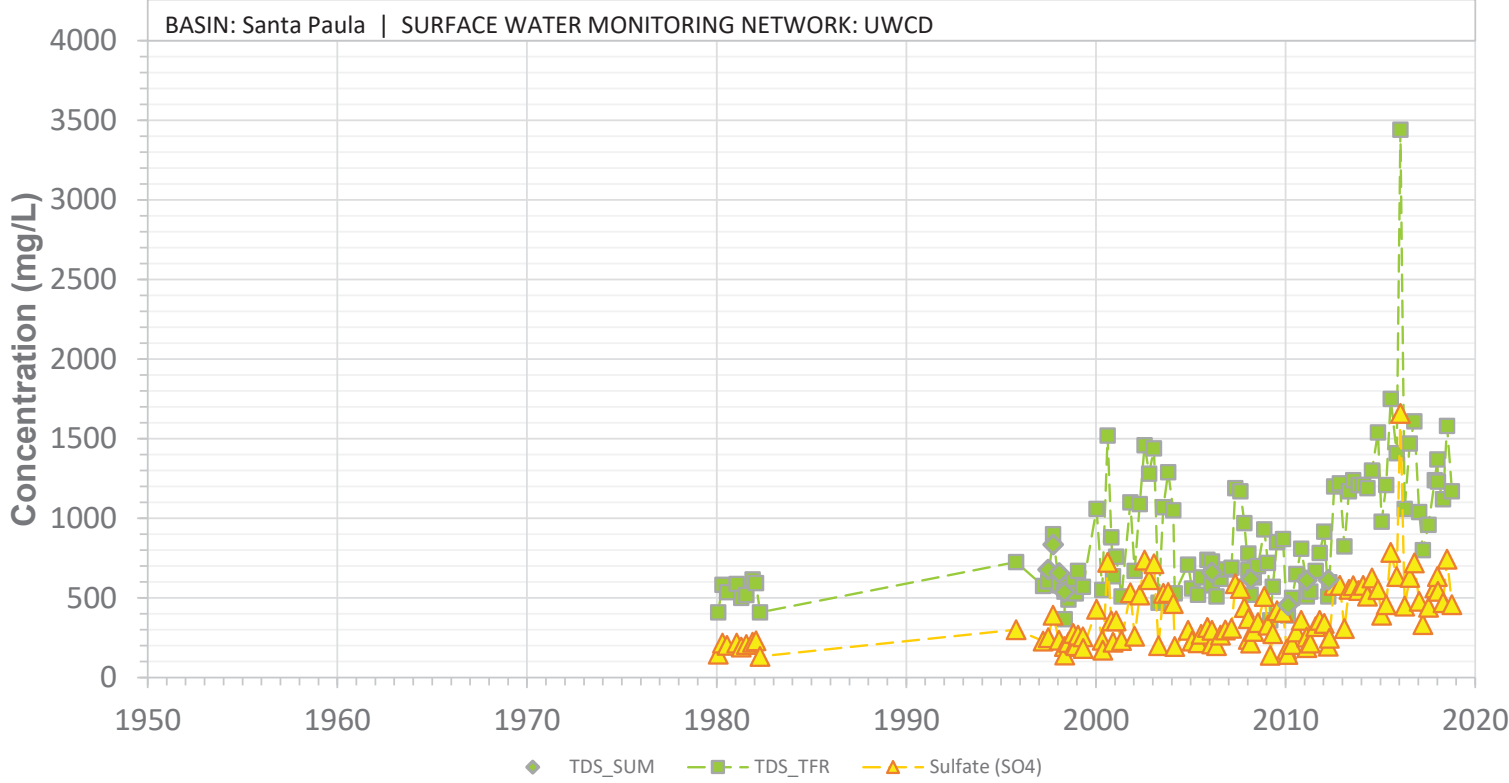
SURFACE WATER SAMPLING SITE NAME: Santa Clara River, 2.6 mi upstream of South Mountain Road

03N20W07SW1



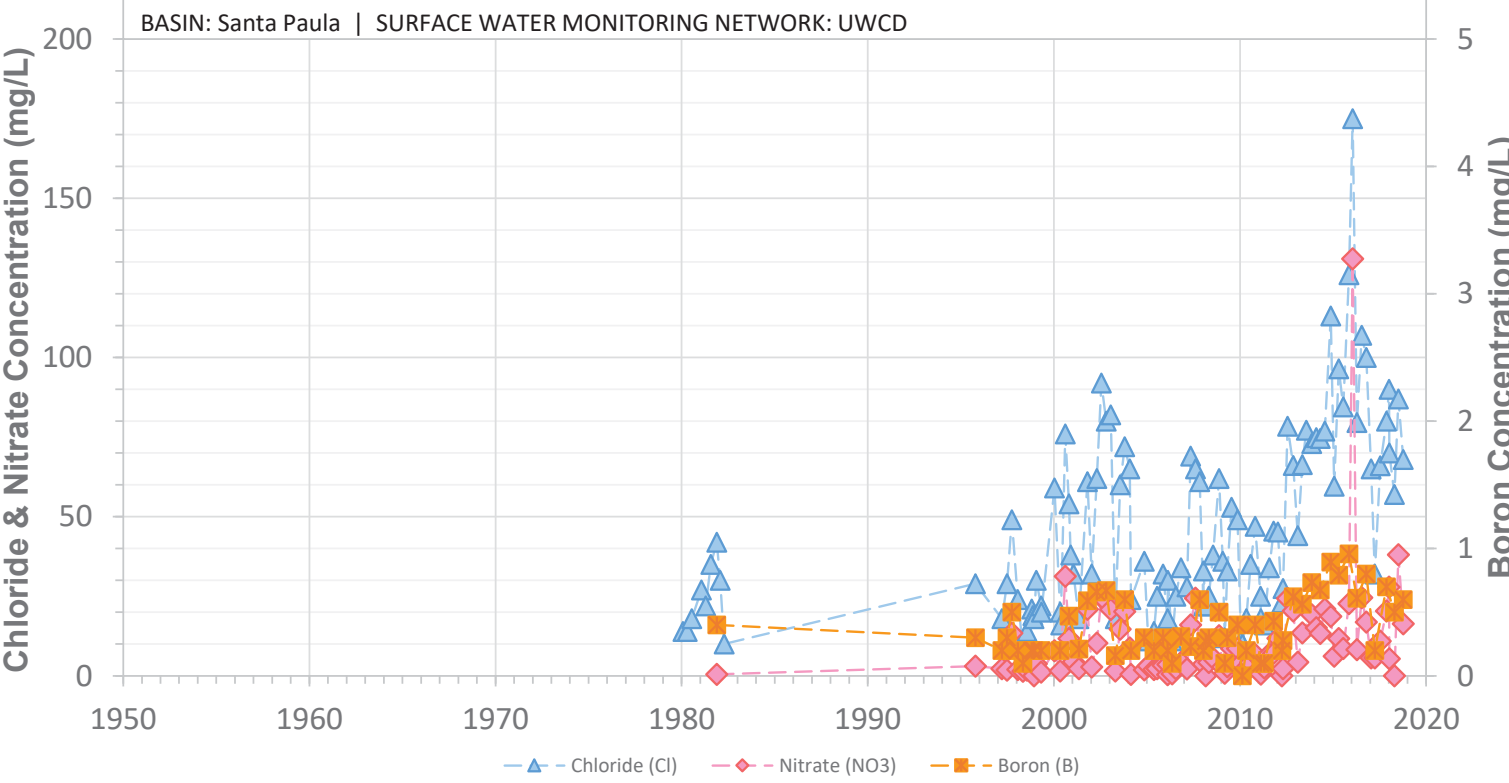
SURFACE WATER SAMPLING SITE NAME: Santa Clara River, 2.6 mi upstream of South Mountain Road

03N21W11SW1



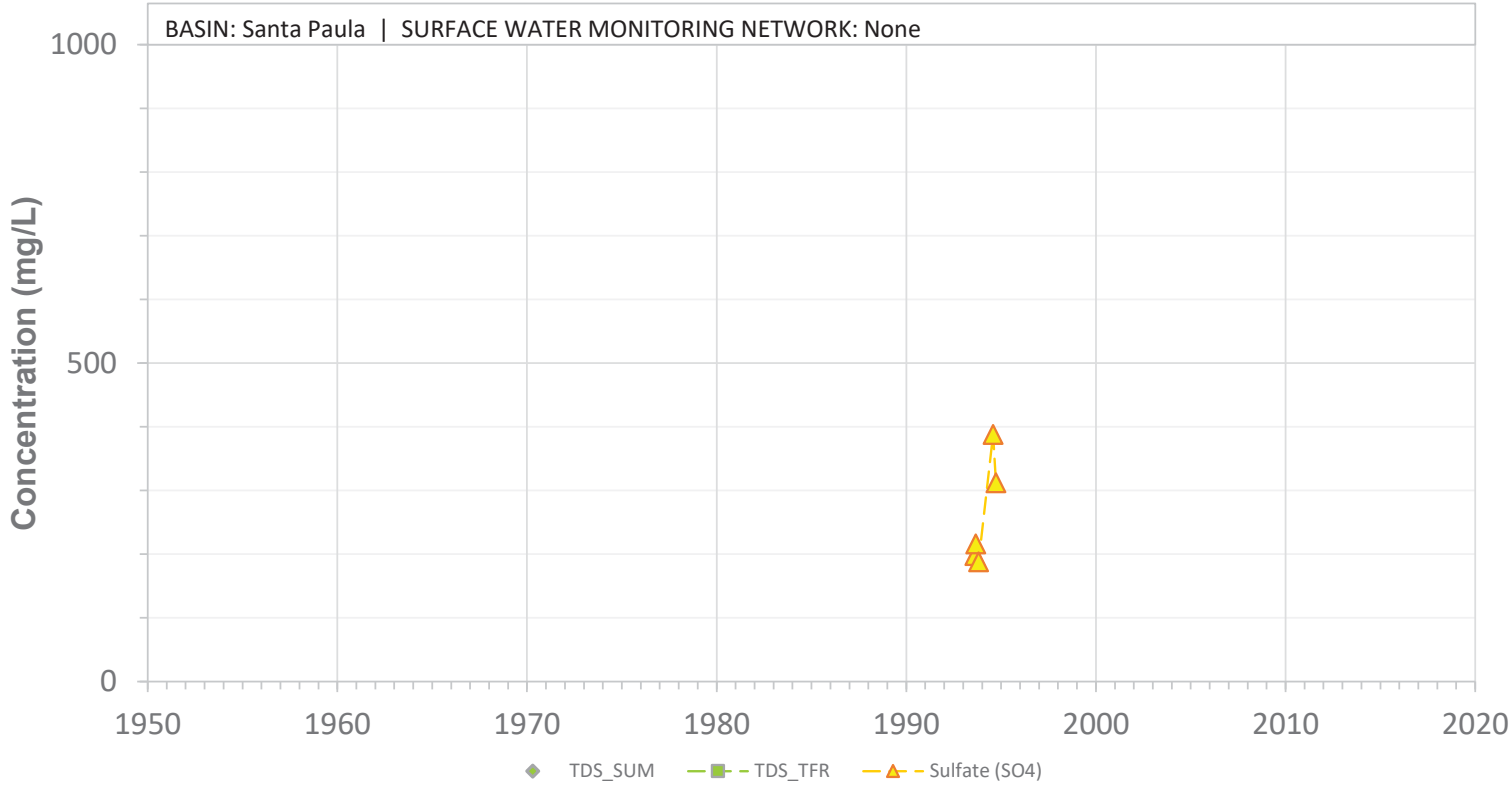
SURFACE WATER SAMPLING SITE NAME: Santa Paula Creek at Harvard Blvd, near Santa Paula

03N21W11SW1



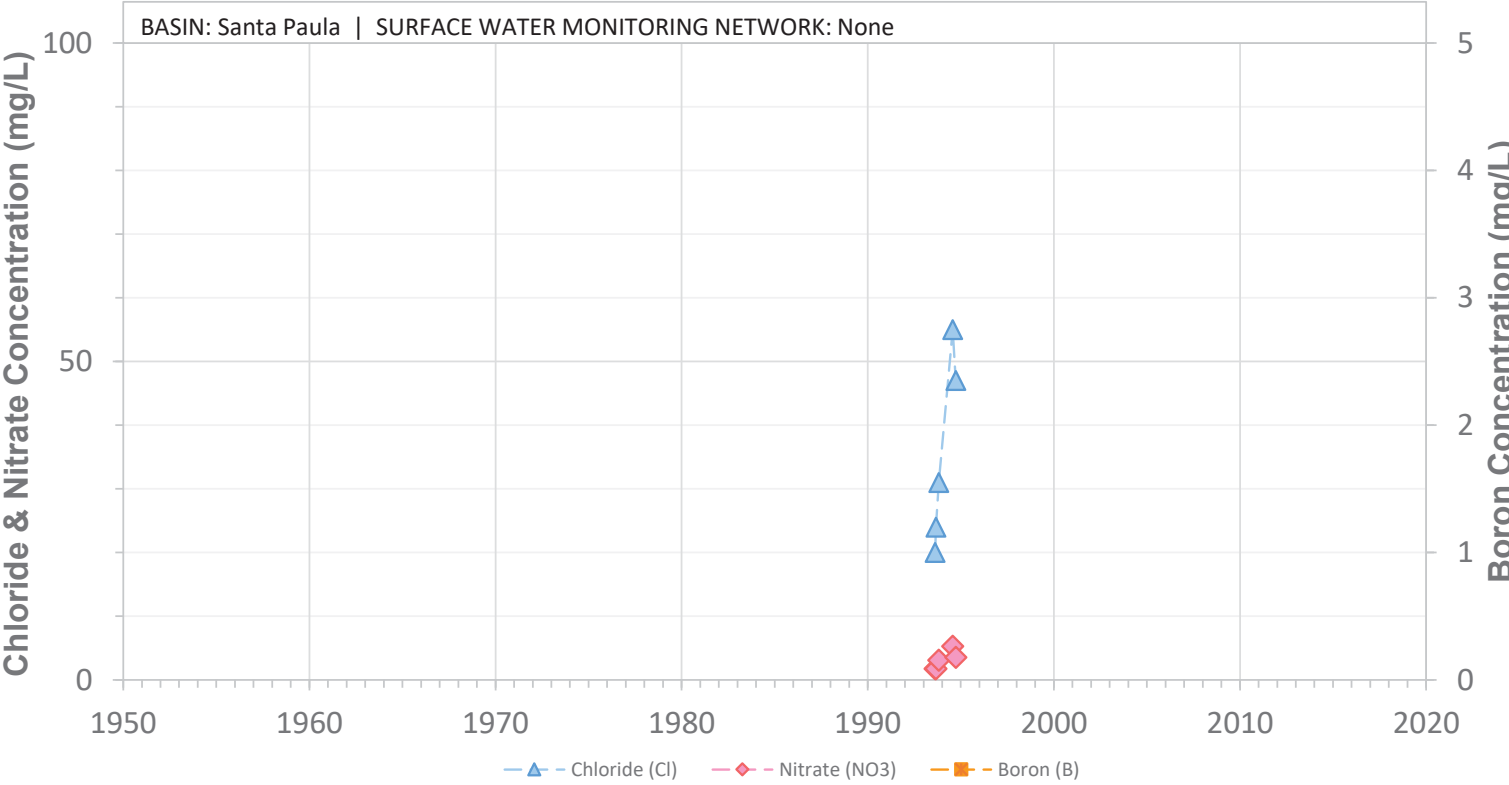
SURFACE WATER SAMPLING SITE NAME: Santa Paula Creek at Harvard Blvd, near Santa Paula

03N21W11SW2



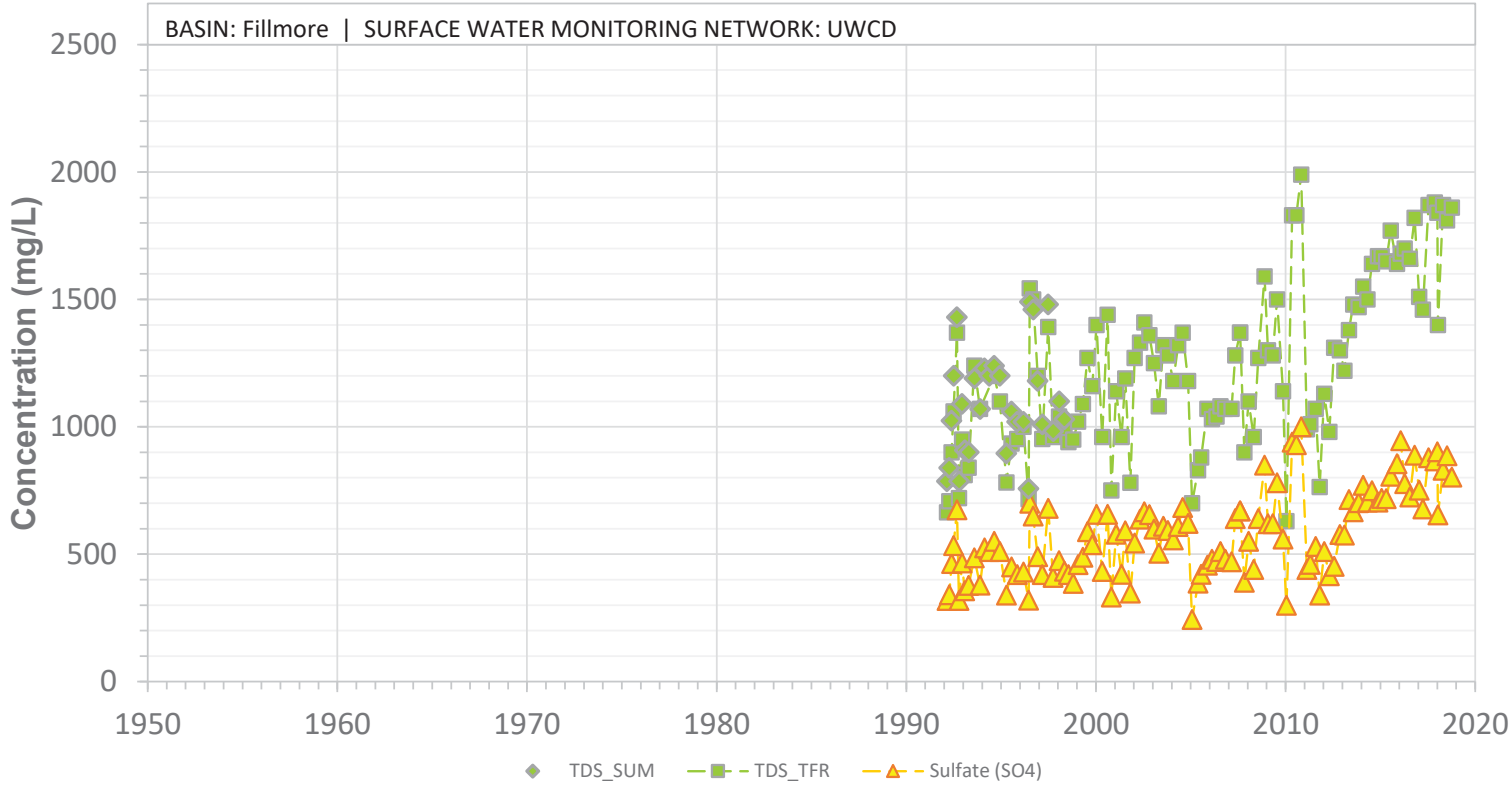
SURFACE WATER SAMPLING SITE NAME: Santa Paula Creek at Hwy 126

03N21W11SW2



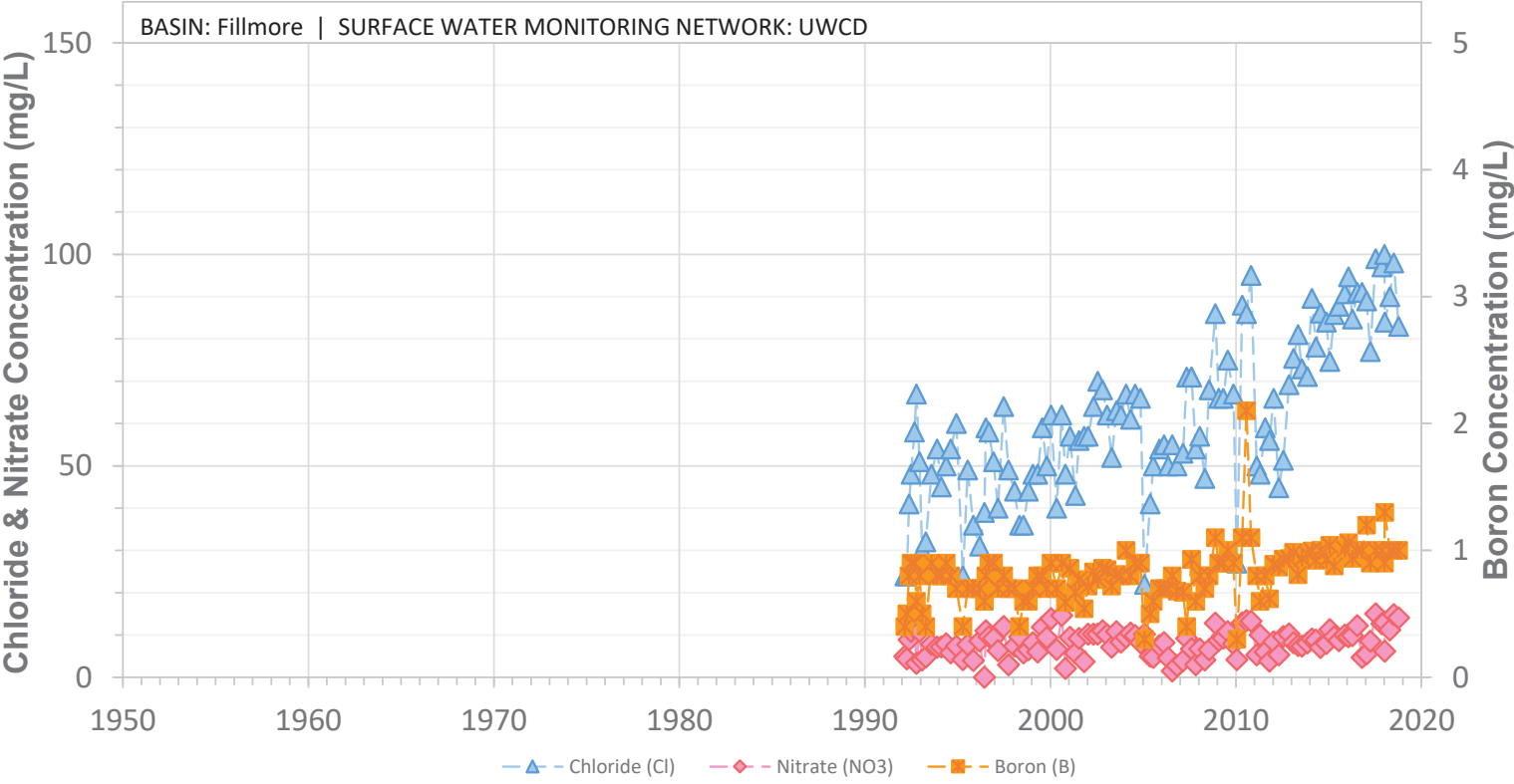
SURFACE WATER SAMPLING SITE NAME: Santa Paula Creek at Hwy 126

03N21W12SW1



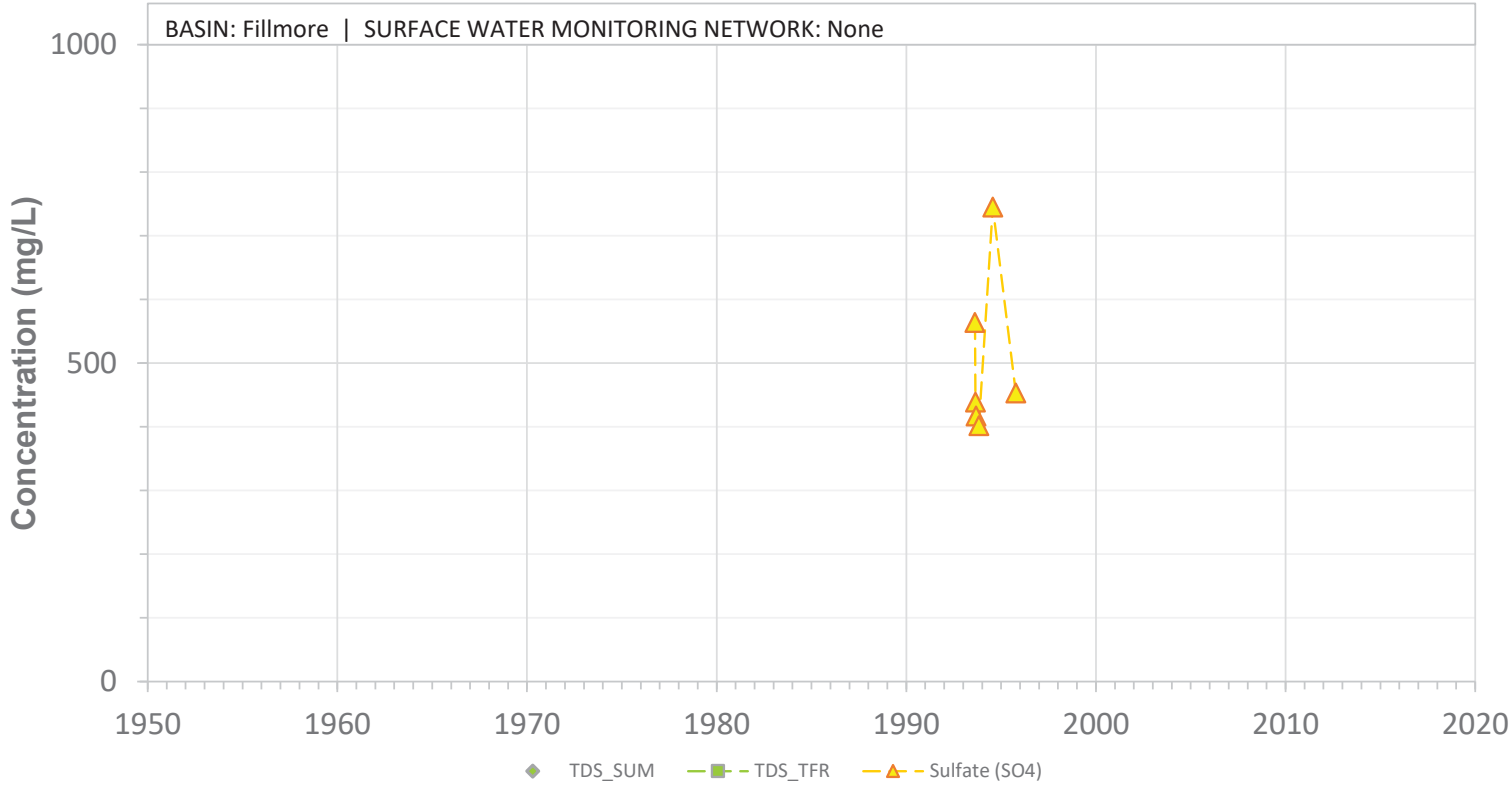
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Willard Road, near Santa Paula-Fillmore Basin boundary

03N21W12SW1



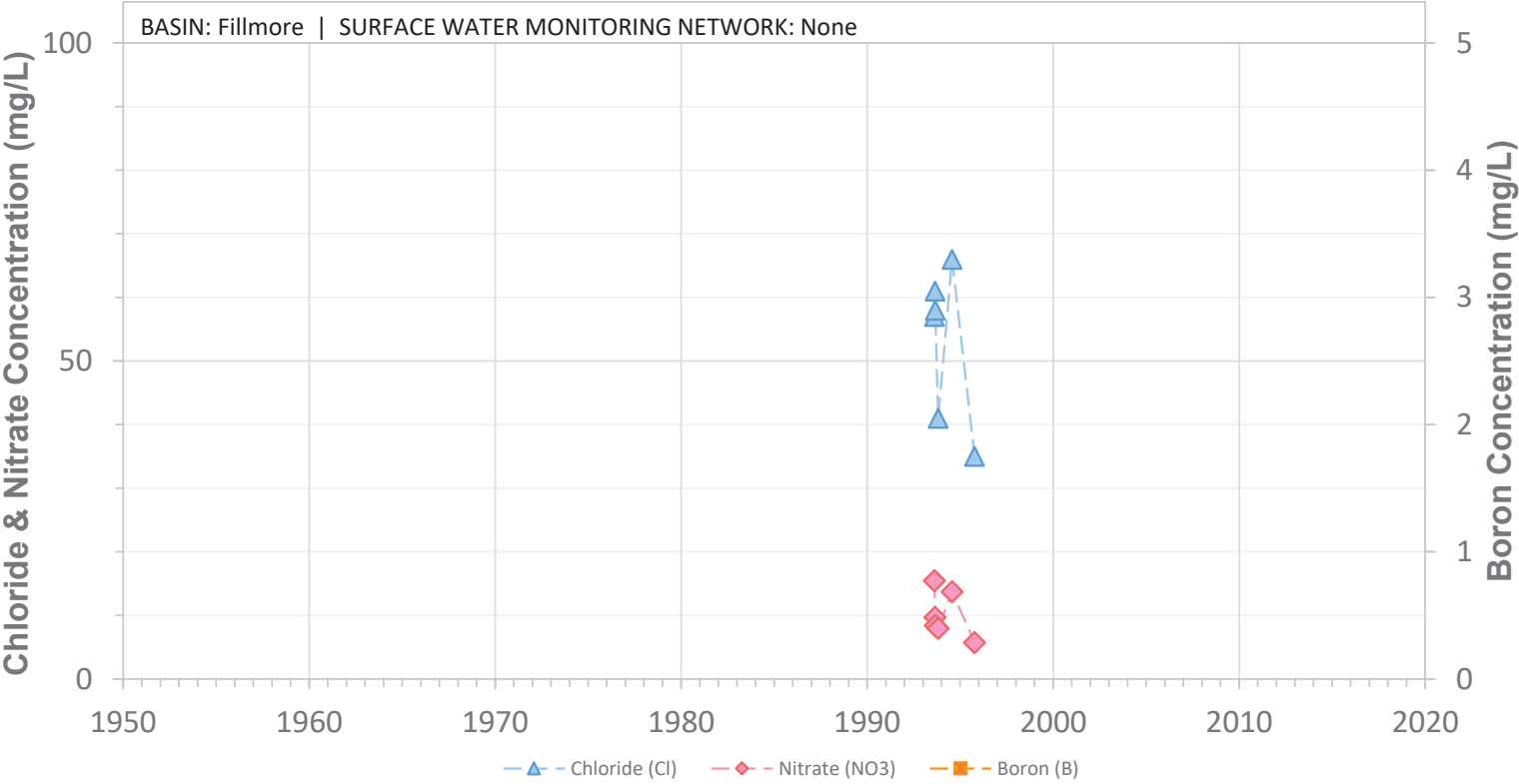
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Willard Road, near Santa Paula-Fillmore Basin boundary

03N21W12SW2



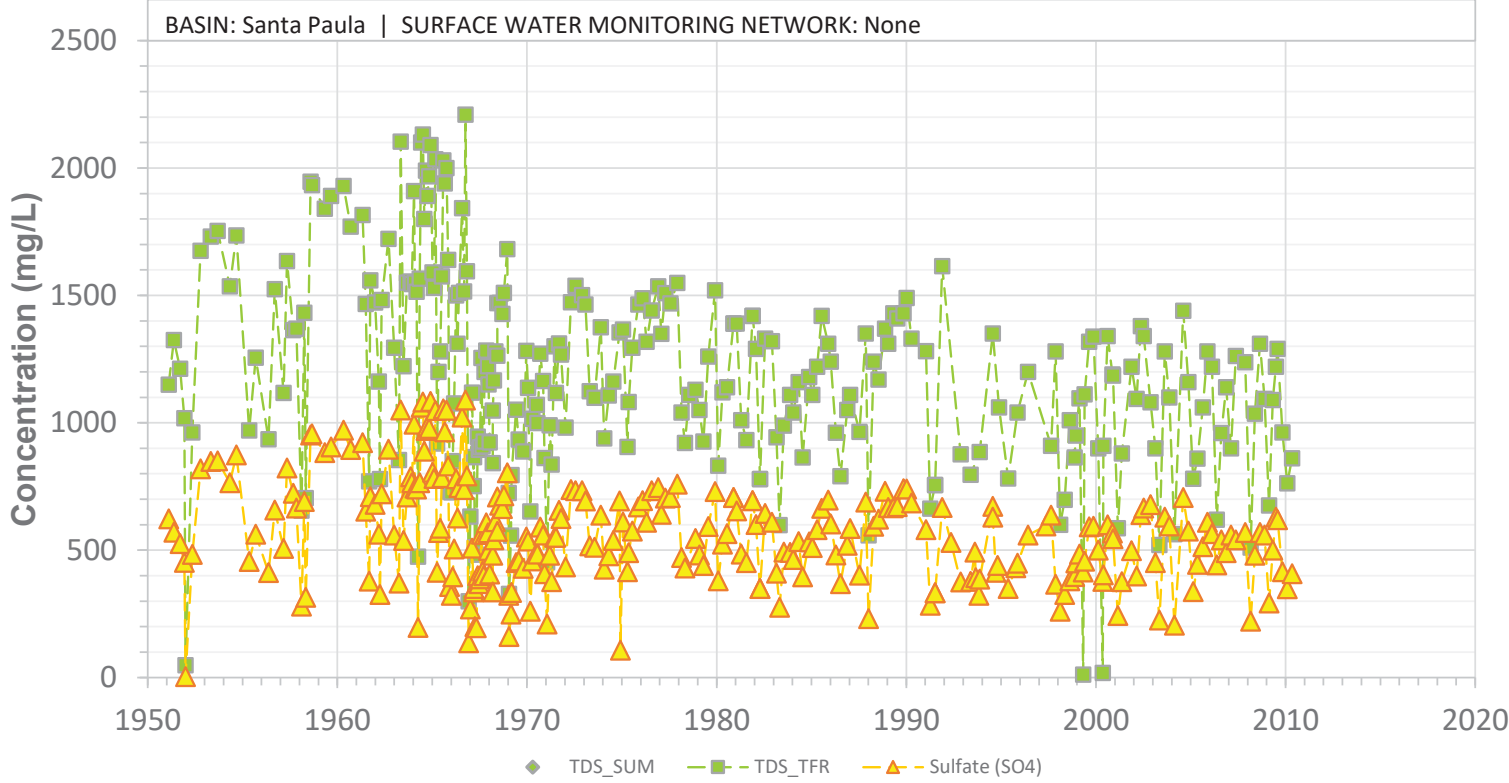
SURFACE WATER SAMPLING SITE NAME: Santa Clara River, 1.4 mi upstream of South Mountain Road

03N21W12SW2



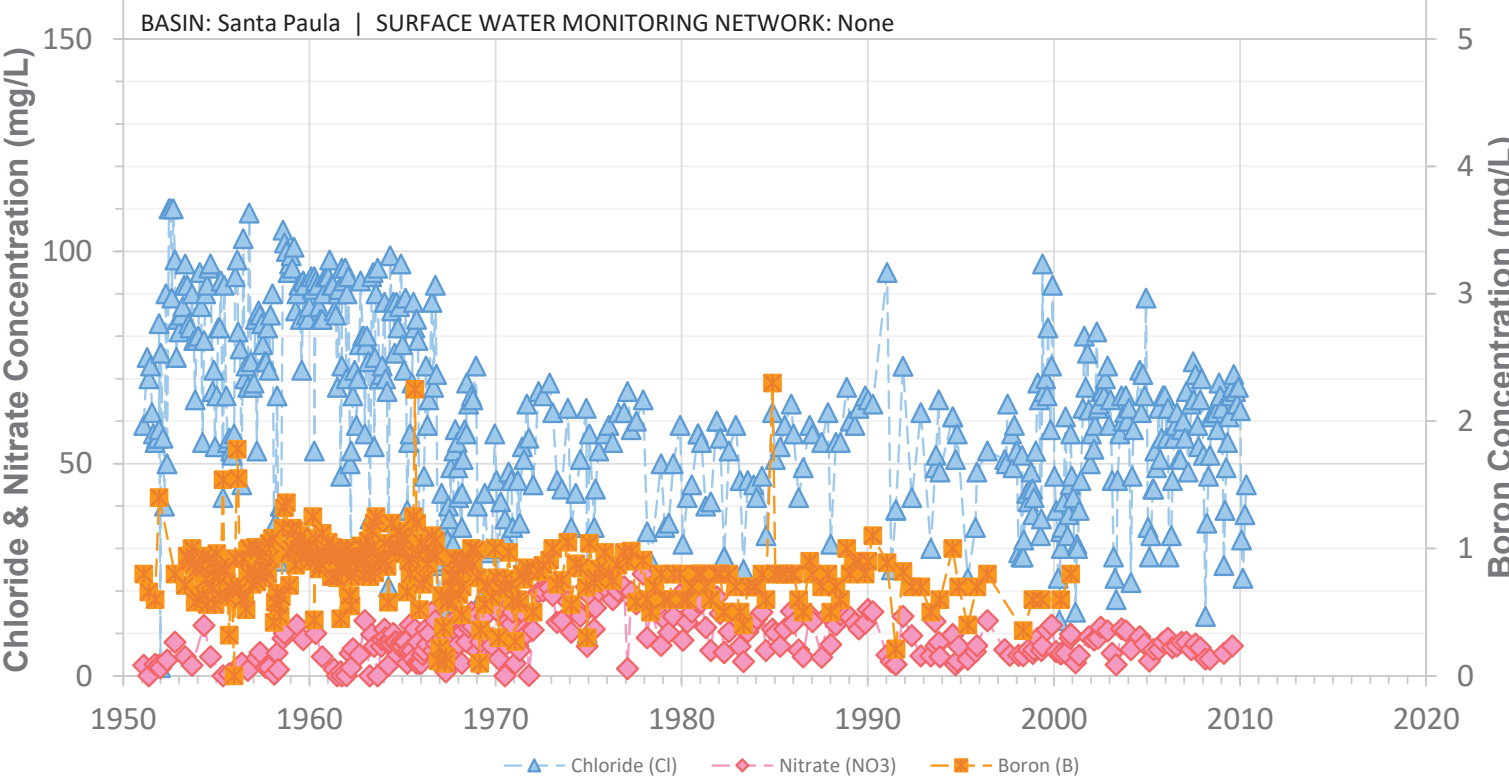
SURFACE WATER SAMPLING SITE NAME: Santa Clara River, 1.4 mi upstream of South Mountain Road

03N21W14SW1



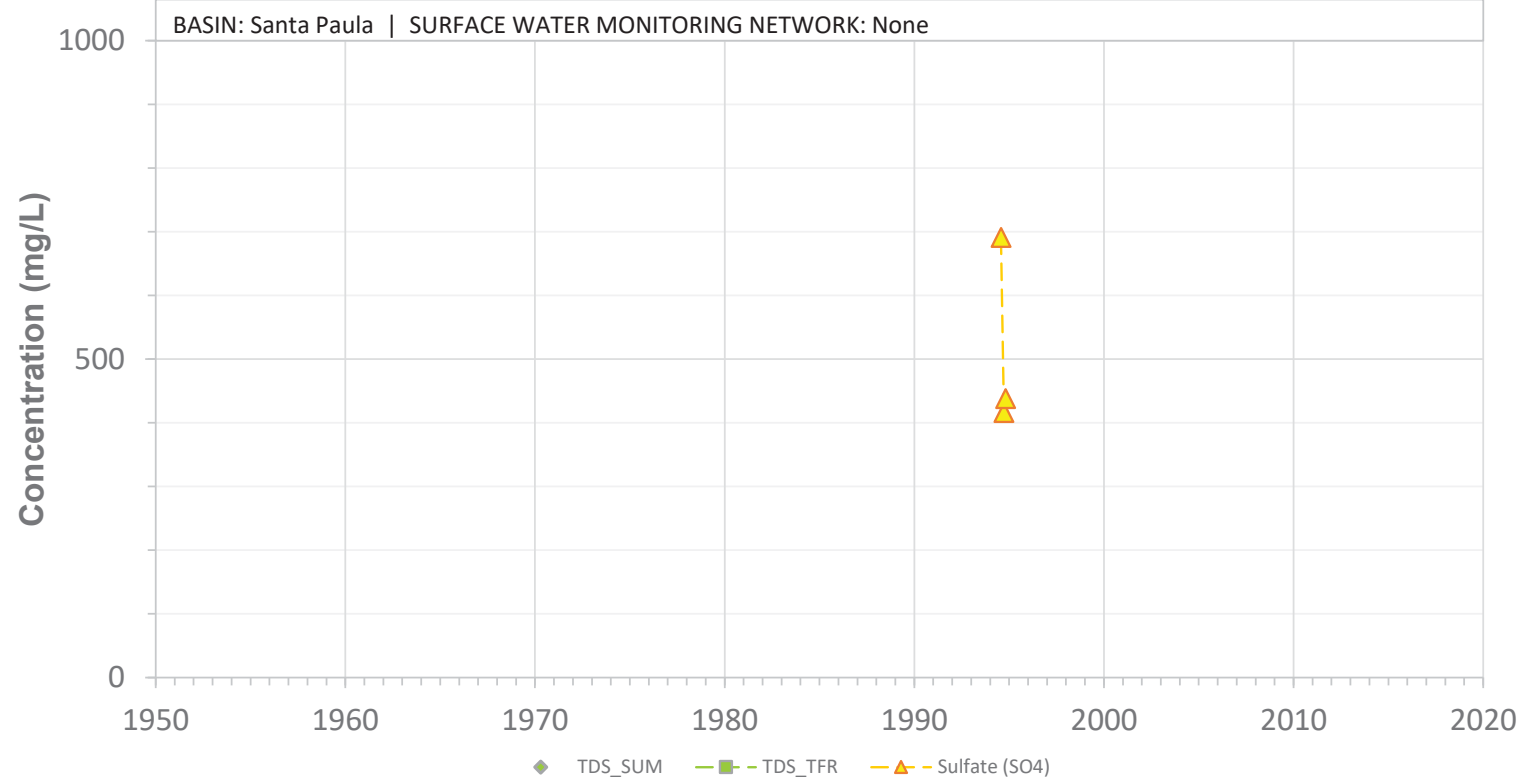
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at 12th Street Bridge, South Mountain Road near Santa Paula

03N21W14SW1



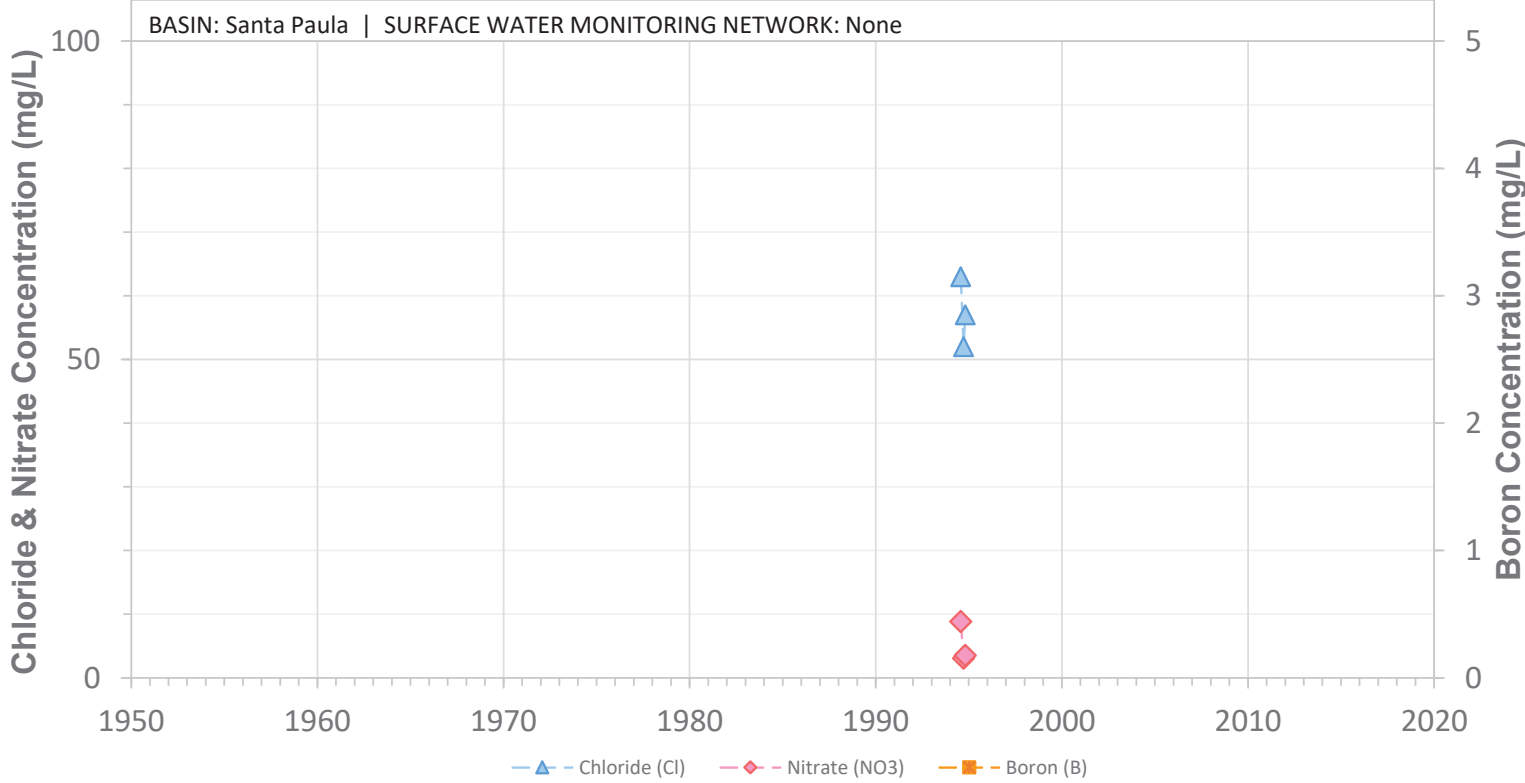
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at 12th Street Bridge, South Mountain Road near Santa Paula

03N21W15SW1



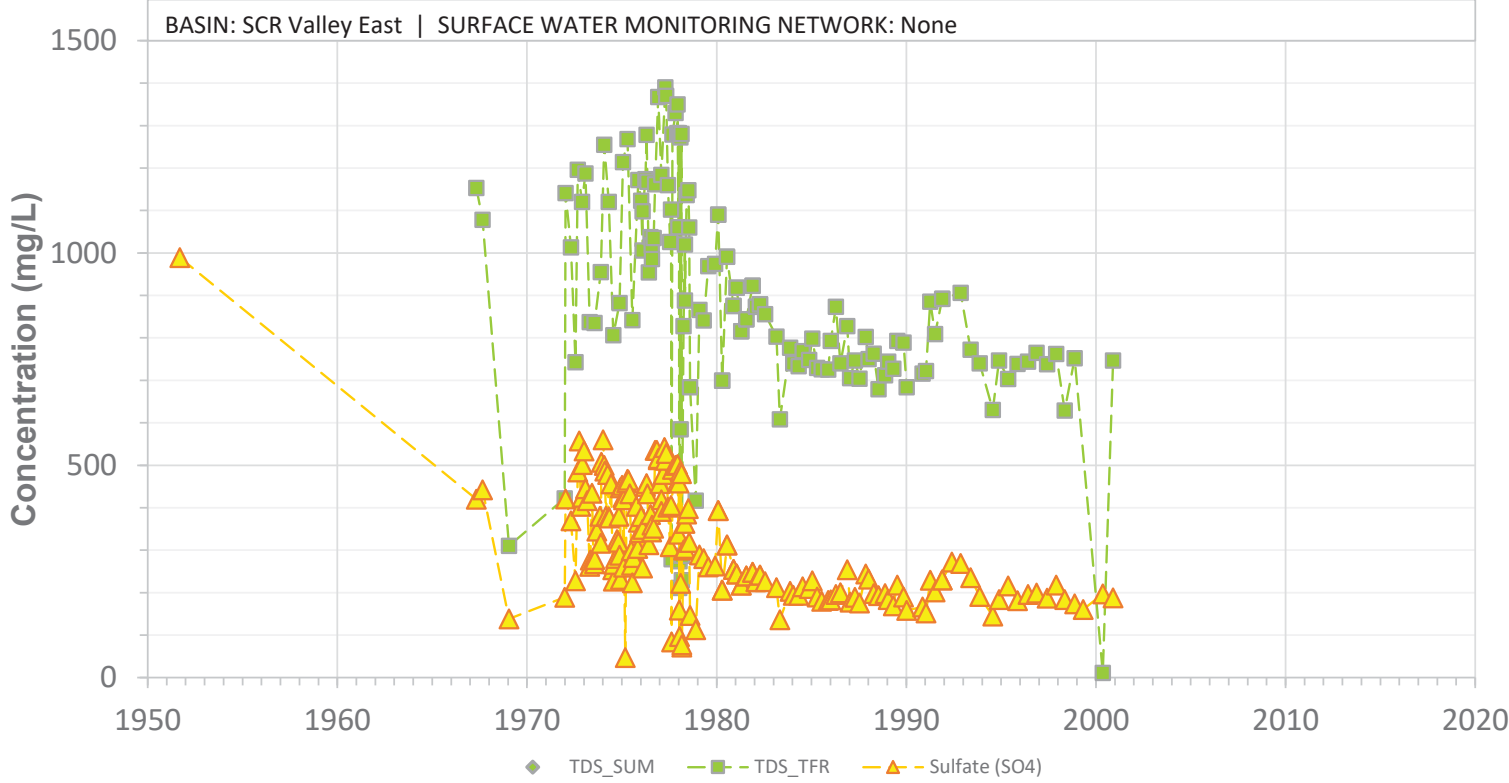
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Palm Ave - Santa Paula Airport, near SP1 nested monitoring well

03N21W15SW1



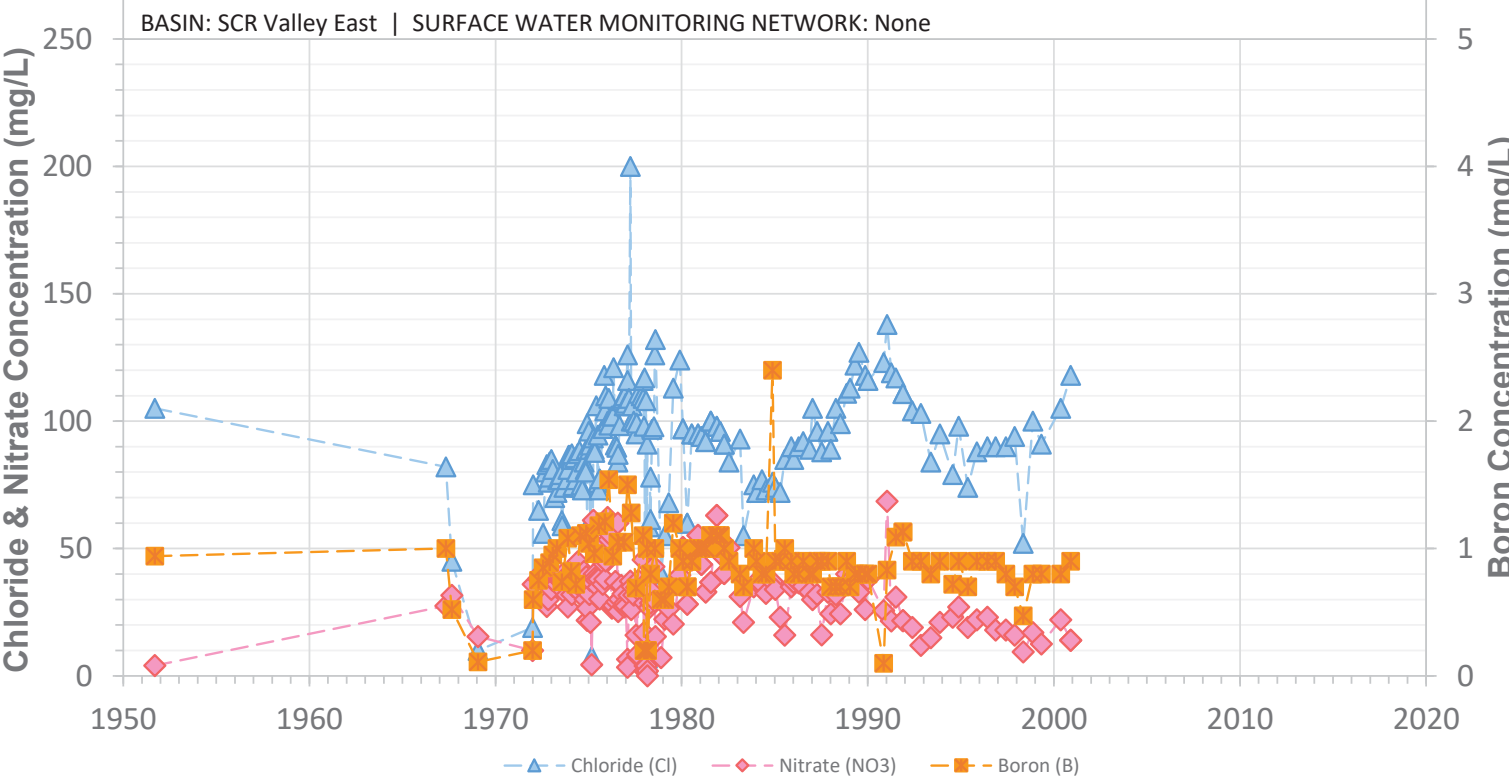
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Palm Ave - Santa Paula Airport, near SP1 nested monitoring well

04N16W17SW1



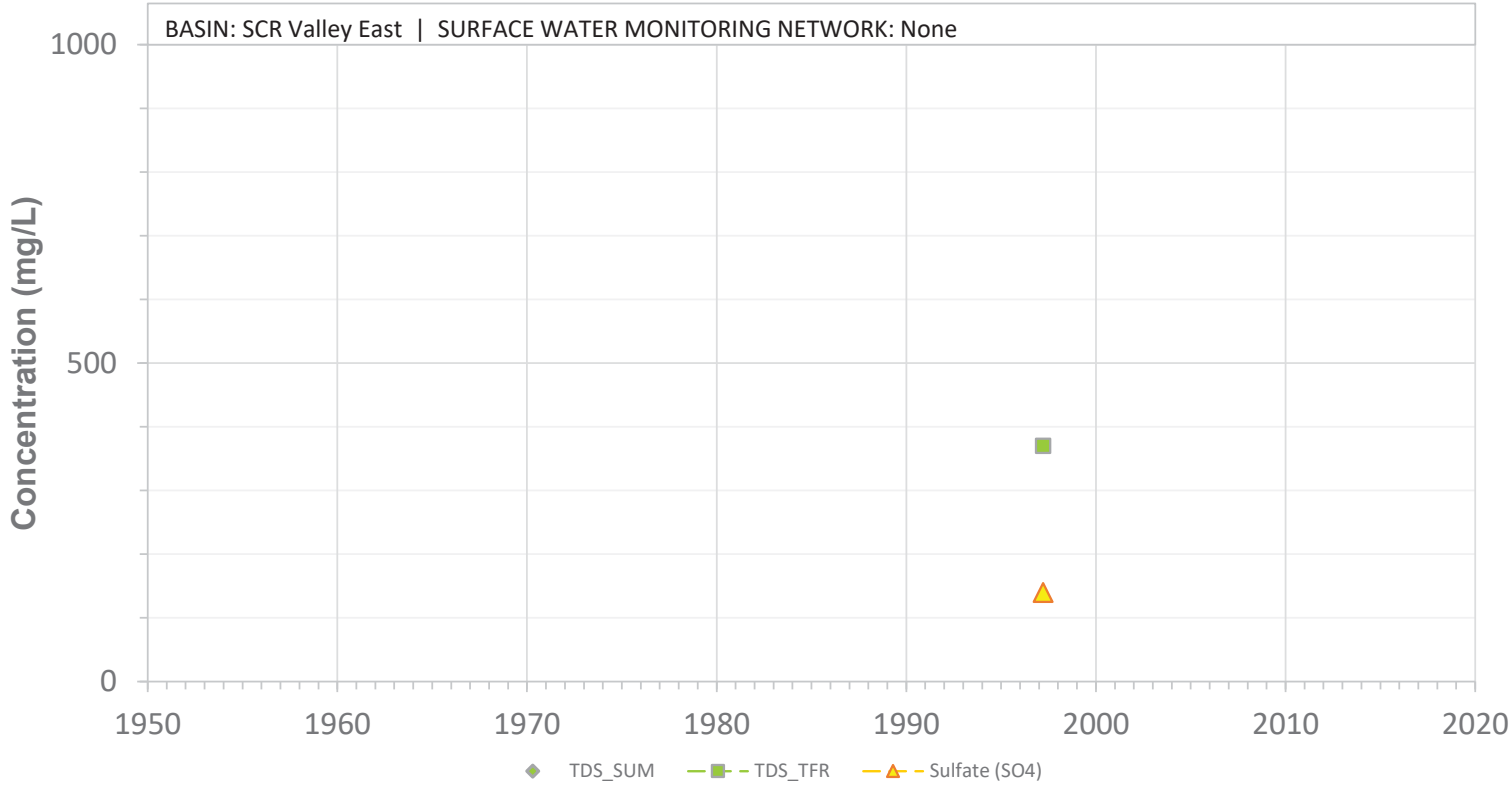
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Hwy 99 Bridge, Santa Clarita

04N16W17SW1



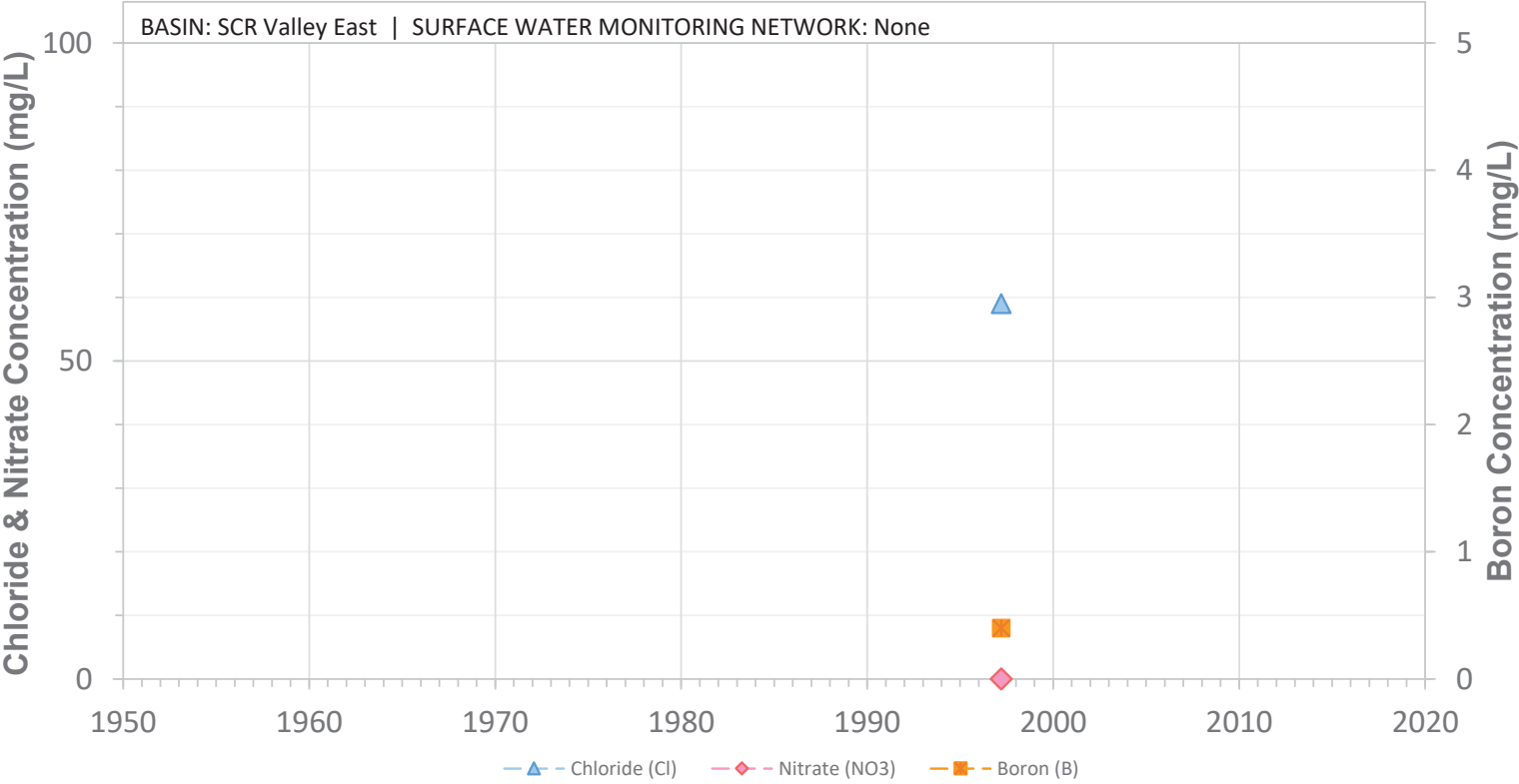
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Hwy 99 Bridge, Santa Clarita

04N17W14SW1



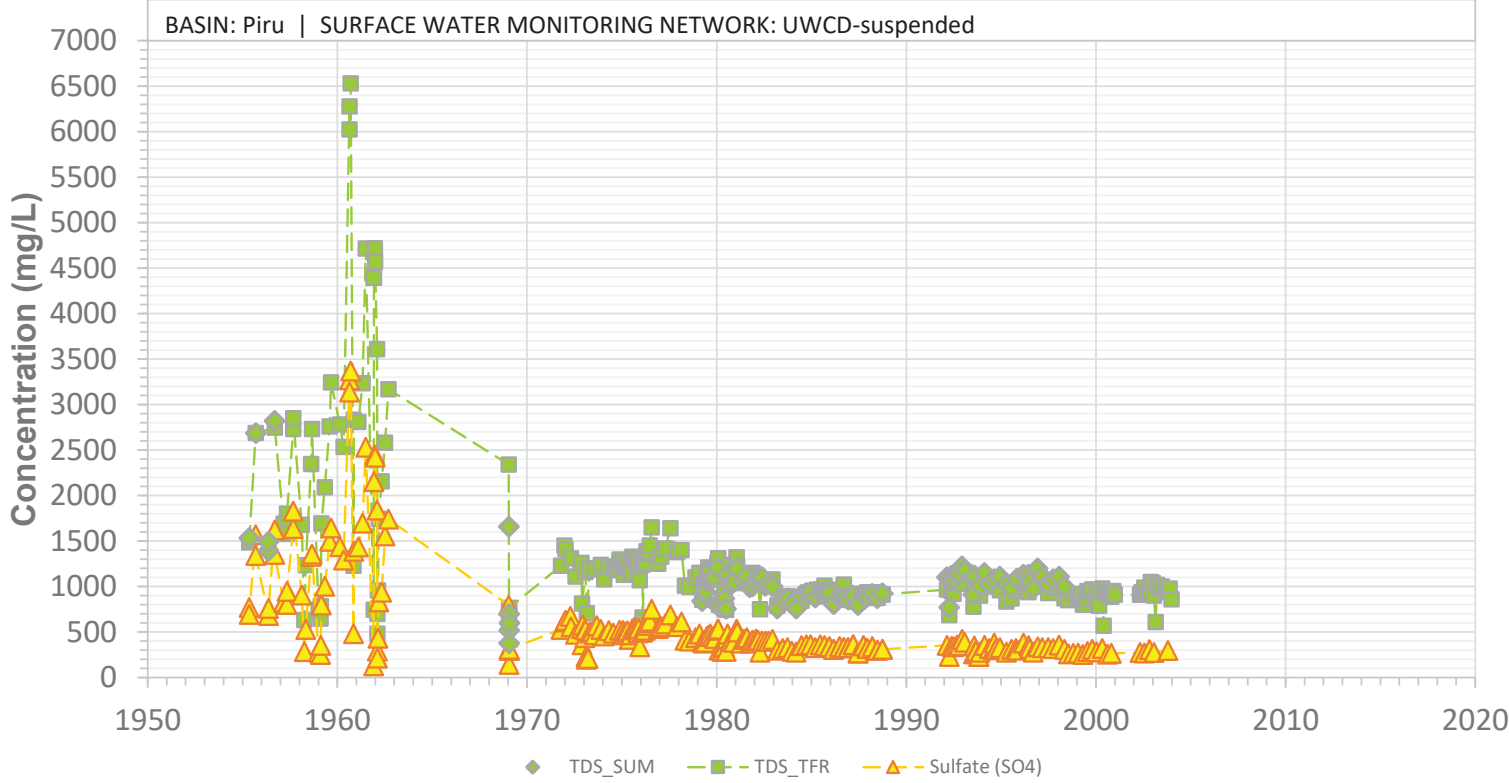
SURFACE WATER SAMPLING SITE NAME: Castaic Creek at Hwy 126

04N17W14SW1



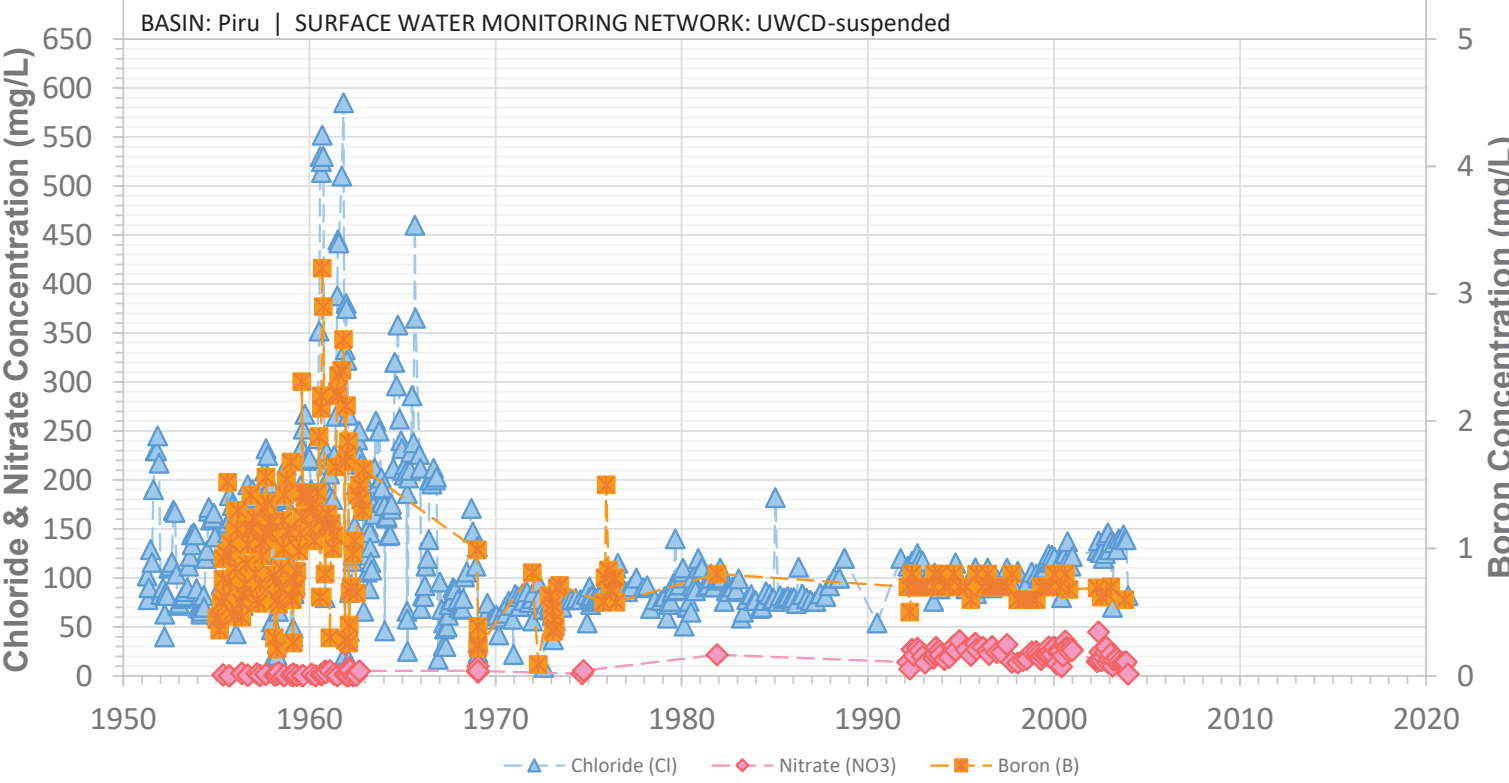
SURFACE WATER SAMPLING SITE NAME: Castaic Creek at Hwy 126

04N17W29SW1



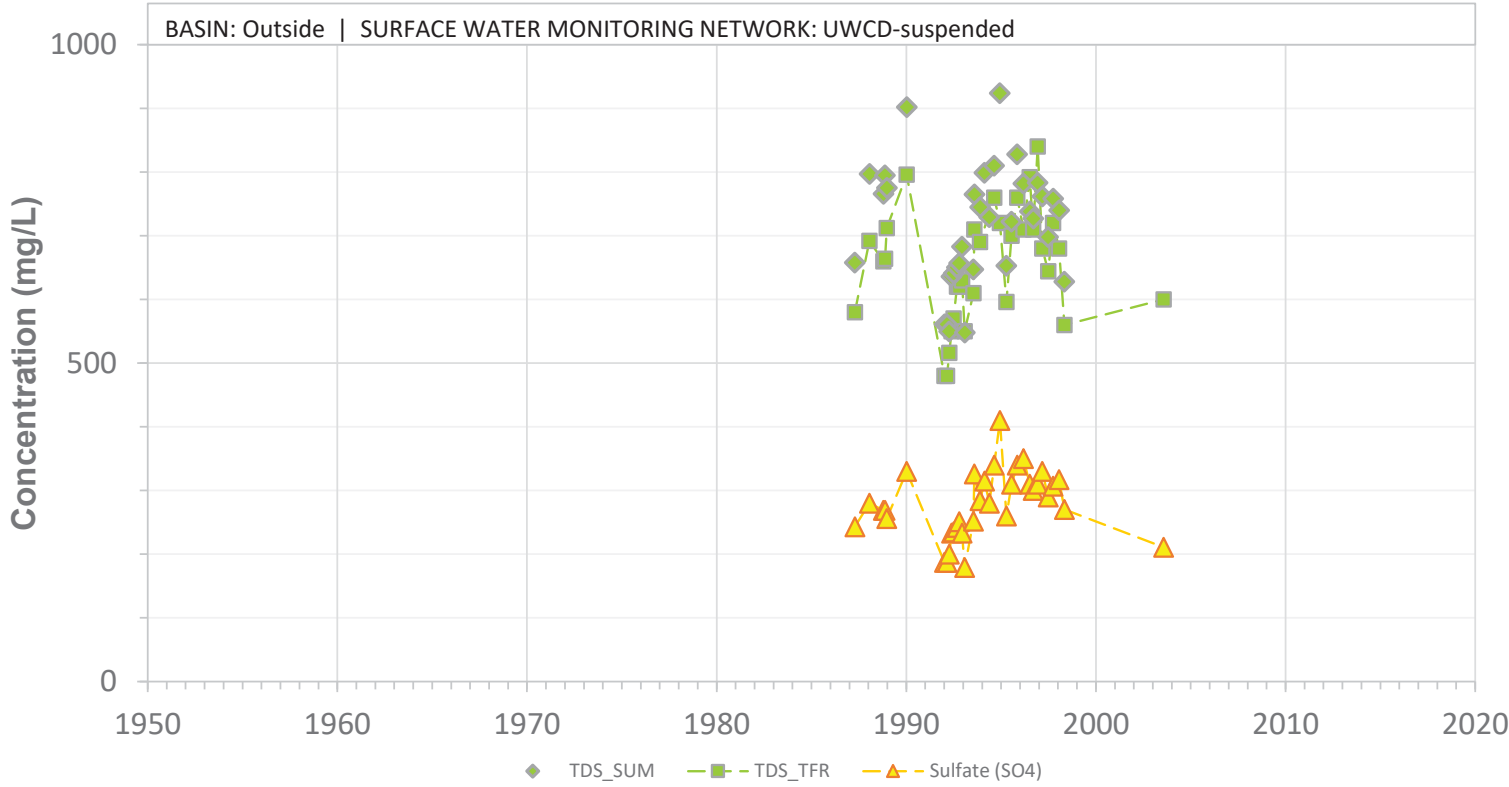
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Blue Cut, near Ventura-L.A. County Line

04N17W29SW1



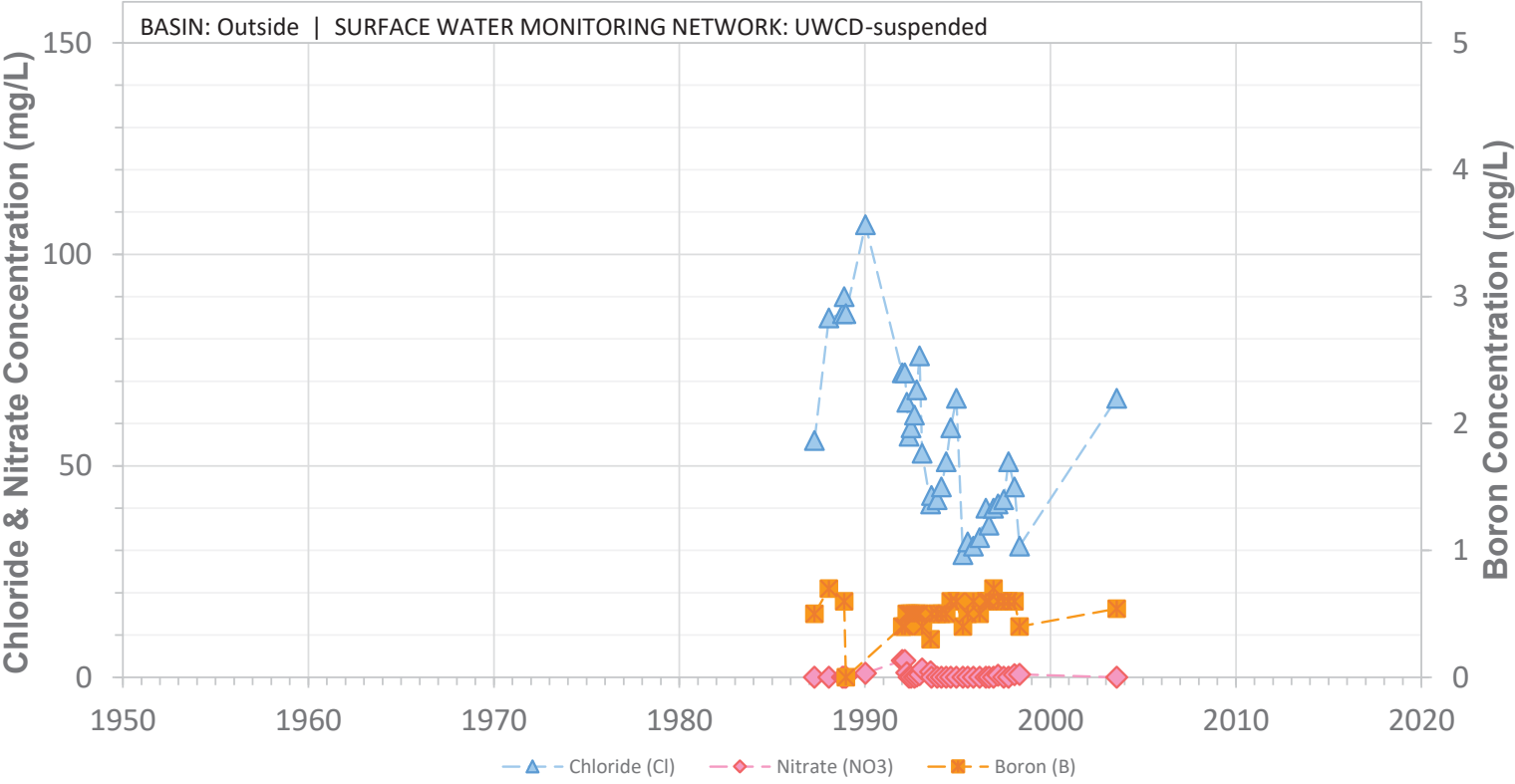
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Blue Cut, near Ventura-L.A. County Line

04N18W03SW1



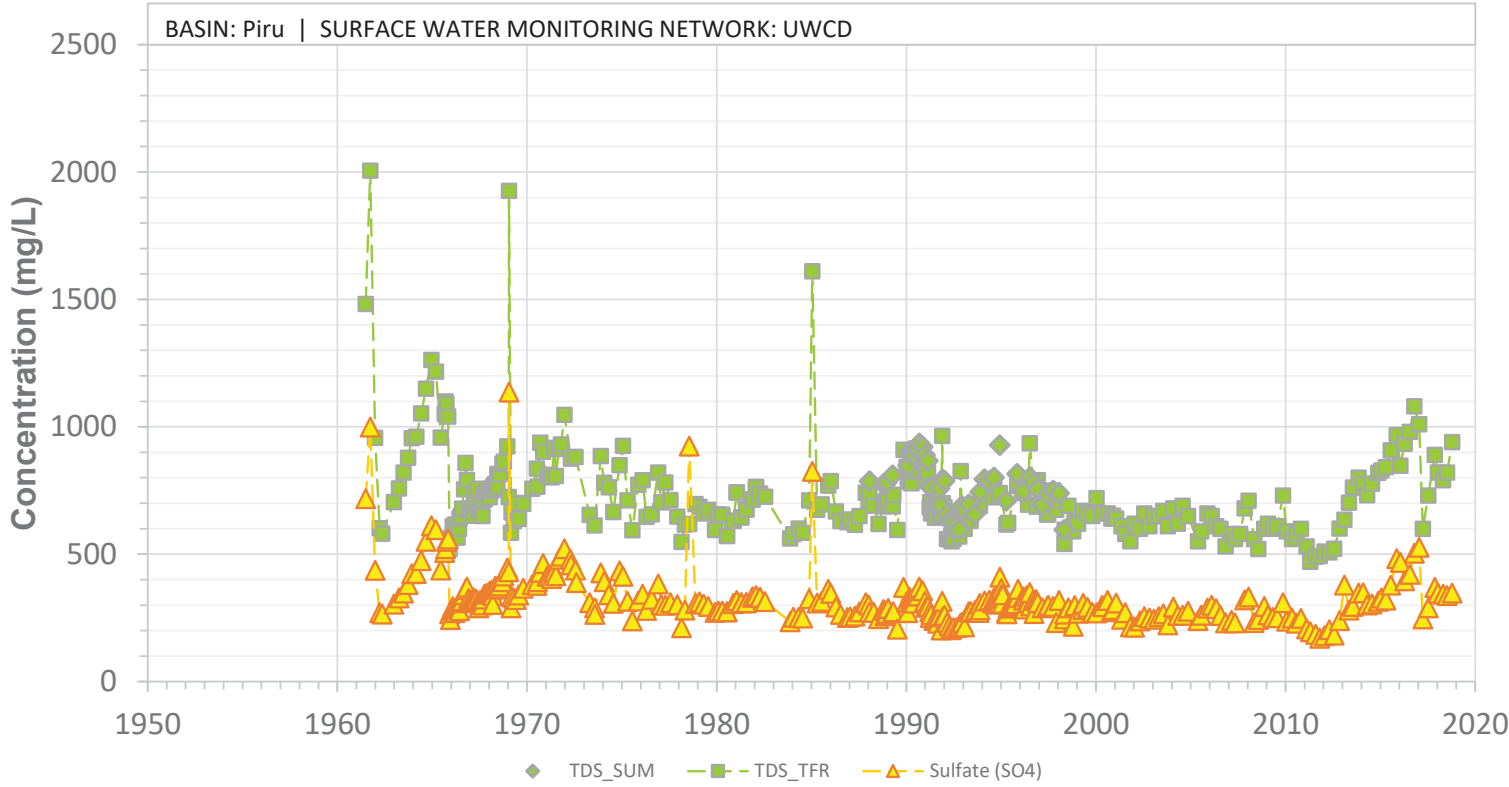
SURFACE WATER SAMPLING SITE NAME: Lake Piru at Santa Felicia Dam

04N18W03SW1



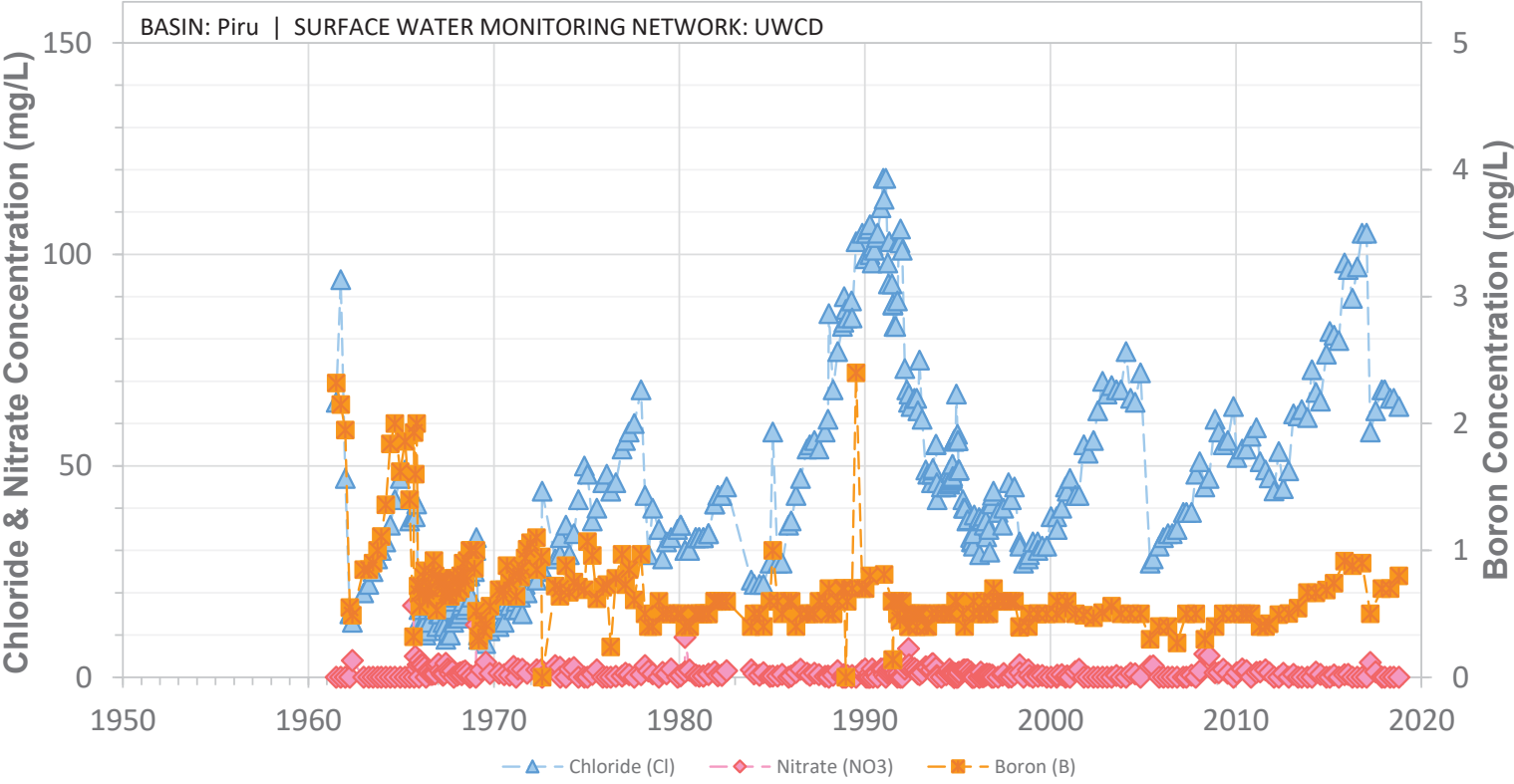
SURFACE WATER SAMPLING SITE NAME: Lake Piru at Santa Felicia Dam

04N18W03SW2



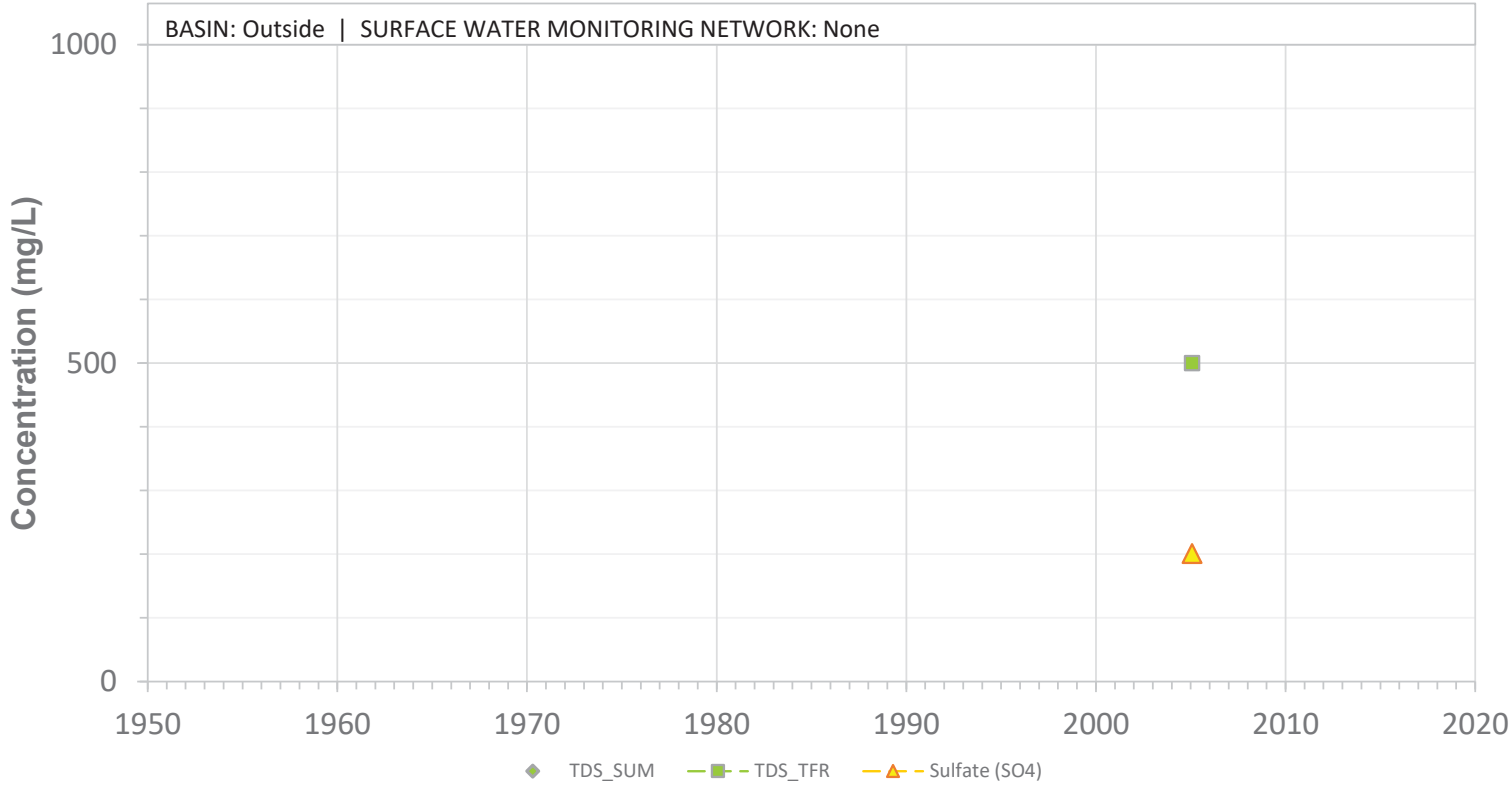
SURFACE WATER SAMPLING SITE NAME: Piru Creek below Santa Felicia Dam

04N18W03SW2



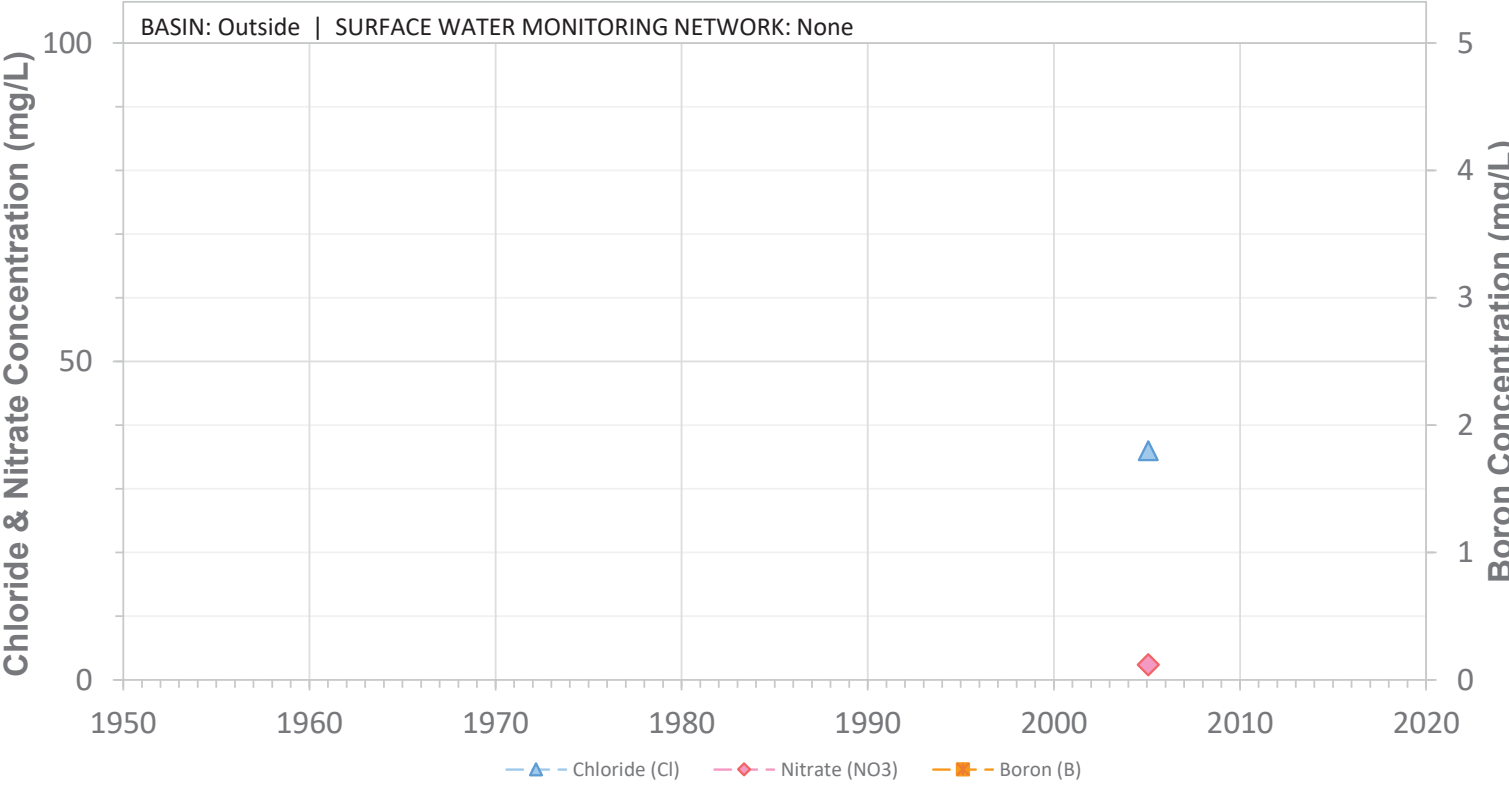
SURFACE WATER SAMPLING SITE NAME: Piru Creek below Santa Felicia Dam

04N18W03SW3



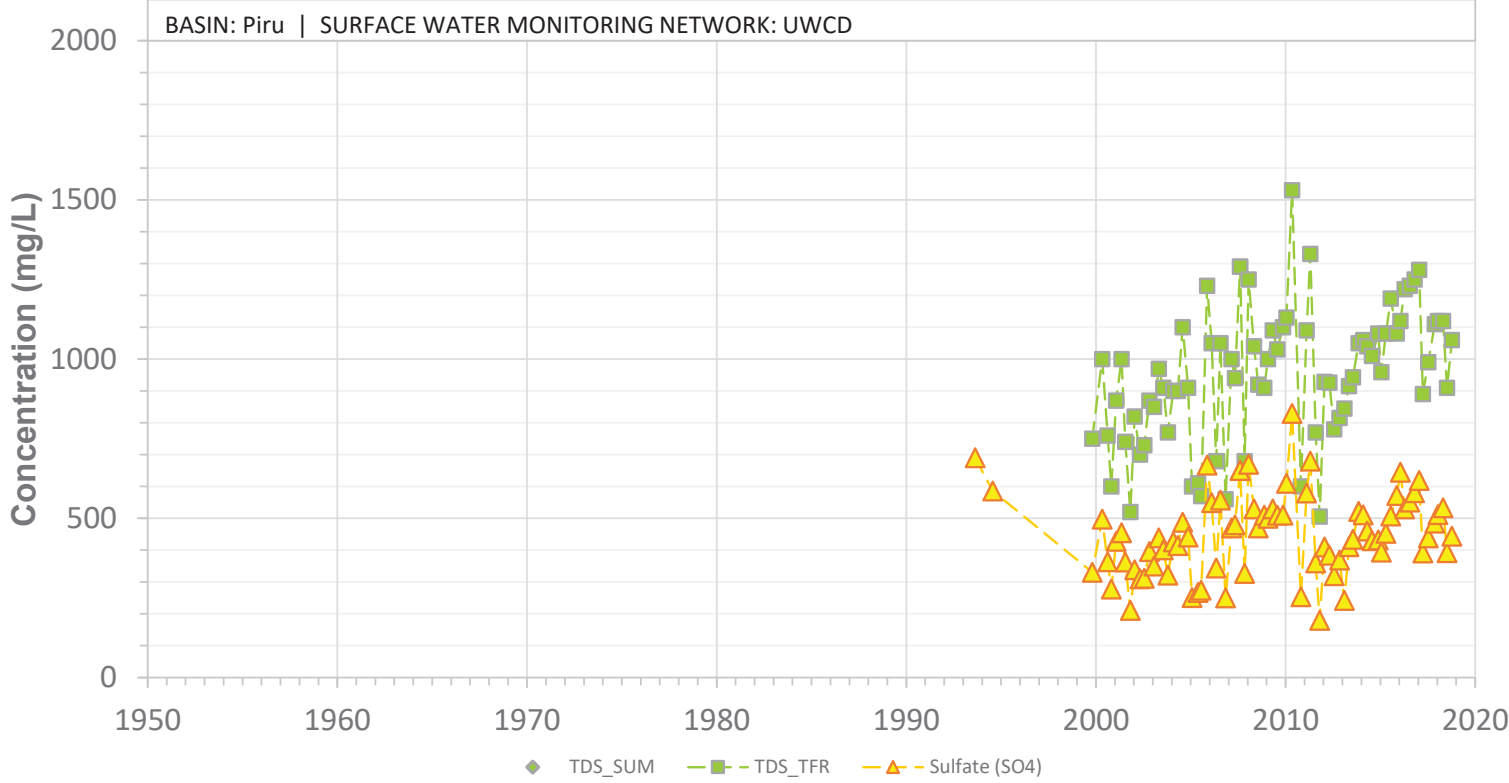
SURFACE WATER SAMPLING SITE NAME: Piru Creek below Santa Felicia Dam spillway, spilling

04N18W03SW3



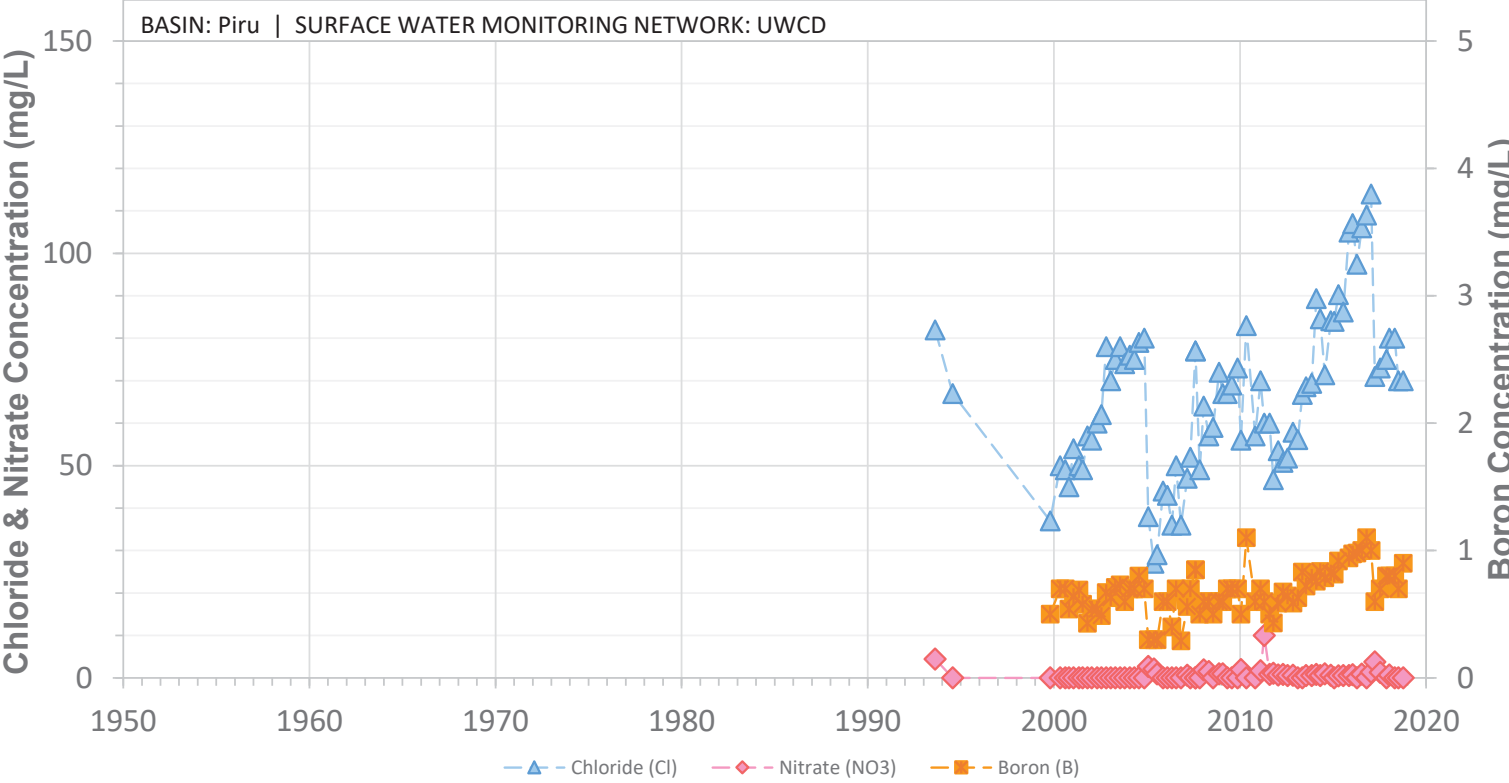
SURFACE WATER SAMPLING SITE NAME: Piru Creek below Santa Felicia Dam spillway, spilling

04N18W20SW1



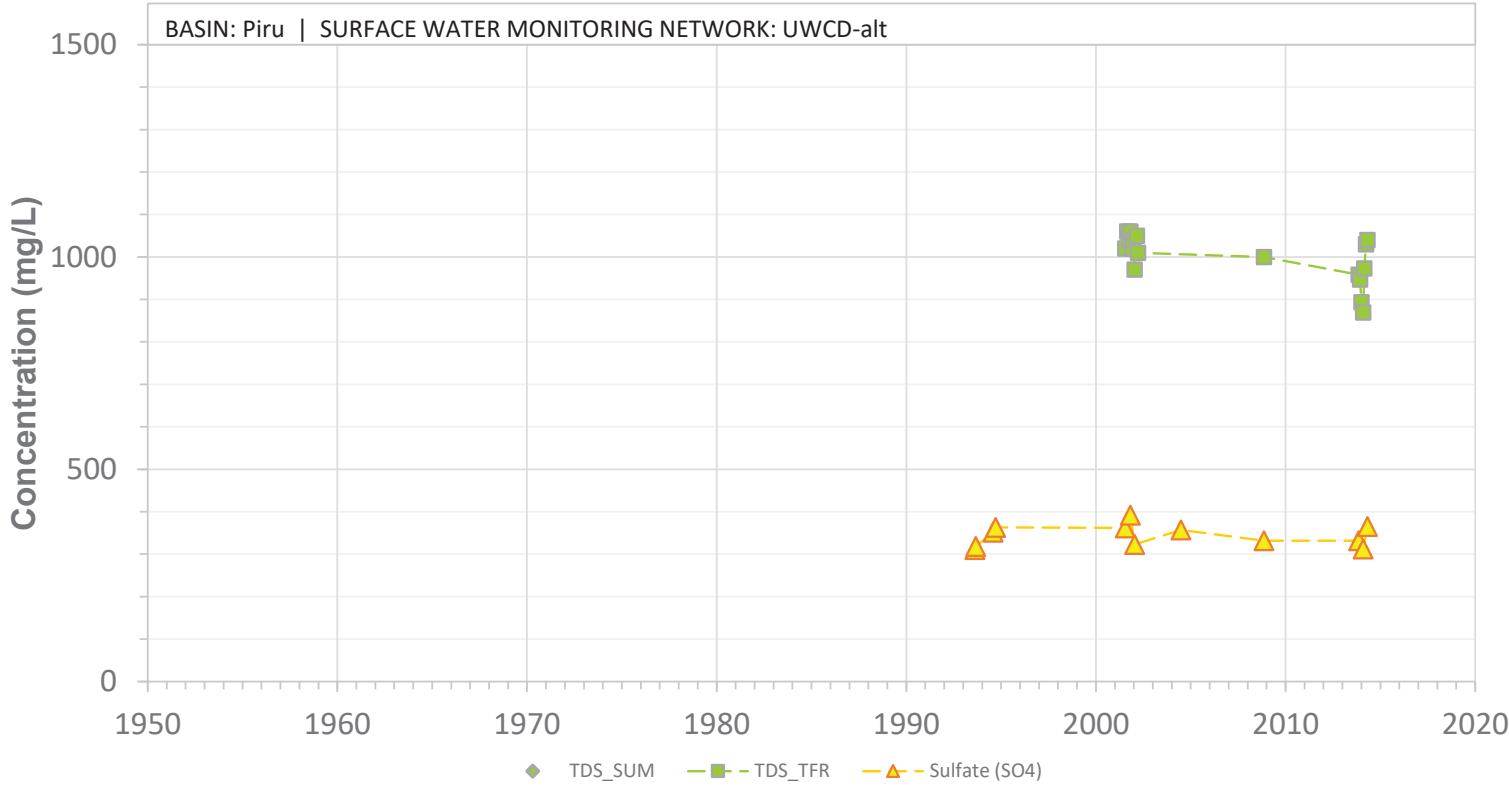
SURFACE WATER SAMPLING SITE NAME: Piru Creek near Piru

04N18W20SW1



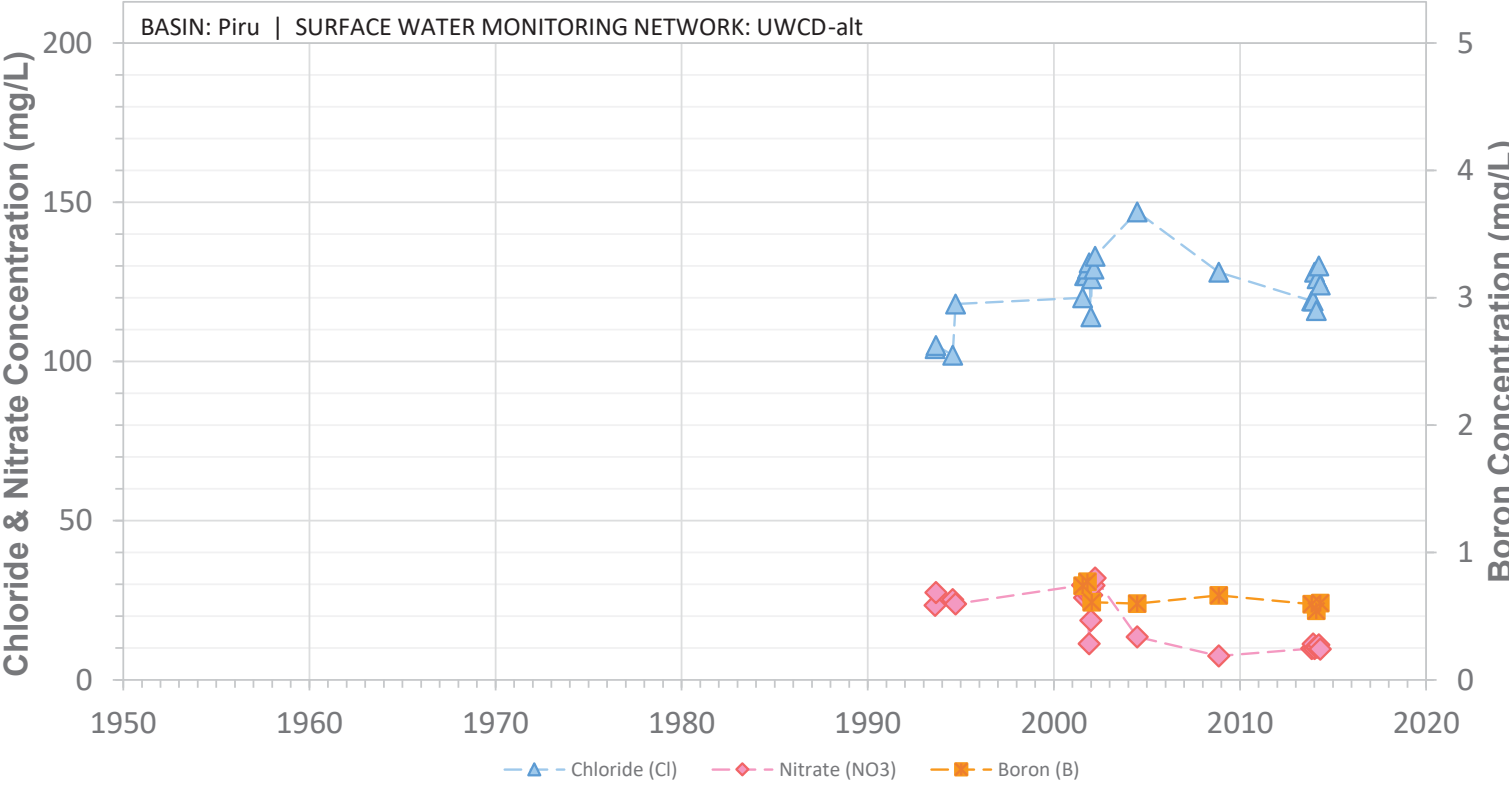
SURFACE WATER SAMPLING SITE NAME: Piru Creek near Piru

04N18W25SW1



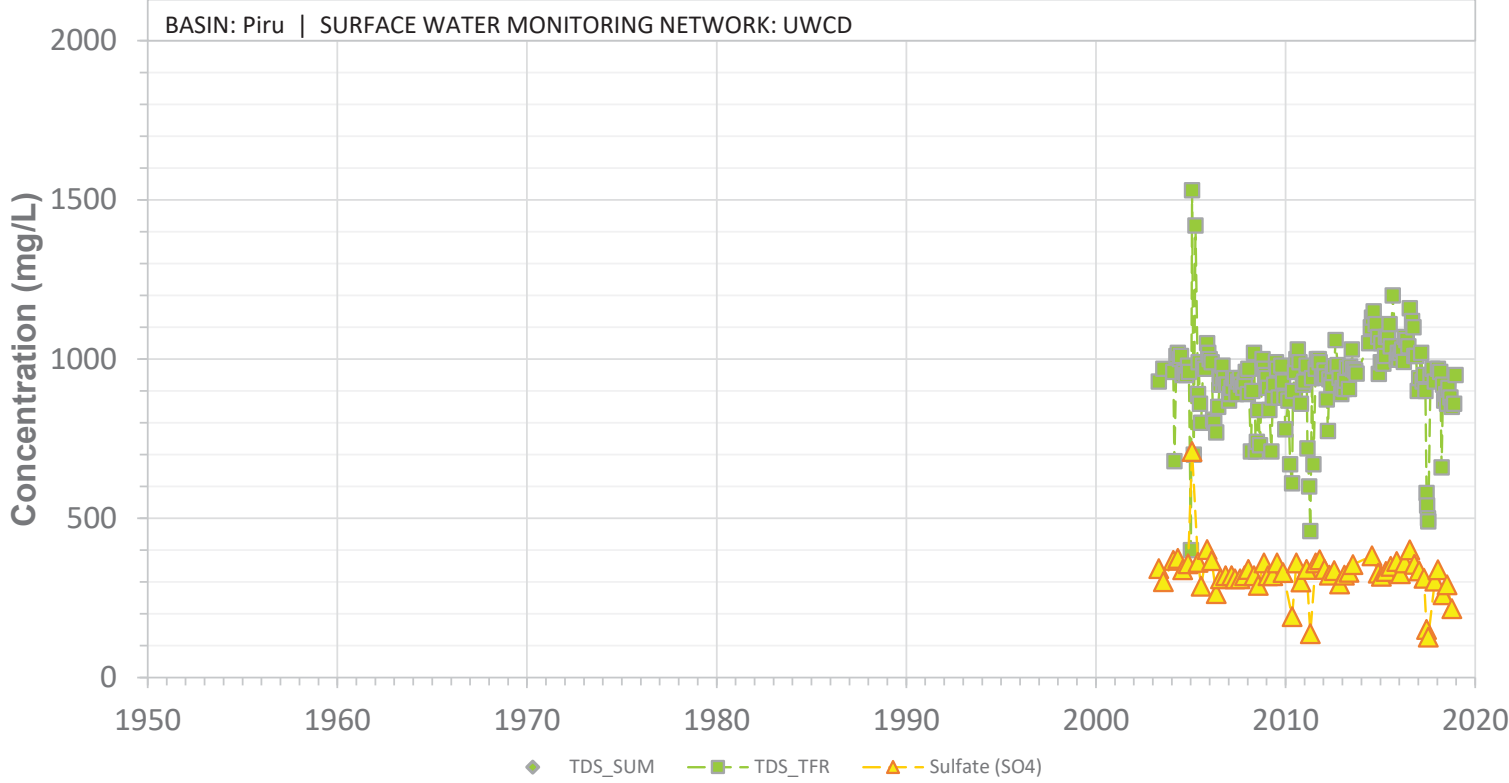
SURFACE WATER SAMPLING SITE NAME: Santa Clara River near Camulos Diversion

04N18W25SW1



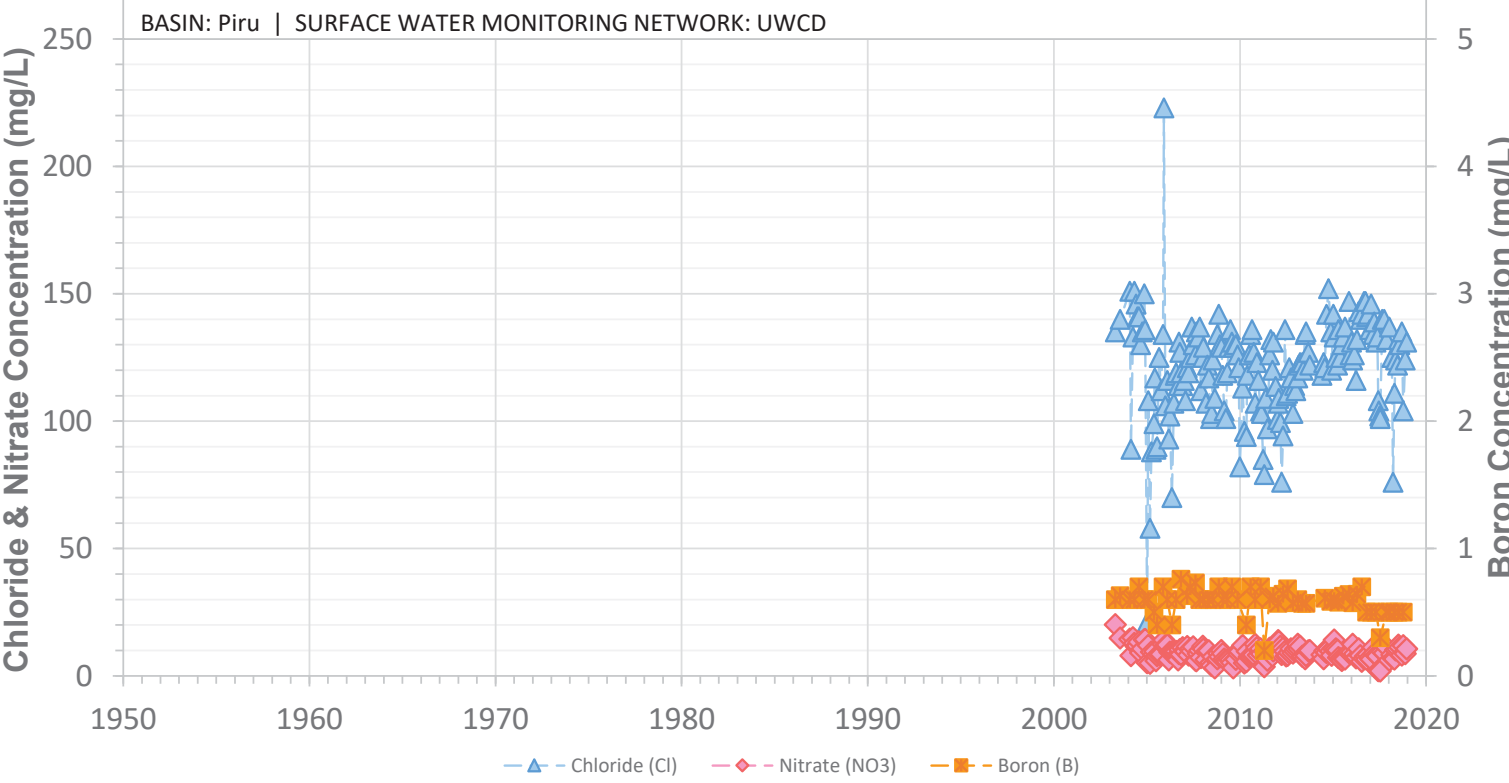
SURFACE WATER SAMPLING SITE NAME: Santa Clara River near Camulos Diversion

04N18W25SW2



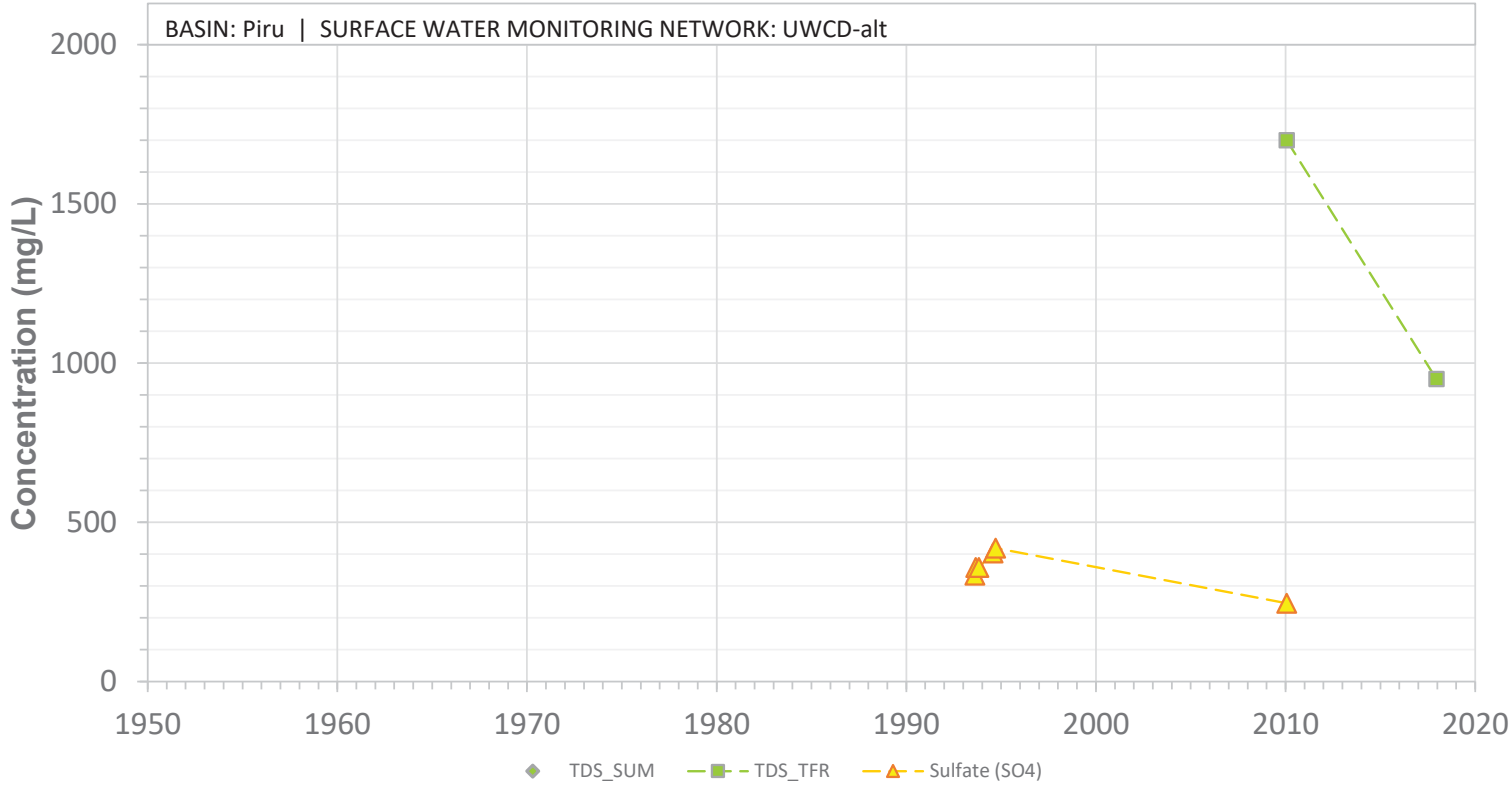
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Newhall Crossing

04N18W25SW2



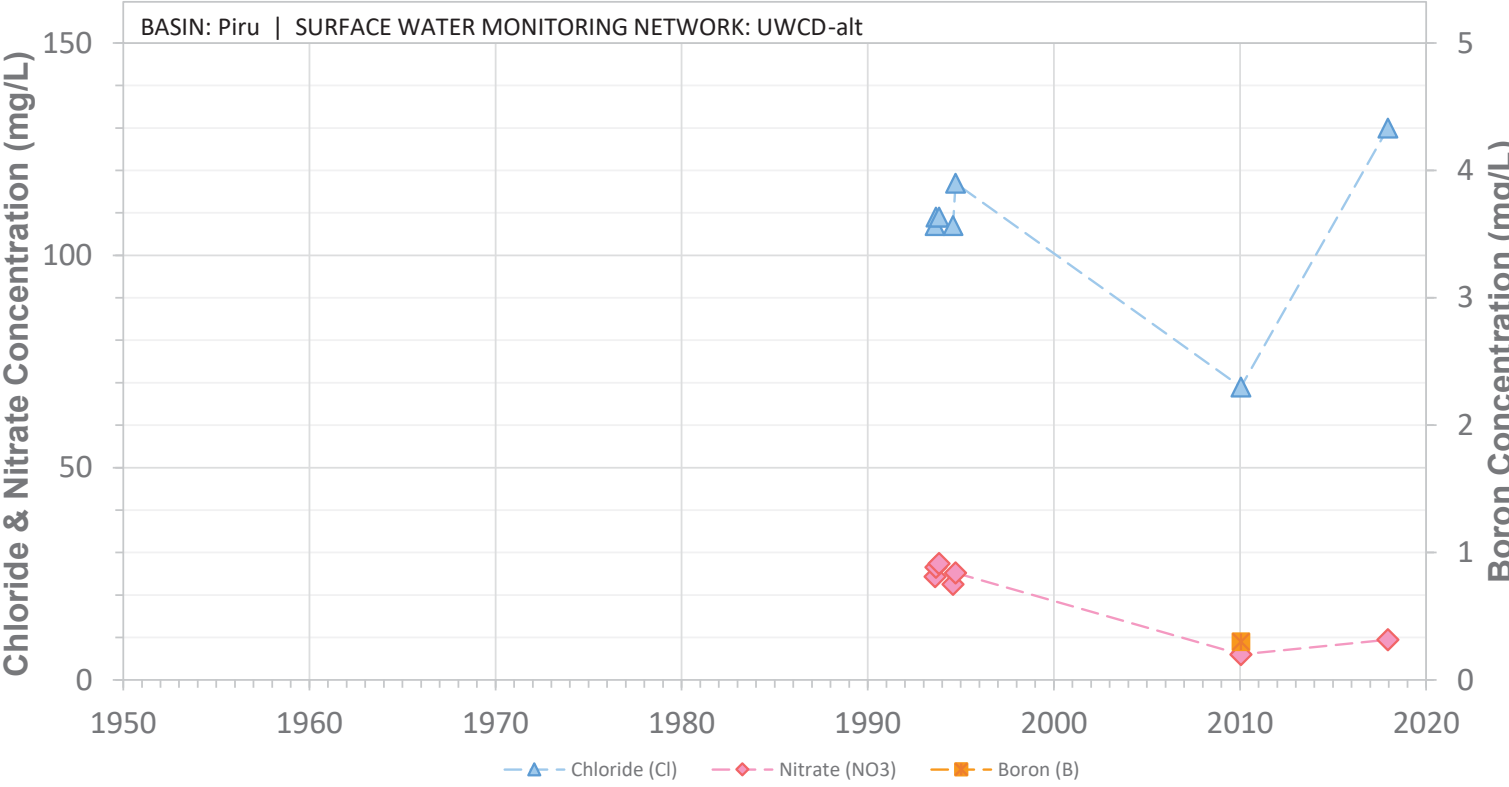
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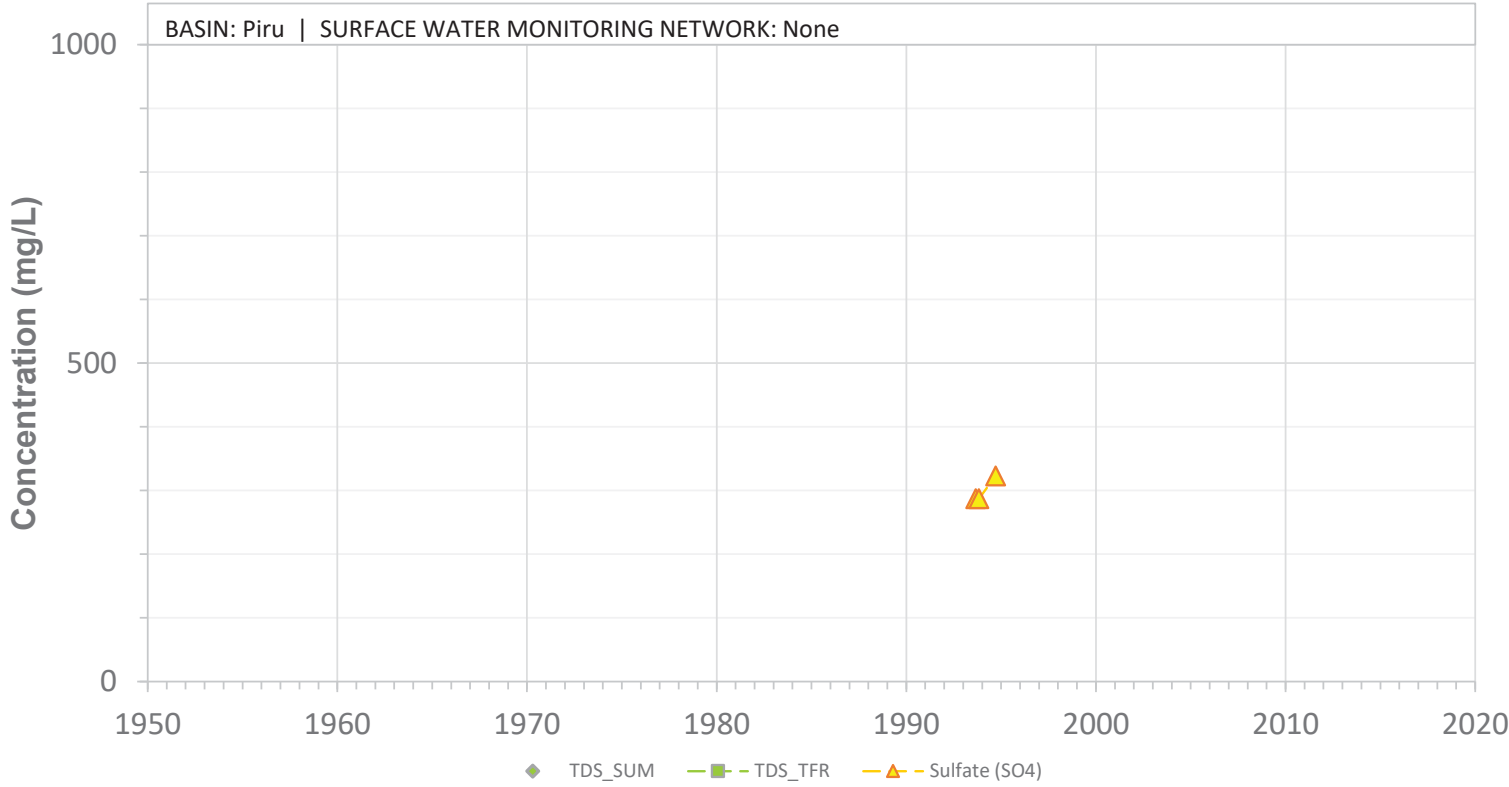
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04N18W26SW1



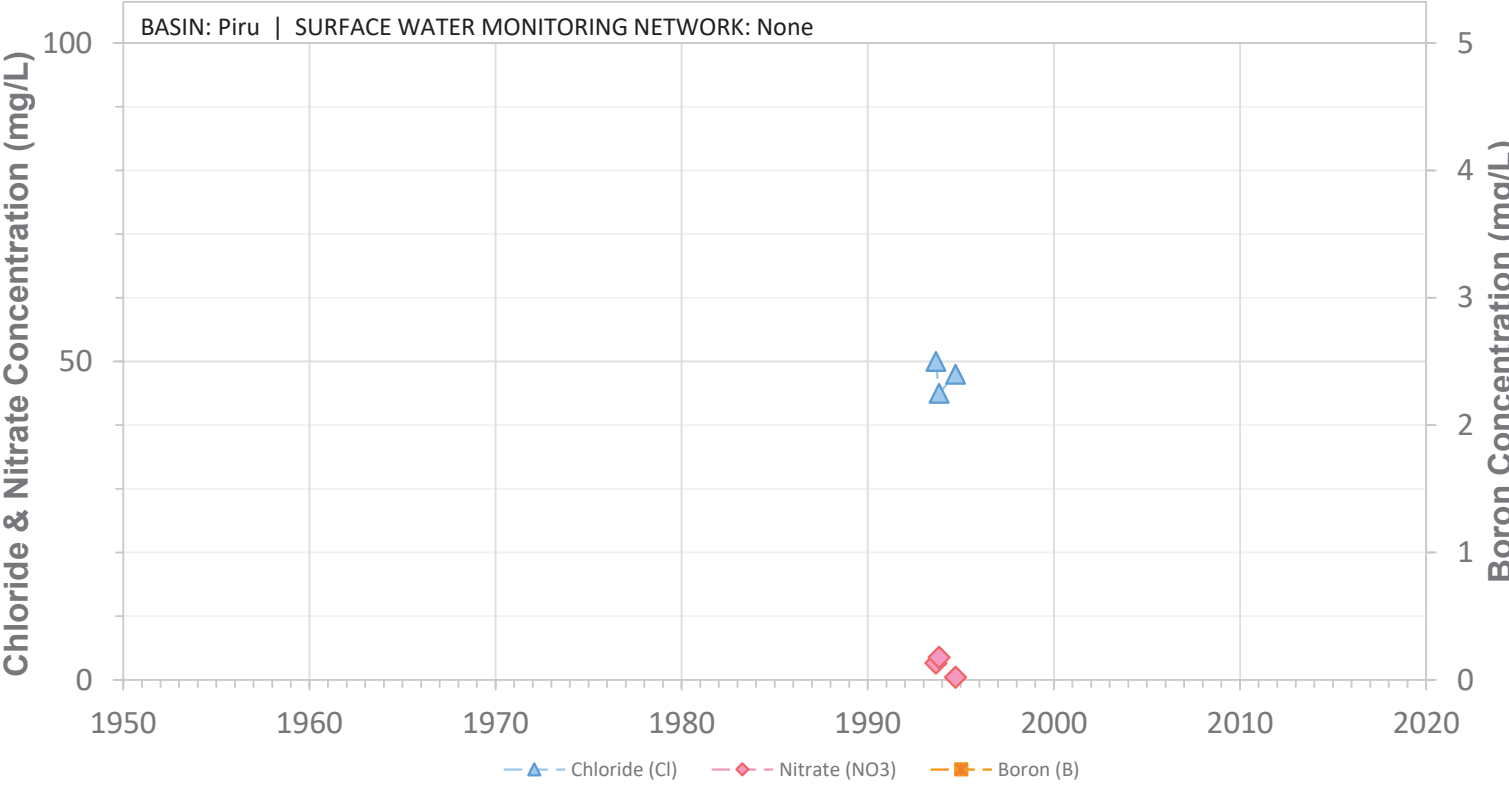
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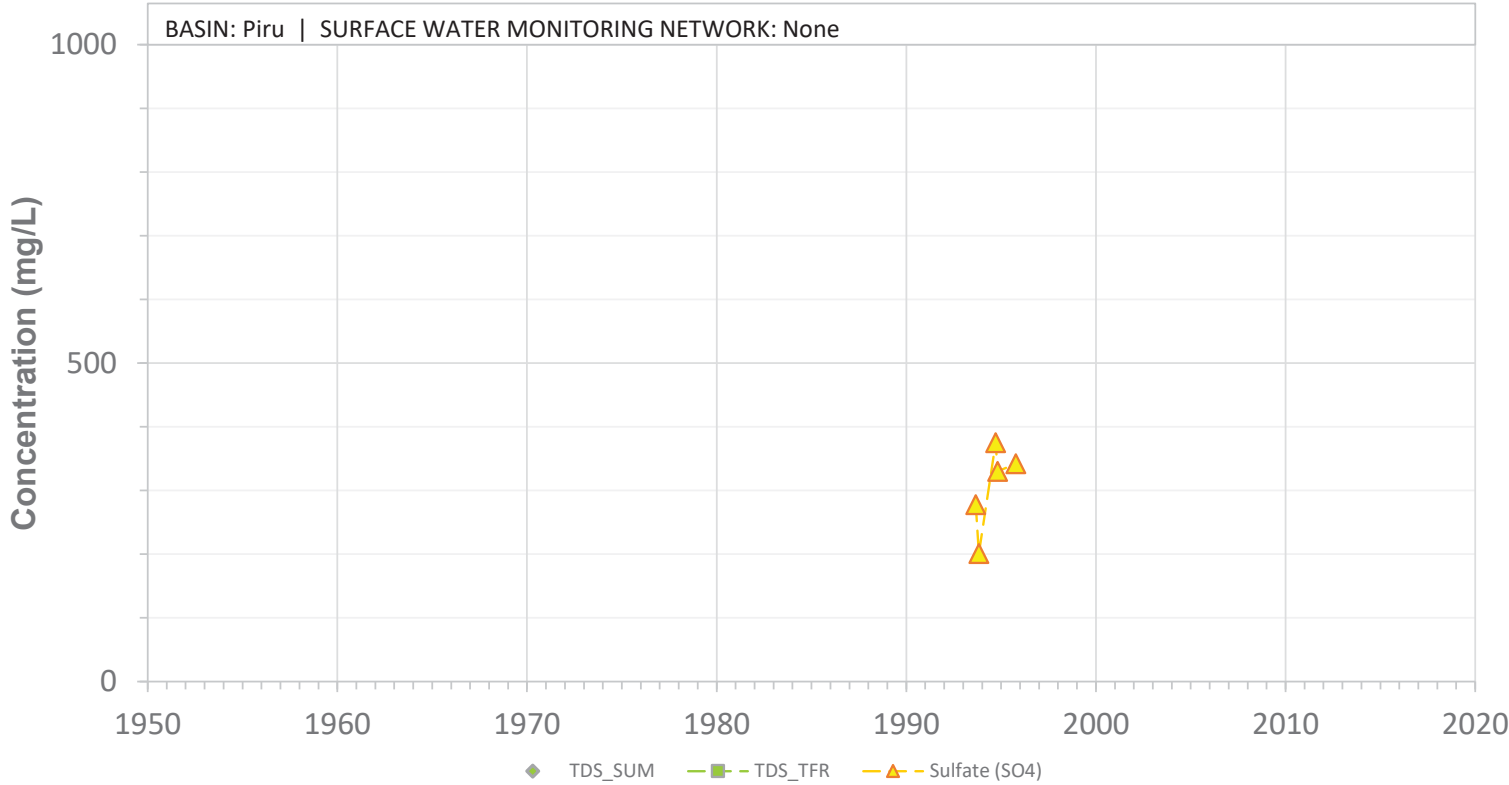
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04N18W29SW1



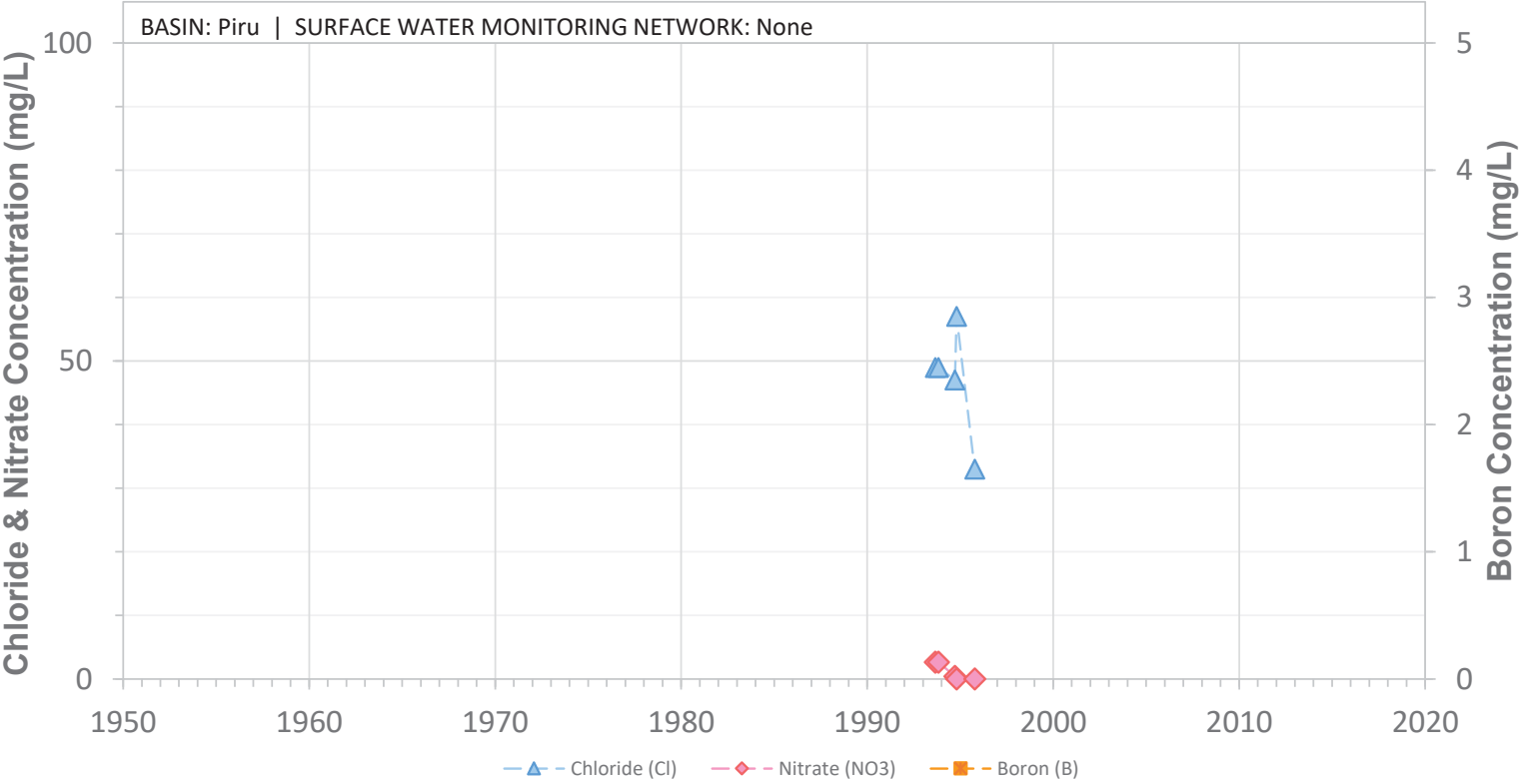
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04N18W30SW1



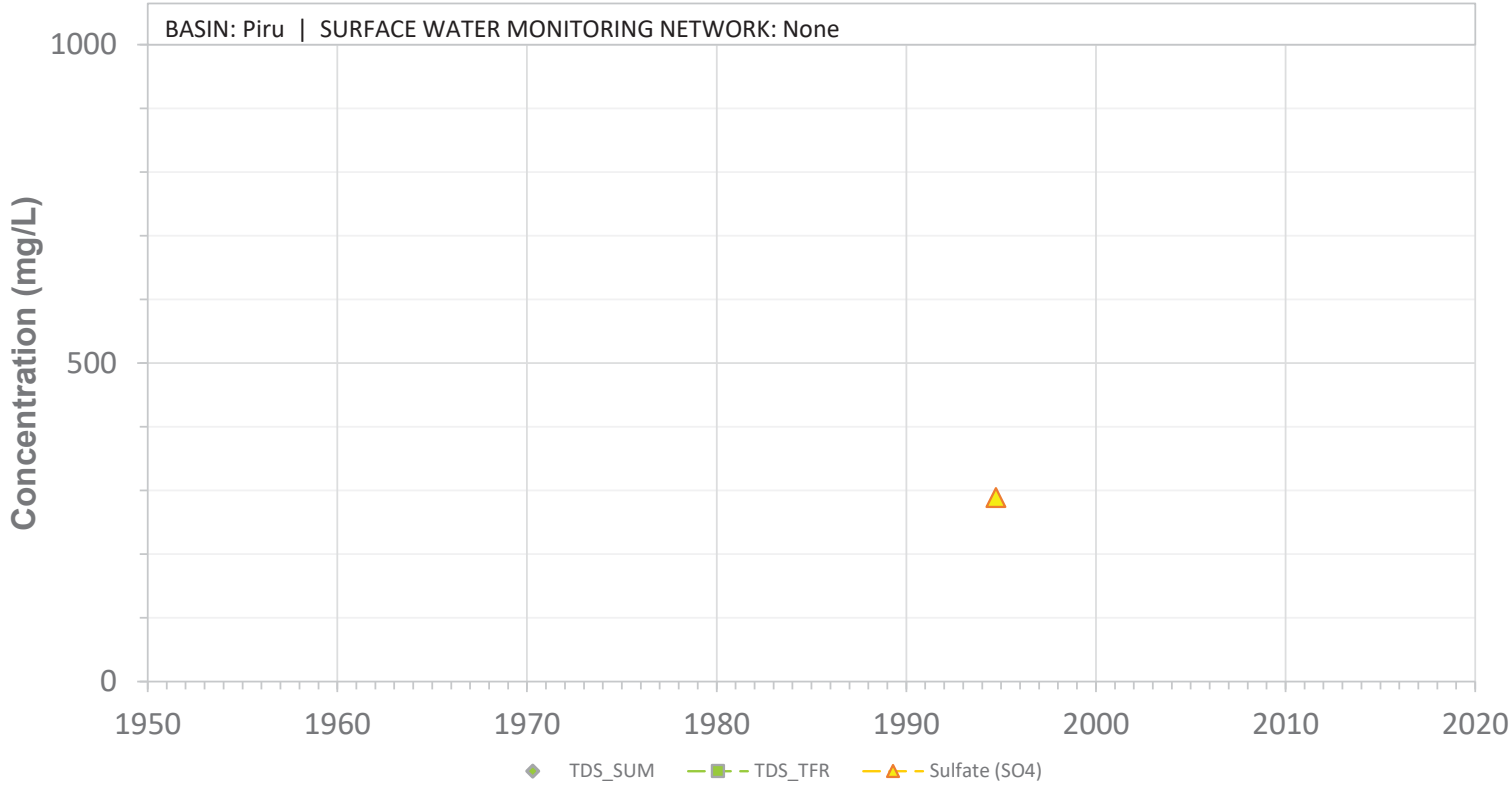
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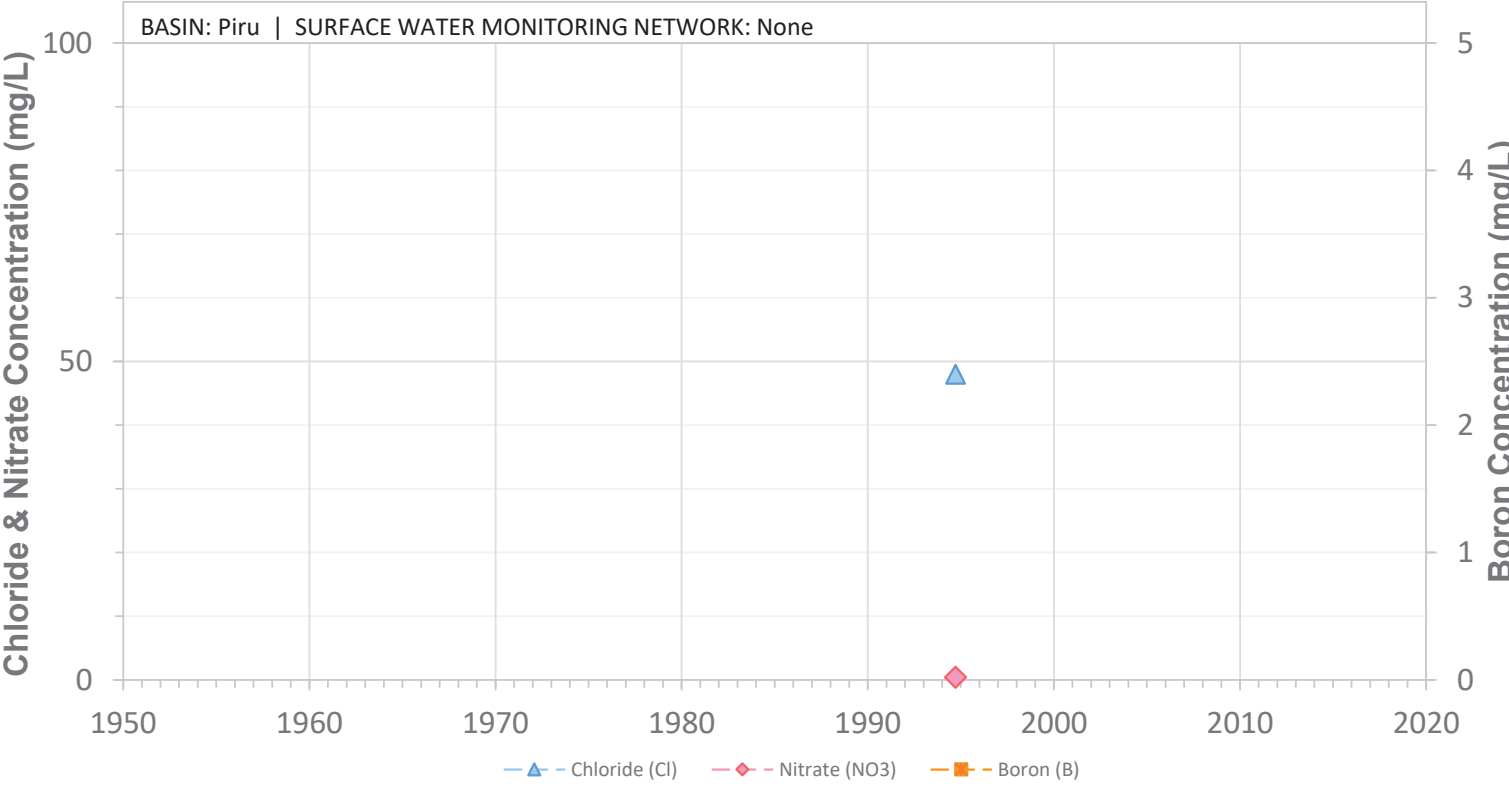
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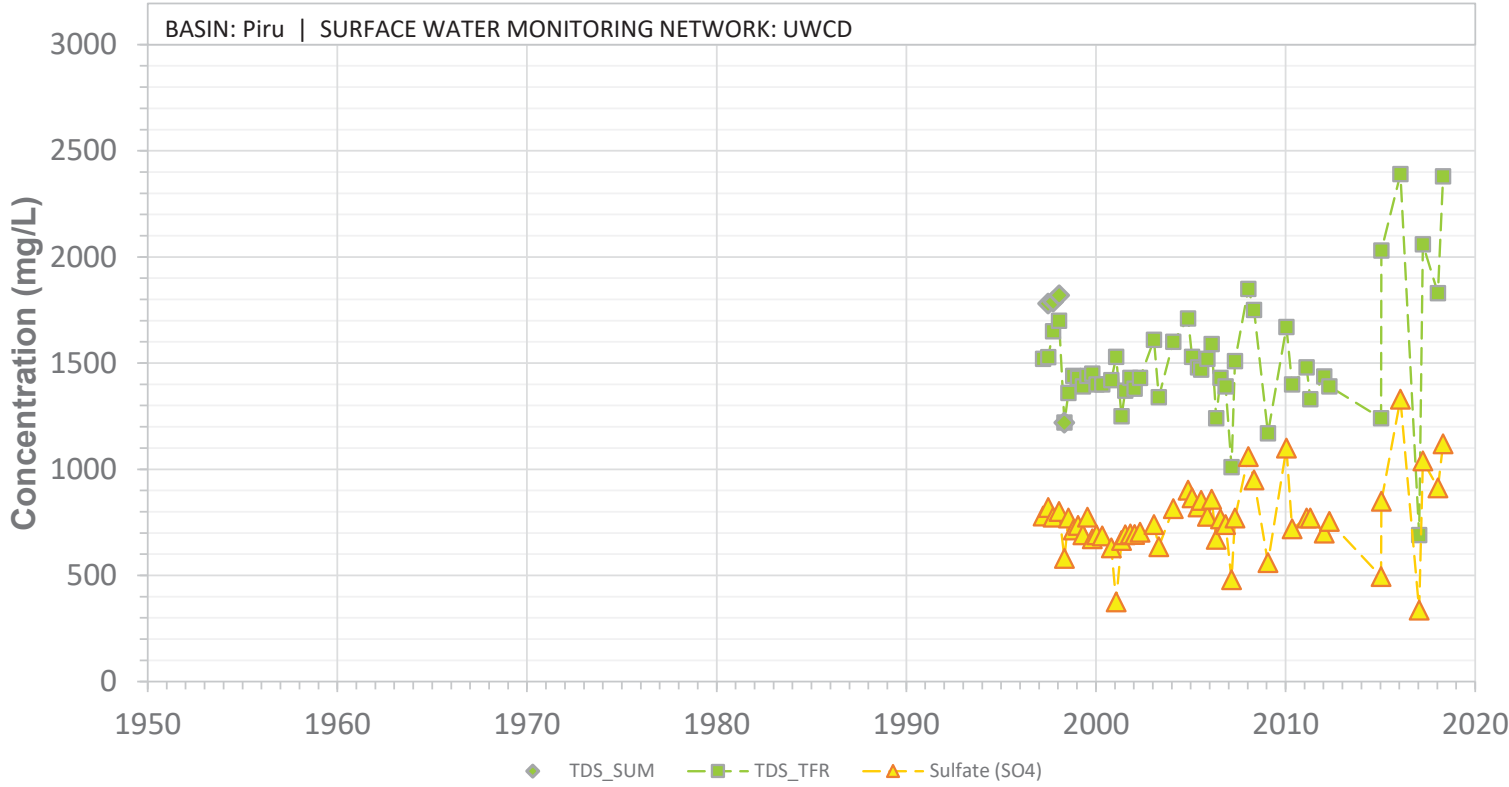
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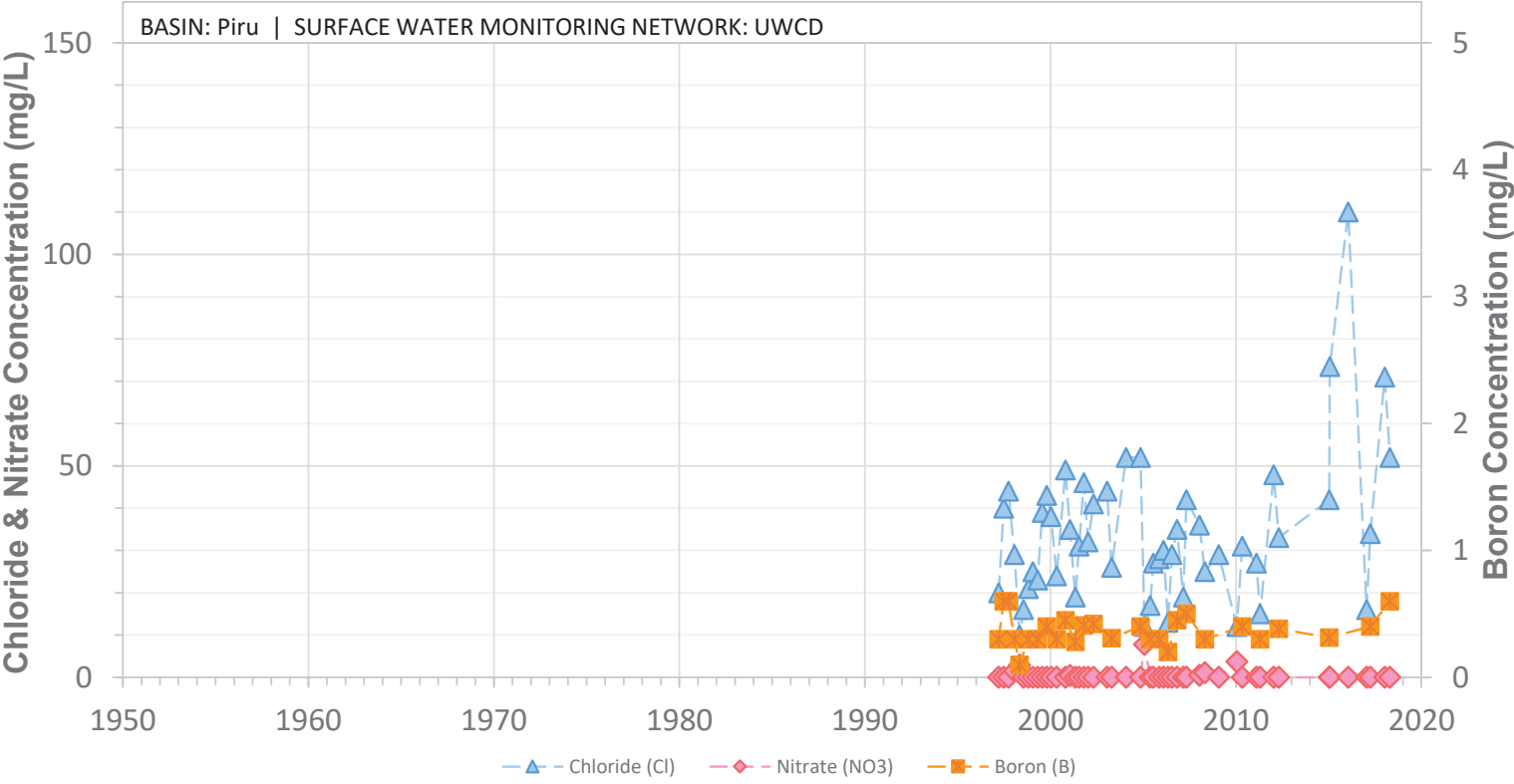
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04N19W25SW1



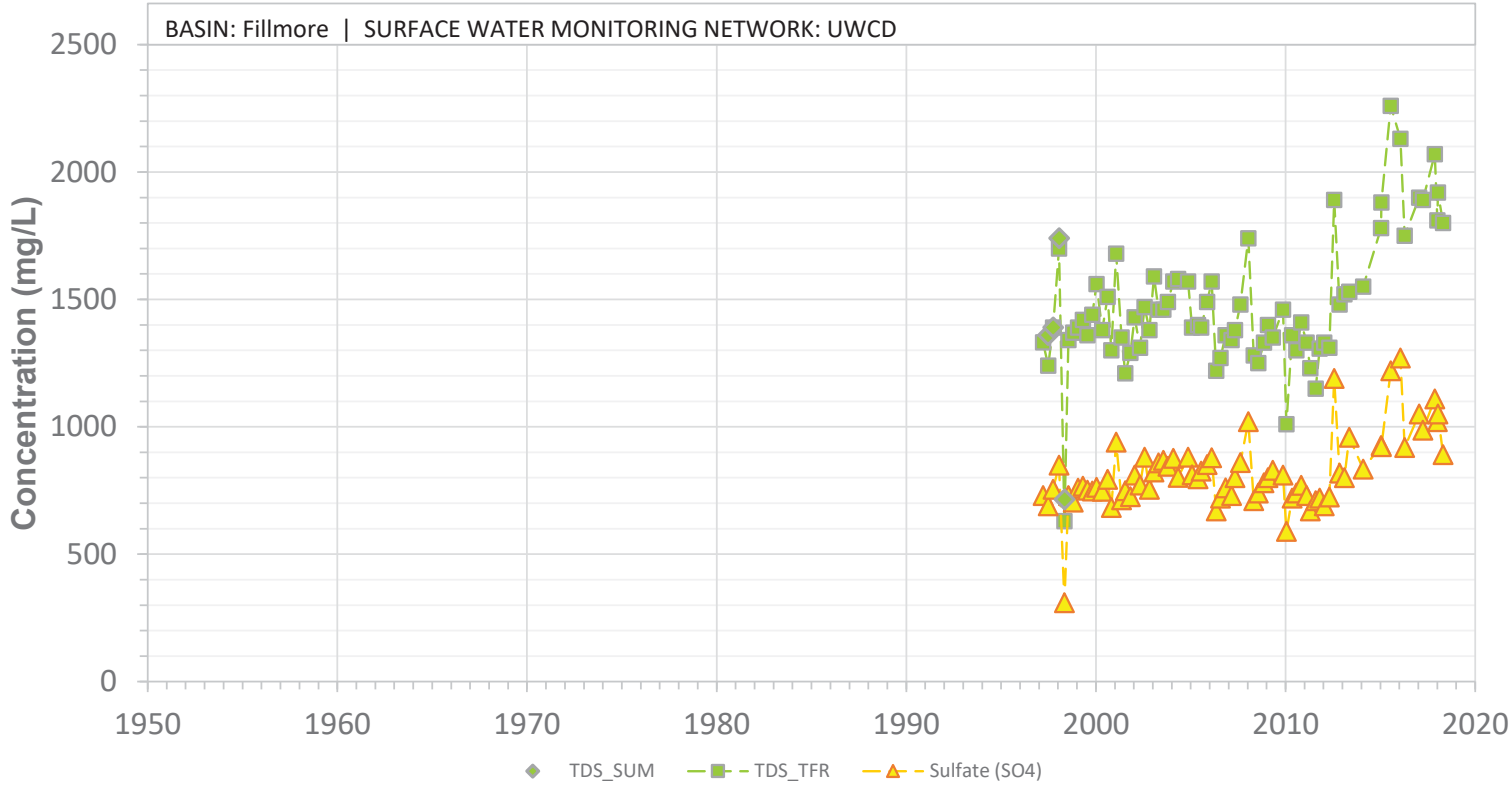
SURFACE WATER SAMPLING SITE NAME: Hopper Creek at Hwy 126

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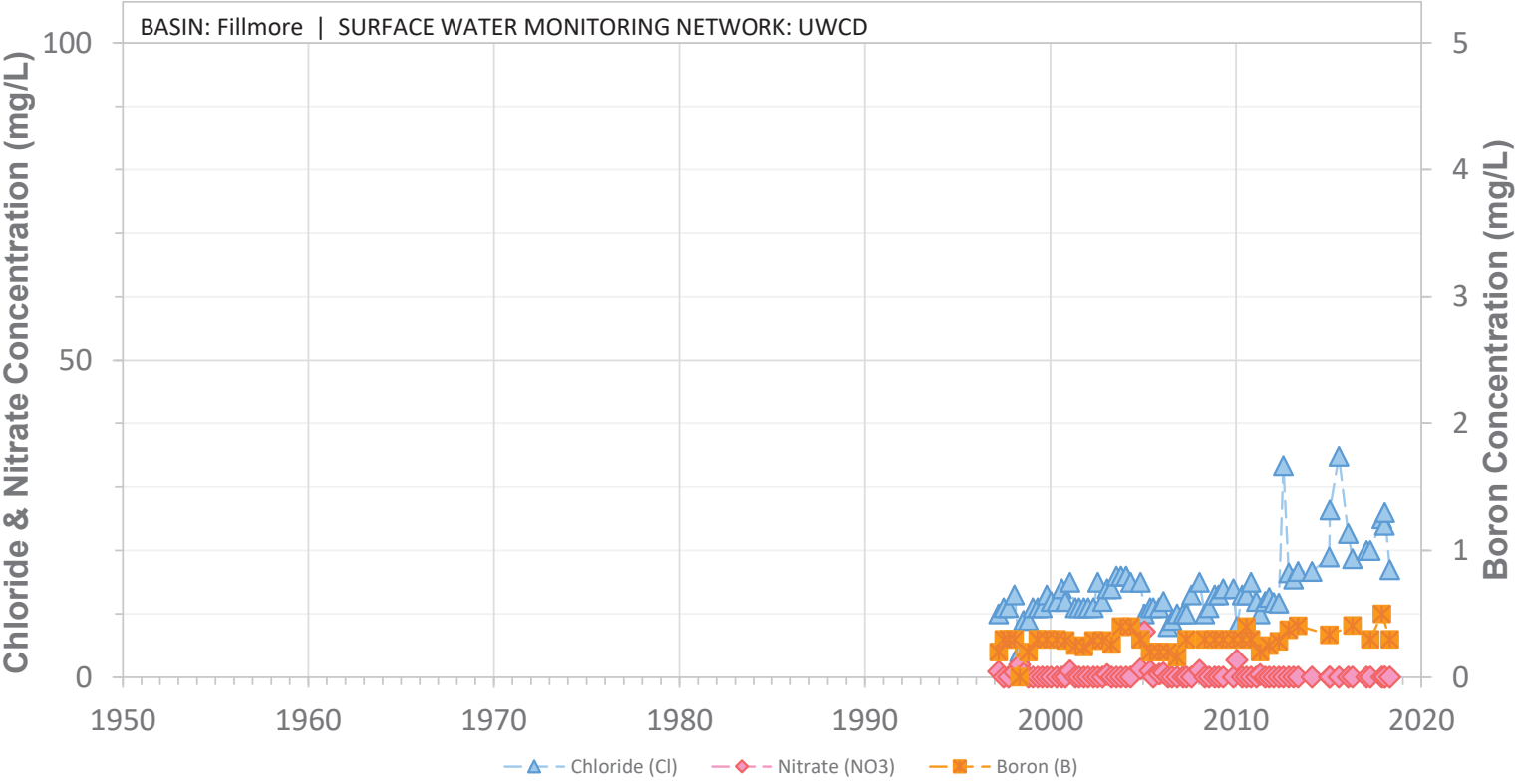
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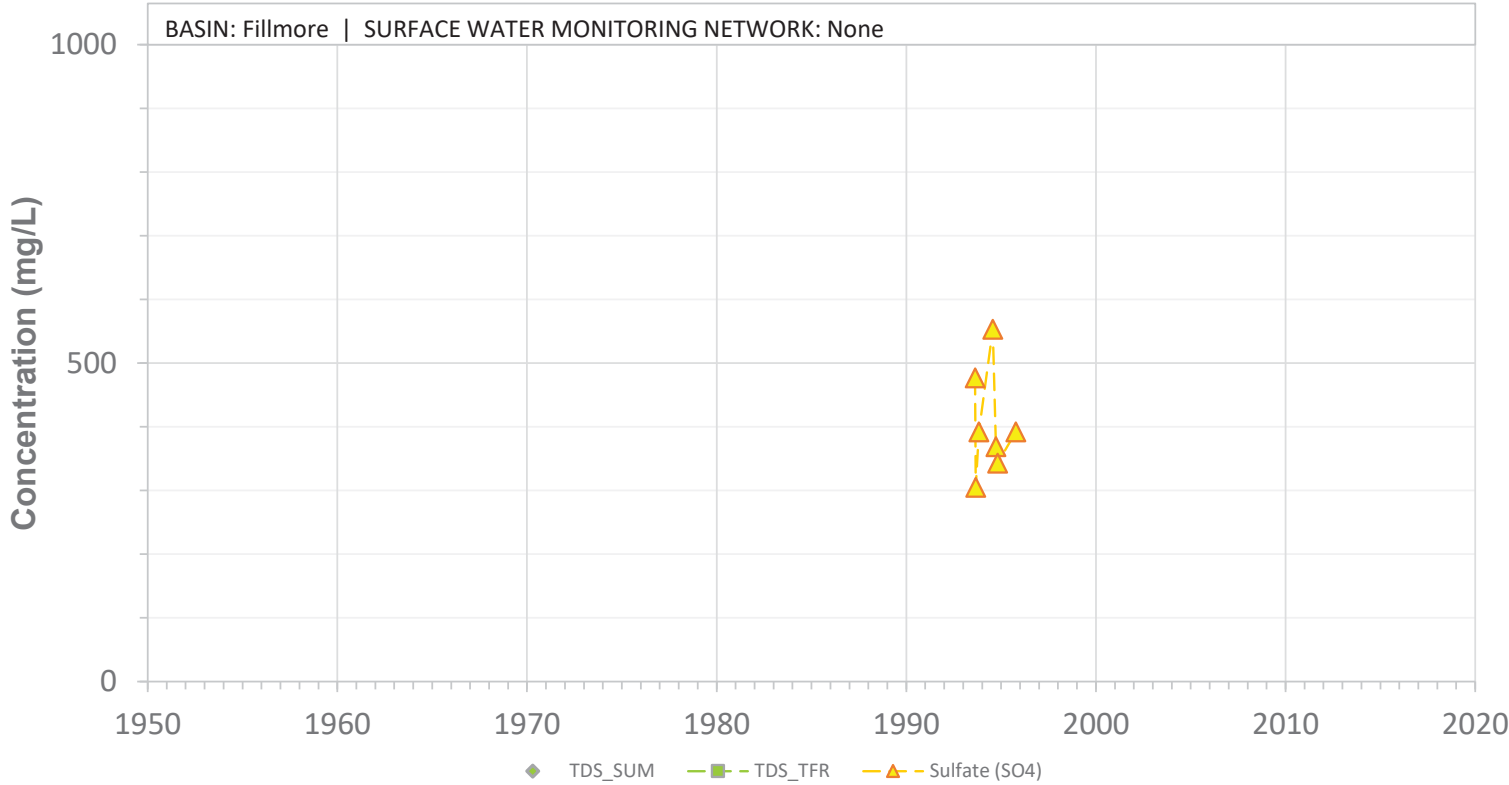
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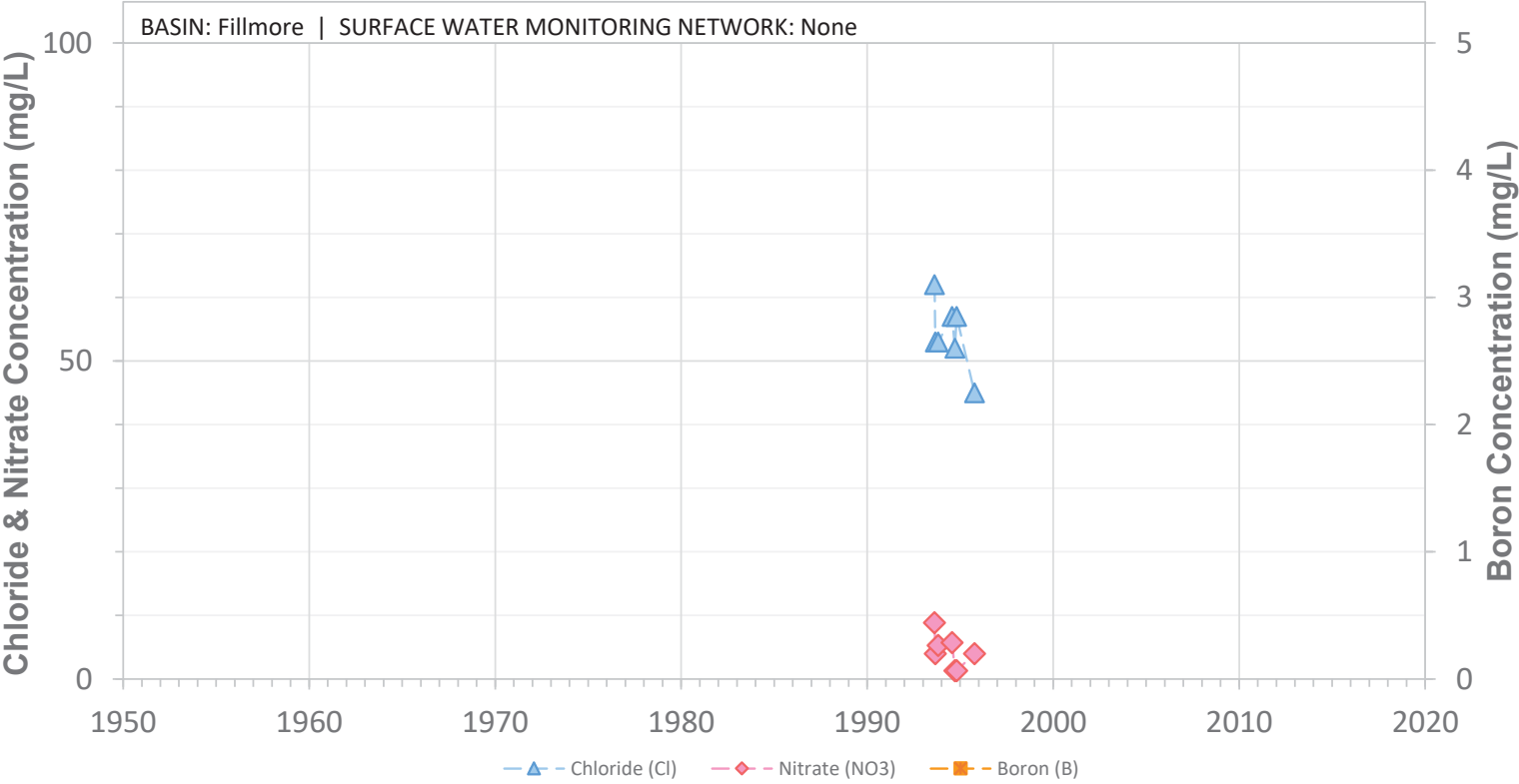
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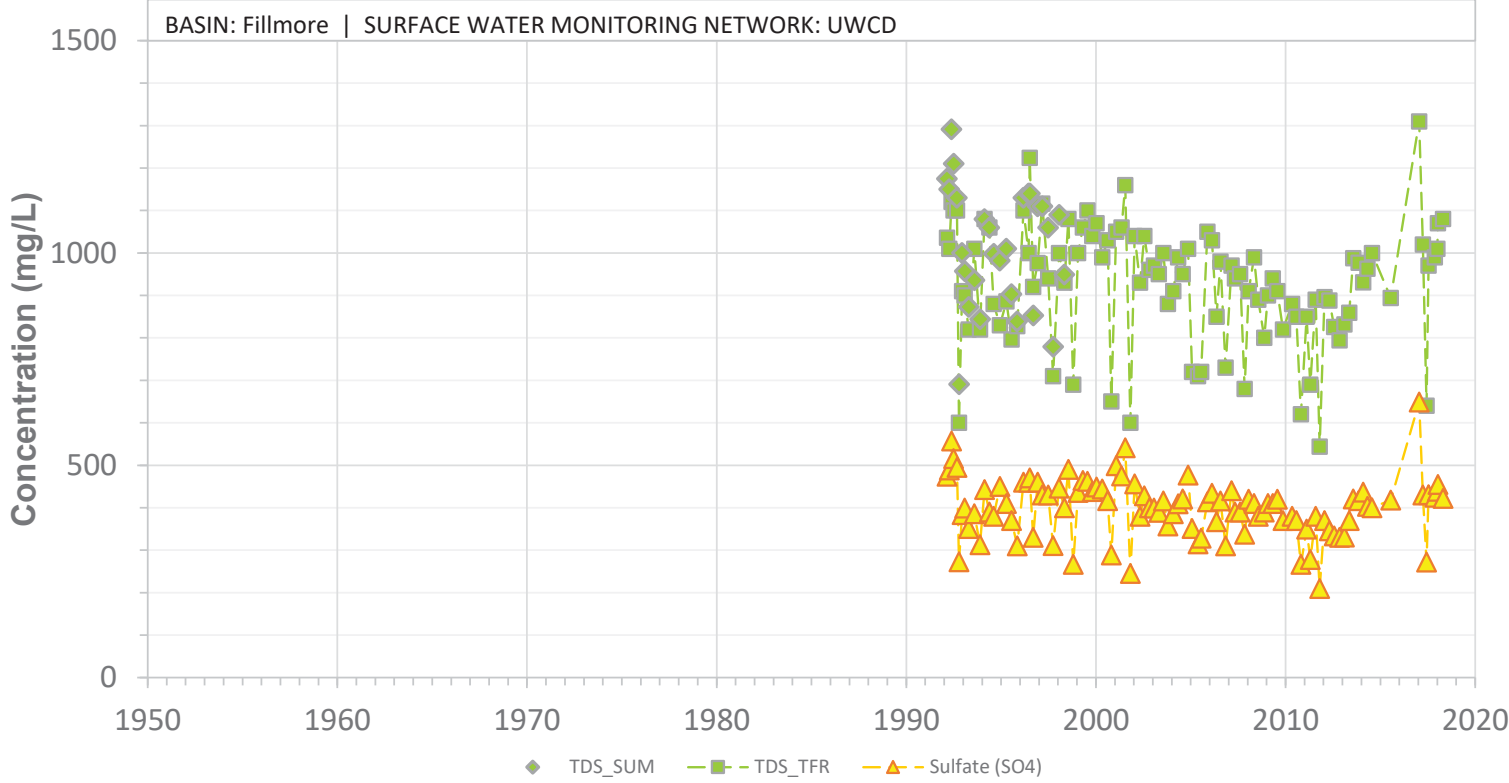
SURFACE WATER SAMPLING SITE NAME: Santa Clara River at Hwy 23 - Chambersburg Road - A Street Bridge

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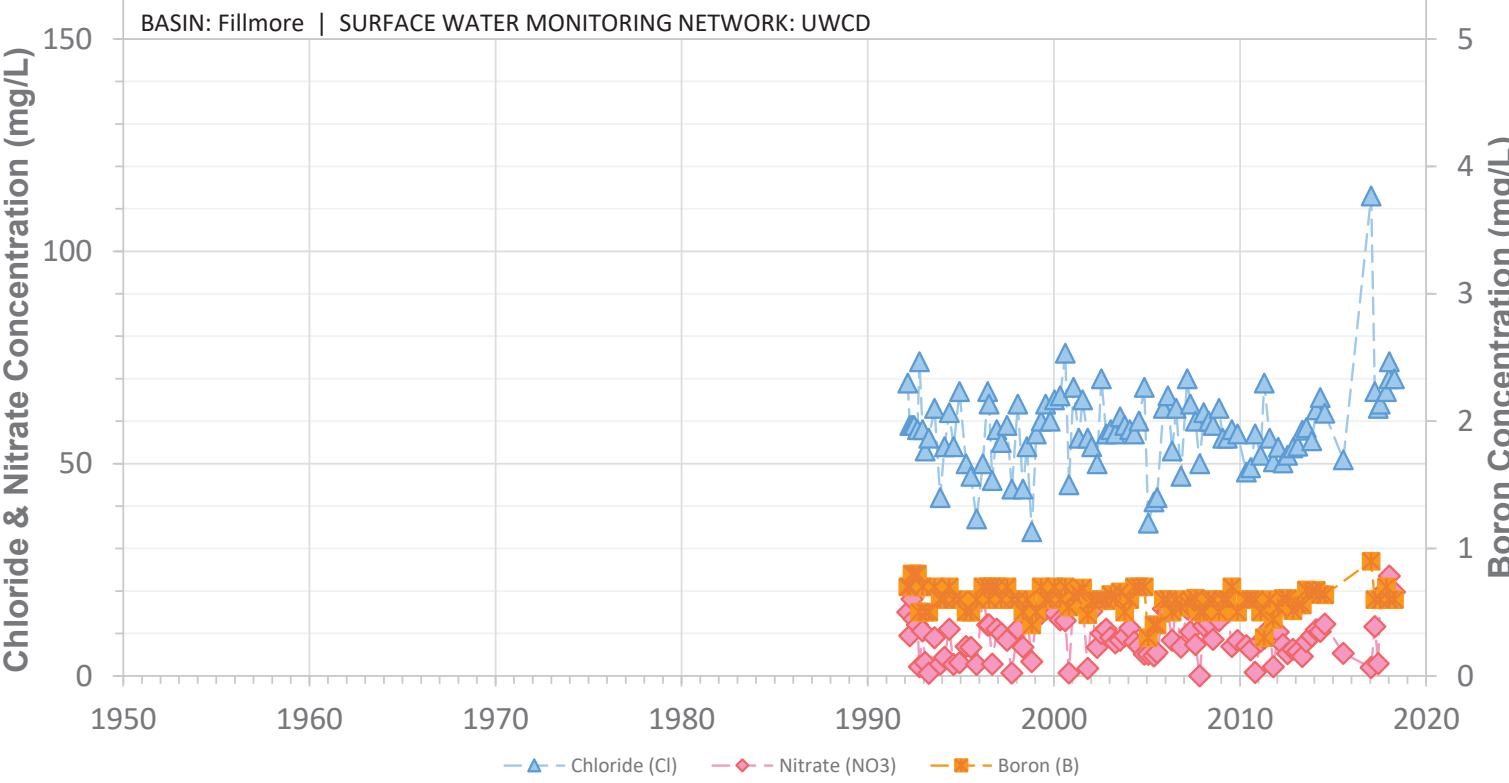
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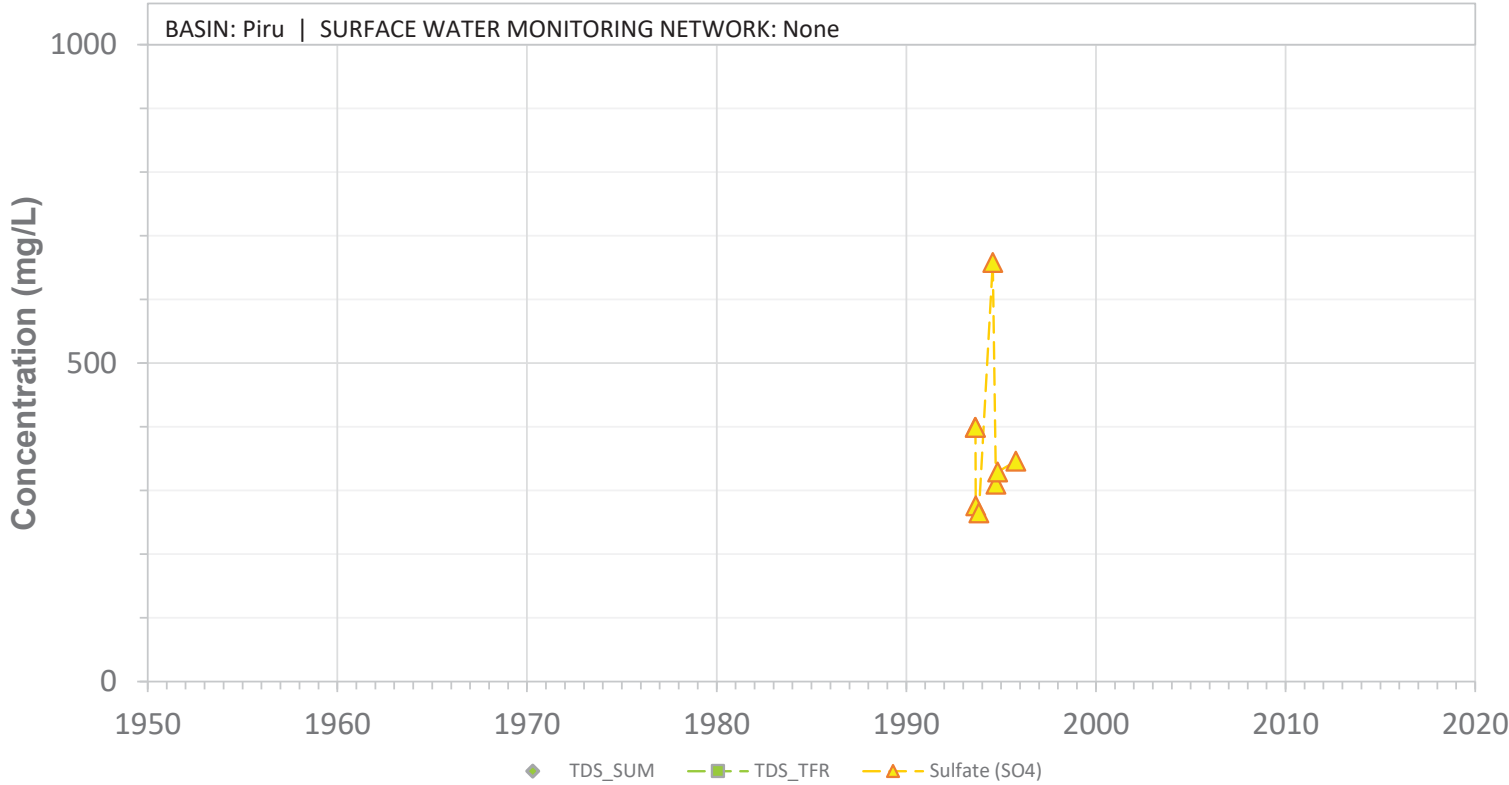
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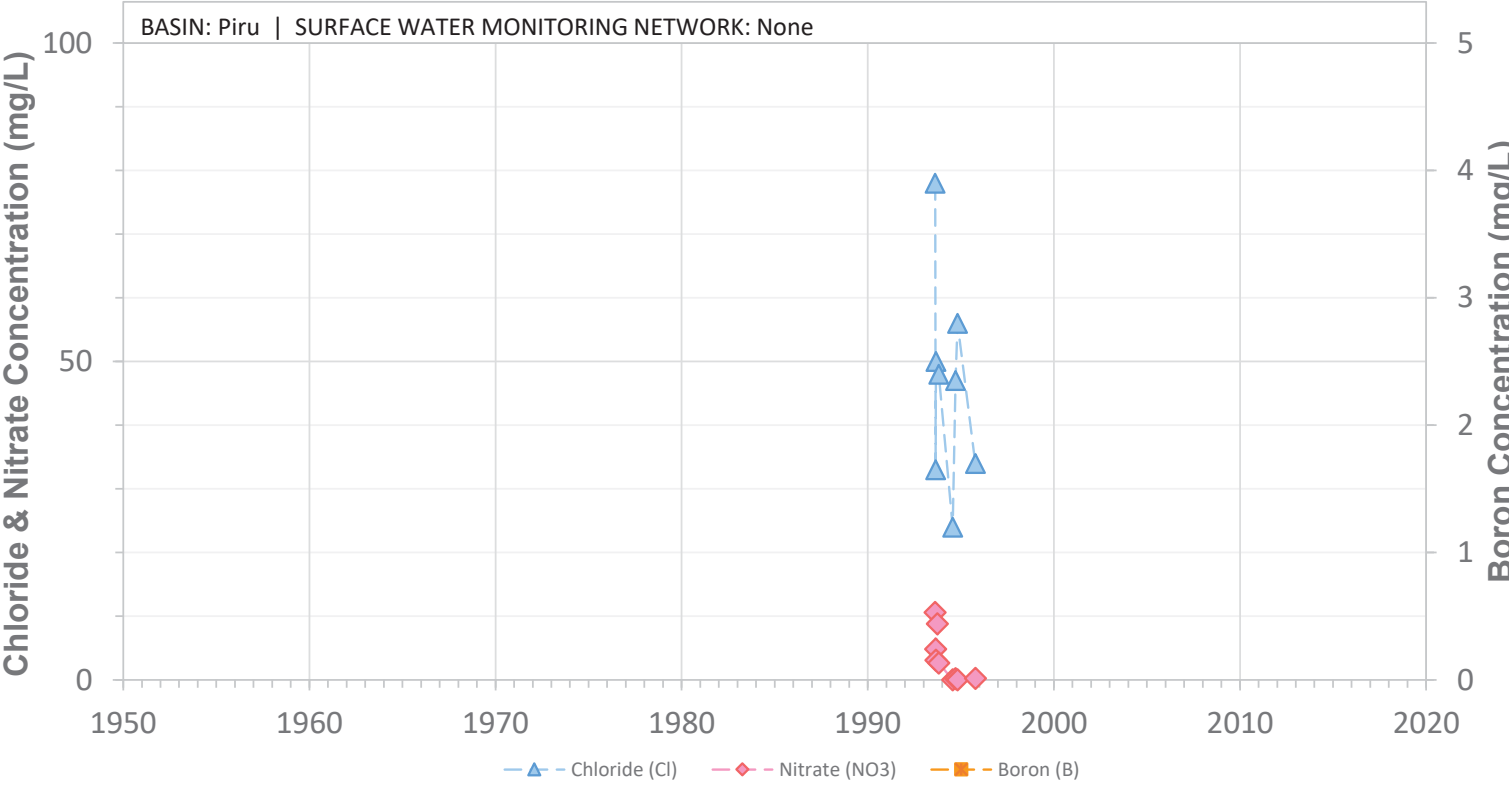
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04N19W35SW1



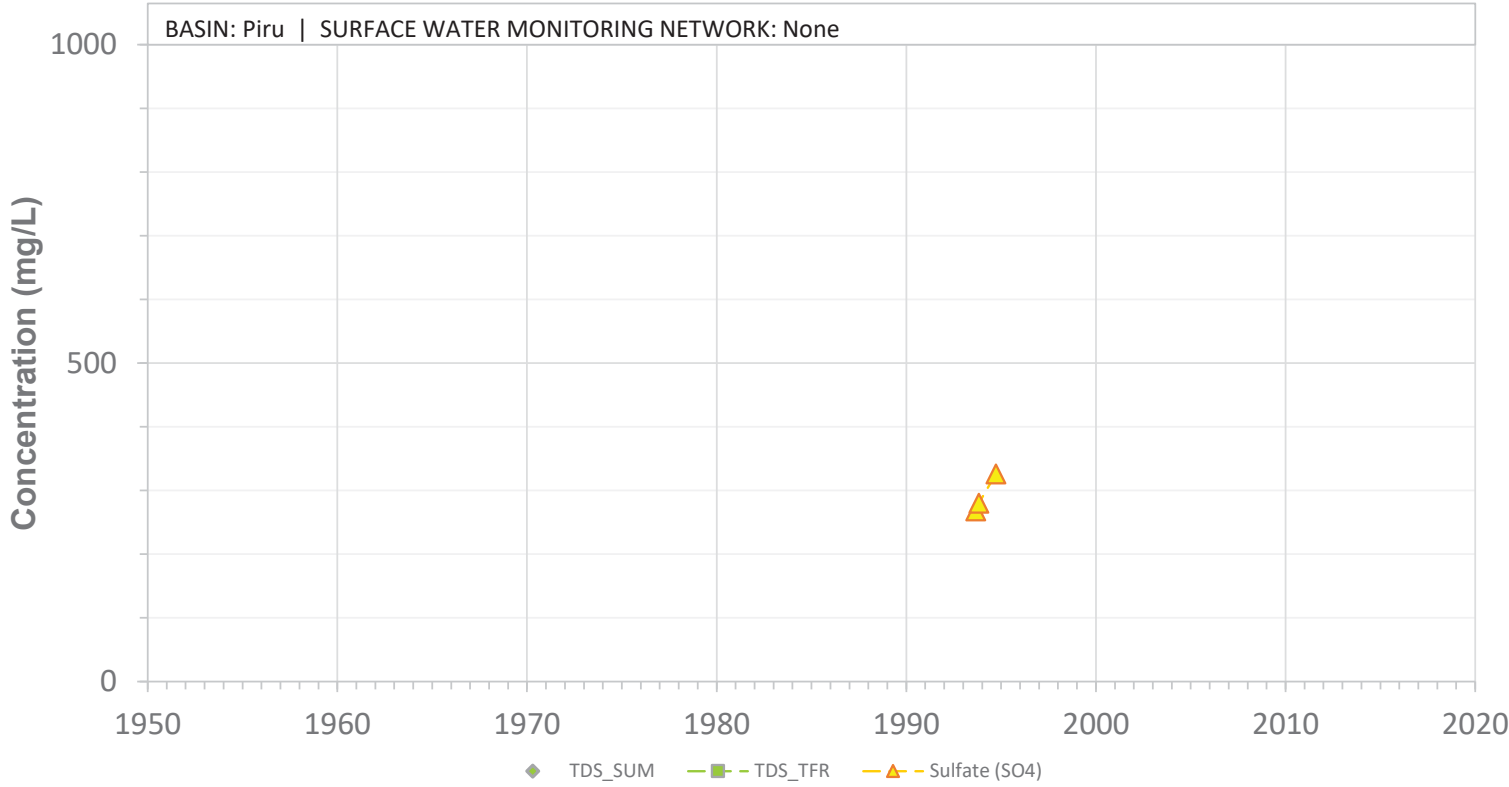
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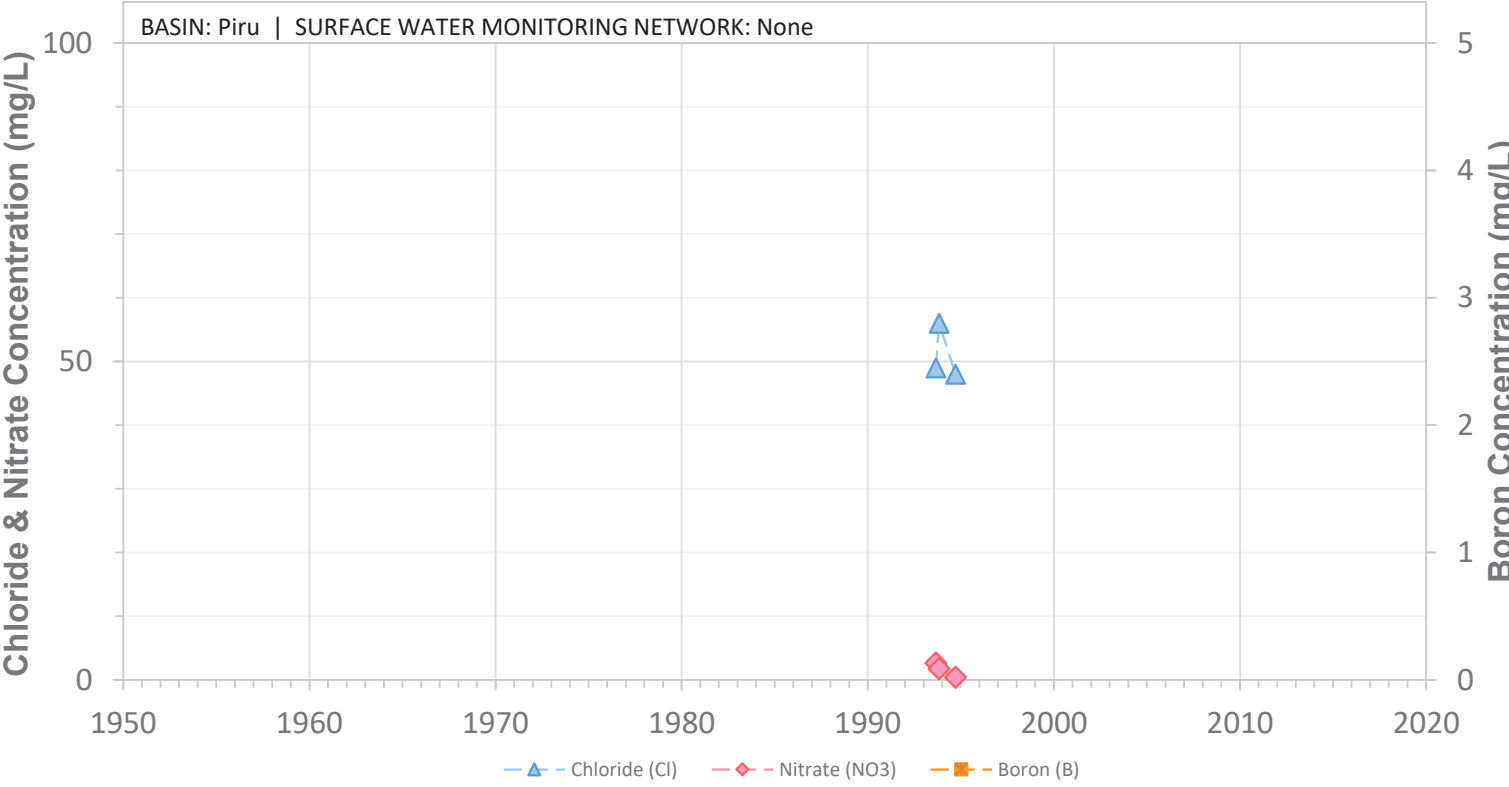
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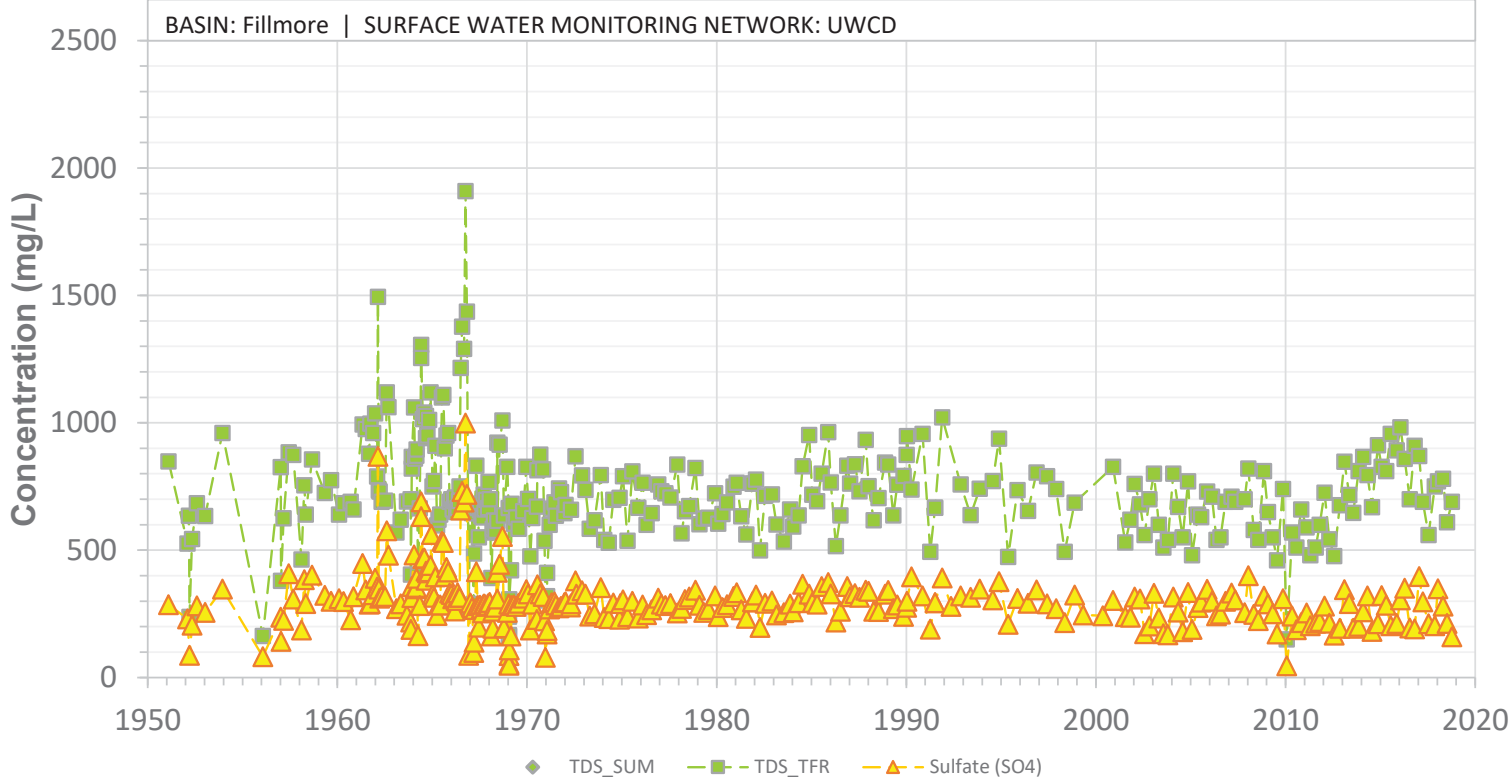
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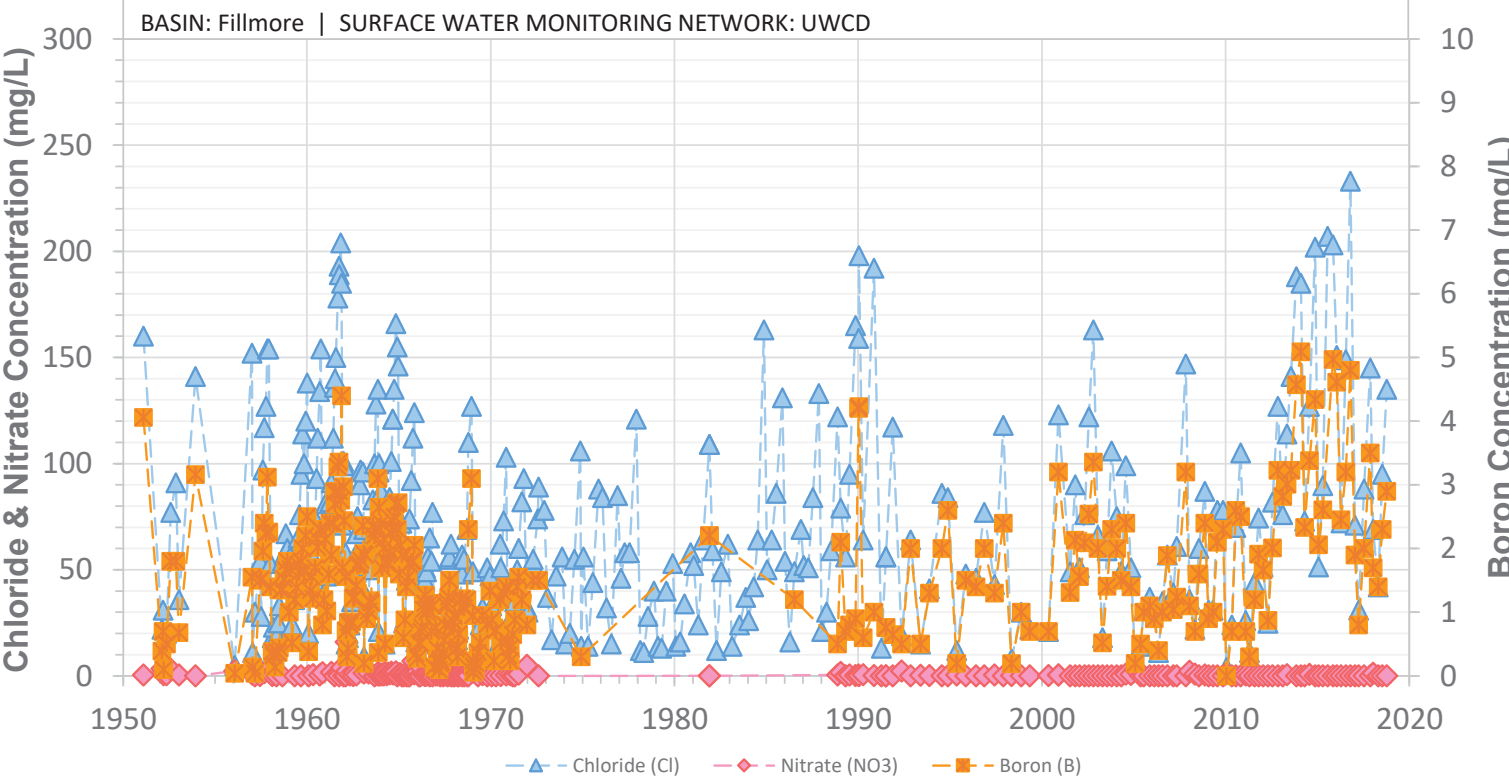
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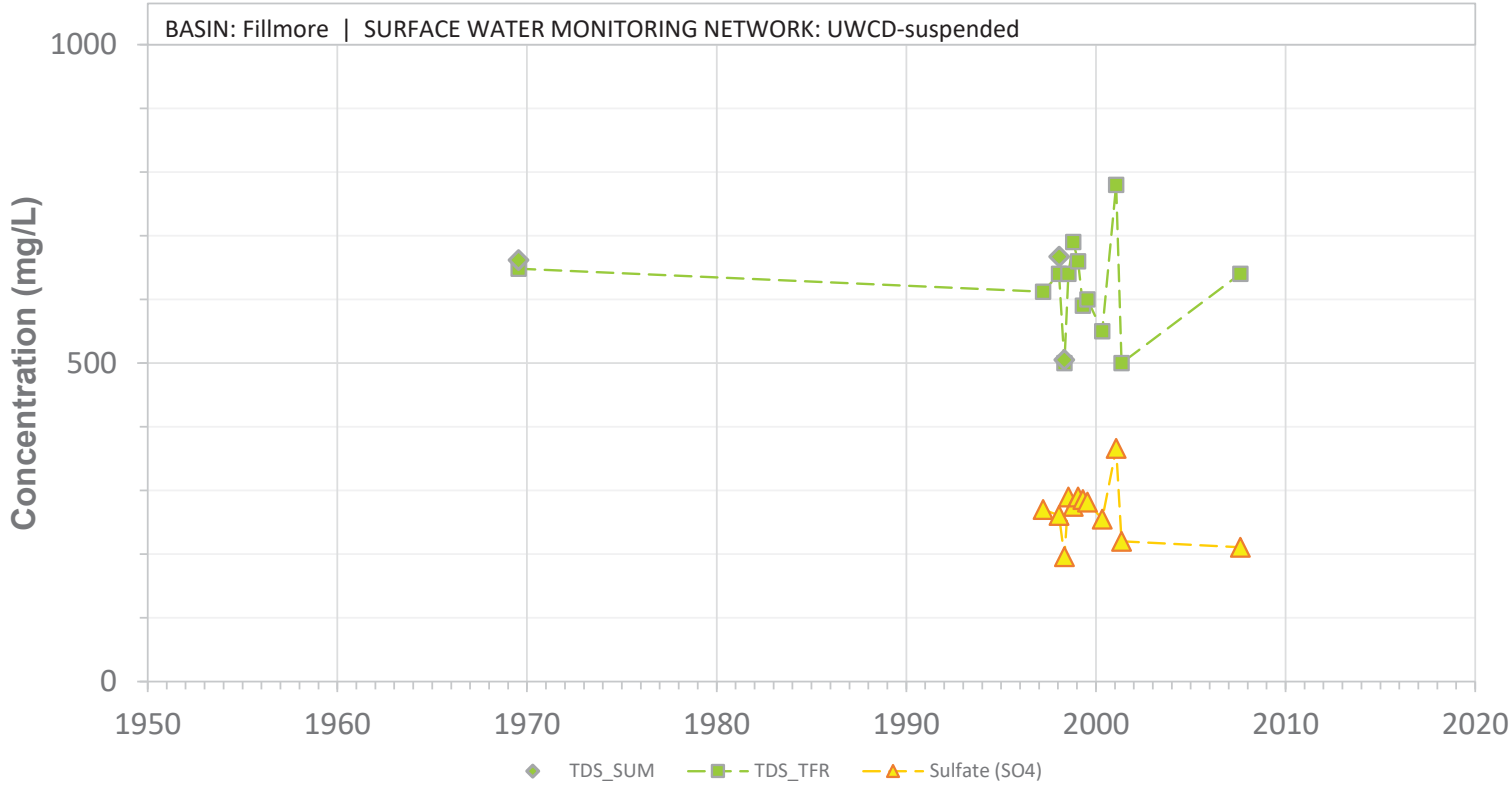
SURFACE WATER SAMPLING SITE NAME: Sespe Creek at USGS Gauging Station, near Fillmore

04N20W12SW1



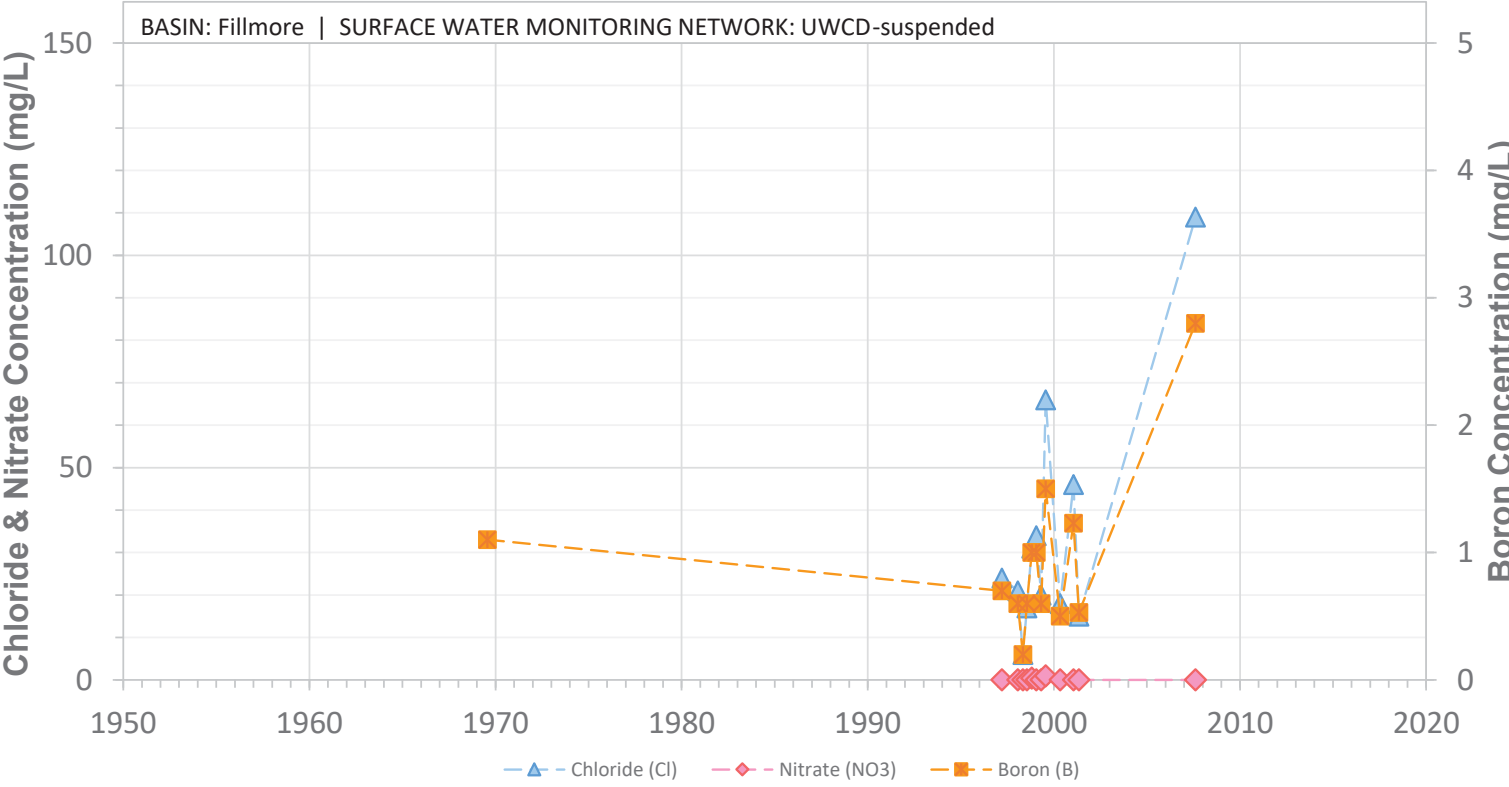
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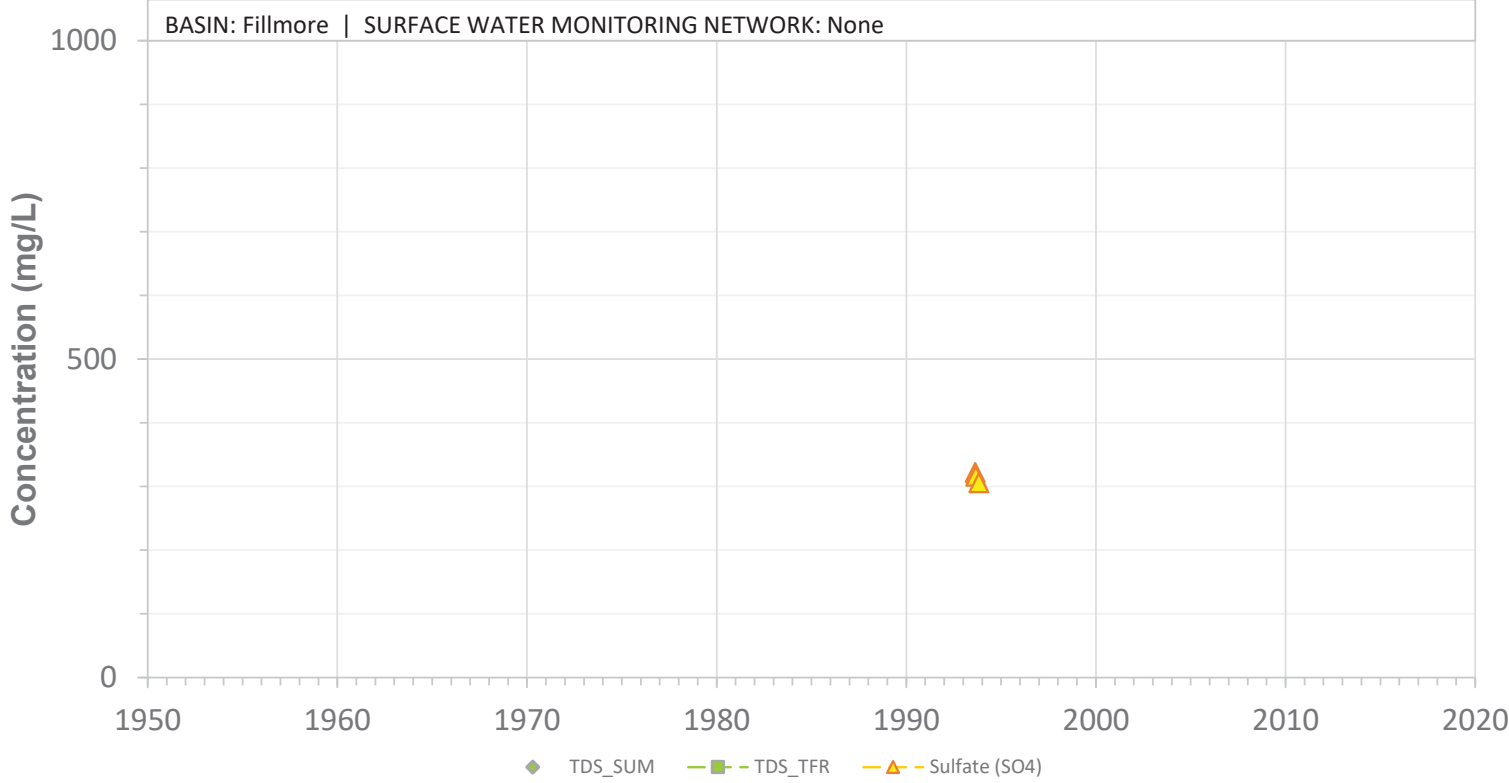
SURFACE WATER SAMPLING SITE NAME: Sespe Creek at Old Telegraph Road

04N20W24SW1



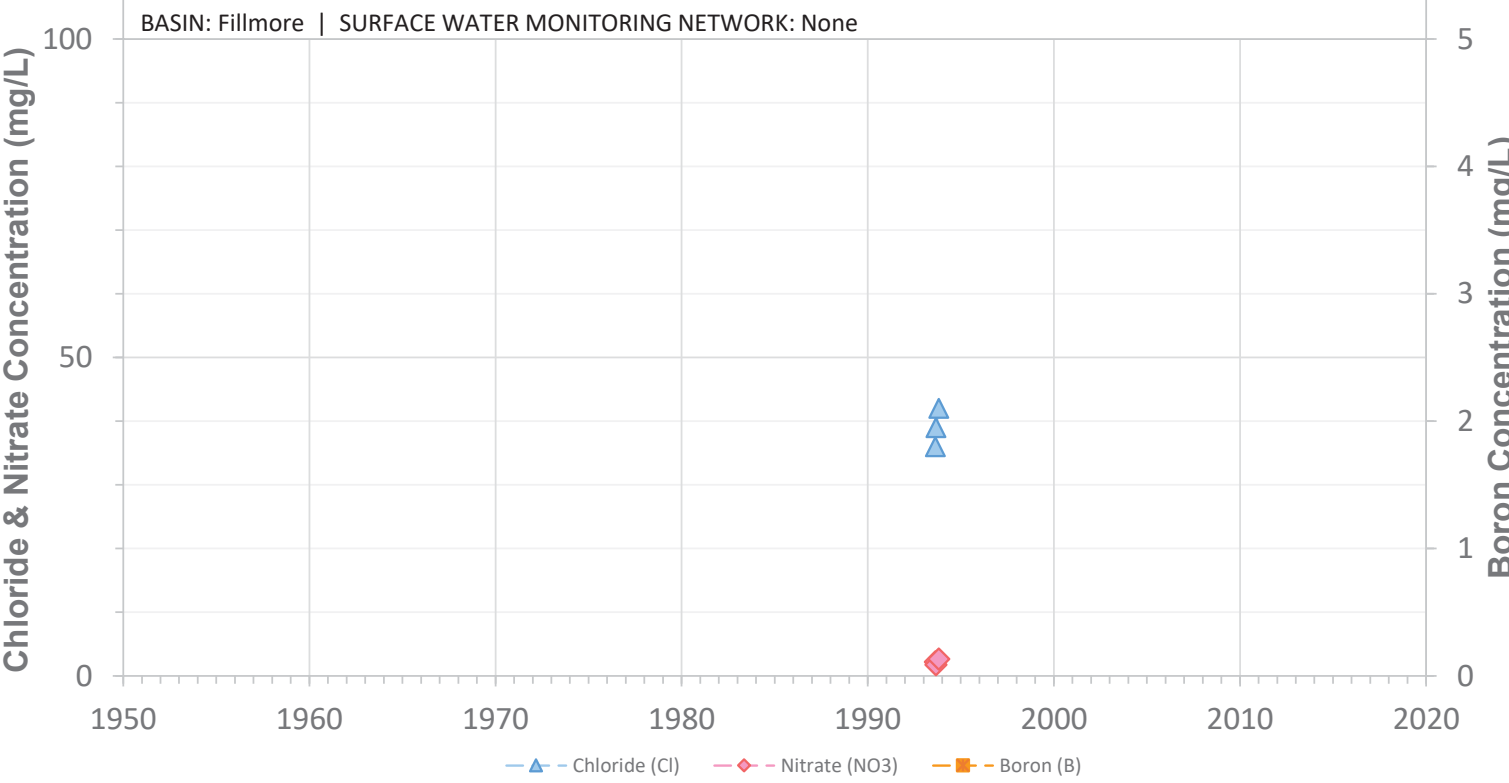
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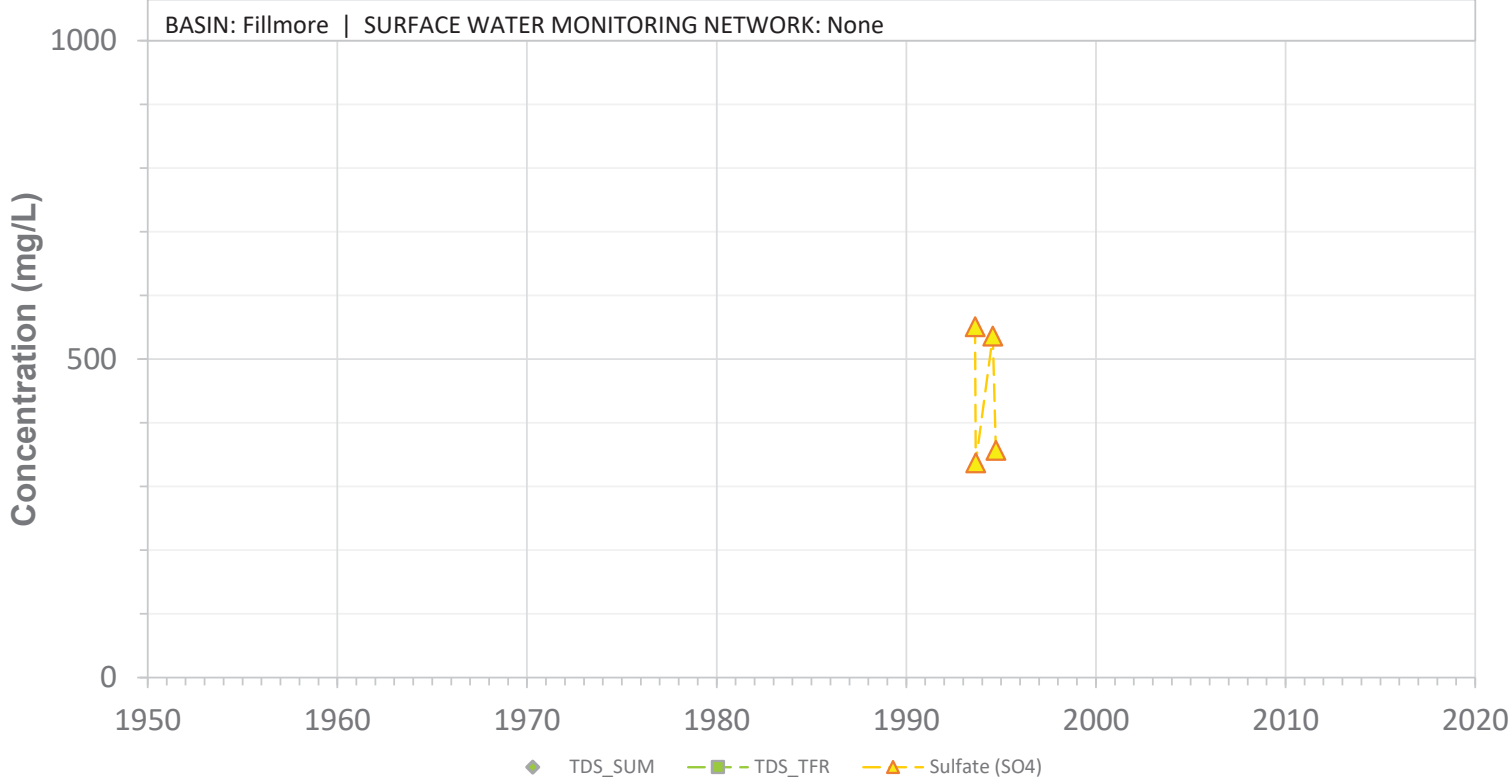
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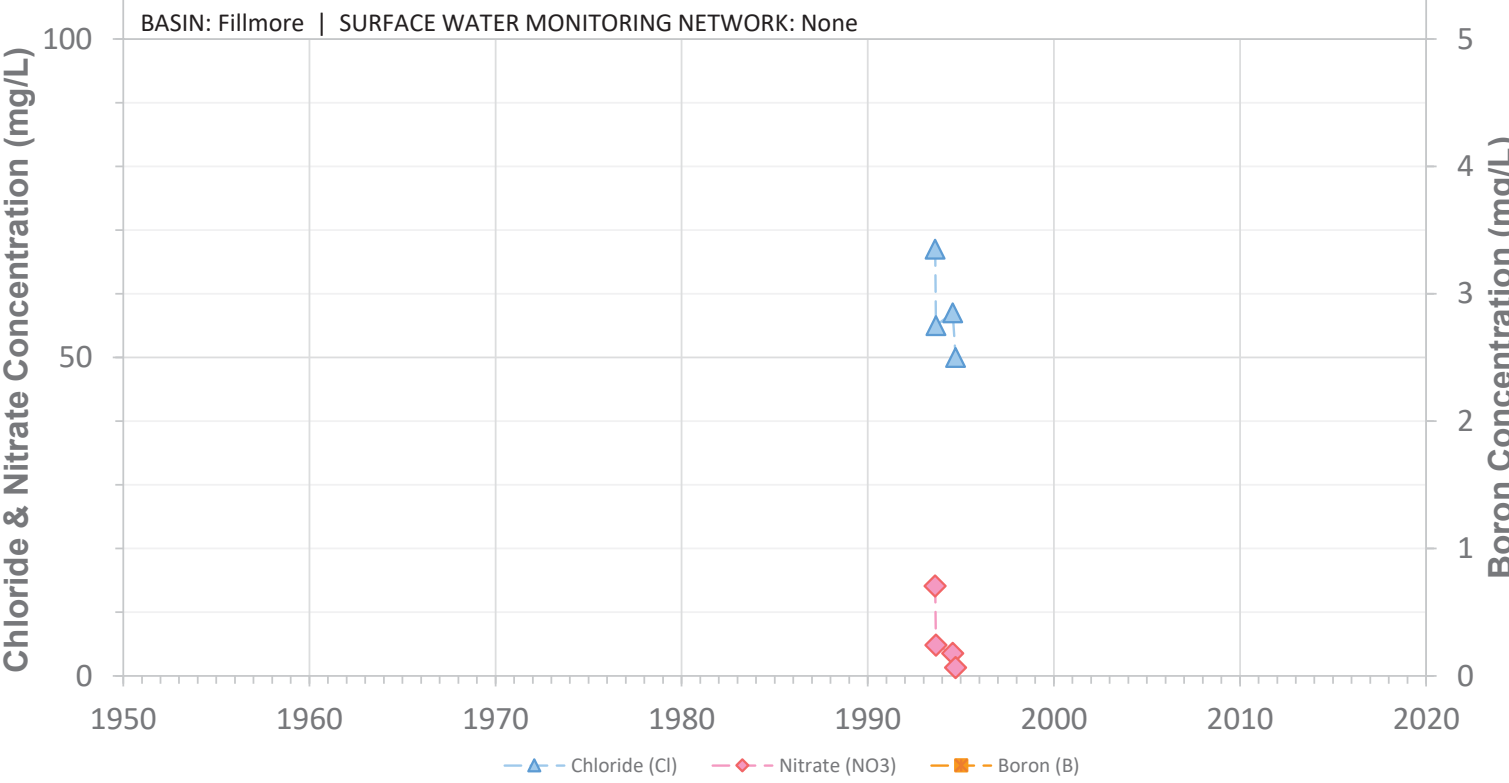
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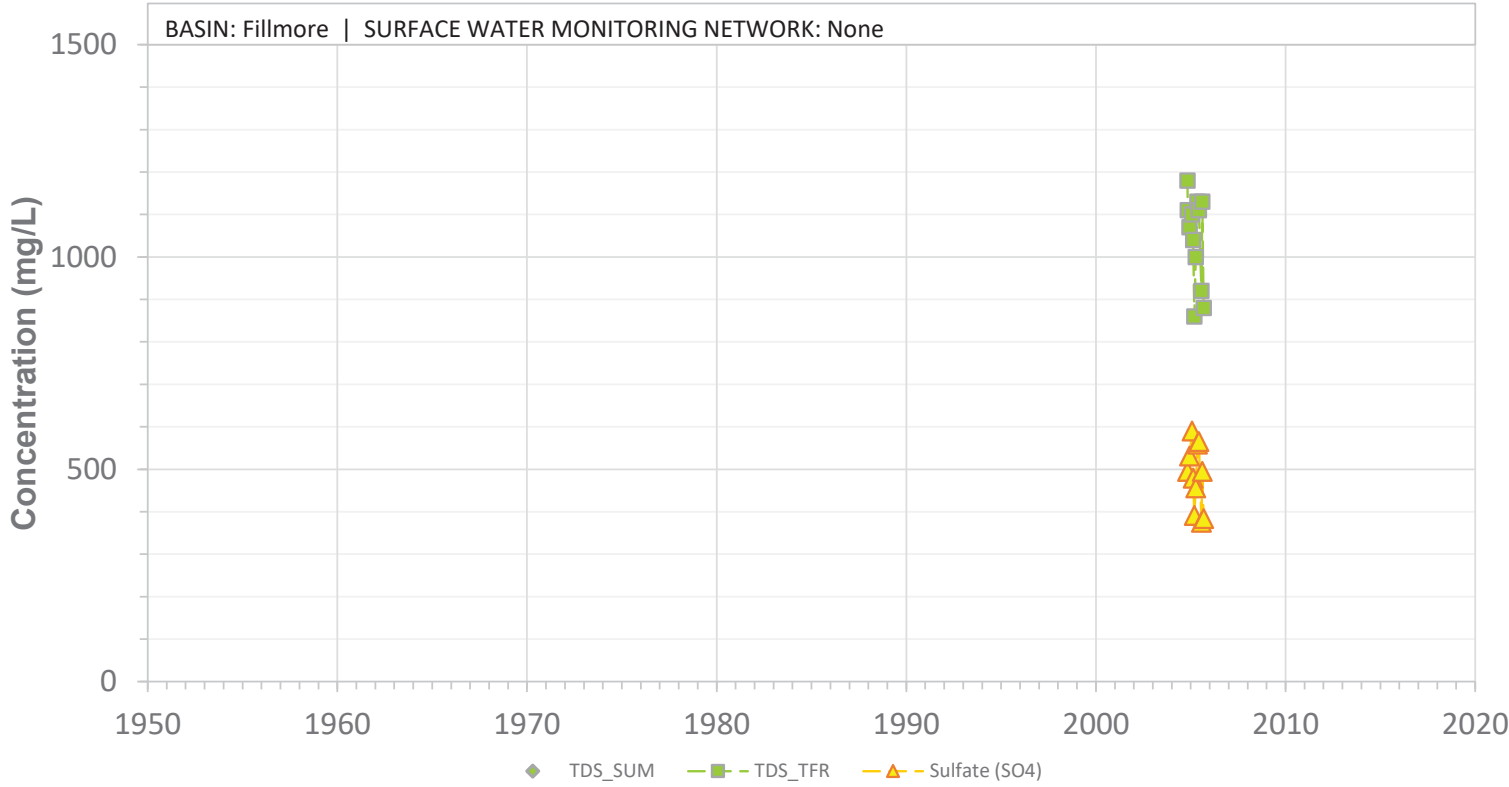
SURFACE WATER SAMPLING SITE NAME: Santa Clara River near Bardsdale

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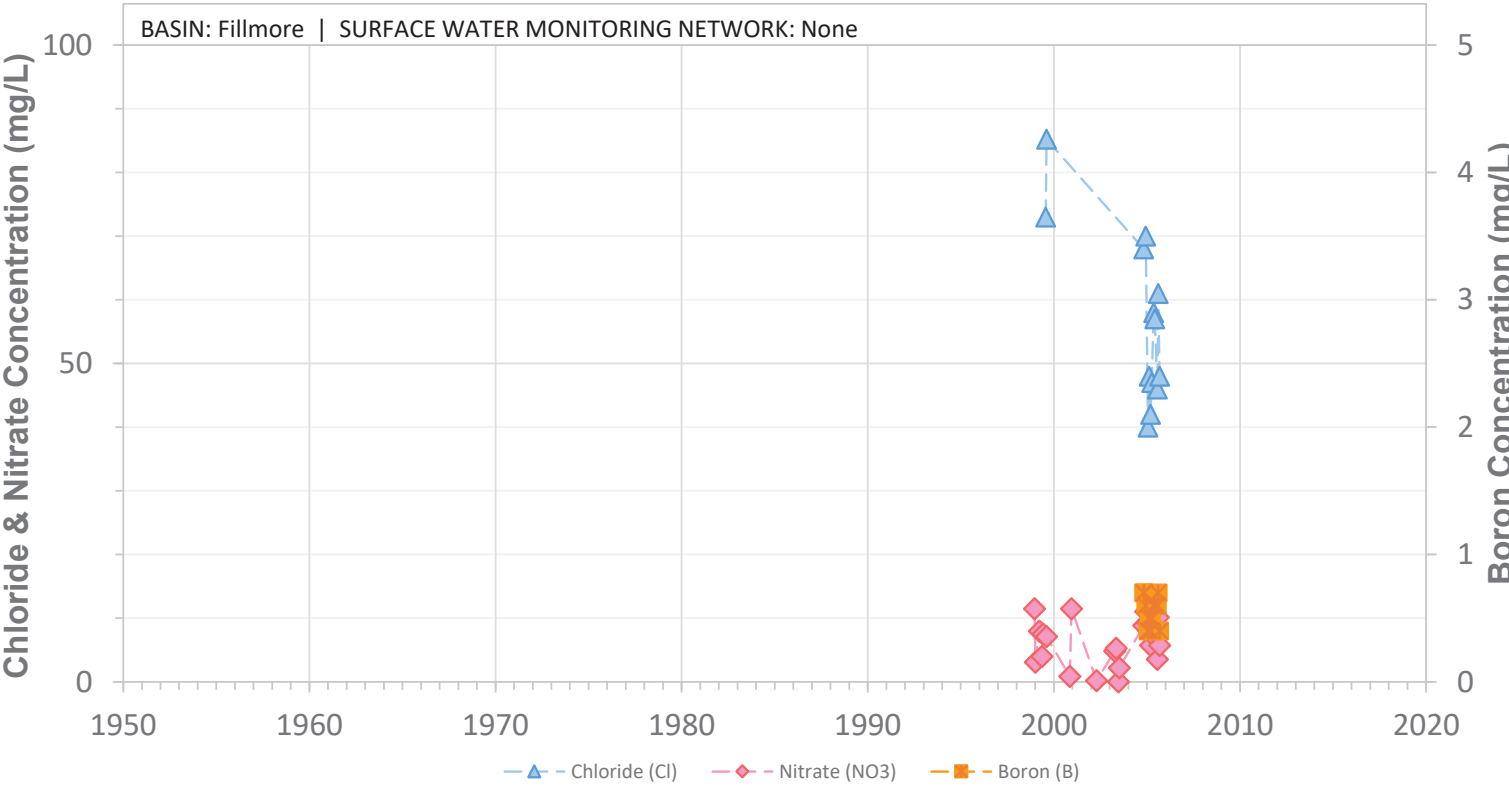
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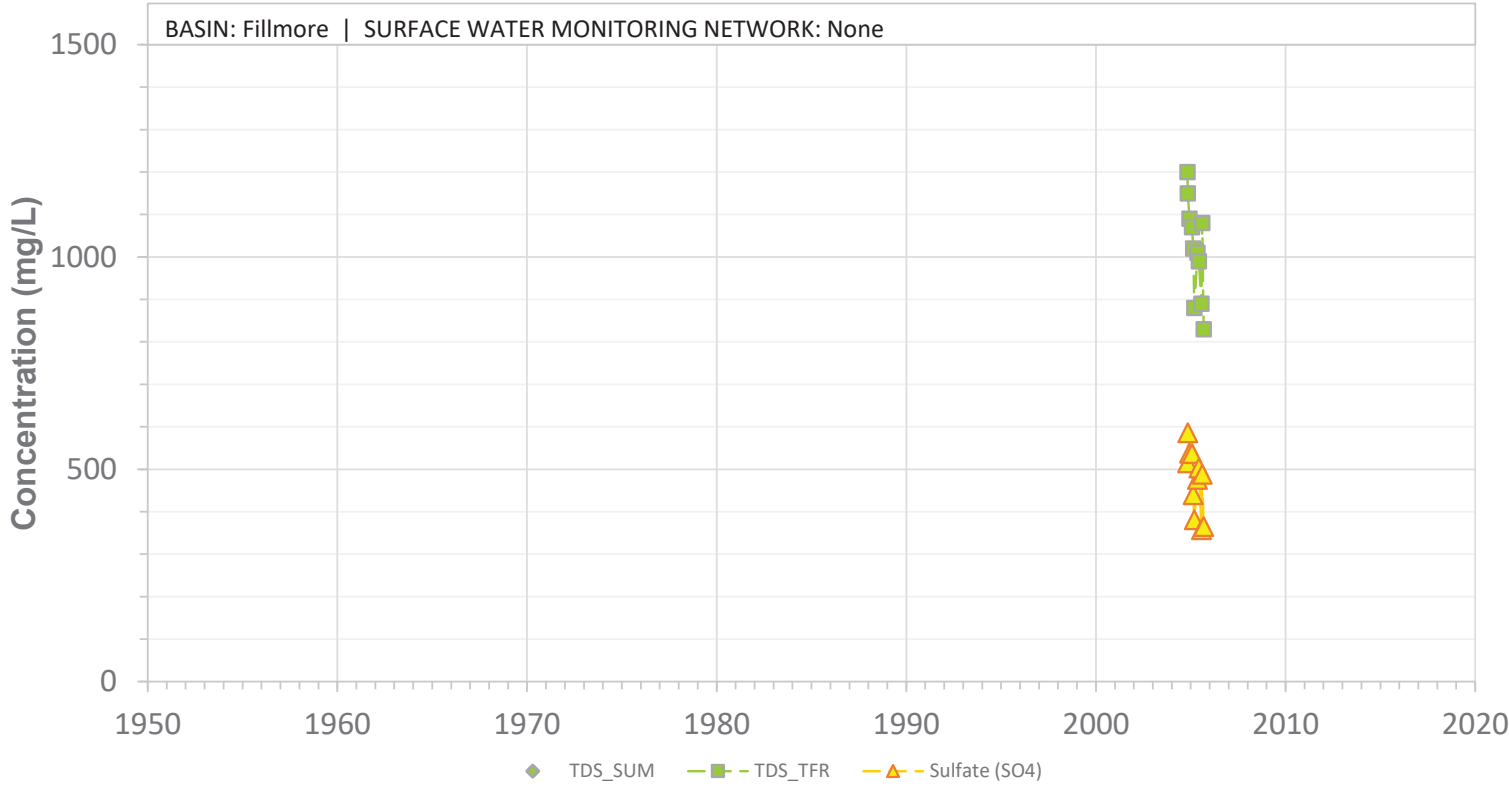
SURFACE WATER SAMPLING SITE NAME: Fillmore WRP, 300 ft upstream from discharge

04N20W36SW1



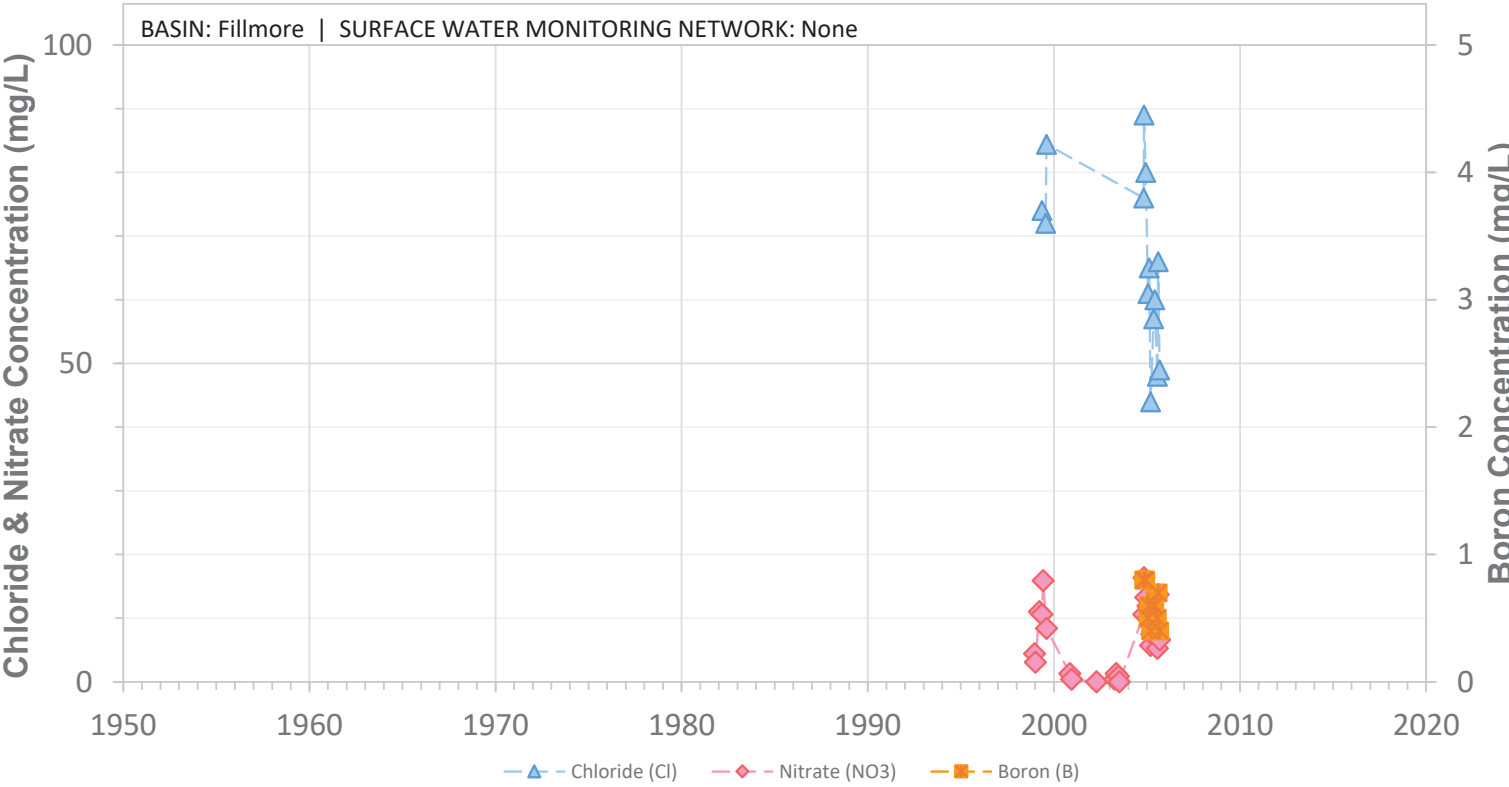
SURFACE WATER SAMPLING SITE NAME: Fillmore WRP, 300 ft upstream from discharge

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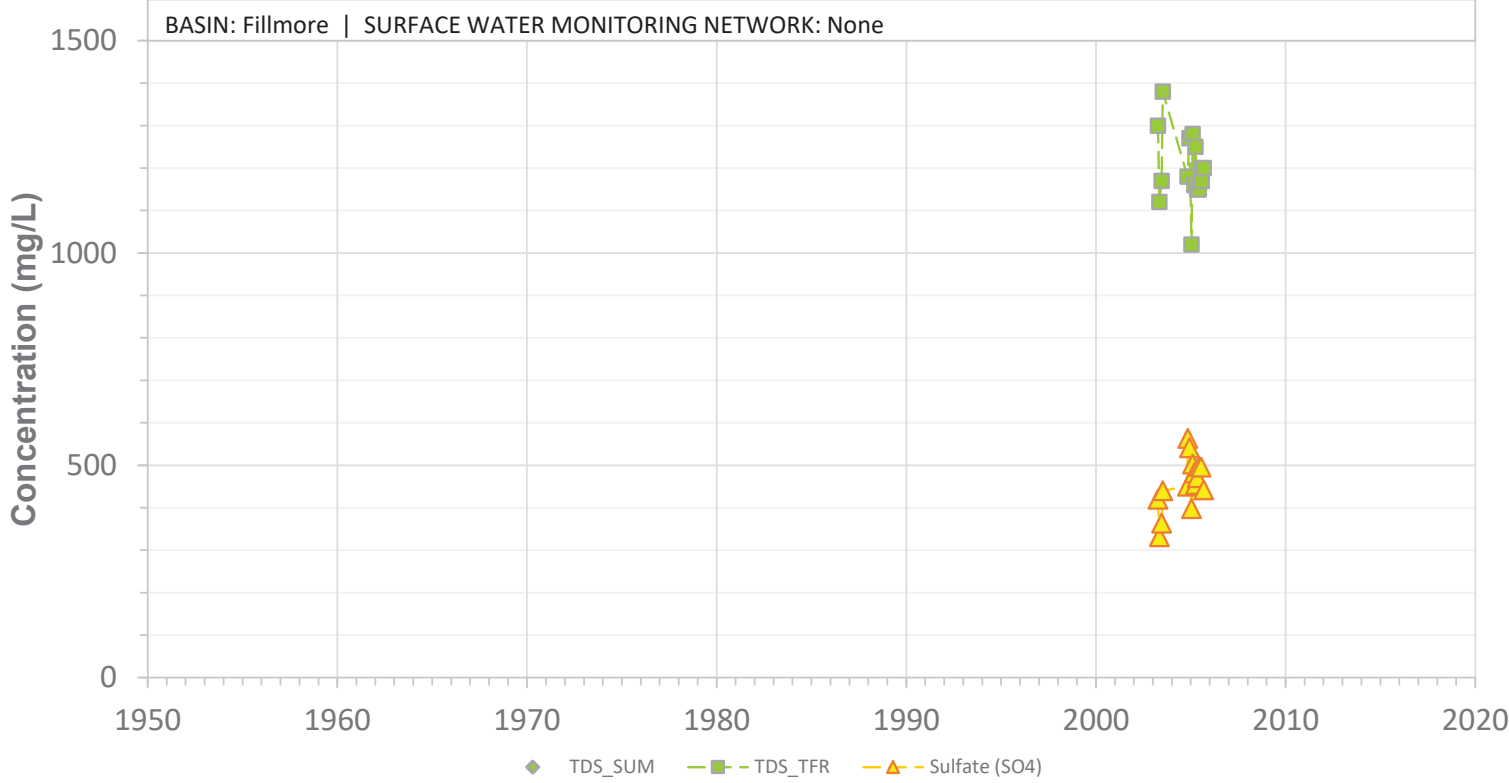
SURFACE WATER SAMPLING SITE NAME: Fillmore WRP, 300 ft downstream from discharge

04N20W36SW2



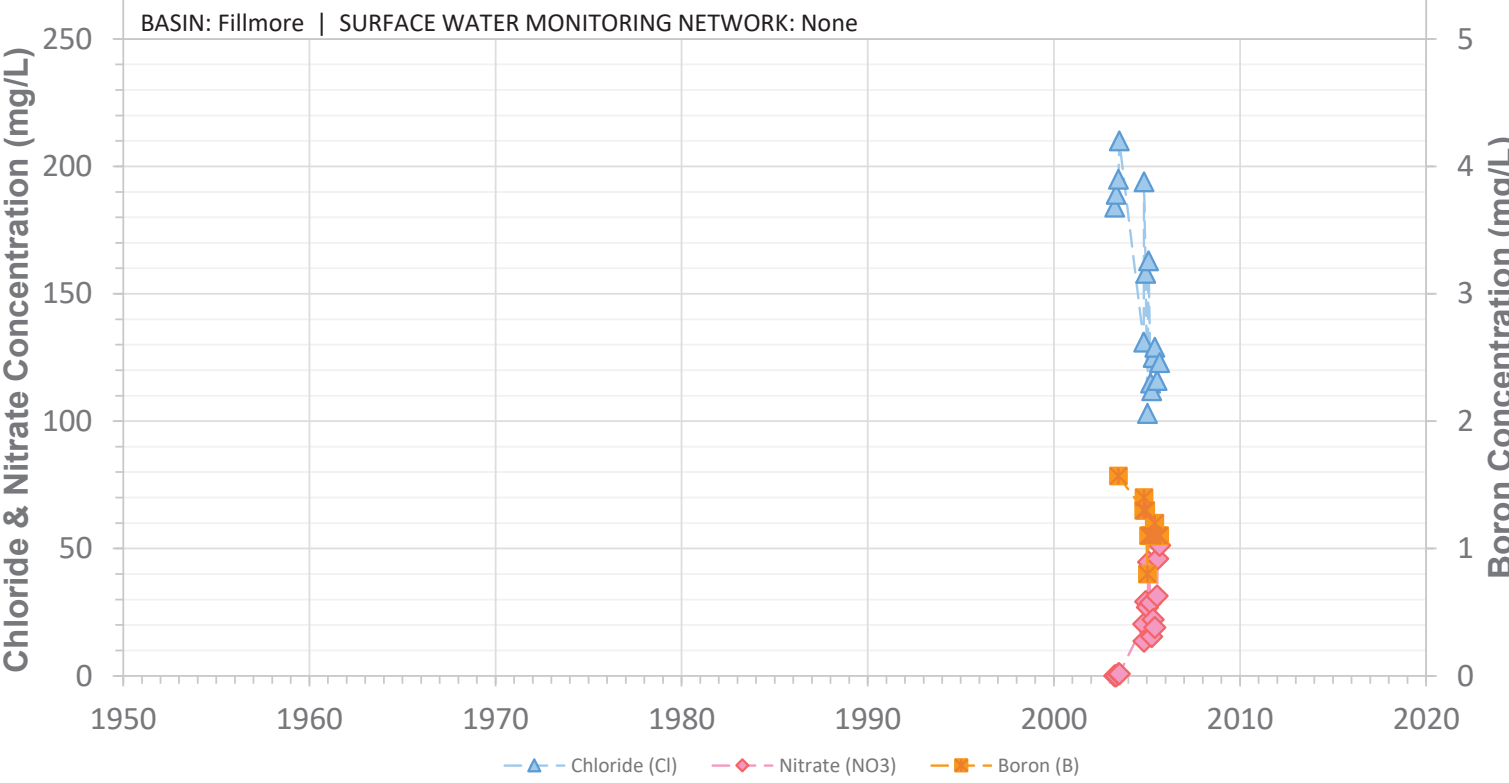
SURFACE WATER SAMPLING SITE NAME: Fillmore WRP, 300 ft downstream from discharge

04N20W36SW3



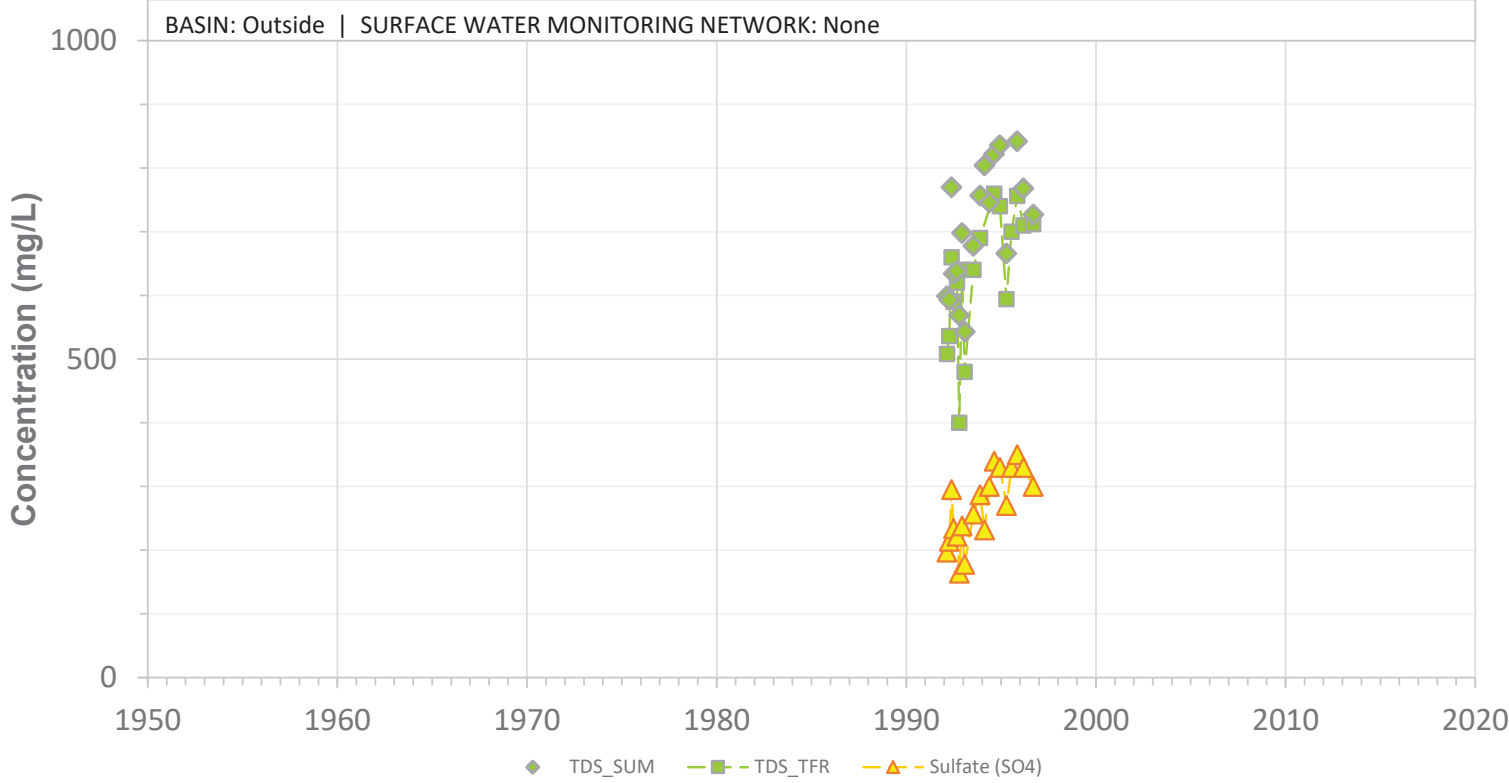
SURFACE WATER SAMPLING SITE NAME: Fillmore WRP effluent from Pond 5

04N20W36SW3



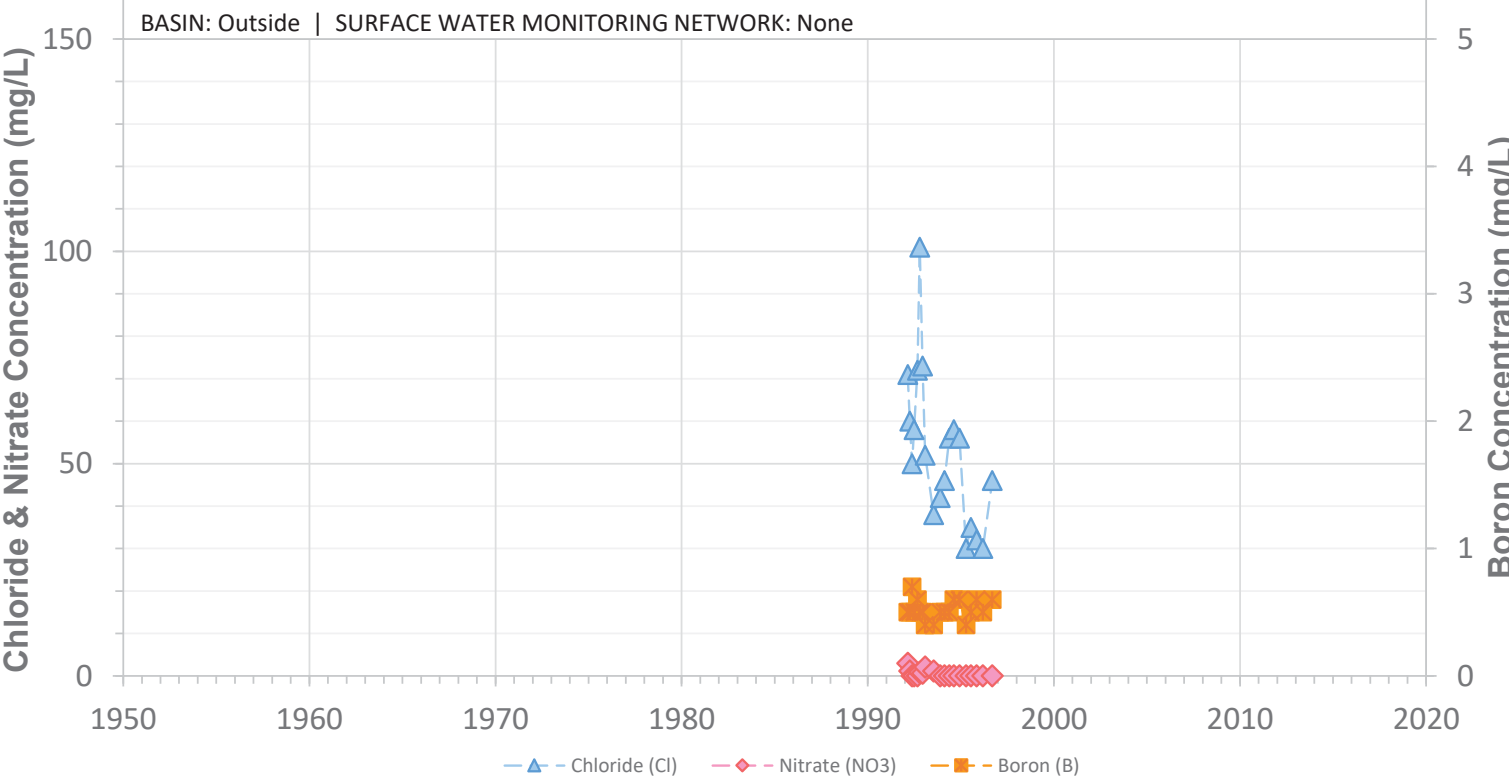
SURFACE WATER SAMPLING SITE NAME: Fillmore WRP effluent from Pond 5

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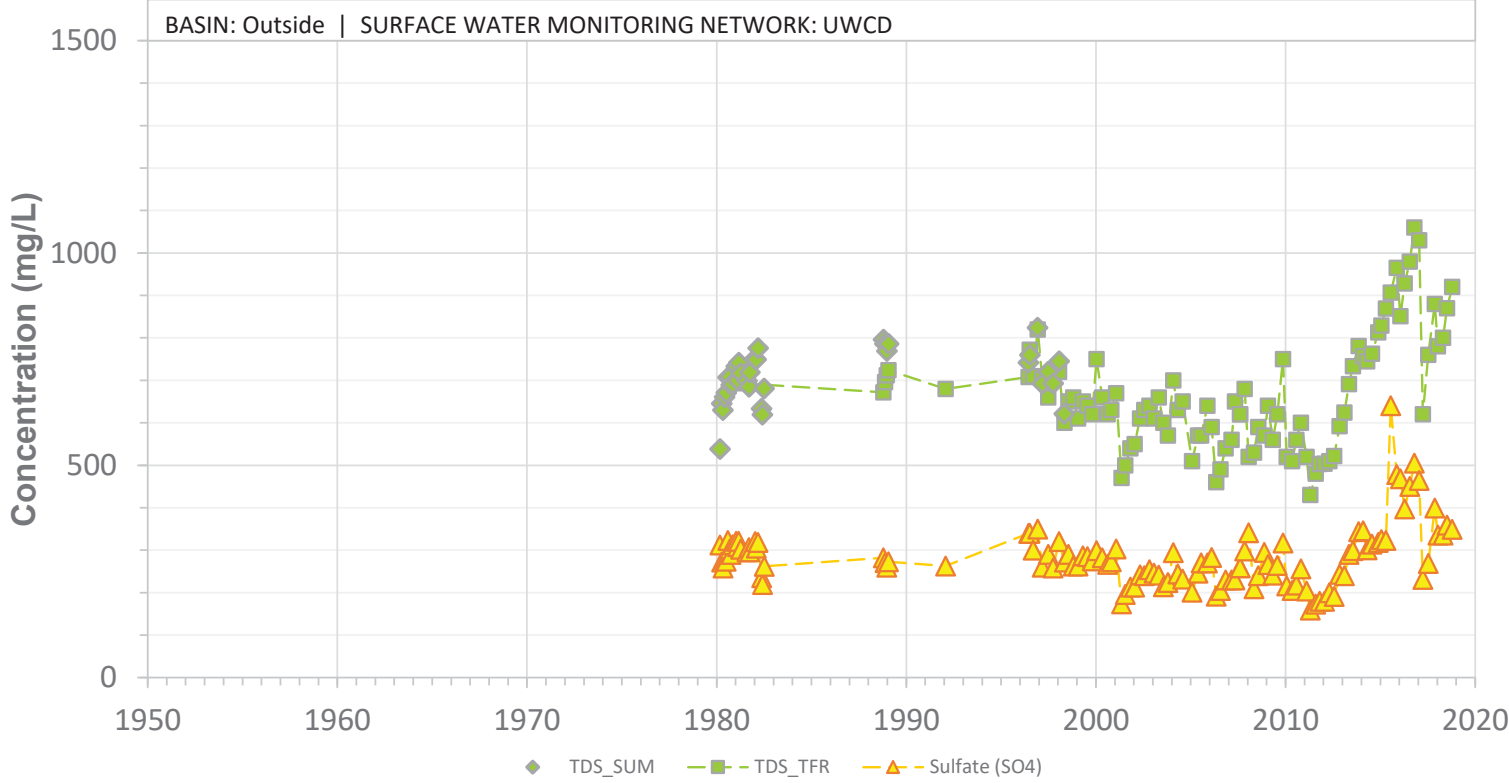
SURFACE WATER SAMPLING SITE NAME: Lake Piru at inlet

05N18W27SW1



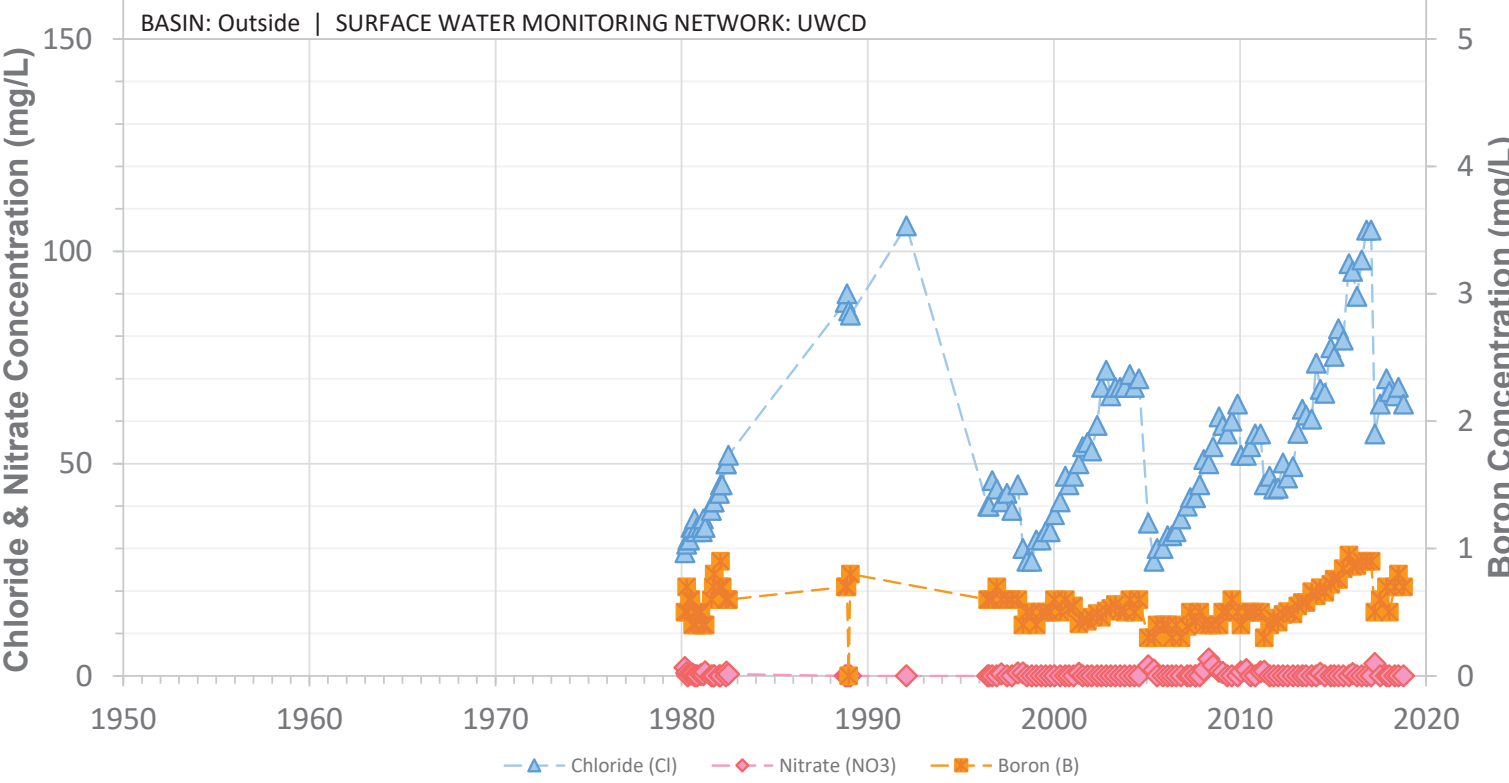
SURFACE WATER SAMPLING SITE NAME: Lake Piru at inlet

05N18W34SW1



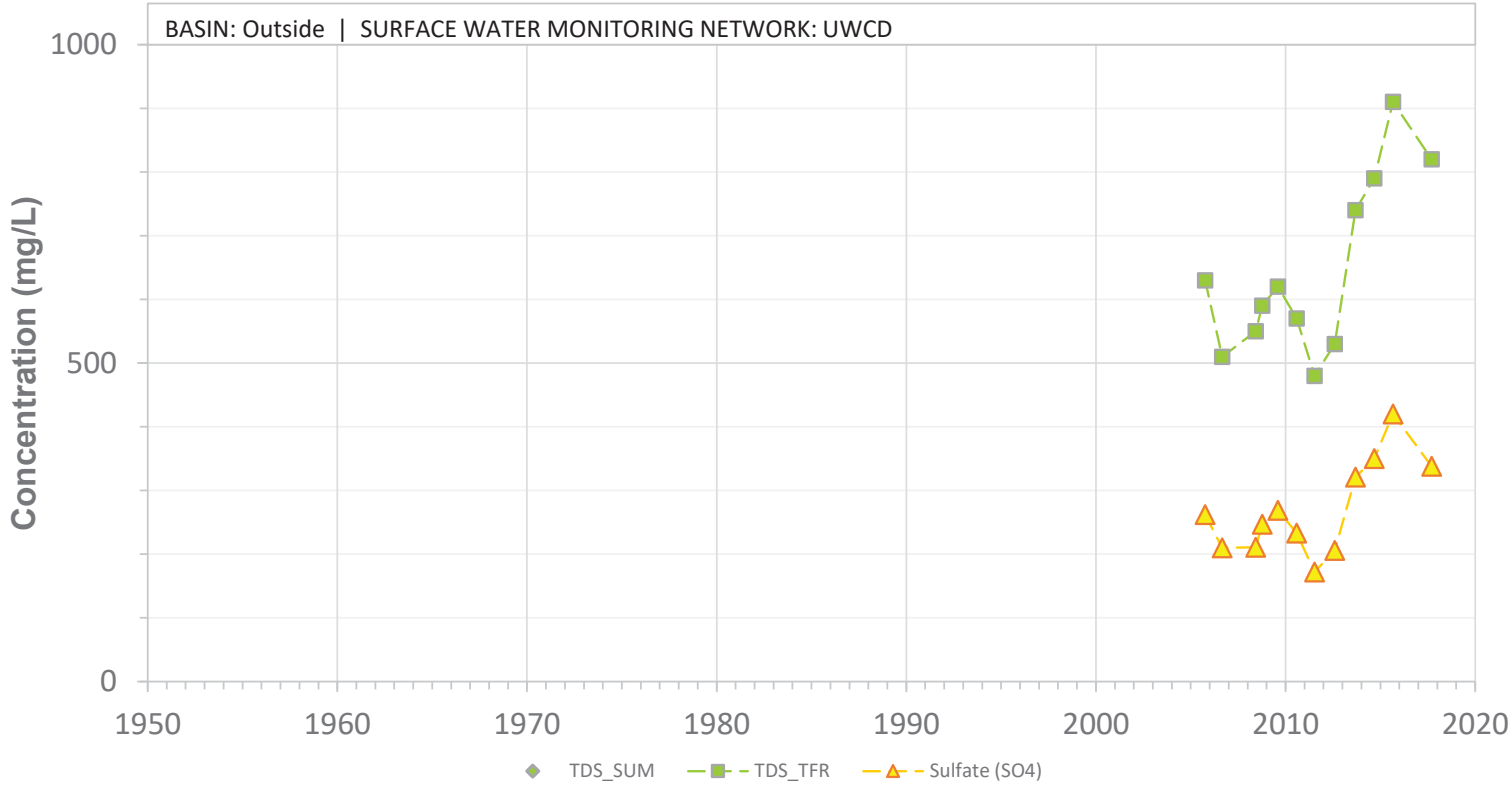
SURFACE WATER SAMPLING SITE NAME: Lake Piru at Marina

05N18W34SW1



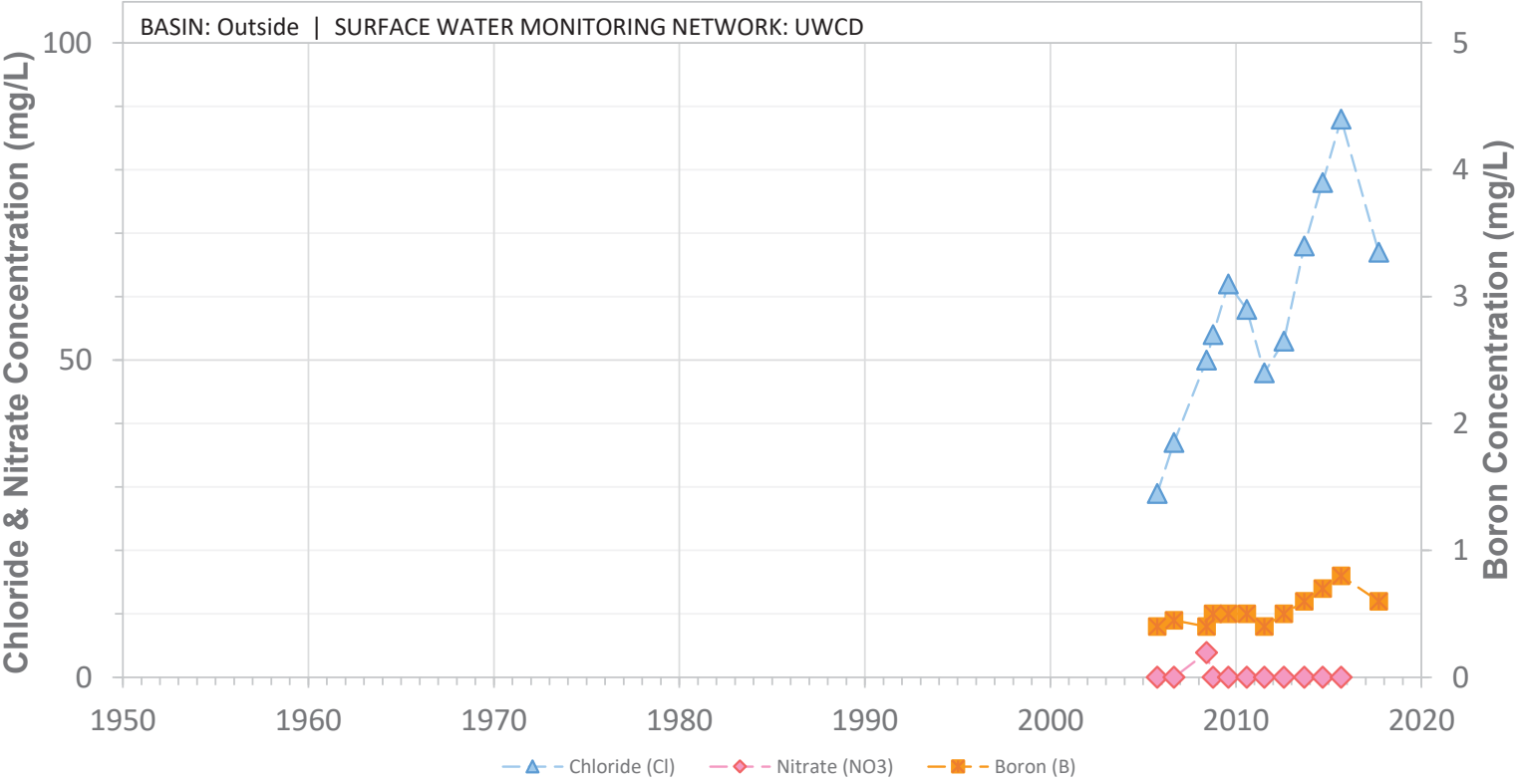
SURFACE WATER SAMPLING SITE NAME: Lake Piru at Marina

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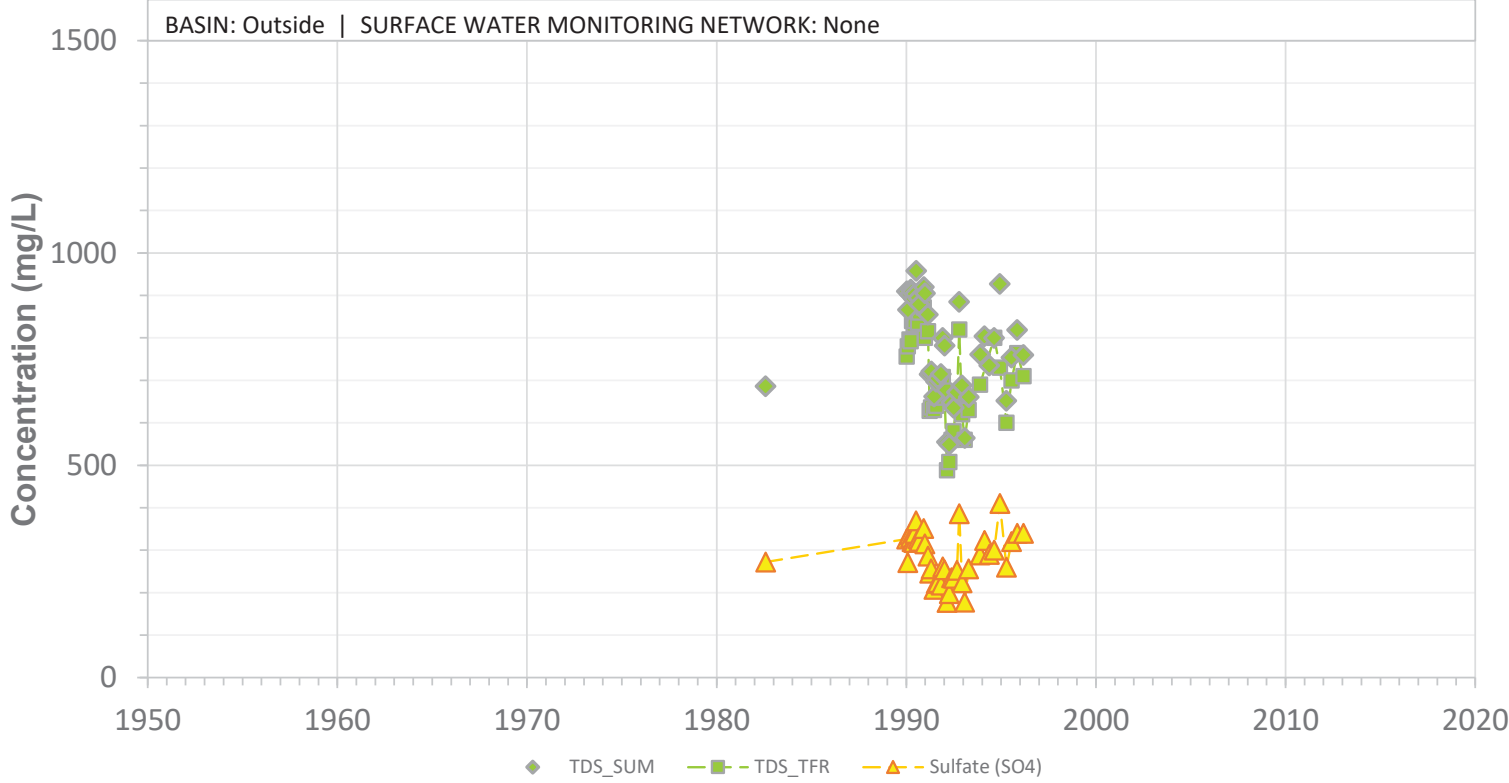
SURFACE WATER SAMPLING SITE NAME: Lake Piru raw water, near UWCD Lake Piru Park

05N18W34SW2



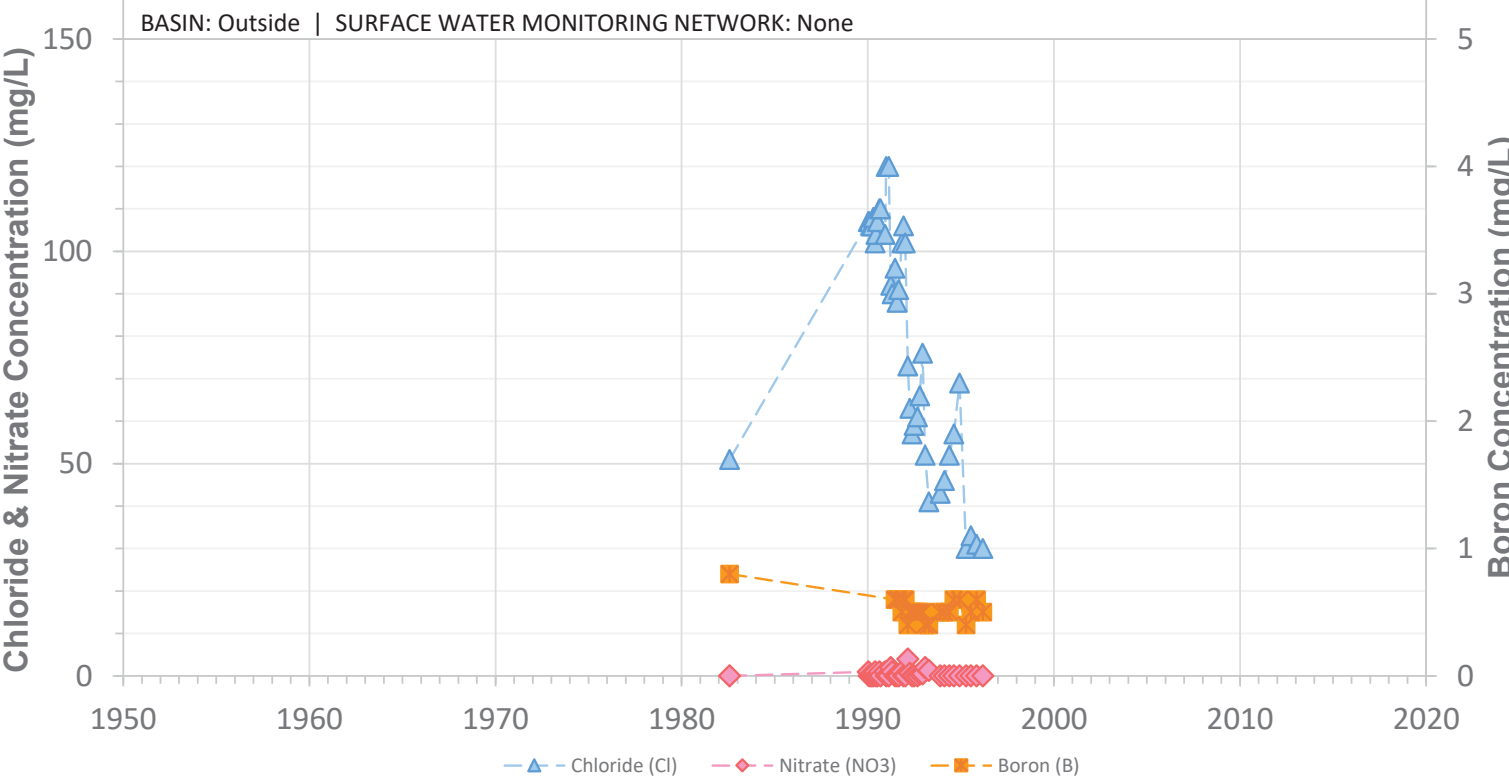
SURFACE WATER SAMPLING SITE NAME: Lake Piru raw water, near UWCD Lake Piru Park

05N18W35SW1



SURFACE WATER SAMPLING SITE NAME: Lake Piru at Santa Felicia Canyon

05N18W35SW1



SURFACE WATER SAMPLING SITE NAME: Lake Piru at Santa Felicia Canyon

Appendix L

Sampling and Analysis Plan (DBS&A, 2020)

FILLMORE AND PIRU BASINS: MONITORING PROTOCOLS AND STANDARD METHODS

SAMPLING AND ANALYSIS PLAN



Prepared for



Prepared by



DBS&A
Daniel B. Stephens & Associates, Inc.

3916 State Street, Suite 1A
Santa Barbara, California 93105

MAY 2020

*This Final Draft Sampling and Analysis Plan (SAP) is preliminary and is subject to
modification based on future analysis and evaluation.*

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- A Analytical Laboratory Information (FGL, Santa Paula)

Distribution List

Name and Affiliation	Copy No.
Fillmore and Piru Basins Groundwater Sustainability Agency	1
United Water Conservation District	2
Ventura County Watershed Protection District	3
City of Fillmore	4

List of Acronyms and Abbreviations

°C	degree(s) Celsius
ASTM	American Society of Testing and Materials
bgs	below ground surface
BMO	Basin Management Objective
BMP	Best Management Practices
DTW	depth-to-water
HCM	Hydrogeologic Conceptual Model
CASGEM	California Statewide Groundwater Elevation Monitoring
CDL	California Driver License
CCR	California Code of Regulations
CFR	Code of Federal Regulations
COC	chain of custody
DBS&A	Daniel B. Stephens & Associates, Inc.
DDW	SWRCB Division of Drinking Water
DO	dissolved oxygen
DQA	data quality assessment
DQO	data quality objective
DWR	California Department of Water Resources
EDD	electronic data deliverable
ELAP	California Environmental Laboratory Accreditation Program
EPA	U.S. Environmental Protection Agency
FPBGSA	Fillmore and Piru Basins Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HASP	health and safety plan
L	liter(s)
LCS	laboratory control sample
MD	matrix duplicate
MCL	maximum contaminant level
MDL	method detection limit
mL	milliliter(s)
MQO	measurement quality objective
MS	matrix spike
MSD	matrix spike duplicate

NAD	North American datum
NAVD	North American vertical datum
ORP	oxidation/reduction potential
OSHA	Occupational Safety and Health Administration
oz	ounce(s)
PARCC	precision, accuracy, representativeness, completeness, and comparability
PPE	personal protective equipment
QA	quality assurance
QC	quality control
PQL	practical quantitation limit
psi	pounds per square inch
RASA	regional aquifer-system analysis
RL	reporting limit
RP	reference point
RPD	relative percent difference
SAP	sampling and analysis plan
SOP	standard operating procedure
SVOC	semivolatile organic compound
SUM	summation
SWN	DWR state well number
SWRCB	California State Water Resources Control Board
TCLP	toxicity characteristic leaching procedure
TD	total depth
TDS	total dissolved solids
TFR	total filterable residue
TMDL	Total Maximum Daily Load
UWCD	United Water Conservation District
USGS	U.S. Geological Survey
VC	Ventura County
VCWPD	Ventura County Watershed Protection District
VOC	volatile organic compound
WLE	water level elevation

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1. Sampling and Analysis Plan Description and Management

Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this Sampling and Analysis Plan (SAP) for the Fillmore and Piru Basins Groundwater Sustainability Agency (FPBGSA or Agency) and is under contract to prepare their Sustainable Groundwater Management Act (SGMA) of 2014 mandated Groundwater Sustainability Plans (GSP or Plan). This SAP is intended to be included as an Appendix in the final GSPs. SGMA requires that separate Plans be prepared for each basin. Fillmore (DWR basin ID: 4-4.05) and Piru (4-4.06) subbasins (hereafter referred to as “basins”) (Figure 1) are hydrogeologically connected (UWCD, 2016) and have historically been managed and monitored together. In keeping with this historical precedent, this SAP has been prepared to cover both basins.

1.1 Introduction, Problem Definition and Background

This section describes the purpose of the SAP and provides background information.

1.1.1 Purpose of the SAP

The purpose of this Sampling and Analysis Plan (SAP) is to establish SGMA compliant monitoring protocols and standard methods for water quality and groundwater level data collection in the Fillmore and Piru basins. Water quality field sampling in the basins includes both groundwater and surface water. This SAP details:

- Water sample collection procedures;
- Analytical methods to be used;
- Groundwater level measurement protocol in water wells; and
- Data Quality Assurance (QA) and Quality Control (QC) procedures.

This SAP is not intend to impose specific schedules or monitoring wells and/or sampling locations on United Water Conservation District (UWCD) or Ventura County Watershed Protections District (VCWPD). The SAP is intended to formalize field techniques and procedures that UWCD and VCWPD may already have in place for their respective existing long-standing monitoring programs. A brief summary of these monitoring networks are presented later in this SAP.

1.1.2 Background

DBS&A has developed this SGMA-focused Sampling and Analysis Plan (SAP) as a companion document to the Monitoring Program Technical Memorandum (Tech Memo) deliverable. The Tech Memo will provide recommendations on filling data gaps (temporal and spatial). SGMA requires aquifer-specific evaluation (DWR, 2016b) which will be a challenge in these basins (and in many basins across the State) as many existing monitoring points utilize privately owned agricultural wells or municipal wells potentially screened across multiple water-bearing units.

The Tech Memo is anticipated to include, but is not necessarily limited to, descriptions of the following:

- Available groundwater level and water quality data;
- The two long-term groundwater level and water quality monitoring networks operated by UWCD and VCWPD;
- A trends analysis of groundwater level and groundwater quality constituents; and
- Recommendations on how refinement and expansion of the existing monitoring programs might minimize or eliminate data gaps, especially in critical areas.

1.1.3 Technical or Regulatory Guidelines and Guidance

In cooperation with UWCD, DBS&A has developed this SAP in accordance with California Department of Water Resources' (DWR) SGMA inspired Best Management Practices (BMP). This SAP has been prepared in accordance with DWR's BMP #1 - *Monitoring Protocols, Standards, and Sites* (DWR, 2016a). Technical guidance documents considered in preparation of this SAP include, but are not limited to, the following documents:

- *Guidance on Systematic Planning Using the Data Quality Objectives Process*, EPA QA/G-4 (EPA, 2006)
- *Requirements for Quality Assurance Project Plans*, EPA QA/R-5 (U.S. EPA, 2001)
- *National Field Manual for the Collection of Water-Quality Data* (USGS, individual Chapters published as separate documents)
- *Groundwater technical procedures of the U.S. Geological Survey: U.S. Geological Survey Techniques and Methods 1–A1* (USGS, 2011)

Much of the content contained in DWR's BMP #1 was directly applicable to the development of this SAP and BMP content has been liberally reproduced in this SAP. Additionally, a biennial Groundwater Conditions Report prepared by UWCD for the years 2014 and 2015 (UWCD, 2016)

was relied upon heavily in preparing the first Section of this SAP. In places, complete passages were reproduced in this SAP with only minor modifications. Links to complete documents, available online and cited in this SAP, are included in the References Section, where available.

This SAP has been prepared to satisfy criteria contained in 23 CCR § 352.2, § 352.4 and § 352.6. Monitoring protocols are to be reviewed and modified, as necessary, at least every five years as part of the periodic GSP evaluation (5 year updates).

1.1.4 SGMA Sustainability Indicators

Six sustainability indicators have been identified in the SGMA legislation that are effects caused by groundwater conditions occurring in a basin that, when significant and unreasonable, become undesirable results. The basins' GSPs will establish sustainable management criteria that will provide metrics for evaluating undesirable results relative to the sustainability indicators. Data must be sufficient to limit uncertainty when used to assess the sustainability indicators. The essence of the six indicators are listed below:

- Groundwater Levels;
- Groundwater Storage;
- Seawater Intrusion;
- Water Quality;
- Land Subsidence; and
- Interconnected Surface Water

“GSP Regulations allow GSAs to use groundwater elevation as a proxy metric for any (or potentially all) of the sustainability indicators when setting minimum thresholds and measurable objectives, provided the GSP demonstrates that there is a significant correlation between groundwater levels and the other metrics” (DWR, 2017).

It is anticipated that groundwater levels will be used as a proxy for assessing other sustainability indicators in the basins in establishing basins-specific sustainable management criteria so it was determined that groundwater level measurement protocols should be included as a component of this SAP.

1.1.5 U.S. EPA Data Quality Objective Process

Data collected in accordance with this SAP will be of a standardized level of quality that provides decision makers with a sufficient level of confidence in the accuracy of the data in which they rely to inform their policy decisions. This SAP describes procedures to assure that the basins-specific Data Quality Objectives (DQOs) are met, and that the quality of data are known and documented.

The following excerpt from DWR's BMP #1 recommends:

“Establishing data collection protocols that are based on best available scientific methods is essential. Protocols that can be applied consistently across all basins will likely yield comparable data. Consistency of data collection methods reduces uncertainty in the comparison of data and facilitates more accurate communication within basins as well as between basins.

Basic minimum technical standards of accuracy lead to quality data that will better support implementation of GSPs....

It is suggested that each GSP incorporate the Data Quality Objective (DQO) process following the U.S. EPA Guidance on Systematic Planning Using the Data Quality Objectives Process (EPA, 2006). Although strict adherence to this method is not required, it does provide a robust approach to consider and assures that data is collected with a specific purpose in mind, and efforts for monitoring are as efficient as possible to achieve the objectives of the GSP and compliance with the GSP Regulations” (DWR, 2016a).

DQOs are qualitative and quantitative statements developed through the seven-step DQO process (U.S. EPA, 2006). The DQOs clarify the study objectives, define the most appropriate data to collect and the conditions under which to collect the data, and specify acceptance criteria that will be used to evaluate whether the quantity and quality of data collected are sufficient to support decision making. The DQOs are used to develop a scientific and resource-effective design for data collection. Basins-specific DQOs are presented in Section 1.3.1 of this SAP.

1.1.6 QA/QC objectives

The overall QA/QC objectives are as follows:

- Obtain data of known quality to support goals set forth in the Fillmore and Piru basins GSPs

- Document all aspects of the quality program, including performance of the work and flexibility for changes to mitigate issues if they are discovered in the future
- Attain QC requirements for field measurements and analyses specified in this SAP

This SAP has been prepared with consideration of the EPA document, *Requirements for Quality Assurance Project Plans, EPA QA/R-5* (U.S. EPA, 2001). Table 1 provides a link between the EPA's guidance and this SAP, and identifies the sections of this SAP that address the elements of QA/R-5.

EPA QA/R-5 QAPP Element	FPBGSA SAP
A1 Title and Approval Sheet	Title and Approval Sheet
A2 Table of Contents	Table of Contents
A3 Distribution List	Distribution List
A4 Project/Task Organization	1.0 SAP Description and Management
A5 Problem Definition/Background	1.1 Introduction, Problem Definition and Background
A6 Project/Task Description	1.2 SAP Description
A7 Quality Objectives and Criteria	1.3 Quality Objectives and Criteria
A8 Special Training/Certification	1.4 SOPs, Special Training and Certification
A9 Documents and Records	2.1 WQ Field Activity Documentation and Record Keeping 3.1 WL Field Documentation and Record Keeping
B1 Sampling Process Design	
B2 Sampling Methods	2.2 Sampling Methods and Field Activities
B3 Sample Handling and Custody	2.3 Sample Handling, Custody and Laboratory Coordination
B4 Analytical Methods	2.5 Analytical Methods
B5 Quality Control	2.6 WQ Assurance and Quality Control 3.5 WL Quality Assurance and Quality Control
B6 Instrument/Equipment Testing, Inspection, and Maintenance	2.7 WQ Instrument and Equipment Testing, Inspection, and Maintenance Requirements 3.3 WL Equipment Testing, Inspection, and Maintenance Requirements
B7 Instrument/Equipment Calibration and Frequency	2.8 Instrument Calibration and Frequency
B8 Inspection/Acceptance of Supplies and Consumables	4.0 Requirements for Inspection and Acceptance of Supplies and Consumables
B9 Non-Direct Measurements	5.0 Non-Direct Measurements)
D2 Validation and Verification Methods	7.2 Verification Methods
B10 Data Management	6.0 Data Management
C1 Assessment and Response Actions	7.1 Assessment and Response Actions
C2 Reports to Management	7.2 Reports to Management

EPA QA/R-5 QAPP Element	FPBGSA SAP
D1 Data Review, Verification, and Validation	8.1 Data Review and Reduction Requirements
D3 Reconciliation with User Requirements	9.0 Reconciliation with Data Quality Objectives

Table 1. Summary of SAP cross-over with EPA QA/R-5 Requirements.

1.1.7 Geographic Description of the Basins

The geographic area covered by the SAP is the DWR Bulletin 118 Fillmore and Piru basins 2019 updated mapping outlined in red on Figure 1. The basins are alluvial groundwater basins located along the Santa Clara River Valley and fully within Ventura County, California. They are connected subbasins, as mentioned above, in a series that comprises the larger groundwater system that drains the Santa Clara River Watershed (UWCD, 2016).

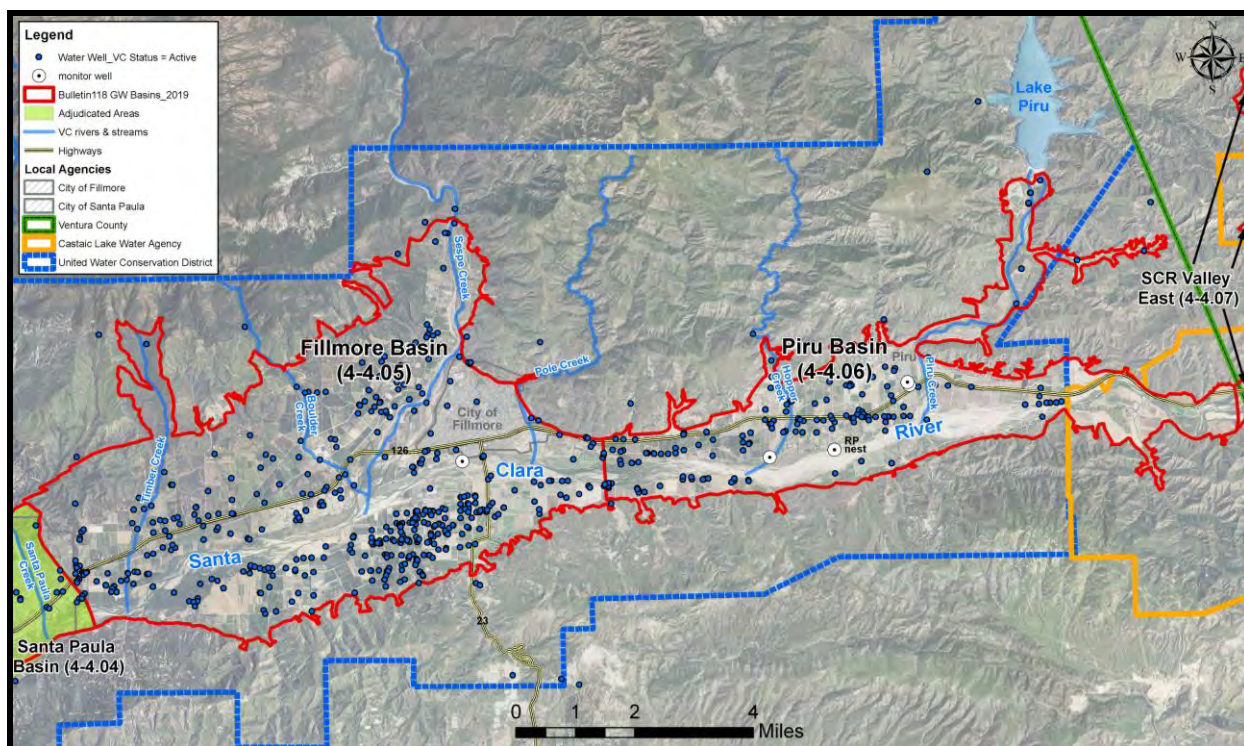


Figure 1: Fillmore and Piru basins area map showing Ventura County designated “Active” water wells and select monitoring wells.

The surface area of the Fillmore and Piru basins are approximately 22,600 acres (35 square miles) and 10,900 acres (17 square miles), respectively. Both basins are also located within UWCD’s boundaries, except for the eastern portion of the Piru basin (Figure 1). The City of Fillmore and the town of Piru are located within these basins, but the predominant land use is

agricultural (UWCD, 2016). The hydrogeologically connected adjudicated Santa Paula basin (DWR basin ID: 4-4.04) is west (down-gradient) of Fillmore basin and Santa Clara River Valley East basin (DWR basin ID: 4-4.07) is east (up-gradient) of Piru basin.

1.1.8 Physical Setting of the Basins

Groundwater aquifers in the basins consist of water-bearing unconsolidated alluvium (permeable material) beneath the ground surface from which groundwater can be extracted from a water well. Movement of groundwater through the alluvium is primarily controlled by water level elevation gradients.

The basins have historically been considered to be unconfined groundwater basins but recent draft (unpublished) mapping of the basins (see Section 1.2.1) shows a greater level of confinement (especially in the west portion of Fillmore basin) than has been historically understood (UWCD, presentation during the FPBGSA 9/27/2019 monthly meeting). Unconfined aquifers have a water-table as its upper boundary. The upper water surface (water-table) is at atmospheric pressure, and is therefore able to rise and fall within the upper and lower bounds of an aquifer. In the case of confined aquifers, the aquifer is fully saturated with water and bounded by layers of impermeable material (fine grained clay and silt) both above and below the aquifer, causing it to be under pressure so that when the aquifer is penetrated by a well, the water level (potentiometric surface) will rise above the top of the aquifer. The presence and characteristics of confined aquifers are presented here to provide context for considering the measurement of flowing wells presented later in this SAP.

The eastern boundary of the Piru basin is approximately 500 feet (0.1 miles) west of the Ventura/Los Angeles County Line. The alluvium of the eastern portion of Piru basin (i.e., the area outside of UWCD's boundary) is at a point where the alluvium is thin and underlain by non-water-bearing rocks. The western boundary of the Piru basin is located approximately one mile upstream of the City of Fillmore near the Fillmore Fish Hatchery. The topographic narrows in this vicinity result in a gaining reach of the Santa Clara River (UWCD, 2016).

The Fillmore basin is contiguous with and lies west of the Piru basin (Figure 1). The basin extends northward to include the Pole Creek fan and the greater floodplain of Sespe Creek, extending approximately four miles north of Highway 126. The western boundary of the Fillmore basin is located approximately 0.5 miles west of Willard Road, which is just east of the City of Santa Paula

and is also distinguished by an area of rising groundwater (a gaining reach of the river) (UWCD, 2016).

Groundwater flow in the Fillmore and Piru basins generally moves east-to-west through the alluvium. Groundwater recharge to Fillmore basin from Sespe Creek generally flows towards the southwest (Mann, 1959).

1.1.9 Historical and Current Groundwater Management in the Basins

California Assembly Bill 3030 was enacted in 1992, which established in the California Water Code sections 10750-10756, a systematic procedure for a local agency to develop a groundwater management plan. Subsequently, in 1995, a Memorandum of Understanding (M.O.U.) was signed among UWCD, the City of Fillmore, water companies and other pumpers with the intent to produce an AB 3030 groundwater management plan (adopted in 1996) that would be a cooperative plan for the basins. The Plan outlined the roles of the various parties in implementing a groundwater management program, including the establishment of a Groundwater Management Council to manage the Plan (UWCD, 2016).

SB 1938 (2002) and AB 359 (2013) required additional elements be included in all AB 3030 management plans, and an updated Draft Piru/Fillmore Basins AB 3030 Groundwater Management Plan (Piru/Fillmore Basins Groundwater Management Council, 2013) was submitted to the AB 3030 Groundwater Management Council in 2011 but was never formally adopted and therefore never finalized. The Draft Plan update included Basin Management Objectives (BMOs) for groundwater quality and surface water quality and groundwater elevation at various locations (UWCD, 2016).

Annual, and later, biennial reports were produced by UWCD to synthesis available up-to-date data for the Council and basins stakeholders. A final biennial groundwater conditions report (UWCD, 2016) in the series was prepared for years 2014 and 2015. The biennial report contained recent and historical hydrologic information related to the Fillmore and Piru basins. As mentioned above, much of the information contained in the first Chapter of this SAP has relied on this report. The AB 3030 process has since been superseded by the Sustainable Groundwater Management Act.

The Fillmore and Piru Basins Groundwater Sustainability Agency, since its formation in 2017, has been responsible for management of the basins. The Agency is a joint powers authority comprised

of the following three local public agencies: County of Ventura, City of Fillmore, and UWCD. The Board consists of six Directors: three Member Directors (i.e., County of Ventura, City of Fillmore and UWCD), two groundwater Pumper Stakeholder Directors (one representing each basin), and an Environmental Stakeholder Director (FPBGSA Bylaws, 2018).

UWCD is authorized under the California Water Code to conduct water resource investigations, acquire water rights, build facilities to store and recharge water, construct wells and pipelines for water deliveries, commence actions involving water rights and water use, and prevent interference with or diminution of stream/river flows and their associated natural subterranean supply of water (California Water Code, section 74500 et al.). The County of Ventura exercises water management and land use authority on land overlying the entire county including Fillmore and Piru Basins. The City of Fillmore is a local municipality that exercises water supply, water management, and land use authority within the city's boundaries.

The Pumper Stakeholder Directors appointed to the FPBGSA Board are currently the president of the Fillmore Pumpers Association and president of the Piru Pumpers Association. An Environmental Stakeholder Director has been appointed to the Board representing a diverse group of environmental stakeholders including several advocacy groups active in the basins.

1.1.10 Summary of Existing Monitoring Networks

The Groundwater Department of UWCD and the Water Resources Division of VCWPD have existing long-standing monitoring networks in the basins. The U. S. Geological Survey (USGS) has historically conducted studies in the basins but does not routinely monitor for water quality or groundwater level in wells in the basins. Some of these studies have included targeted data collection programs and have contributed to the available datasets in the basins. The USGS installed the only nested (multi-depth) groundwater monitoring facility in the basins (labeled "RP nest" in Figure 1) as part of their Regional Aquifer-System Analysis (RASA) Program.

Surface water discharge conditions are monitored in the basins by various entities that include, UWCD, VCWPD and the USGS. Periodic instream measurements are collected by these entities by field staff with top setting wading rods equipped with flow velocimeters. Fixed gauge recording stations fitted with telemetry systems (e.g., attached to a bridge) are also operated in the basins. Surface water discharge is beyond the scope of this SAP.

1.1.10.1 Groundwater Quality

Groundwater monitoring in the basins is conducted by several organizations. VCWPD annually samples production wells within the basins in the fall (VCWPD, 2016). UWCD samples monitoring and production wells in the basins biannually in the spring and fall in order to evaluate the quality of groundwater within their boundary (UWCD, 2016).

For water purveyors' wells, monitoring of a variety of regulated constituents, including biological constituents, is required by law and ensures that groundwater is safe for potable use. These data are available from the California State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) (UWCD, 2016). Other sources of information may include, but are not limited to, the following:

- California Department of Water Resources;
- City of Fillmore potable water supply wells;
- Waste Water Treatment Plants (i.e., City of Fillmore, Ventura County Waterworks District #16 servicing the unincorporated town of Piru, and Los Angeles County Sanitation District operated Saugus and Valencia plants);
- Landfill (i.e., Toland Road) operators;
- Consultant reports and technical studies; and
- Individual well owners.

1.1.10.2 Surface Water Quality

UWCD conducts monthly surface water sampling for Total Dissolved Solids (TDS), chloride and nitrate in the Santa Clara River downstream of the Ventura/Los Angeles County Line (Figure 1). On a quarterly basis surface water samples are collected for general mineral analysis from the Santa Clara and tributaries at approximately eight locations. On alternate quarters, UWCD has a reduced suite of analytes run for some sample locations (UWCD, 2016). VCWPD does not routinely sample surface water in the basins.

1.1.10.3 Groundwater Level

Groundwater levels are measured in wells included on VCWPD and UWCD's respective water level monitoring network lists. Measurements are made with either a steel survey tape, acoustic sounder (VCWPD only), dual-wire or single-wire electric sounder. A few private well owners and purveyors of pumped groundwater in the basins are known to measure and maintain water level

records for their wells. VCWPD monitors groundwater levels in wells on a quarterly basis (VCWPD, 2016) and UWCD conducts its monitoring on monthly, bimonthly, semi-annual or event-based schedules. A few wells in the basins are monitored by both UWCD and VCWPD staff. The overlap between VCWPD and UWCD's monitoring networks is useful as a QA/QC measure to ensure consistency between data collected by the different entities (UWCD, 2016).

Approximately 75 wells are measured for groundwater level in wells within the Fillmore and Piru basins. In 2014 and/or 2015 there were 40 wells monitored for water level in the Fillmore basin (VCWPD monitored 14 and UWCD monitored 30 wells). It is unknown if the City of Fillmore has monitored water levels in their wells in recent years. A total of 34 reported wells were monitored for groundwater levels in the Piru basin during the same years (VCWPD monitored 8 and UWCD monitored 28 wells). In 2015, UWCD had 9 wells in Fillmore basin and 7 wells in Piru basin equipped with pressure transducers (with data loggers) that record groundwater levels every four hours (UWCD, 2016).

The California Statewide Groundwater Elevation Monitoring (CASGEM) Program is a collaboration between local monitoring parties and DWR to collect statewide groundwater elevation measurements from wells in each basin throughout the State. Much of the water level data collected by VCWPD and UWCD is reported to the State and made publicly available as part of the program. VCWPD acts as the CASGEM Umbrella Monitoring Entity for water level data collected in Ventura County. Data is uploaded a minimum of two times per year to the CASGEM website (VCWPD, 2016).

1.1.11 Principal Decision Makers

The SAP principal decision makers are the Fillmore and Piru Basins GSA Board of Directors. These decision makers will use data collected in accordance with this SAP in their basins management decision making process. Information regarding the six member Board composition, representation, and the formation and legal authority of the three GSA founding local public agencies is included in Section 1.1.9 of this SAP.

1.2 SAP Description

This section describes the SAP data collection objectives and measurements for the basins.

This SAP addresses collection of water quality and groundwater level data indicative of the sustainability of human and environmental beneficial uses of groundwater in the basins. Additional analyses considerations may be necessary to address ecological receptors.

1.2.1 Basins Hydrogeologic Conceptual Model

A basins HCM is currently being updated by UWCD as part of their efforts to append the river basins (Santa Paula, Fillmore and Piru basins) to their Ventura Regional Groundwater Flow Model. The Model is anticipated to include calibration that is sensitive to groundwater and surface water interactions. The updated conceptual model documentation will be included as a component of FPBGSA's GSPs.

1.2.1.1 Analyses of Concern

Historically water quality data analytes (chemicals) of concern in the basins have generally included, but are not necessarily limited to, the following analytes:

- Total Dissolved Solids (TDS);
- Sulfate;
- Chloride;
- Nitrate; and
- Boron

These analytes have been used historically as water quality indicators of the “health” of the basins. As mentioned above, BMOs were established for groundwater quality, surface water quality and groundwater elevation at various locations in the Draft AB 3030 Groundwater Management Plan update.

BMOs for groundwater elevations were established for various “key” wells in the basins. The BMOs for these wells were intended to sustain groundwater elevations above the then lowest recorded level of the 1984 to 1991 drought. The recent drought ending in 2017, spanned a period where most wells in the basins reached historical low groundwater levels.

The lowest water level recorded for each well from the 1984-91 period was established as the BMO in the Draft Plan update. Benchmark #1 was the 2004 low water level year (final year of a 6 year moderately dry period) and benchmark #2 was defined as halfway between benchmark #1

and the BMO for each key well (UWCD, 2016). These BMOs are mentioned here to provide context for historical concern of water quality and groundwater level.

1.2.1.2 Historically Established Potential Sources of Groundwater Contamination

From 1951 to 1968 elevated concentrations of TDS, sulfate, chloride and boron were recorded near the Ventura/Los Angeles County Line, and is generally attributed to the surface discharge of oil field brines prior to the enactment of the Federal Clean Water Act (UWCD, 2016). However, high TDS and chloride persisted in Santa Clara River in surface water sampled at the County Line and in local groundwater after passage of the Clean Water Act.

The main water quality concern over the past twenty years for agricultural users in the Piru basin has been impacts associated with high chloride concentrations in the Santa Clara River flows sourcing from Los Angeles County, much of which originates as discharge from the Valencia wastewater treatment plant in Santa Clarita. The high chloride concentrations in the eastern portion of the basin associated with these discharges has made a steady advance westward with groundwater flow down the Piru basin (UWCD, 2016).

1.2.1.3 Groundwater Flow Paths and Potential Migration Pathways

Groundwater flow in the Fillmore and Piru basins generally moves east-to-west through the alluvium. Groundwater recharge to Fillmore basin from Sespe Creek generally flows towards the southwest (Mann, 1959). Site-specific flow paths in the basins and groundwater gradients are often influenced by localized and/or transient pumping depressions induced by well fields and individual wells pumped at high extraction rates.

The following are offered as general groundwater migration pathways of contaminants and are not specific to the Fillmore and Piru basins. Groundwater contaminants may migrate by advection and dispersion, volatilize to soil gas, and ultimately disperse into the atmosphere, or may become adsorbed to aquifer soils. Groundwater flow may redistribute contaminants within the shallow groundwater environment or transfer them to deeper aquifers.

1.2.1.4 Receptors

The predominated land use in the basins is for agricultural purposes. Other land uses consist of residential, commercial/industrial, and open space. Potable groundwater produced for human use and consumption is monitored and regulated by the SWRCB Division of Drinking Water (large

water systems) and the Ventura County Resource Management Agency Environmental Health Division (small water systems).

Elevated chloride concentrations in the surface water crossing the Ventura/Los Angeles County Line impairs its value as irrigation water when diverted from the river, and the long-term recharge of this water has been recognized to be degrading the groundwater in the eastern Piru basin (UWCD, 2016).

A Los Angeles Regional Water Quality Control Board (RWQCB-LA) sponsored Agricultural Threshold Study conducted in Piru basin established a chloride concentration that will be protective of salt sensitive crops such as avocados, strawberries and nursery crops. The first phase included an extensive literature review and then an evaluation of the literature review. In September 2005 the evaluation of the literature review was published. It was determined for avocados that chloride damage will begin to occur somewhere between 100 mg/L and 120 mg/L (CH2MHILL, 2005). Existing studies did not provide sufficient threshold data for strawberries or nursery crops. A chloride objective of 117 mg/L was proposed for surface water in the eastern Piru basin (UWCD, 2016).

1.2.2 Objectives

The primary objectives of this SAP are as follows:

- Describe water sample collection procedures;
- Analytical methods to be used;
- Groundwater level measurement protocol in water wells; and
- Data Quality Assurance (QA) and Quality Control (QC) procedures.

1.2.3 Tasks

SAP tasks include the following:

- Data collection planning and support;
- Management;
- Field acquisition of data; and
- Data review and validation.

Field activities should be conducted in accordance with this SAP to ensure proper sample management, including accurate chain of custody procedures for sample tracking, protective

sample packaging techniques, and proper sample preservation techniques, as well as compliance with any applicable site-specific health and safety plans (HASP) (not included as part of this SAP).

1.3 Quality Objectives and Criteria

The following subsections present the DQOs and measurement quality objectives (MQOs) for the basins.

1.3.1 Data Quality Objectives

The seven steps of the DQO process for this SAP are presented in Table 2. Key to systematic planning is determining whether the problem to be solved requires a quantitative or qualitative answer (U.S. EPA, 2006).

Step 1: State the Problem
<ul style="list-style-type: none">Multiple entities collect water quality and water level data in the basins and basic minimum technical standards of accuracy are needed to ensure quality data are collected that will better support GSP implementation and FPBGSA policy decisions. Data must be sufficient to limit uncertainty when used to assess the sustainability indicators.
Step 2: Identify the Goal(s)
<ul style="list-style-type: none">Establish data collection protocols that are based on best available scientific methods. Protocols that can be applied consistently across the basins will likely yield comparable data. Consistency of data collection methods reduces uncertainty in the comparison of data and facilitates more accurate communication within basins as well as between basins.
Step 3: Identify the Inputs
<ul style="list-style-type: none">Groundwater Quality Sampling of Water Wells (dedicated monitor wells will be sampled where available)Surface Water Quality SamplingGroundwater Level Measuring in Water Wells (dedicated monitor wells will be sampled where available)
Step 4: Define the Boundaries of the Study
<ul style="list-style-type: none">The horizontal study boundaries are defined as the boundaries of the Fillmore (4-4.05) and Piru (4-4.06) subbasins.The vertical boundaries are defined as the base of groundwater below ground surface that is of a quality and quantity that it can be beneficially used.There is no foreseeable temporal boundary as up-to-date water quality and water level data will continue to be necessary through GSP implementation and into the future to ensure sustainability in the basins is maintained once achieved.
Step 5: Develop an Analytical Approach
<ul style="list-style-type: none">Groundwater quality samples will be compared to the FPBGSA approved sustainable management criteria protective of water quality in the basins.Groundwater levels will be compared to the FPBGSA approved sustainable management criteria protective of groundwater levels in the basins and any sustainability indicators in which water level is established as a viable proxy in the basins' GSPs.
Step 6: Specify Performance or Acceptance Criteria

<ul style="list-style-type: none"> • Quality assurance samples will be collected during the sampling to evaluate sampling techniques and consistency. • Analytical results will be evaluated within their own tolerance limits and compared to appropriate screening levels. • Water quality samples will be analyzed using EPA methods that have been selected based on the reporting limits (RLs). RLs should be at a resolution that are sensitive enough to meet basins' DQOs.
Step 7: Develop a Plan for Obtaining Data
<ul style="list-style-type: none"> • It is not the purpose of this SAP to establish specific monitoring points but to equip the field data collecting entities active in the basins to collect data that is of a quality that will support sustainability monitoring in the basins. • The protocols established in this SAP will allow for consistency of data collection across the basins and will reduce uncertainty in data comparisons.

Table 2. Data Quality Objectives.

1.3.2 Measurement Quality Objectives

Analytical results of water quality samples should be evaluated in accordance with precision, accuracy, representativeness, completeness, and comparability (PARCC) and sensitivity parameters to document the quality of the data and to ensure that the data are of sufficient quality to meet the SAP objectives. Of these PARCC parameters, precision and accuracy should be evaluated quantitatively by collecting the QC samples listed in Table 3. The following subsections describe each of the PARCC parameters and how they will be assessed within this SAP.

Data Quality Indicator	QC Check Sample	Acceptance Criteria
Precision (RPD)	MS/MSD Field duplicates	35% RPD 50% RPD
Accuracy (Percent recovery)	MS and MSD Blanks ^a	50 to 150% recovery Less than MDL
Representativeness	The sampling methods and the analytical methods described in this SAP are designed to provide data that are representative of site conditions.	
Completeness	The objective for data completeness is 90%.	
Comparability	The use of standard published sampling and analytical methods, and the use of QC samples, will ensure data of known quality. These data can be compared to any other data of known quality.	
Sensitivity	Not applicable	RLs and laboratory RLs sensitive to basins' DQOs.

^a May include method blanks, reagent blanks, instrument blanks, calibration blanks, and other blanks collected in the field (such as field blanks)

QC = Quality control

MS = Matrix spike

RPD = Relative percent difference

MSD = Matrix spike duplicate

MDL = Method detection limit

Table 3. Data Quality Indicators for Water Quality Sample Laboratory Analysis.

1.3.2.1 Precision

Precision is the degree of mutual agreement between individual measurements of the same chemical property under similar conditions. Usually, combined field and laboratory precision is evaluated by collecting and analyzing field duplicates and then calculating the variance between the samples, typically as a relative percent difference (RPD).

RPD is calculated as follows:

$$RPD = \frac{|A - B|}{(A + B)/2} \times 100\%$$

where A = First duplicate concentration

B = Second duplicate concentration

Field sampling precision can be evaluated by analyzing field duplicate samples. It is recommended that for every 10 samples collected, 1 blind duplicate sample should be collected. However, this may not be necessary for inorganic analytes with low risk of contamination during sampling and are analyzed by straight forward standardized laboratory methods.

Laboratory analytical precision is evaluated by analyzing laboratory duplicates or matrix spike (MS) and matrix spike duplicate (MSD) samples. For this SAP, MS/MSD samples should be generated for all analytes. The results of the analysis of each MS/MSD pair should be used to calculate the RPD as a measure of laboratory precision.

1.3.2.2 Accuracy

A program of sample spiking should be conducted to evaluate laboratory accuracy. This program includes analysis of the MS and MSD samples, laboratory control samples (LCSs) or blank spikes, surrogate standards, and method blanks. MS and MSD samples should be prepared and analyzed at a frequency of 5 percent. LCSs or blank spikes are also analyzed at a frequency of 5 percent. Surrogate standards, where available, are added to every sample analyzed for organic constituents. The results of the spiked samples are used to calculate the percent recovery for evaluating accuracy.

$$\text{Percent Recovery} = \frac{S - C}{T} \times 100\%$$

where S = Measured spike sample concentration

C = Sample concentration

T = True or actual concentration of the spike

1.3.2.3 Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represent the characteristics of a population, variations in a parameter at a sampling point, or an environmental condition that they are intended to represent. For this SAP, representative data are anticipated to be obtained through careful selection of sampling locations and analytical parameters. Representative data will be obtained through proper collection and handling of samples to avoid interference and minimize contamination.

Representativeness of data can be ensured through the consistent application of established field and laboratory procedures. Field blanks (if appropriate) and laboratory blank samples should be evaluated for the presence of contaminants to aid in evaluating the representativeness of sample results. Data determined by comparison with existing data to be non-representative should be used only if accompanied by appropriate qualifiers and limits of uncertainty. However, this may not be necessary for inorganic analytes with low risk of contamination during sampling and are analyzed by straight forward standardized laboratory methods.

1.3.2.4 Completeness

Completeness is a measure of the percentage of basins-specific data that are valid. Valid data are obtained when samples are collected and analyzed in accordance with QC procedures outlined in this SAP, and when none of the QC criteria that affect data usability are exceeded.

When all data validation is completed, the percent completeness value should be calculated by dividing the number of usable sample results by the total number of sample results planned for this investigation.

Completeness should also be evaluated as part of the data quality assessment (DQA) process (U.S. EPA, 2000). This evaluation will help determine whether any limitations are associated with the decisions to be made based on the data collected.

1.3.2.5 Comparability

Comparability expresses the confidence with which one dataset can be compared with another. Comparability of data can be achieved by consistently following standard field and laboratory procedures and by using standard measurement units in reporting analytical data.

1.3.2.6 Detection and Quantitation Limits

The method detection limit (MDL) is the minimum concentration of an analyte that can be reliably distinguished from background noise for a specific analytical method. The MDL for each analyte should be listed as the detection limit in the laboratory's electronic data deliverable (EDD). The practical quantitation limit (PQL) represents the lowest concentration of an analyte that can be accurately and reproducibly quantified in a sample matrix by a specific method. Reporting limits (RL or RDL) may vary from lab-to-lab and are the lowest detection of an analyte from a sample after any sample dilution adjustments have been accounted for. Analyte concentrations below the RL are reported as not detectable. Sometimes laboratory results can be obtained for analytes below the PQL but these results should be reported as estimated values if concentrations are less than MDLs. For potable water samples, the U.S. EPA and many states have established water regulations for Maximum Contamination Levels (MCL) for primary and secondary contaminants. In California, state drinking water MCLs are often lower than the national regulations.

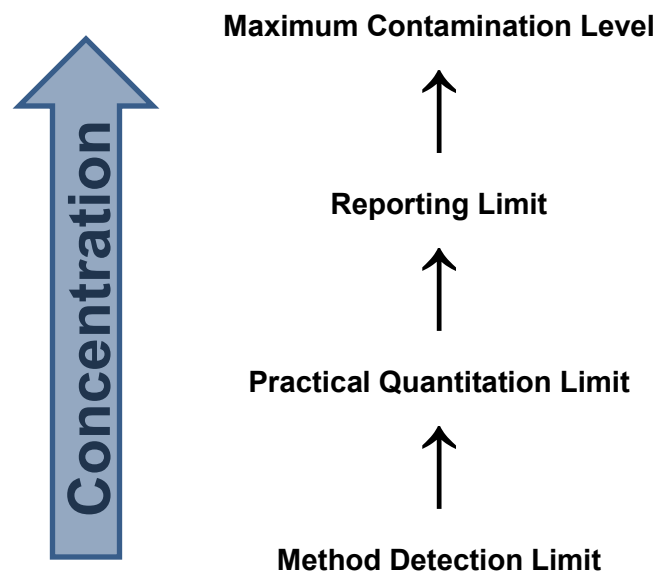


Figure 2. Laboratory water quality analysis detection and quantitation limits diagram.

1.4 SAP Personnel Organization

Personnel involved in SAP implementation are listed in Table 4, and shown as an organization chart in Figure 3.

Individual	Role in SAP	Organizational Affiliation	Contact Information
	Data Clearing House	UWCD	
	QA Officer	UWCD/FPBGSA	
Tony Emmert	SAP Manager	UWCD (FPBGSA Executive Director)	
Board of Directors	Policy/Decision Maker	FPBGSA	
	Regulatory Agency	DWR	

Table 4. SAP Implementation Personnel

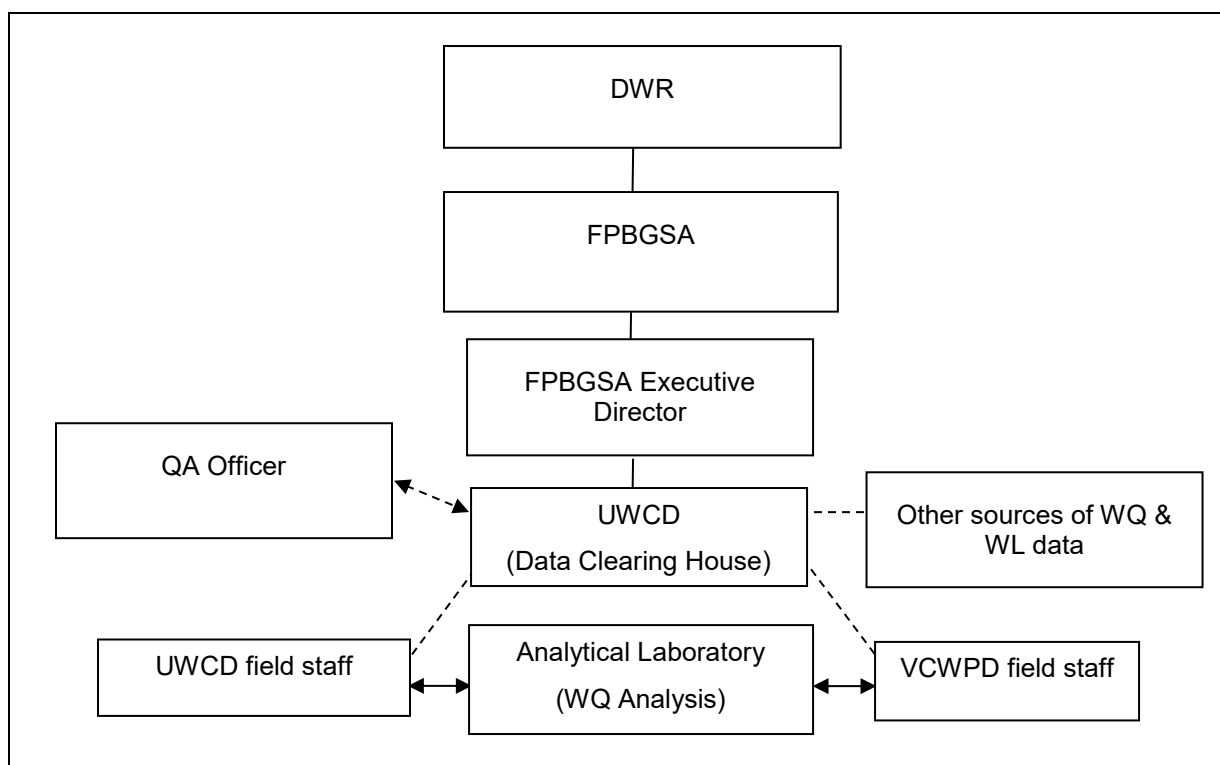


Figure 3: Organizational Chart

1.5 Standard Operating Procedures, Special Training and Certification

This section outlines potential Standard Operating Procedure development, field staff training, and certification requirements that may be necessary to complete the activities described in this SAP.

1.5.1 Standard Operating Procedures

It is recommended that individual monitoring entities develop and maintain Standard Operating Procedures for all field program activities. Table 5 lists recommended SOPs that should be developed (or updated as necessary) and implemented, if not currently in place, by monitoring entities in accordance with DWR's BMP #1 - *Monitoring Protocols, Standards, and Sites* (DWR, 2016a) and guidance from USGS reference documents cited in this SAP.

SOP Title
General Requirements
Equipment
Field Notes
Decontamination of Field Equipment
Water Sampling
Preparation for Water Sampling
Measurement of Field Parameters
Collection of Groundwater Samples
Collection of Surface Water Samples
Sample Preservation
Sample Filtration
Quality Assurance/Quality Control (QA/QC) Samples
Water Sampling
Measurement of Water Levels in Wells

SOP Title
Pressure Transducer & Data Logger: Deployment, Download, Maintenance and Troubleshooting
Quality Assurance/Quality Control (QA/QC) Water Levels

Table 5. List of potential Standard Operating Procedures

1.5.2 Equipment Operator Certifications and Licenses

Individual monitoring network managers and supervisors are responsible for ensuring that all field personnel are properly trained and certified in the activities they perform. Field sampling sometimes requires the use of specialized equipment that may require certification and training to safely operate.

Drivers of sampling vehicles may require possessions of a Class B California Driver License (CDL). The State requires the operator of any single vehicle with a gross vehicle weight rating of 26,001 or more pounds, or any such vehicle towing a vehicle not in excess of 10,000 pounds gross vehicle weight rating to be in possession of a valid Class B CDL.

1.5.3 Health and Safety Training

A basins-specific health and safety plan (HASP) is not included as part of this SAP. Agencies (e.g., UWCD and VCWPD) should have in place HASPs and ongoing field staff training programs that are specific to the field conditions and safety hazards encountered in field data collection activities.

It is not anticipated that field personnel working in the basins will necessitate access to sites that contain hazardous materials but personnel should be aware that OSHA training requirements are defined in 29 Code of Federal Regulations (CFR) 1910.120(e). However, if necessary, these requirements include (1) 40 hours of formal off-site instruction, (2) a minimum of 3 days of actual on-site field experience under the supervision of a trained and experienced field supervisor, and (3) 8 hours of annual refresher training. Field personnel who directly supervise employees engaged in hazardous waste operations also receive at least 8 additional hours of specialized supervisor training.

Copies of the field team's health and safety training records, including course completion certifications for the specialized supervisor training and the initial and refresher health and safety training, should be maintained and kept with site-specific files.

1.6 Monitoring Site Access Agreements

A signed access agreement should be procured prior to accessing all sites. The signed agreement should be on file and should be on hand in the field.

General agreement components should include, but are not necessarily limited to, the following:

- Monitoring site name (and any known alias), location and address;
- Property owner's name;
- Property contact information including property representative primary point of contact;
- Names of field staff, agency affiliations and contractors (if any) accessing the site as part of the monitoring program;
- Date and expiration (if any) of agreement;
- Prior notification requirements of intent to access property;
- Days of the week and time(s) of day property access is permitted; and
- Terms of agreement (e.g., liability considerations, data sharing considerations).

2. Water Quality Data Generation and Acquisition

A primary objective of this SAP is to describe groundwater and surface water sample collection procedures that will produce reliable basins-specific water quality data that can be used to evaluate sustainability in the basins with respect to the sustainability indicators set forth in the SGMA legislation. This section details activities associated with data collection, including field methods to be implemented, analytical requirements of the SAP, and steps that should be undertaken to ensure the adequacy of the data collection activities.

The following excerpt is from DWR's BMP 1 (DWR, 2016a):

Groundwater quality sampling protocols should ensure that:

- *Groundwater quality data are taken from the correct location*
- *Groundwater quality data are accurate and reproducible*
- *Groundwater quality data represent conditions that inform appropriate basin management and are consistent with the DQOs*
- *All salient information is recorded to normalize, if necessary, and compare data*
- *Data are handled in a way that ensures data integrity*

2.1 Water Quality Field Activity Documentation and Record Keeping

This Section discusses the requirements for documenting field activities and general record keeping. This documentation is imperative in preparing laboratory data packages (Section 2.3). Field personnel should follow the guidelines outlined in DWR's BMP #1 - *Monitoring Protocols, Standards, and Sites* (DWR, 2016a).

Field personnel should use monitoring network specifically prepared forms ("run sheets") or permanently bound field logbooks with sequentially numbered pages to record and document field activities. All paper field documentation should be scanned and archived by the monitoring entity.

General field-site documentation information should be on file with the monitoring agency that includes any access agreements (see Section 1.6) and associated property information. All field forms and logbooks should include and record at a minimum, the following information:

- Monitoring site name;
- Monitoring schedule event/list (e.g., fall water quality sampling run);

- Date and time (24-hour format) onsite;
- Name and affiliation of all on-site personnel including contractors or visitors;
- Weather conditions during the field activity;
- Summary of activities performed and significant events;
- Notes of conversations with coordinating officials;
- References to other field logbooks or forms that contain specific information;
- Discussions of problems encountered and their resolution;
- Discussions of deviations from the monitoring entity's field sampling plan or other governing documents; and
- Description of all photographs taken.

2.2 Sampling Methods and Field Activities

This Section describes the procedures for sample collection, including sampling methods and equipment, sample preservation requirements, and decontamination procedures. All samples collected should be analyzed by a laboratory certified under the Environmental Laboratory Accreditation Program (ELAP) (DWR, 2016a).

The USGS publishes the *National Field Manual for the Collection of Water Quality Data* (NFM). The NFM is comprised of standalone Chapters which are periodically updated by the USGS. DWR recommends that the NFM be used to guide the collection of reliable data (DWR, 2016a).

2.2.1 Groundwater Well Sampling Methodology

Groundwater samples should be collected from wells in the basins in accordance with the monitoring entities' SOPs that should adhere to the standard methods detailed in the USGS NFM. *"The specific sample collection procedure should reflect the type of analysis to be performed and DQOs"* (DWR, 2016a).

Before purging and sampling, groundwater level elevation should be measured in the well as described in the protocols in Section 3 of this SAP. The total depth (TD) of the well, depth-to-water (DTW) level measurement, and casing internal radius (in consistent units of feet) are needed to calculate the casing volume (V).

Casing volume in gallons is calculated as follows:

$$V = \pi r^2 h \text{ (7.48)}$$

where V = casing volume (in gallons)

r = casing radius (feet)

h = TD – DTW (feet)

Each well, not equipped with low-flow or passive sampling equipment, should be purged of a minimum of three casing volumes (3 x V) prior to sampling to ensure that a representative groundwater sample is obtained. When purging by use of a pump or airlifting, a discharge rate should be estimated (if a flow meter is unavailable) so that field staff can estimate the time required to complete the purging process before sample collection. In the case of sampling with bailers, the volume of water extracted before sampling should be estimated.

“Professional judgment should be used to determine the proper configuration of the sampling equipment with respect to well construction such that a representative ambient groundwater sample is collected” (DWR, 2016a). If a well is purged dry, it should be documented and sampled when the well has recharged to within 90% of the original level prior to sampling. *“Professional judgment should be exercised as to whether the sample will meet the DQOs and adjusted as necessary” (DWR, 2016a).*

Means of extracting groundwater from a well for sampling include, but may not be limited to, the following industry standard methods:

- **Dedicated pump** - It is recommended that “samples should be collected at or near the wellhead. Samples should not be collected from storage tanks, at the end of long pipe runs, or after any water treatment” (DWR, 2016a).
- **Temporary pump** - See Section 2.2.3 for decontamination considerations between monitoring sites.
- **Bailer** - Dedicated or disposable polyethylene bailers are recommended. Bottom-emptying devices are recommended to transfer groundwater samples from bailers to unpreserved containers, to minimize volatilization and ensure sample integrity.
- **Airlifting** - Method not recommended when collecting samples for determination of analytes that are volatile or otherwise are affected by exposure to oxygen (USGS, 2018).

- **Low-Flow Sampling Equipment** - Requires additional special protocols. “In addition to the protocols listed above, sampling using low-flow sample equipment should adopt the following protocols derived from EPA’s Low-flow (minimal drawdown) ground-water sampling procedures (Puls and Barcelona, 1996). These protocols apply to low-flow sampling equipment that generally pumps between 0.1 and 0.5 liters per minute. These protocols are not intended for bailers” (DWR, 2016a).
- **Passive Sampling Equipment** - Requires additional special protocols. “In addition to the protocols listed above, passive diffusion samplers should follow protocols set forth in [USGS Fact Sheet 088-00](#)” (DWR, 2016a).

If a pressure transducer and data logger is installed in a dedicated monitor well, it should be removed before bailing, airlifting or installing any temporary sampling equipment (e.g., Grundfos Red-Flo2). See Section 3.3.3 for additional pressure transducer and data logger considerations.

The following minimum field parameters should be collected at the time of sampling:

- Specific Conductivity or Electrical Conductivity (EC);
- pH - *“Measurements of pH should only be measured in the field, lab pH analysis are typically unachievable due to short hold times”* (DWR, 2016a); and
- Temperature.

Additional field parameters *“may also be useful for meeting DQOs of GSP and assessing purge conditions. All field instruments should be calibrated daily and evaluated for drift throughout the day”* (DWR, 2106a). See Section 2.7.2 for Field Equipment and Instruments considerations.

Additional field parameters may include, but are not limited to, the following:

- Dissolved Oxygen (DO) (in situ measurements preferable);
- Oxidation/Reduction Potential (ORP); and
- Turbidity.

Field parameters should be collected before, during and immediately after purging and should stabilize prior to sampling. *“Samples should be collected under laminar flow conditions. This may require reducing pumping rates prior to sample collection”* (DWR, 2016a). The water samples collected for dissolved metals should be mechanically filtered using a 0.45-micron filter, if necessary, to remove suspended particulates prior to the samples being placed in the appropriate containers for laboratory analyses.

“All samples requiring preservation must be preserved as soon as practically possible, ideally at the time of sample collection. Ensure that samples are appropriately filtered as recommended for the specific analyte. Entrained solids can be dissolved by preservative leading to inconsistent results of dissolve analytes. Specifically, samples to be analyzed for metals should be field-filtered prior to preservation; do not collect an unfiltered sample in a preserved container” (DWR, 2016a).

Monitoring entities in the basins should have specific analytical programs adapted for their respective monitoring networks. Laboratory analytical methods are described in Section 2.5 of this SAP. Groundwater samples should be accompanied by full chain of custody documentation at all times (see Section 2.3.4).

2.2.2 Surface Water Sampling Methodology

Surface water samples should be collected from wells in the basins in accordance with the monitoring entities' SOPs that should adhere to the standard methods detailed in the USGS NFM. *“The specific sample collection procedure should reflect the type of analysis to be performed and DQOs”* (DWR, 2016a).

Similar methodologies should be used in sampling surface water as have been described above for sampling groundwater. Samples should be collected from flowing streams (not stagnate ponded water). Samples can be collected directly from the water source and so pumps and the purging process described above, is not necessary for collecting surface water samples.

Section 2.7.2 describes Field Equipment and Instruments considerations. The following minimum field parameters should be collected at the time of sampling:

- Specific Conductivity or Electrical Conductivity (EC);
- pH - *“Measurements of pH should only be measured in the field, lab pH analysis are typically unachievable due to short hold times”* (DWR, 2016a); and
- Temperature.

Additional field parameters may include, but are not limited to, the following:

- Dissolved Oxygen (DO) (in situ measurements preferable);
- Oxidation/Reduction Potential (ORP); and
- Turbidity.

If field conditions require filtering (e.g., such as with turbid surface water), the water samples should be mechanically filtered using a 0.45-micron filter to remove suspended particulates prior

to the samples being placed in the appropriate containers for laboratory analyses. Field filtered samples shall be noted on the accompanying chain of custody and with reported results.

“All samples requiring preservation must be preserved as soon as practically possible, ideally at the time of sample collection. Ensure that samples are appropriately filtered as recommended for the specific analyte. Entrained solids can be dissolved by preservative leading to inconsistent results of dissolve analytes. Specifically, samples to be analyzed for metals should be field-filtered prior to preservation; do not collect an unfiltered sample in a preserved container” (DWR, 2016a).

Monitoring entities in the basins should have specific analytical programs adapted for their respective monitoring networks. Laboratory analytical methods are described in Section 2.5 of this SAP. Surface water samples should be accompanied by full chain of custody documentation at all times (see Section 2.3.4).

2.2.3 Equipment Decontamination

Sampling decontamination between monitoring sites may be required, especially if a sampling site is known to contain transferable contaminants. If a site is known to be contaminated, dedicated or disposable sampling equipment should be used. Disposable gloves should be properly discarded between sampling sites.

The following excerpt is from DWR’s BMP #1 (DWR, 2016a):

The sampler should clean the sampling port and/or sampling equipment and the sampling port and/or sampling equipment must be free of any contaminants. The sampler must decontaminate sampling equipment between sampling locations or wells to avoid cross-contamination between samples.

Basins-specific examples include, but are not limited to, the following:

- Bailers used to sample shallow monitoring wells down-gradient from septic systems that serve the Lake Piru campground that are known to have elevated levels of Nitrate and coliform bacteria should not be used to sample any wells in the basins.
- Quagga Muscles are known to inhabit lake Piru and down-gradient surface water that may or may not be contaminated (e.g., Lower Piru Creek and Santa Clara River) should be assumed to be contaminated for the purpose of sampling surface water quality. Field equipment such as waders should be decontaminated according to the monitoring entities SOP or dedicated equipment should be used.

2.3 Sample Handling, Custody and Laboratory Coordination

Each sample collected by the field staff should be traceable from the point of collection through analysis and final disposition to ensure sample integrity. Sample integrity helps to ensure the legal defensibility of the analytical data and subsequent conclusions.

The following bullets are general guidance and standardized protocols recommended by DWR in BMP #1 (DWR, 2016a):

- *Prior to sampling, the sampler must contact the laboratory to schedule laboratory time, obtain appropriate sample containers, and clarify any sample holding times or sample preservation requirements.*
- *Each well used for groundwater quality monitoring must have a unique identifier. This identifier must appear on the well housing or the well casing to avoid confusion.*
- *Sample containers should be labeled prior to sample collection. The sample label must include: sample ID (often well ID), sample date and time, sample personnel, sample location, preservative used, and analytes and analytical method.*
- *Samples should be chilled and maintained at 4 °C to prevent degradation of the sample. The laboratory's Quality Assurance Management Plan should detail appropriate chilling and shipping requirements.*
- *Samples must be shipped under chain of custody documentation to the appropriate laboratory promptly to avoid violating holding time restrictions.*
- *Instruct the laboratory to use reporting limits that are equal to or less than the applicable DQOs or regional water quality objectives/screening levels.”*

2.3.1 Site and Sample Identification

Each sampling location (groundwater and surface water) should be identified as clearly as possible (e.g., Well #1 is not an acceptable site identifier). *“Each well used for groundwater quality monitoring must have a unique identifier. This identifier must appear on the well housing or the well casing to avoid confusion”* (DWR 2016a). All monitoring entities operating within the basins should use the same unique identifier scheme but where not practical (e.g., for historical network or other reasons), cross-over tables should be developed to identify monitoring sites within the basins. Blind duplicates should be clearly documented, with the actual well location listed in the logbook.

California Code of Regulations (23 CCR § 352.4) requires that the CASGEM Well Identification Number be used, if available, for identifying site locations. In addition, DWR identifies wells by State Well Number (SWN). SWNs are in an alphanumeric form (e.g., 04N18W20P01S) based on the public land grid (Township, Range and Section) which indicates geographic location of the well. In the SWN naming scheme, Sections are further subdivided into 1/16ths in which individual wells are numbered sequentially. The final letter in a SWN is the baseline and meridian of the public land grid in which the well lies. The following recommends naming conventions appropriate for different kinds of samples:

- **Groundwater samples.** CASGEM Well Identification Number and DWR State Well Numbers (SWN) are recommended for identifying well sampling sites in the basins.
- **Surface water samples.** A modified SWN format is recommended for identifying surface water sampling sites in the basin in the form: Township, Range and Section followed by “SW” and ending with individual sites within the section numbered sequentially (e.g., 04N17W29SW1)
- **Trip blanks, field blanks, and equipment blanks.** Samples should be designated TB, FB, and EB respectively.

2.3.2 Sample Labeling

A sample label should be affixed to each sample container. The label should be completed with the following information written in indelible ink:

- Sample location and identification number;
- Date and time of sample collection;
- Sample collector’s initials;
- Preservation required; and
- Analysis required.

2.3.3 Sample Documentation

Documentation during sampling is essential to ensure proper sample identification. Field staff should adhere to the following general guidelines for maintaining field documentation:

- Documentation will be completed in permanent black or dark blue ink.
- All entries will be legible.
- Errors will be corrected by crossing out with a single line and then dating and initialing the lineout.

- Any serialized documents will be maintained by the monitoring entity and referenced in the site logbook.
- Unused portions of pages will be crossed out, and each page will be signed and dated.

The monitoring entity's supervisor is responsible for ensuring that sampling activities are properly documented.

2.3.4 Chain of Custody

Standard sample custody procedures should be used to maintain and document sample integrity during collection, transportation, storage, and analysis. A sample should be considered to be in custody if one of the following statements applies:

- It is in a person's physical possession or view.
- It is in a secure area with restricted access.
- It is placed in a container and secured with an official seal such that the sample cannot be reached without breaking the seal.

Chain of custody procedures provide an accurate written record that traces the possession of individual samples from the time of collection in the field to the time of acceptance at the laboratory. The chain of custody record should be used to document all samples collected and the analysis requested. Information that the field personnel should record on the chain of custody record includes the following:

- Sample location and identification number;
- Name and signature of sampler;
- Destination of samples (laboratory name);
- Date and time of collection;
- Analysis requested;
- Signatures of individuals involved in custody transfer, including the date and time of transfer;
- Airbill number (if applicable); and
- Monitoring entity supervisor's contact and phone number.

Unused lines on the chain of custody record should be crossed out. Field personnel should sign chain of custody records that are initiated in the field, and the airbill number should be recorded. The record should be placed in a waterproof plastic bag and taped to the inside of the shipping

container used to transport the samples. Signed airbills serve as evidence of custody transfer between field personnel and the courier, and between the courier and the laboratory. Copies of the chain of custody record and the airbill should be retained and filed by field personnel before the containers are shipped.

2.3.5 Sample Shipment

The following procedures should be implemented if samples collected in accordance to this SAP are shipped:

- The shipping box should be filled with bubble wrap, sample bottles, and packing material. Sufficient packing material should be used to prevent sample containers from breaking during shipment.
- The chain of custody records should be placed inside a plastic bag. The bag should be sealed and taped to the inside of the cooler lid. The airbill, if required, should be filled out before the samples are handed over to the carrier. The laboratory should be notified if the sampler suspects that the sample contains any substance that would require laboratory personnel to take safety precautions.
- The shipping box should be closed and taped shut with strapping tape around both ends.
- Signed and dated custody seals should be placed on the front and side of each shipping box. Wide clear tape should be placed over the seals to prevent accidental breakage.
- The chain of custody record should be transported within the taped sealed shipping box. When the shipping box is received at the analytical laboratory, laboratory personnel should open the shipping box and sign the chain of custody record to document transfer of samples.

2.4 Sampling Containers and Holding Times

Confer with the ELAP certified analytical lab that will be receiving the samples for required containers for required sample volume, container type, preservation technique, and holding time for each analysis that is to be conducted on the groundwater samples collected. Required containers, preservation techniques, and holding times for field QC samples, such as field duplicates and MS/MSD samples (Section 2.6), should be the same as for field samples.

2.5 Analytical Methods

The source of analytical services to be provided will be determined by the individual entities conducting monitoring in the basins and should support the basins-specific DQOs presented in this SAP. EPA-approved methods for laboratory analyses of the samples should be used. Many of the general mineral, general physical and metals constituents (analytes or chemicals) listed in Table 6 are commonly sampled for in the basins by UWCD and VCWPD. EPA-approved standard analytical methods are associated with each constituent listed in the table. As mentioned above, operators of potable water systems are required to sample for a variety of additional constituents including organic compounds.

Constituent	Analytical Method
General Mineral	
Aggressive Index	SM 4500HB
Bicarbonate as HCO ₃	EPA 2320B
Boron	EPA 200.7
Calcium	EPA 200.7
Carbonate as CO ₃	EPA 2320B
Chloride	EPA 300.0
Copper	EPA 200.7
Fluoride	EPA 300.0
Hydroxide as OH	EPA 2320B
Iron	EPA 200.7
Langlier Index (20°C)	SM 4500HB
Magnesium	EPA 200.7
Manganese	EPA 200.7
MBAS Screen (Foaming Agents)	SM 5540C
Nitrate + Nitrite as N	EPA 300.0
Nitrate as NO ₃	EPA 300.0
Nitrate Nitrogen	EPA 300.0
Nitrite as N	EPA 300.0
pH (Field)	-
Potassium	EPA 200.7
Sodium	EPA 200.7
Sodium Absorption Ratio (SAR)	EPA 200.7
Specific Conductivity	EPA 2510B
Sulfate	EPA 300.0
Total Alkalinity (as CaCO ₃)	EPA 2320B
Total Anions	EPA 200.7
Total Cations	EPA 200.7
Total Dissolved Solids SUM	EPA 200.7
Total Dissolved Solids TFR	EPA 2540C
Total Hardness as CaCO ₃	EPA 200.7
Zinc	EPA 200.7
General Physical	
Color	SM 2120B
Odor	SM 2150B
Temperature (Field)	-
Turbidity	SM 2130B
Microbiology	
Total Coliform P/A	SM 9223B
Total Coliform (Enumeration)	SM 9223B

Constituent	Analytical Method
Inorganic Chemicals (IOC) - Metals	
Aluminum	EPA 200.8
Antimony	EPA 200.8
Arsenic	EPA 200.8
Barium	EPA 200.8
Beryllium	EPA 200.8
Cadmium	EPA 200.8
Chromium	EPA 200.8
Lead	EPA 200.8
Mercury	EPA 245.1
Nickel	EPA 200.8
Selenium	EPA 200.8
Silver	EPA 200.8
Thallium	EPA 200.8
Vanadium	EPA 200.8
1,2,3 - Trichloropropane	SRL 524M-TCP
Carbamates	EPA 531.1
Chlorinated Pesticides	EPA 505
Chromium VI	EPA 218.6
Diquat	EPA 549.2
EDB & DBCP	EPA 504.1
Endothall	EPA 548.1
Glyphosate	EPA 547
Gross Alpha	EPA 900.0
Haloacetic Acids	EPA 552.2
Herbicides	EPA 515.3
Nitrogen Phosphorus Pesticides	EPA 507
Radium-228	EPA Ra-05
Perchlorate	EPA 314.0
Total Alpha Emitting Radium-226	EPA 903.0
Total Cyanide (CN)	SM 4500-CN C,E
Trihalomethanes	EPA 551.1
Uranium	EPA 908.0
VOC's Full List	EPA 524.2
Asbestos	EPA 100.2
Dioxin (AQ/Solid) - 2,3,7,8, TCDD Only	EPA 1613
Organic Compounds in Drinking Water	EPA 525.2

Table 6. Laboratory Analytical Methods.

If an analytical system fails, the laboratory QA officer should be notified, and corrective action should be taken. In general, laboratory corrective actions should include stopping the analysis,

examining instrument performance and sample preparation information, and determining the need to reprepare and/or reanalyze the samples.

Both UWCD and VCWPD currently contract sample analysis to an analytical laboratory, Fruit Growers Laboratory, Inc. (FGL), with a local office in Santa Paula, California. FGL's ELAP certification (Expiration Date 7/31/2020) for their Santa Paula office is available through their website and is included in Appendix A of this SAP. FGL intends to renew their ELAP certification after the 2020 expiration date.

TDS can be reported by either Total Filterable Residue (TFR) or by Summation (SUM), which is calculated by summing the mass of the major anions and cations in a water sample. TDS by Summation commonly yields a slightly higher value than the TDS by Total Filterable Residue. The wet chemistry evaporative method (TFR) is now the standard laboratory analysis for TDS and is recommended method for water sample analysis in the basins.

2.6 Water Quality Assurance and Quality Control

Various field and laboratory QC samples and measurements should be used to verify that analytical data meet the QA objectives. It is recommended that field QC samples and measurements be collected to assess the influence of sampling activities and measurements on data quality. Similarly, laboratory QC samples should be used to assess how the laboratory's analytical program influences data quality. This section describes the QC samples that are recommended to be analyzed during the site sampling activities. Table 3 shows the acceptance criteria for each type of QC sample. Table 7 specifies the recommended frequency of QC samples to be collected at the site.

Field Quality Control Sample	Frequency for Soil Matrix
Field duplicate	1 per 10 samples, rounded up
Equipment rinsate blank	1 per sampling event (run)
Matrix spike/matrix spike duplicate ^a (organics only)	1 per 20 samples
Matrix spike/matrix duplicate ^b (inorganics only)	1 per 20 samples
Trip blank	1 with each cooler containing aqueous samples for VOC analysis
Temperature blank	1 per cooler

^a Matrix spike, matrix spike duplicate, and matrix duplicate analyses are technically not field quality control samples; however, they generally require that the field personnel collect additional volume of sample, and are therefore included on this table for easy reference.

Table 7. Frequency of Field Quality Control Samples.

All laboratories that perform analytical work under this SAP should adhere to a QA program that is used to monitor and control all laboratory QC activities. Each laboratory must have a written QA manual that describes the QA program in detail. The laboratory QA manager is responsible for ensuring that all laboratory internal QC checks are conducted in accordance with EPA methods and protocols, the laboratory's QA manual, and the requirements of this SAP.

Many of the laboratory QC procedures and requirements are described in EPA-approved analytical methods, laboratory method SOPs, and method guidance documents.

2.6.1 Field Quality Control Samples

Field QC samples should be collected and analyzed to assess the quality of data that are generated by sampling activities. These samples include laboratory QC samples collected in the field, field duplicates, equipment rinsates, MS/MSDs, and trip blanks. A temperature blank should be included. QC samples collected in the field for fixed laboratory analysis are presented in Table 7.

Field duplicates are independent samples that are collected as close as possible, in space and time, to the original investigative sample. Field duplicates can measure the influence of sampling

and field procedures on the precision of an environmental measurement. They can also provide information on the heterogeneity of a sampling location. Field duplicates should be collected as listed in Table 7.

Equipment rinsate blanks are collected when non-dedicated or non-disposable sampling equipment is used to collect samples and put the samples into containers. One equipment blank should be collected per sampling event (run).

MS/MSDs are laboratory QC samples that are associated with analytical methods for organics. MSs are typically associated with analytical methods for inorganics. In the laboratory, MS/MSDs and MSs are split and spiked with known amounts of analytes. Analytical results for MS/MSDs and MSs and laboratory duplicate samples are used to measure the precision and accuracy of the laboratory's organic and inorganic analytical programs, respectively. Each of these QC samples should be collected and analyzed at a frequency of 1 for every 20 investigative samples or 1 method blank per batch if the batches consist of fewer than 20 samples.

Temperature blanks are containers of deionized or distilled water that are placed in each cooler shipped to the laboratory. Their purpose is to provide a container to test the temperature of the samples in the respective cooler.

2.6.2 Laboratory Quality Control Samples

EPA methods specify the preparation and analysis of QC samples. These samples may include, but are not limited to, the following types: (1) LCSs, (2) method blanks, (3) MS and MSD samples, (4) matrix duplicate (MD) samples, (5) surrogate spikes, and (6) standard reference materials or independent check standards. The following subsections discuss the QC checks that should be implemented.

2.6.2.1 Laboratory Control Samples

LCSs are thoroughly characterized, laboratory-generated samples that are used to monitor the laboratory's day-to-day performance of analytical methods. The results of LCS analyses are compared to well-defined laboratory control limits to determine whether the laboratory system is in control for the particular method. If the system is not in control, corrective action should be implemented. Appropriate laboratory corrective actions include (1) stopping the analysis, (2) examining instrument performance or sample preparation and analysis information, and (3) determining whether samples should be reprepared or reanalyzed.

2.6.2.2 Method Blanks

Method blanks, which are also known as preparation blanks, are analyzed to assess the level of background interference or contamination in the analytical system and the level that may lead to elevated concentration levels or false positive data. Method blanks should be required for all laboratory analyses and should be prepared and analyzed at a frequency of 1 method blank for every 20 samples, or 1 method blank per batch if the batch consists of fewer than 20 samples.

A method blank consists of reagents that are specific to the analytical method and are carried through every aspect of the analytical procedure, including sample preparation, cleanup, and analysis. The results of the method blank analysis should be evaluated in conjunction with other QC information to determine the acceptability of the data generated for that batch of samples. Ideally, the concentration of a target analyte in the method blank should be below the reporting limit for that analyte. For some common laboratory contaminants, a higher concentration may be allowed.

If the method blank for any analysis is beyond control limits, the source of contamination should be investigated, and appropriate corrective action should be taken and documented. This investigation includes an evaluation of the data to determine the extent of the contamination and its effect on sampling results. If a method blank is within control limits but analysis indicates a concentration of analytes that is above the reporting limit, an investigation should be conducted to determine whether any corrective action could eliminate an ongoing source of target analytes.

For organic and inorganic analyses, the concentration of target analytes in the method blank must be below the reporting limit for that analyte for the blank to be considered acceptable. An exception may be made for common laboratory contaminants (such as methylene chloride, acetone, 2-butanone, and phthalate esters) that may be present in the blank at up to five times the reporting limit. These compounds are frequently detected at low levels in method blanks from materials that are used to collect, prepare, and analyze samples for organic parameters.

2.6.2.3 Matrix Spikes and Matrix Spike Duplicates

MSs and MSDs are aliquots of an environmental sample to which known concentrations of target analytes and compounds have been added. The MS is used to evaluate the effect of the sample matrix on the accuracy of the analysis. If there are many target analytes, they should be divided into two to three spike standard solutions. Each spike standard solution should be used

alternately. The MS, in addition to an unspiked aliquot, should be taken through the entire analytical procedure, and the recovery of the analytes should be calculated. Results should be expressed in terms of percent recoveries and RPD. The percent recoveries of the target analytes and compounds are calculated and used to determine the effects of the matrix on the precision and accuracy of the method. The RPD between the MS and MSD results is used to evaluate method precision.

The MS/MSD is divided into three separate aliquots, two of which are spiked with known concentrations of target analytes. The two spiked aliquots, in addition to an unspiked sample aliquot, are analyzed separately, and the results are compared to determine the effects of the matrix on the precision and accuracy of the analysis. Results should be expressed as RPD and percent recovery and compared to control limits that have been established for each analyte. If results fall outside control limits, corrective action should be performed.

2.6.2.4 Laboratory (Matrix) Duplicates

MDs, which are also called laboratory duplicates, are prepared and analyzed for inorganic analyses to assess method precision. Two aliquots of sample material are taken from the sample and processed simultaneously without adding spiking compounds. The MD and the original sample aliquot are taken through the entire analytical procedure, and the RPD of the duplicate result is calculated. Results are expressed as RPD and are compared to control limits that have been established for each analyte.

2.6.2.5 Surrogate Spikes

Surrogates are organic compounds that are similar to the analytes of interest in chemical properties but are not normally found in environmental samples. Surrogates are added to field and QC samples before the samples are extracted to assess the efficacy of the extraction procedure and to assess the bias that is introduced by the sample matrix. Results are reported in terms of percent recovery. Individual analytical methods may require sample reanalysis based on surrogate criteria.

The laboratory should use surrogate recoveries mainly to assess matrix effects on sample analysis. Obvious problems with sample preparation and analysis (such as evaporation to dryness or a leaking septum) that can lead to poor surrogate spike recoveries must be eliminated before low surrogate recoveries can be attributed to matrix effects.

2.6.3 Common Data Quality Indicators

This section describes how QA objectives for precision, accuracy, completeness, and sensitivity are measured, calculated, and reported.

2.6.3.1 Precision

Precision of many analyses is assessed by comparing analytical results of MS and MSD sample pairs for organic analyses, field duplicate samples, laboratory duplicate samples, MDs, and field replicate measurements. If precision is calculated from two measurements, it is normally measured as RPD. If precision is calculated from three or more replicates, it is measured as relative standard deviation.

2.6.3.2 Accuracy

The accuracy of many analytical methods is assessed by using the results of MS and MSD samples for organic analyses, MS samples for inorganic analyses, surrogate spike samples, LCSs, standard reference materials, independent check standards, and measurements of instrument responses against zero and span gases.

For measurements in which spikes are used, percent recovery should be calculated.

2.6.3.3 Completeness

Completeness is a measure of the percentage of basins-specific data that are valid. Valid data are obtained when samples are collected and analyzed in accordance with QC procedures outlined in this SAP, and when none of the QC criteria that affect data usability are exceeded.

When all data validation is completed, the percent completeness value should be calculated by dividing the number of usable results by the total number of sample results planned for this investigation.

Completeness should also be evaluated as part of the DQA process (U.S. EPA, 2000). This evaluation will help determine whether any limitations are associated with the decisions to be made based on the data collected.

2.6.3.4 Sensitivity

The achievement of MDLs depends on instrument sensitivity and matrix effects. Therefore, it is important to monitor the instrument sensitivity to ensure data quality and to ensure that analyses meet sensitivity requirements with respect to SAP QA objectives (Section 1.3.2).

2.7 Water Quality Instrument and Equipment Testing, Inspection, and Maintenance Requirements

This section outlines testing, inspection, and maintenance procedures for field equipment and instruments and for laboratory instruments.

2.7.1 General Requirements

Testing, inspection, and maintenance methods and frequency should be based on the following:

- The type of instrument;
- The instrument's stability characteristics;
- The required accuracy, sensitivity, and precision of the instrument;
- The instrument's intended use, considering basins-specific DQOs;
- Manufacturer's recommendations; and
- Other conditions that affect measurement or operational control.

For most instruments, preventive maintenance is performed in accordance with procedures and schedules recommended in (1) the instrument manufacturer's literature or operating manual or (2) SOPs associated with particular applications of the instrument.

In some cases, testing, inspection, and maintenance procedures and schedules will differ from the manufacturer's specifications or SOPs. This can occur when a field instrument is used to make critical measurements or when the analytical methods that are associated with a laboratory instrument require more frequent testing, inspection, and maintenance.

2.7.2 Field Equipment and Instruments

After the field equipment and instruments arrive in the field, they should be inspected for damage and the beginning and end of each day of use. Damaged equipment and instruments should be replaced or repaired immediately, if practicable. Battery-operated equipment (e.g., EC/pH meter)

should be checked to ensure full operating capacity; if needed, batteries should be recharged or replaced.

Following use, field equipment should be properly decontaminated. Any equipment problems should be reported so that problems are not overlooked and any necessary equipment repairs are performed before the next use of the equipment.

2.7.3 Laboratory Instruments

All laboratories that analyze samples collected in accordance with this SAP must have a preventive maintenance program that addresses (1) testing, inspection, and maintenance procedures and (2) the maintenance schedule for each measurement system and required support activity. This program is usually documented by an SOP for each analytical instrument that is to be used. The program will typically be laboratory specific; however, it should follow requirements outlined in EPA-approved guidelines. Some of the basic requirements and components of such a program are as follows:

- As a part of its QA/QC program, each laboratory will conduct a routine preventive maintenance program to minimize instrument failure and other system malfunction.
- An internal group of qualified personnel will maintain and repair instruments, equipment, tools, and gauges. Alternatively, manufacturers' representatives may provide scheduled instrument maintenance and emergency repair under a repair and maintenance contract.
- The laboratory will perform instrument maintenance on a regularly scheduled basis. The scheduled service of critical items should minimize the downtime of the measurement system. The laboratory will prepare a list of critical spare parts for each instrument. The laboratory will request the spare parts from the manufacturer and will store the parts.
- Testing, inspection, and maintenance procedures described in laboratory SOPs will be performed in accordance with manufacturer's specifications and the requirements of the specific analytical methods that are used.
- All maintenance and service should be documented in service logbooks (or the site-specific logbook) to provide a history of maintenance records. A separate service logbook should be kept for each instrument. All maintenance records will be traceable to the specific instrument, equipment, tool, or gauge.
- The laboratory will maintain and file records that are produced as a result of tests, inspections, or maintenance of laboratory instruments. If necessary, these records will be available for review by internal and external laboratory system audits.

2.8 Instrument Calibration and Frequency

All laboratory equipment that is used to analyze samples collected in accordance with this SAP should be calibrated on the basis of written SOPs that are maintained by the laboratory. Calibration records (including the dates and times of calibration and the names of the personnel performing the calibration) should be filed at the location at which the analytical work was performed and maintained by the laboratory personnel who performed QC activities. The laboratory QA manager is responsible for ensuring that all laboratory instruments are calibrated in accordance with the requirements of this SAP

Subcontracted laboratories may conduct laboratory work if the primary laboratory is not ELAP certified to perform requested analysis or cannot meet requested turnaround times. Subcontracted laboratories are subject to the same requirements as the primary sample receiving laboratory.

The laboratories should follow the method specific calibration procedures and requirements for laboratory measurements. Calibration procedures and requirements should also be provided, as appropriate, for laboratory support equipment, such as balances, mercury thermometers, pH meters, and other equipment that is used to take chemical and physical measurements.

3. Groundwater Level Data Generation and Acquisition Protocol

An objective of this SAP is to describe groundwater data collection procedures that will produce reliable basins-specific water level data that can be used to evaluate sustainability in the basins with respect to the SGMA legislation sustainability indicators. This section details activities associated with measuring water levels in wells, including field methods to be implemented and steps that should be undertaken to ensure the adequacy of the data collection activities.

DWR's BMP #1 (DWR, 2016a) includes the following considerations for developing groundwater level protocols:

- *Groundwater level data are taken from the correct location, well ID, and screen interval depth*
- *Groundwater level data are accurate and reproducible*
- *Groundwater level data represent conditions that inform appropriate basin management DQOs*
- *All salient information is recorded to correct, if necessary, and compare data*
- *Data are handled in a way that ensures data integrity*

3.1 Groundwater Level Field Documentation and Record Keeping

This Section discusses the requirements for documenting water level measurement activities. Field personnel should follow the documentation guidelines outlined in DWR's BMP #1 - *Monitoring Protocols, Standards, and Sites* (DWR, 2016a).

Field personnel should use monitoring network specifically prepared forms ("run sheets") or permanently bound field logbooks with sequentially numbered pages to record and document field activities. Example water level data collection forms are included in *Groundwater technical procedures of the U.S. Geological Survey: U.S. Geological Survey Techniques and Methods 1–A1* (USGS, 2011). All paper field documentation should be scanned and archived by the monitoring entity.

General field-site documentation information should be on file with the monitoring agency that includes any access agreements (see Section 1.6) and associated property information. All field forms and logbooks should include and record at a minimum, the following information:

- Well identifier - CASGEM Well Identification Number and CA DWR SWN are recommended (see Section 2.3.1 for a description of DWR's well identification convention);
- Monitoring schedule event/list (e.g., fall water level run);
- Date and time (24-hour format) of measurement; and
- Comments/ Notes field
 - Discussions of problems encountered and their resolution
 - Discussions of deviations from the monitoring entity's water level measuring SOP or other governing documents
 - Factors that may influence the depth to water readings (see Section 3.4.1).

Documentation of water level measurements is essential to ensure data integrity. Field staff should adhere to the following general guidelines for maintaining field documentation:

- Documentation will be completed in permanent black or dark blue ink.
- All entries will be legible.
- Errors will be corrected by crossing out with a single line and then dating and initialing the lineout.
- Any serialized documents will be maintained by the monitoring entity and referenced in the site logbook.
- Unused portions of pages will be crossed out, and each page will be signed and dated.

The monitoring entity's supervisor is responsible for ensuring that water level measurement activities are properly documented. The following subsections offer common "no measurement" obtained explanations and data qualifiers. It is important that monitoring entities maintain standardized lists of data qualifiers and all field staff understand the intended meaning (i.e., field conditions) of each qualifier so that they are applied in a standardized and consistent manner.

3.1.1 No Measurement Documentation

The following are common explanations for why a water level measurement was not obtained by field staff while accessing a well-site listed on a monitoring network schedule. Each of the bulleted explanations shown below can be assigned a unique number in a list maintained by a monitoring entity that allows field staff to quickly and efficiently document the field conditions that prohibited a water level measurement from being obtained. The listed qualifiers are those currently used by UWCD. Documentation may include, but is not limited to, the following explanations:

- Measurement Discontinued;
- Pumping;
- Pump house locked;
- Tape hung up;
- Can't get tape in casing;
- Unable to locate well;
- Well has been destroyed;
- Special/Other (requires explanation in comments field);
- Casing leaking or wet;
- Temporarily inaccessible;
- Well dry; and
- Unmeasured flowing well.

If a water level is not obtained, the minimum site visit information, outlined above, should still be collected. Documenting well-site conditions can help inform future data collection efforts in the basins. For example, if a well is pumping multiple site visits in a row, it may warrant contacting the well owner or operator to schedule a time to measure the well when it will be off.

3.1.2 Water Level Measurement Qualifiers

The following are common water level measurement qualifiers that that can be assigned a unique number in a list maintained by a monitoring entity that allows field staff to quickly and efficiently document ancillary information associated with a water level measurement. The listed qualifiers are those currently used by UWCD.

- Caved or deepened;
- Pumping;
- Nearby pump operating;
- Casing leaking or wet;
- Pumped recently;
- Air or pressure gauge measurement;
- Special/Other (requires explanation in comments field);
- Recharge operation at or nearby well;
- Oil in Casing;
- Acoustic sounder;

- Measured flowing well; and
- Does not match transducer record.

3.2 Scheduling of Groundwater Level Monitoring Events

Groundwater levels in California basins are often at their highest annual levels during the spring of each year following winter precipitation. They are often at their lowest in the fall preceding the start of the winter rainy season with much of the annual precipitation falling from November through February in Ventura County. Temporal coordination of groundwater level collection activities across the State is important for comparison of water level measurements collected by different monitoring entities. DWR's BMP #2 specifies that *"Groundwater levels will be collected during the middle of October and March for comparative reporting purposes"* (DWR, 2016b)

The following excerpt is from DWR's BMP 1:

"Groundwater elevation data will form the basis of basin-wide water-table and piezometric maps, and should approximate conditions at a discrete period in time. Therefore, all groundwater levels in a basin should be collected within as short a time as possible, preferably within a 1 to 2 week period" (DWR, 2016a).

Likely water levels will be collected by both UWCD and VCWPD as part of their established monitoring networks in the basins during other times of the year for various purposes, but as tight (small) a monitoring event window as reasonably possible should be scheduled around October and March of each year. These recommended spring-high water level measurement runs centering around March 15 and fall-low runs around October 15 are to conform to DWR's timing preference (mentioned above) for producing comparative state-wide record sets.

3.3 Groundwater Level Equipment Testing, Inspection, and Maintenance Requirements

This section outlines testing, inspection, and maintenance procedures for field equipment and water level measurement devices.

3.3.1 General Requirements

Testing, inspection, and maintenance methods and frequency should be based on the following:

- The type of water level measurement device;

- The instrument's stability characteristics;
- The required accuracy, sensitivity, and precision of the equipment;
- The equipment's intended use, considering basins-specific DQOs;
- Manufacturer's recommendations; and
- Other conditions that affect measurement or operational control.

For most equipment, preventive maintenance is performed in accordance with procedures and schedules recommended in (1) the manufacturer's literature or operating manual or (2) SOPs associated with particular applications of the measurement device.

3.3.2 Manual Water Level Measurement Equipment

After field equipment and measurement devices are transported to the field, they should be inspected for damage at the beginning and end of each day of use. Damaged equipment should be replaced or repaired immediately, if practicable. Battery-operated equipment (e.g., electric sounder) should be checked to ensure full operating capacity; if needed, batteries should be replaced.

Following use, field equipment should be properly decontaminated. Any equipment problems should be reported so that problems are not overlooked and any necessary equipment repairs are performed before the next use of the equipment. Common water level measurement devices are listed below:

- Steel Surveyor's Measuring Tape;
- Electric Sounder (single wire and dual wire);
- Acoustic Sounder; and
- Permanently Installed Air Line.

For air line measurements, gauge reading is recorded after pressurizing with a pneumatic pump or compressed air tank. The depth of the bottom of the submerged tubing in the well open to the atmosphere must be known to calculate the water level in the well from the measured pressure.

3.3.3 Recording Water Level Devices - Pressure Transducer and Data Loggers

As mentioned in Section 1.1.10.3, UWCD has an established pressure transducer and data logger monitoring network in the basins. These devices can be used for recording water level measurements in wells on user defined or event based schedules.

The electronics components of the device are sealed in a housing that is installed below the water level surface in the well. They measure pressure (commonly in psi) above the sensor. For every 1 psi of pressure recorded by the gauge, there are 2.31 feet of potentiometric head above the sensor. A simple linear correction (coefficient) can be applied to adjust output readings to depth-to-water in the well or water level elevation referenced to mean sea level (given a RP elevation has been surveyed for the site). The devices can be downloaded during well-site visits or can be connected to telemetry systems to transmit data remotely.

The following excerpt is from DWR's BMP #1 (DWR, 2016a) and provides guidance on the use of pressure transducers and data loggers as a component of the monitoring plan for a basin:

When installing pressure transducers, care must be exercised to ensure that the data recorded by the transducers is confirmed with hand measurements.

The following general protocols must be followed when installing a pressure transducer in a monitoring well:

- The sampler must use an electronic sounder or chalked steel tape and follow the protocols listed above to measure the groundwater level and calculate the groundwater elevation in the monitoring well to properly program and reference the installation. It is recommended that transducers record measured groundwater level to conserve data capacity; groundwater elevations can be calculated at a later time after downloading.*
- The sampler must note the well identifier, the associated transducer serial number, transducer range, transducer accuracy, and cable serial number.*
- Transducers must be able to record groundwater levels with an accuracy of at least 0.1 foot. Professional judgment should be exercised to ensure that the data being collected is meeting the DQO and that the instrument is capable. Consideration of the battery life, data storage capacity, range of groundwater level fluctuations, and natural pressure drift of the transducers should be included in the evaluation.*
- The sampler must note whether the pressure transducer uses a vented or non-vented cable for barometric compensation. Vented cables are preferred, but non-vented units provide accurate data if properly corrected for natural barometric pressure changes. This requires the consistent logging of barometric pressures to coincide with measurement intervals.*
- Follow manufacturer specifications for installation, calibration, data logging intervals, battery life, correction procedure (if non-vented cables used), and anticipated life expectancy to assure that DQOs are being met for the GSP.*

- *Secure the cable to the well head with a well dock or another reliable method. Mark the cable at the elevation of the reference point with tape or an indelible marker. This will allow estimates of future cable slippage.*
- *The transducer data should periodically be checked against hand measured groundwater levels to monitor electronic drift or cable movement. This should happen during routine site visits, at least annually or as necessary to maintain data integrity.*
- *The data should be downloaded as necessary to ensure no data is lost and entered into the basin's DMS following the QA/QC program established for the GSP. Data collected with non-vented data logger cables should be corrected for atmospheric barometric pressure changes, as appropriate. After the sampler is confident that the transducer data have been safely downloaded and stored, the data should be deleted from the data logger to ensure that adequate data logger memory remains.*

3.4 Groundwater Level Measurements and Related Field Activities

Water level measurements from wells in the basins should be performed in accordance with the monitoring entities' SOPs that should adhere to the standard methods detailed in *Groundwater technical procedures of the U.S. Geological Survey: U.S. Geological Survey Techniques and Methods 1–A1* (USGS, 2011). “*Well construction, anticipated groundwater level, groundwater level measuring equipment, field conditions, and well operations should be considered prior collection of the groundwater level measurement*” (DWR, 2016a).

3.4.1 Well-Site Conditions Assessment and Pre/Post-Measurement Activities

Upon arriving at a well-site, a basic site conditions assessment should be conducted. If the well being monitored is not a dedicated monitor well and is equipped with a pump, check to see if the pump is in operation or for other indicators that the pump was in operation recently (e.g., warm motor, wet adjacent irrigated fields or water around the well not associated with rain events). Do not measure the water level in the well if it is pumping unless instructed to do so by the monitoring entity's supervisor. Document “*factors that may influence the depth to water readings such as weather, nearby irrigation, flooding, potential for tidal influence [not applicable for the Fillmore and Piru basin], or well condition*” (DWR, 2016a). Document any site conditions findings that do not result in a water level measurement according to Section 3.1.1, and qualify water level measurements, as appropriate, with qualifiers listed in Section 3.1.2.

The sampler should remove the appropriate cap, lid, or plug that covers the monitoring access point listening for pressure release. If a release is observed, the measurement should follow a period of time to allow the water level to equilibrate” (DWR, 2016a). “If agricultural or municipal wells are used for monitoring, the wells must be screened across a single water-bearing unit, and care must be taken to ensure that pumping drawdown has sufficiently recovered before collecting data from a well” (DWR, 2016b). After measuring the well, “The sampler should replace any well caps or plugs, and lock any well buildings or covers” (DWR, 2016a).

3.4.2 Reference Points and Surveying

If not previously measured and recorded for the site, or the former measurement is no longer valid (e.g., the surface casing was sheared off as the result of being run over by a truck), the reference point (RP) height in feet (above or below ground surface) should be measured. *“Depth to groundwater must be measured relative to an established Reference Point (RP) on the well casing. The RP is usually identified with a permanent marker, paint spot, or a notch in the lip of the well casing. By convention in open casing monitoring wells, the RP reference point is located on the north side of the well casing. If no mark is apparent, the person performing the measurement should measure the depth to groundwater from the north side of the top of the well casing” (DWR, 2016a).*

Ground elevation and top of casing elevation reference points should be measured to North American Vertical Datum 1988 (NAVD88) within 0.5 foot accuracy (23 CCR § 352.4) and a higher level of accuracy of 0.1 foot or less is preferred.

The locations of the monitoring wells on the land surface should be surveyed to North American Datum 1983 (NAD83) to an accuracy of 0.1 foot. DWR’s standard horizontal projected coordinate system is California Teale Albers, NAD83. Feature class (location) data uploaded through the SGMA portal is required to be converted to this projected coordinate system for consistency across data sets. UWCD currently uses NAD 1983, California state plane coordinates and VCWPD currently uses NAD 1927 state plane coordinates in projecting their respective well location and construction files.

“Survey grade global navigation satellite system (GNSS) global positioning system (GPS) equipment can achieve similar vertical accuracy when corrected. Guidance for use of GPS can be found at USGS <http://water.usgs.gov/osw/gps/>. Hand-held GPS units likely will not produce

reliable vertical elevation measurement accurate enough for the casing elevation consistent with the DQOs and regulatory requirements” (DWR, 2016a).

“Geographic locations shall be reported in GPS coordinates by latitude and longitude in decimal degree to five decimal places, to a minimum accuracy of 30 feet, relative to NAD83, or another national standard that is convertible to NAD83” (23 CCR § 352.4).

3.4.3 Measuring Groundwater Levels in Water Wells

Depth to groundwater should be measured to a minimum accuracy of 0.1 feet (23 CCR § 352.4) with a desired accuracy of 0.01 feet relative to the RP. *“Measure depth to water in the well using procedures appropriate for the measuring device. Equipment must be operated and maintained in accordance with manufacturer’s instructions” (DWR, 2016a).* Measurements must be in consistent units. Recommended units are feet, partitioned into tenths of feet, and hundredths of feet. The use of feet and inches is not recommended. *“Air lines and acoustic sounders may not provide the required accuracy of 0.1 foot” (DWR, 2016a).*

Groundwater elevation is calculated as follows:

$$WLE = RP - DTW$$

Where:

WLE = Groundwater Level Elevation

RP = Reference Point Elevation

DTW = Depth to Water

“For measuring wells that are under pressure, allow a period of time for the groundwater levels to stabilize. In these cases, multiple measurements should be collected to ensure the well has reached equilibrium such that no significant changes in water level are observed. Every effort should be made to ensure that a representative stable depth to groundwater is recorded. If a well does not stabilize, the quality of the value should be appropriately qualified as a questionable measurement” (DWR, 2016a).

3.4.3.1 Flowing Wells

A special condition associated with confined aquifer systems (see Section 1.1.8) are naturally flowing wells (artesian) wells where the potentiometric head in the well rises above the land

surface. If a monitored well is found to be flowing (i.e., naturally without the aid of a pump) after removal of the well cap, the condition should be documented. If appropriate and safe, the well should be measured. *“Site specific procedures should be developed to collect accurate information and be protective of safety conditions associated with a pressurized well. In many cases, an extension pipe may be adequate to stabilize head in the well. Record the dimension of the extension and document measurements and configuration”* (DWR, 2016a).

Two methods of measuring flowing wells are summarized below:

- Use of tubing or an extension pipe (appropriate for low artesian pressures). Water level under pressure from the flowing well rises in the tube/pipe to a height that is measured above the top of the well casing with respect to the established RP.
- Use of a pressure gauge (commonly applied where high artesian pressures make use of tubing/extension pipes impractical). For every 1 psi of pressure recorded by the gauge, there are 2.31 feet of potentiometric head above the gauge.

3.4.3.2 Periodically Dry Wells

If a well is dry, then document the total depth of the well (TD). If water level is measured near the TD of the well, professional judgment must be used to decide if the measurement is actually representative of the aquifer zone the well is completed in. Many wells have a sump (blank casing with a bottom cap) at the bottom of the well. Ten to 20-foot sumps are common in irrigation and production wells. Water level measurements that approach the TD of a well should be considered suspect unless the construction of the well is known and it has been determined that the water is not evaporation (condensation) water in the bottom of the well with the actual water level of the aquifer some distance below the bottom of the well.

3.4.4 Equipment Decontamination

“The water level meter should be decontaminated after measuring each well” (DWR, 2016a). Equipment decontamination is especially important if a monitoring well-site is known to contain transferable contaminants. If a site is known to be contaminated, dedicated equipment or thorough decontamination after each use may be necessary. Disposable gloves should be properly discarded between sampling sites.

3.5 Groundwater Level Quality Assurance and Quality Control

UWCD and VCWPD have QA and QC measures in place to maintain the quality of the data collected by their individual monitoring networks. DWR recommends that *“All data should be entered into the GSA data management system (DMS) as soon as possible. Care should be taken to avoid data entry mistakes and the entries should be checked by a second person for compliance with the DQOs”* (DWR, 2016a).

As mentioned above, VCWPD acts as the clearinghouse for water level data collected in Ventura County and is the single CASGEM submitting agency in the County. This arrangement provides an additional QA/QC check for water level data collected in the basins by standardizing reference points and the use of data qualifiers associated with water level measurements. If any collected data are found to be suspect, VCWPD contacts the originating source of the data (entity that collected the water level measurements) and resolves any apparent issues before upload to the State's database.

4. Requirements for Inspection and Acceptance of Supplies and Consumables

Individual monitoring network managers and supervisors are responsible for identifying the types and quantities of supplies and consumables that are needed for collecting the samples and groundwater level measurements described in this SAP. When supplies are received, field personnel should inspect the condition of all supplies before the supplies are accepted for use. If the supplies do not meet the monitoring entities acceptance criteria (e.g., non-expired field meter calibration standards), the supplies should be rejected.

5. Non-Direct Measurements

For this SAP, it is anticipated that FPBGSA or their consultants will acquire data acquired from non-direct measurements such as databases, spreadsheets, and literature files. In addition, UWCD and VCWPD may acquire well owner verbally reported data (e.g., verbal water level measurement). Professional judgment and comparison to direct-measurements will be necessary in assessing the usefulness of non-direct measurements in GSP preparation.

6. Data Management

“Each Agency shall develop and maintain a data management system that is capable of storing and reporting information relevant to the development or implementation of the Plan and monitoring of the basin” (23 CCR § 352.6).

6.1 Water Quality Data

When appropriate, the data should be obtained from the analytical service provider in the form of an EDD, in addition to the required hard copy analytical data package. Formal verification of data should be conducted before associated results are presented or are used in subsequent activities.

Data tracking is essential to ensure timely, cost-effective, and high-quality results. Data tracking begins with sample chain of custody. When the analytical service provider receives custody of the samples, the provider should send a sample acknowledgment to the supervisor of the monitoring network entity. The sample acknowledgment confirm sample receipt, condition, and required analyses. The chain of custody forms should contain all pertinent information about each sample and can track the data at each phase of the process.

Data should be imported into the monitoring entities electronic database and shared with the UWCD clearing house for FPBGSA use annually at a minimum.

6.2 Water Level Data

Data should be imported into the monitoring entities electronic database and shared with the UWCD clearing house for FPBGSA use on a minimum frequency of once a year. Water level elevation data appropriately and All data qualifiers (Section 3.1.2) and associated water level measurements should be entered into the database along with any no measurement explanations (Section 3.1.1) documented in the field collection effort should be entered into the database along with the measured water levels.

7. Assessment, Response Actions, and Reports to Management

7.1 Assessment and Response Actions

The SAP QA Officer should conduct a readiness review immediately prior to major data collection tasks in the basins. The QA Officer should report findings to the FPBGSA Executive Director, who should take corrective action (if necessary) before the data collection task begins. The FPBGSA Executive Director and QA Officer should thoroughly debrief field staff a short time after beginning their respective implementation tasks if any emerging/unanticipated problems are reported and take corrective action, if necessary.

7.2 Reporting to Management

An annual report, after submittal of the basins' GSPs, is required as a component of the SGMA legislation. The annual reports are intended to document monitoring and water use data to the DWR to gauge performance of the groundwater basins relative to the sustainability goal(s) identified in the basins' GSPs. A component of the annual report could include SAP performance in meeting the sustainability monitoring requirements in the basins. Any limitations in the way the data can be reliably used should be described.

The FPBGSA Executive Director could present an annual oral report to the FPBGSA Board of Directors during a regular monthly board meeting. The oral report should include:

- Readiness review findings (described above);
- Status of SAP related activities in the basins; and
- Identify whether any major QA problems were encountered (and if so, how they were handled).

8. Data Evaluation and Usability

This section describes the procedures that are planned to review and verify field and laboratory data, as well as procedures for verifying that the data are sufficient to meet DQOs and MQOs for the basins.

8.1 Data Review and Reduction Requirements

Data reduction (i.e., processing) and review are essential functions for preparing data that can be used effectively to support basins-specific policy decisions and DQOs. Data review includes all procedures that field or laboratory personnel conduct to ensure that measurement results are correct and acceptable in accordance with the QA objectives that are stated in this SAP. Field and laboratory measurement data reduction and review procedures and requirements are specified in previously discussed field and laboratory methods, and guidance documents.

Field personnel should record, in a field logbook and/or on the appropriate field form, all raw data from chemical and physical field measurements. Field staff should have the primary responsibility for (1) verifying that field measurements were made correctly, (2) confirming that sample collection and handling procedures specified in this basins-specific SAP were followed, and (3) ensuring that all field data reduction and review procedures requirements are followed. Field staff are also responsible for assessing preliminary data quality and for advising the data user of any potential QA/QC problems with field data. If field data are used in required basins reporting, data reduction methods should be fully documented.

The laboratory should complete data reduction for chemical and physical laboratory measurements and should complete an in-house review of all laboratory analytical results. The laboratory QA manager is responsible for ensuring that all laboratory data reduction and review procedures follow State and Federal requirements. The FPBGSA SAP QA manger is responsible for ensuring that these laboratory procedures are consistent with the requirements that are stated in this SAP. The laboratory QA manager should also be responsible for assessing data quality and for advising the FPBGSA SAP QA manager of possible QA/QC problems with laboratory data.

8.2 Verification Methods

All data that are used to support decision making must be adequate for their intended purposes. This section outlines the basic data verification procedures that should be followed for all field and laboratory measurements.

The usability of a dataset is determined by comparing the data with a predetermined set of QC limits. UWCD and VCWPD data reviewers should conduct a systematic review of the data for compliance with established QC limits (such as sensitivity, precision, and accuracy) on the basis of spike, duplicate, and blank sampling results that are provided by the laboratory. Data reviewers should evaluate laboratory data for compliance with the following information:

- Method- and basins-specific analytical service requests;
- Holding times;
- Initial and continuing calibration acceptance criteria;
- Field, trip, and method blank acceptance criteria;
- Surrogate recovery;
- Field duplicates and MS and MSD acceptance criteria;
- MD precision;
- LCS accuracy;
- Other laboratory QC criteria specified by the method or on the basins-specific analytical service request form;
- Compound identification and quantitation; and
- Overall assessment of data, in accordance with basins-specific objectives.

The most current EPA guidelines should be followed for completing data verification for all applicable test methods (U.S. EPA, 2002).

9. Reconciliation with Data Quality Objectives

After data have been collected, reviewed, and validated, the data should undergo a final evaluation to determine whether the DQOs specified in this SAP have been met. EPA's DQA process should be followed to verify that the type, quality, and quantity of data that are collected are appropriate for their intended use (U.S. EPA, 2000).

The DQA process involves (1) verifying that the data have met the assumptions under which the data collection design and DQOs were developed, (2) taking appropriate corrective action if the assumptions have not been met, and (3) evaluating the extent to which the data support the decision that must be made so that scientifically valid and meaningful conclusions can be drawn from the data. To the extent possible, DQA methods and procedures should be followed that have been outlined by the U.S. EPA (2000).

To the extent possible, DQA process should be followed to verify that the type, quality, and quantity of data collected are appropriate for their intended use (U.S. EPA, 2000). This assessment should include the following:

- A review of the sampling design and sampling methods to verify that these were implemented as planned and are adequate to support basins' objectives.
- A review of basins-specific data quality indicators for PARCC and quantitation limits to determine whether acceptance criteria have been met.
- A review of basins-specific DQOs to determine whether they have been achieved by the data collected.
- An evaluation of any limitations associated with the decisions to be made based on the data collected. For example, if data completeness is only 90 percent compared to a basins-specific completeness objective of 95 percent, the data may still be usable to support a decision, but at a lower level of confidence.

References

- Bylaws of the Fillmore and Piru Basins Groundwater Sustainability Agency (Amended). Dated May 31, 2018. <https://s29420.pcdn.co/wp-content/uploads/2018/09/2018-07-17-FPBGSA-Bylaws-Amended-Approved-and-Adopted.pdf>
- California Code of Regulations: Title 23, Division 2, Chapter 1.5, and Subchapter 2. https://water.ca.gov/LegacyFiles/groundwater/sgm/pdfs/GSP_Emergency_Regulations.pdf
- California Department of Water Resources, 2016a, BMP 1: Best Management Practices for the Sustainable Management of Groundwater Monitoring Protocols, Standards, and Sites, December 2016. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-1-Monitoring-Protocols-Standards-and-Sites_ay_19.pdf
- California Department of Water Resources, 2016b, BMP 2: Best Management Practices for the Sustainable Management of Groundwater Monitoring Networks and Identification of Data Gaps, December 2016. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-2-Monitoring-Networks-and-Identification-of-Data-Gaps_ay_19.pdf
- California Department of Water Resources, 2017, Draft BMP 6: Best Management Practices for the Sustainable Management of Groundwater Sustainable Management Criteria, November 2017. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Best-Management-Practices-and-Guidance-Documents/Files/BMP-6-Sustainable-Management-Criteria-DRAFT_ay_19.pdf
- CH2MHILL, 2005, Literature review evaluation final report, Upper Santa Clara River Chloride TMDL collaborative process, prepared for Upper Santa Clara River Agricultural Technical Working Group; September 2005.
- Mann, 1959, John F. Mann Jr. & Associates, A plan for groundwater management for United Water Conservation District.

- Piru/Fillmore Basins Groundwater Management Council, 2013, Draft 2013 Piru/Fillmore basins AB 3030 groundwater management plan update prepared by United Water Conservation District. https://www.unitedwater.org/images/stories/reports/GW-Conditions-Reports/2013/DRAFT_2013_Piru-Fillmore_AB3030_GW_Man_Plan_10-23-2013%20all.pdf
- Puls, R.W., and Barcelona, M.J., 1996, Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures; US EPA, Ground Water Issue EPA/540/S-95/504. <https://www.epa.gov/sites/production/files/2015-06/documents/lwflw2a.pdf>
- U.S. Environmental Protection Agency. 2000. *Guidance for data quality assessment, practical methods for data analysis, EPA QA/G-9, QA00 update*. EPA/600/R-96/084. July 2000. <https://www.epa.gov/sites/production/files/2015-06/documents/g9-final.pdf>
- U.S. Environmental Protection Agency. 2001. *EPA requirements for quality assurance project plans, EPA QA/R-5*. EPA/240/B-01/003. March 2001. https://www.epa.gov/sites/production/files/2016-06/documents/r5-final_0.pdf
- U.S. Environmental Protection Agency. 2002. *Guidance on environmental data verification and data validation, EPA QA/G-8*. EPA/240/R-02/004. November 2002. <https://www.epa.gov/sites/production/files/2015-06/documents/g8-final.pdf>
- U.S. Environmental Protection Agency. 2006. *Guidance on systematic planning using the data quality objectives process, EPA QA/G-4*. EPA/240/B-06/001. February 2006. <https://www.epa.gov/sites/production/files/2015-06/documents/g4-final.pdf>
- U.S. Environmental Protection Agency. 2009. National drinking water regulations. May 2009. https://www.epa.gov/sites/production/files/2016-06/documents/npwdr_complete_table.pdf
- U.S. Geological Survey. Fact Sheet 088-00. June 2000. <https://pubs.usgs.gov/fs/fs-088-00/pdf/fs-088-00.pdf>
- U.S. Geological Survey. Compiled by Cunningham, W.L., and Schalk, C.W., 2011, Groundwater technical procedures of the U.S. Geological Survey: U.S. Geological Survey Techniques and Methods 1–A1. <https://pubs.usgs.gov/tm/1a1/pdf/tm1-a1.pdf>

U.S. Geological Survey. National Field Manual for the Collection of Water-Quality Data.

https://www.usgs.gov/mission-areas/water-resources/science/national-field-manual-collection-water-quality-data-nfm?qt-science_center_objects=0#qt-science_center_objects

U.S. Geological Survey, 2018, Preparations for water sampling: U.S. Geological Survey

Techniques and Methods, book 9, chap. A1 <https://pubs.usgs.gov/tm/09/a1/tm9a1.pdf>

United Water Conservation District, 2016, 2014 and 2015 Piru and Fillmore Basins Biennial Groundwater Conditions Report, United Water Conservation District Open-File Report 2016-

01. <https://www.unitedwater.org/images/stories/reports/GW-Conditions-Reports/2015/2014-2015%20Piru%20%20Fillmore%20basins%20Biennial%20GW%20Cond%20Rpt%20FINAL.pdf>

Ventura County Watershed Protection District, Hydrologic Data Server (Hydrodata).

<http://www.vcwatershed.net/hydrodata/>

Ventura County Watershed Protection District: Water Resources Division, 2016, 2015 Annual Report of Groundwater Conditions. September 2016. <https://s29422.pcdn.co/wp-content/uploads/2018/08/2015-Annual-Report-Final-Reduced.pdf>

Appendix A. Analytical Laboratory Information (FGL, Santa Paula)



STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

Interim

CALIFORNIA STATE



ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

CERTIFICATE OF ENVIRONMENTAL ACCREDITATION

Is hereby granted to

Fruit Growers Laboratory

Santa Paula

853 Corporation Street

Santa Paula, CA 93060

Scope of the certificate is limited to the
"Fields of Testing"
which accompany this Certificate.

Continued accredited status depends on successful completion of on-site inspection,
proficiency testing studies, and payment of applicable fees.

This Certificate is granted in accordance with provisions of
Section 100825, et seq. of the Health and Safety Code.

Certificate No.: **1573**

Expiration Date: **7/31/2020**

Effective Date: **8/1/2019**

A handwritten signature in black ink, appearing to read "Christine Sotelo".

Sacramento, California
subject to forfeiture or revocation

Christine Sotelo, Chief
Environmental Laboratory Accreditation Program

State Water Resources Control Board

July 26, 2019

Mr. Kelly Dunnahoo
Fruit Growers Laboratory
853 Corporation Street
Santa Paula, CA 93060

Dear Mr. Kelly Dunnahoo:

Certificate No. 1573

This is to advise you that the laboratory named above has been granted an interim certificate pursuant to California Health and Safety Code (HSC), Division 101, Part 1, Chapter 4, Section 100850(d).

The Fields of Testing for which this laboratory has been granted interim certification is shown in the enclosed "Fields of Testing". The Interim certificate shall remain in effect until

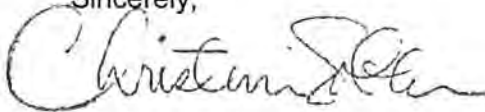
July 31, 2020 or until a certificate pursuant to HSC 100825(a) is issued.

Your laboratory is required to participate in the appropriate performance evaluation studies and to perform acceptably in such studies as stated in HSC 100870 and Title 22 of the California Code of Regulations Section 64809. Continued compliance with the Environmental Laboratory Accreditation Program statutes and regulations is required for maintaining the interim certification status.

Any changes in laboratory location or structural alterations, which may adversely affect the quality of analysis in the fields of testing for which the laboratory has been granted certification, require prior notification. Notification is also required for changes in ownership or laboratory director within 30 days after the change (HSC 100845(b) and (d)).

Contact our office at (916) 323-3431 or elapca@waterboards.ca.gov for questions.

Sincerely,



Christine Sotelo, Chief
Environmental Laboratory Accreditation Program

Enclosure



**CALIFORNIA STATE
ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM
Accredited Fields of Testing**



Fruit Growers Laboratory

Santa Paula
853 Corporation Street
Santa Paula, CA 93060
Phone: 8053922000

Certificate No. 1573
Expiration Date 7/31/2020
INTERIM

Field of Testing: 101 - Microbiology of Drinking Water

101.010	001	Heterotrophic Bacteria	SM 9215 B
101.020	001	Total Coliform P/A	SM 9221 B
101.020	002	Fecal Coliform P/A	SM 9221 B,E
101.020	004	Total Coliform (Enumeration)	SM 9221 B,C
101.020	005	Fecal Coliform (Enumeration)	SM 9221 B,E
101.050	001	Total Coliform P/A	SM 9223 B Colilert
101.050	002	E. coli P/A	SM 9223 B Colilert
101.050	003	Total Coliform (Enumeration)	SM 9223 B Colilert
101.050	004	E. coli (Enumeration)	SM 9223 B Colilert
101.050	005	Total Coliform P/A	SM 9223 B Colilert 18
101.050	006	E. coli P/A	SM 9223 B Colilert 18
101.050	007	Total Coliform (Enumeration)	SM 9223 B Colilert 18
101.050	008	E. coli (Enumeration)	SM 9223 B Colilert 18
101.050	009	Total Coliform P/A	SM 9223 B Colisure
101.050	010	E. coli P/A	SM 9223 B Colisure
101.050	011	Total Coliform (Enumeration)	SM 9223 B Colisure
101.050	012	E. coli (Enumeration)	SM 9223 B Colisure
101.170	001	Enterococci	Enterolert

Field of Testing: 102 - Inorganic Chemistry of Drinking Water

102.026	001	Calcium	EPA 200.7
102.026	002	Magnesium	EPA 200.7
102.026	003	Potassium	EPA 200.7
102.026	004	Silica	EPA 200.7
102.026	005	Sodium	EPA 200.7
102.026	006	Hardness (Calculation)	EPA 200.7
102.030	001	Bromide	EPA 300.0
102.030	003	Chloride	EPA 300.0
102.030	005	Fluoride	EPA 300.0
102.030	006	Nitrate (as N)	EPA 300.0
102.030	007	Nitrite (as N)	EPA 300.0
102.030	008	Phosphate,Ortho (as P)	EPA 300.0
102.030	009	Sulfate (as SO4)	EPA 300.0
102.045	001	Perchlorate	EPA 314.0

102.095	001	Turbidity	SM 2130 B-2001
102.100	001	Alkalinity	SM 2320 B-1997
102.130	001	Specific Conductance	SM 2510 B-1997
102.140	001	Residue, Filterable TDS	SM 2540 C-1997
102.175	001	Chlorine, Free	SM 4500-Cl G-2000
102.175	002	Chlorine, Total Residual	SM 4500-Cl G-2000
102.190	001	Cyanide, Total	SM 4500-CN E-1999
102.203	001	Hydrogen Ion (pH)	SM 4500-H+ B-2000
102.220	001	Nitrite (as N)	SM 4500-NO2 B-2000
102.234	001	Nitrite (as N)	SM 4500-NO3 F-2000
102.234	002	Nitrate (as N)	SM 4500-NO3 F-2000
102.240	001	Phosphate, Ortho (as P)	SM 4500-P E-1999
102.262	001	Organic Carbon-Total (TOC)	SM 5310 C-2000
102.263	001	Dissolved Organic Carbon (DOC)	SM 5310 C-2000
102.270	001	Surfactants	SM 5540 C-2000

Field of Testing: 103 - Toxic Chemical Elements of Drinking Water

103.130	001	Aluminum	EPA 200.7
103.130	003	Barium	EPA 200.7
103.130	004	Beryllium	EPA 200.7
103.130	005	Cadmium	EPA 200.7
103.130	007	Chromium	EPA 200.7
103.130	008	Copper	EPA 200.7
103.130	009	Iron	EPA 200.7
103.130	011	Manganese	EPA 200.7
103.130	012	Nickel	EPA 200.7
103.130	015	Silver	EPA 200.7
103.130	017	Zinc	EPA 200.7
103.130	018	Boron	EPA 200.7
103.140	001	Aluminum	EPA 200.8
103.140	002	Antimony	EPA 200.8
103.140	003	Arsenic	EPA 200.8
103.140	004	Barium	EPA 200.8
103.140	005	Beryllium	EPA 200.8
103.140	006	Cadmium	EPA 200.8
103.140	007	Chromium	EPA 200.8
103.140	008	Copper	EPA 200.8
103.140	009	Lead	EPA 200.8
103.140	010	Manganese	EPA 200.8
103.140	012	Nickel	EPA 200.8
103.140	013	Selenium	EPA 200.8
103.140	014	Silver	EPA 200.8
103.140	015	Thallium	EPA 200.8

103.140	016	Zinc	EPA 200.8
103.140	017	Boron	EPA 200.8
103.140	018	Vanadium	EPA 200.8
103.160	001	Mercury	EPA 245.1
103.310	001	Chromium (VI)	EPA 218.6

Field of Testing: 104 - Volatile Organic Chemistry of Drinking Water

104.030	001	1,2-Dibromoethane (EDB, Ethylene Dibromide)	EPA 504.1
104.030	002	1,2-Dibromo-3-chloropropane (DBCP)	EPA 504.1
104.035	001	1,2,3-Trichloropropane (TCP)	SRL 524M-TCP
104.040	000	Volatile Organic Compounds	EPA 524.2
104.040	001	Benzene	EPA 524.2
104.040	007	n-Butylbenzene	EPA 524.2
104.040	008	sec-Butylbenzene	EPA 524.2
104.040	009	tert-Butylbenzene	EPA 524.2
104.040	010	Carbon Tetrachloride	EPA 524.2
104.040	011	Chlorobenzene	EPA 524.2
104.040	015	2-Chlorotoluene	EPA 524.2
104.040	016	4-Chlorotoluene	EPA 524.2
104.040	019	1,3-Dichlorobenzene	EPA 524.2
104.040	020	1,2-Dichlorobenzene	EPA 524.2
104.040	021	1,4-Dichlorobenzene	EPA 524.2
104.040	022	Dichlorodifluoromethane	EPA 524.2
104.040	023	1,1-Dichloroethane	EPA 524.2
104.040	024	1,2-Dichloroethane	EPA 524.2
104.040	025	1,1-Dichloroethene (1,1-Dichloroethylene)	EPA 524.2
104.040	026	cis-1,2-Dichloroethene	EPA 524.2
104.040	027	trans-1,2-Dichloroethene	EPA 524.2
104.040	028	Dichloromethane (Methylene Chloride)	EPA 524.2
104.040	029	1,2-Dichloropropane	EPA 524.2
104.040	033	cis-1,3-Dichloropropene	EPA 524.2
104.040	034	trans-1,3-Dichloropropene	EPA 524.2
104.040	035	Ethylbenzene	EPA 524.2
104.040	037	Isopropylbenzene	EPA 524.2
104.040	039	Naphthalene	EPA 524.2
104.040	041	N-propylbenzene	EPA 524.2
104.040	042	Styrene	EPA 524.2
104.040	043	1,1,1,2-Tetrachloroethane	EPA 524.2
104.040	044	1,1,2,2-Tetrachloroethane	EPA 524.2
104.040	045	Tetrachloroethylene (Tetrachloroethene)	EPA 524.2
104.040	046	Toluene	EPA 524.2
104.040	047	1,2,3-Trichlorobenzene	EPA 524.2
104.040	048	1,2,4-Trichlorobenzene	EPA 524.2

104.040	049	1,1,1-Trichloroethane	EPA 524.2
104.040	050	1,1,2-Trichloroethane	EPA 524.2
104.040	051	Trichloroethene	EPA 524.2
104.040	052	Trichlorofluoromethane	EPA 524.2
104.040	054	1,2,4-Trimethylbenzene	EPA 524.2
104.040	055	1,3,5-Trimethylbenzene	EPA 524.2
104.040	056	Vinyl Chloride	EPA 524.2
104.040	057	Xylenes, Total	EPA 524.2
104.045	000	Trihalomethanes, Total	EPA 524.2
104.045	001	Bromodichloromethane	EPA 524.2
104.045	002	Bromoform	EPA 524.2
104.045	003	Chloroform	EPA 524.2
104.045	004	Dibromochloromethane	EPA 524.2
104.050	000	Gasoline Additives	EPA 524.2
104.050	002	Methyl tert-butyl Ether (MTBE)	EPA 524.2
104.050	003	tert-Amyl Methyl Ether (TAME)	EPA 524.2
104.050	004	Ethyl tert-butyl Ether (ETBE)	EPA 524.2
104.050	005	Trichlorotrifluoroethane	EPA 524.2
104.050	006	tert-Butyl Alcohol (TBA)	EPA 524.2

Field of Testing: 105 - Semi-volatile Organic Chemistry of Drinking Water

105.010	000	Organochlorine Pesticides and PCBs	EPA 505
105.010	002	Alachlor	EPA 505
105.010	004	Chlordane	EPA 505
105.010	006	Endrin	EPA 505
105.010	007	Heptachlor	EPA 505
105.010	008	Heptachlor Epoxide	EPA 505
105.010	009	Hexachlorobenzene	EPA 505
105.010	010	Hexachlorocyclopentadiene	EPA 505
105.010	011	Lindane (HCH-gamma)	EPA 505
105.010	012	Methoxychlor	EPA 505
105.010	014	Toxaphene	EPA 505
105.010	015	PCBs as Aroclors (screen)	EPA 505
105.030	000	N-, P- Pesticides	EPA 507
105.030	001	Alachlor	EPA 507
105.030	002	Atrazine	EPA 507
105.030	003	Butachlor	EPA 507
105.030	005	Metolachlor	EPA 507
105.030	006	Metribuzin	EPA 507
105.030	007	Molinate	EPA 507
105.030	008	Prometryn	EPA 507
105.030	009	Simazine	EPA 507
105.082	000	Chlorinated Acids	EPA 515.3

105.082	001	2,4-D	EPA 515.3
105.082	002	Dinoseb	EPA 515.3
105.082	003	Pentachlorophenol	EPA 515.3
105.082	004	Picloram	EPA 515.3
105.082	005	2,4,5-TP (Silvex)	EPA 515.3
105.082	006	Bentazon	EPA 515.3
105.082	007	Dalapon	EPA 515.3
105.082	008	Dicamba	EPA 515.3
105.100	000	Carbamates	EPA 531.1
105.100	001	Aldicarb	EPA 531.1
105.100	002	Aldicarb Sulfone	EPA 531.1
105.100	003	Aldicarb Sulfoxide	EPA 531.1
105.100	004	Carbaryl	EPA 531.1
105.100	005	Carbofuran	EPA 531.1
105.100	006	3-Hydroxycarbofuran	EPA 531.1
105.100	007	Methomyl	EPA 531.1
105.100	008	Oxamyl	EPA 531.1
105.120	001	Glyphosate	EPA 547
105.140	001	Endothal	EPA 548.1
105.150	001	Diquat	EPA 549.2
105.175	001	Bromodichloromethane	EPA 551.1
105.175	002	Bromoform	EPA 551.1
105.175	003	Chloroform	EPA 551.1
105.175	004	Dibromochloromethane	EPA 551.1
105.175	005	Trihalomethanes	EPA 551.1
105.200	001	Bromoacetic Acid	EPA 552.2
105.200	003	Chloroacetic Acid	EPA 552.2
105.200	005	Dibromoacetic Acid	EPA 552.2
105.200	006	Dichloroacetic Acid	EPA 552.2
105.200	007	Trichloroacetic Acid	EPA 552.2
105.200	008	Haloacetic Acids (HAA5)	EPA 552.2

Field of Testing: 106 - Radiochemistry of Drinking Water

106.010	001	Gross Alpha	EPA 900.0
106.010	002	Gross Beta	EPA 900.0
106.050	001	Total Alpha Radium	EPA 903.0
106.050	002	Radium-226	EPA 903.0
106.070	003	Strontium-90	EPA 905.0
106.080	001	Tritium	EPA 906.0
106.090	001	Uranium	EPA 908.0
106.092	001	Uranium	EPA 200.8
106.170	001	Radium-228	EPA Ra-05
106.270	001	Gross Alpha	SM 7110 C

106.610 001 Radon-222 SM 7500-Rn

Field of Testing: 107 - Microbiology of Wastewater

107.010	001	Heterotrophic Bacteria	SM 9215 B
107.020	002	Total Coliform	SM 9221 B-2006
107.030	002	Total Coliform with Chlorine Present	SM 9221 B-2006
107.040	002	Fecal Coliform (Enumeration)	SM 9221 C,E-2006
107.050	002	Fecal Coliform with Chlorine Present	SM 9221 C,E-2006
107.242	001	Enterococci	Enterolert
107.245	001	E. coli (Enumeration)	SM 9223 B Colilert 18
107.245	002	E. coli (Enumeration)	SM 9223 B Colilert

Field of Testing: 108 - Inorganic Chemistry of Wastewater

108.090	001	Residue, Volatile	EPA 160.4
108.112	001	Boron	EPA 200.7
108.112	002	Calcium	EPA 200.7
108.112	003	Hardness (Calculation)	EPA 200.7
108.112	004	Magnesium	EPA 200.7
108.112	005	Potassium	EPA 200.7
108.112	006	Silica, Dissolved	EPA 200.7
108.112	007	Sodium	EPA 200.7
108.112	008	Phosphorus, Total	EPA 200.7
108.113	001	Boron	EPA 200.8
108.120	001	Bromide	EPA 300.0
108.120	002	Chloride	EPA 300.0
108.120	003	Fluoride	EPA 300.0
108.120	008	Sulfate (as SO ₄)	EPA 300.0
108.120	012	Nitrate (as N)	EPA 300.0
108.120	013	Nitrate-Nitrite (as N)	EPA 300.0
108.120	014	Nitrite (as N)	EPA 300.0
108.120	015	Phosphate, Ortho (as P)	EPA 300.0
108.211	002	Kjeldahl Nitrogen, Total (as N)	EPA 351.2
108.267	001	Phosphorus, Total	EPA 200.7
108.360	001	Phenols, Total	EPA 420.1
108.381	001	Oil & Grease Total	EPA 1664 A
108.390	001	Turbidity	SM 2130 B-2001
108.410	001	Alkalinity	SM 2320 B-1997
108.430	001	Specific Conductance	SM 2510 B-1997
108.440	001	Residue, Total	SM 2540 B-1997
108.441	001	Residue, Filterable TDS	SM 2540 C-1997
108.442	001	Residue, Non-filterable TSS	SM 2540 D-1997
108.443	001	Residue, Settleable	SM 2540 F-1997
108.465	001	Chlorine, Total Residual	SM 4500-Cl G-2000
108.470	001	Cyanide, Total	SM 4500-CN B or C-1999

108.472	001	Cyanide, Total	SM 4500-CN E-1999
108.490	001	Hydrogen Ion (pH)	SM 4500-H+ B-2000
108.508	002	Ammonia (as N)	SM 4500-NH3 G-1997
108.514	001	Nitrite (as N)	SM 4500-NO2 B-2000
108.529	001	Nitrate-Nitrite (as N)	SM 4500-NO3 F-2000
108.529	002	Nitrite (as N)	SM 4500-NO3 F-2000
108.529	003	Nitrate (as N)	SM 4500-NO3 F-2000
108.540	001	Phosphate,Ortho (as P)	SM 4500-P E-1999
108.541	001	Phosphorus,Total	SM 4500-P E-1999
108.584	001	Sulfide (as S)	SM 4500-S D-2000
108.592	001	Biochemical Oxygen Demand	SM 5210 B -2001
108.592	002	Carbonaceous BOD	SM 5210 B -2001
108.595	001	Chemical Oxygen Demand	SM 5220 D-1997
108.597	001	Organic Carbon-Total (TOC)	SM 5310 C-2000
108.605	001	Surfactants	SM 5540 C-2000

Field of Testing: 109 - Toxic Chemical Elements of Wastewater

109.010	001	Aluminum	EPA 200.7
109.010	002	Antimony	EPA 200.7
109.010	003	Arsenic	EPA 200.7
109.010	004	Barium	EPA 200.7
109.010	005	Beryllium	EPA 200.7
109.010	006	Boron	EPA 200.7
109.010	007	Cadmium	EPA 200.7
109.010	009	Chromium	EPA 200.7
109.010	010	Cobalt	EPA 200.7
109.010	011	Copper	EPA 200.7
109.010	012	Iron	EPA 200.7
109.010	013	Lead	EPA 200.7
109.010	015	Manganese	EPA 200.7
109.010	016	Molybdenum	EPA 200.7
109.010	017	Nickel	EPA 200.7
109.010	019	Selenium	EPA 200.7
109.010	021	Silver	EPA 200.7
109.010	023	Thallium	EPA 200.7
109.010	024	Tin	EPA 200.7
109.010	025	Titanium	EPA 200.7
109.010	026	Vanadium	EPA 200.7
109.010	027	Zinc	EPA 200.7
109.020	001	Aluminum	EPA 200.8
109.020	002	Antimony	EPA 200.8
109.020	003	Arsenic	EPA 200.8
109.020	004	Barium	EPA 200.8

109.020	005	Beryllium	EPA 200.8
109.020	006	Cadmium	EPA 200.8
109.020	007	Chromium	EPA 200.8
109.020	008	Cobalt	EPA 200.8
109.020	009	Copper	EPA 200.8
109.020	010	Lead	EPA 200.8
109.020	011	Manganese	EPA 200.8
109.020	012	Molybdenum	EPA 200.8
109.020	013	Nickel	EPA 200.8
109.020	014	Selenium	EPA 200.8
109.020	015	Silver	EPA 200.8
109.020	016	Thallium	EPA 200.8
109.020	017	Vanadium	EPA 200.8
109.020	018	Zinc	EPA 200.8
109.020	021	Iron	EPA 200.8
109.104	001	Chromium (VI)	EPA 218.6
109.190	001	Mercury	EPA 245.1

Field of Testing: 110 - Volatile Organic Chemistry of Wastewater

110.040	000	Purgeable Organic Compounds	EPA 624
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Field of Testing: 111 - Semi-volatile Organic Chemistry of Wastewater

111.100	000	Base/Neutral & Acid Organics	EPA 625
111.101	000	Organochlorine Pesticides and PCBs	EPA 625
111.170	000	Organochlorine Pesticides and PCBs	EPA 608
111.210	000	Carbamates	EPA 632

Field of Testing: 112 - Radiochemistry of Wastewater

112.010	001	Gross Alpha	EPA 900.0
112.010	002	Gross Beta	EPA 900.0
112.020	001	Total Alpha Radium	EPA 903.0
112.180	001	Tritium	EPA 906.0
112.190	001	Uranium	EPA 908.0

Field of Testing: 114 - Inorganic Chemistry of Hazardous Waste

114.010	001	Antimony	EPA 6010 B
114.010	002	Arsenic	EPA 6010 B
114.010	003	Barium	EPA 6010 B
114.010	004	Beryllium	EPA 6010 B
114.010	005	Cadmium	EPA 6010 B
114.010	006	Chromium	EPA 6010 B
114.010	007	Cobalt	EPA 6010 B
114.010	008	Copper	EPA 6010 B
114.010	009	Lead	EPA 6010 B
114.010	010	Molybdenum	EPA 6010 B

114.010	011	Nickel	EPA 6010 B
114.010	012	Selenium	EPA 6010 B
114.010	013	Silver	EPA 6010 B
114.010	014	Thallium	EPA 6010 B
114.010	015	Vanadium	EPA 6010 B
114.010	016	Zinc	EPA 6010 B
114.020	002	Arsenic	EPA 6020
114.020	004	Beryllium	EPA 6020
114.020	005	Cadmium	EPA 6020
114.020	006	Chromium	EPA 6020
114.020	007	Cobalt	EPA 6020
114.020	009	Lead	EPA 6020
114.020	010	Molybdenum	EPA 6020
114.020	012	Selenium	EPA 6020
114.020	014	Thallium	EPA 6020
114.140	001	Mercury	EPA 7470 A
114.221	001	Cyanide, Total	EPA 9012 A
114.240	001	Corrosivity - pH Determination	EPA 9040 B
114.241	001	Corrosivity - pH Determination	EPA 9045 C

Field of Testing: 115 - Extraction Test of Hazardous Waste

115.030	001	Waste Extraction Test (WET)	CCR Chapter 11, Article 5, Appendix II
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Field of Testing: 116 - Volatile Organic Chemistry of Hazardous Waste

116.080	000	Volatile Organic Compounds	EPA 8260 B
116.080	120	Oxygenates	EPA 8260 B

Field of Testing: 117 - Semi-volatile Organic Chemistry of Hazardous Waste

117.010	001	Diesel-range Total Petroleum Hydrocarbons	EPA 8015 B	
117.110	000	Extractable Organics	EPA 8270 C	
117.210	000	Organochlorine Pesticides	EPA 8081 A	Aqueous Only
117.220	000	PCBs	EPA 8082	Aqueous Only
117.240	000	Organophosphorus Pesticides	EPA 8141 A	Aqueous Only
117.250	000	Chlorinated Herbicides	EPA 8151 A	Aqueous Only

Field of Testing: 126 - Microbiology of Recreational Water

126.010	001	Total Coliform (Enumeration)	SM 9221 B-2006
126.030	001	Fecal Coliform (Enumeration)	SM 9221 C,E-2006
126.050	001	Total Coliform (Enumeration)	SM 9223 B Colilert
126.050	002	E. coli (Enumeration)	SM 9223 B Colilert
126.080	001	Enterococci	Enterolert

Appendix M

Statement of Findings
Regarding the
Determination of
Incomplete Status of the
Piru Subbasin



CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

715 P Street, 8th Floor | Sacramento, CA 95814 | P.O. Box 942836 | Sacramento, CA 94236-0001

January 18, 2024

Tony Emmert
Fillmore and Piru Basins
PO Box 1110
Fillmore, CA 93016
tonye@unitedwater.org

RE: Santa Clara River Valley – Piru Subbasin - 2022 Groundwater Sustainability Plan

Dear Tony Emmert,

The Department of Water Resources (Department) has evaluated the groundwater sustainability plan (GSP or Plan) submitted for the Santa Clara River Valley – Piru Subbasin. The Department has determined that the Plan is “incomplete” pursuant to Section 355.2(e)(2) of the GSP Regulations.

The Department based its incomplete determination on recommendations from the Staff Report, included as an enclosure to the attached Statement of Findings, which describes that the Subbasin’s Plan does not satisfy the objectives of the Sustainable Groundwater Management Act (SGMA) nor substantially comply with the GSP Regulations. The Staff Report also provides corrective actions which the Department recommends the Subbasin’s groundwater sustainability agency (GSA) review while determining how to address the deficiencies.

The Subbasin’s GSA has 180 days, the maximum allowed by the GSP Regulations, to address the identified deficiencies. Where addressing the deficiencies requires modification of the Plan, the GSA must adopt those modifications into the GSP and all applicable coordination agreement materials, or otherwise demonstrate that those modifications are part of the Plan before resubmitting it to the Department for evaluation no later than July 16, 2024. The Department understands that much work has occurred to advance sustainable groundwater management since the GSA submitted the GSP in January 2022. To the extent to which those efforts are related or responsive to the Department’s identified deficiencies, we encourage you to document that as part of your Plan resubmittal. The Department prepared a [Frequently Asked Questions](#) document to provide general information and guidance on the process of addressing deficiencies in an “incomplete” determination.

Department staff will work expeditiously to review the revised components of your Plan resubmittal. If the revisions sufficiently address the identified deficiencies, the Department will determine that the Plan is “approved”. In that scenario, Department staff will identify additional recommended corrective actions that the GSA should address

early in implementing the GSP (i.e., no later than the first required periodic evaluation). Among other items, those corrective actions will recommend the GSA provide more detail on their plans and schedules to address data gaps. Those recommendations will call for significantly expanded documentation of the plans and schedules to implement specific projects and management actions. Regardless of those recommended corrective actions, the Department expects the first periodic evaluations, required no later than January 2027 – one-quarter of the way through the 20-year implementation period – to document significant progress toward achieving sustainable groundwater management.

If the Subbasin's GSA cannot address the deficiencies identified in this letter by July 16, 2024, then the Department, after consultation with the State Water Resources Control Board, will determine the GSP to be "inadequate". In that scenario, the State Water Resources Control Board may identify additional deficiencies that the GSAs would need to address in the state intervention processes outlined in SGMA.

Please contact Sustainable Groundwater Management staff by emailing sgmps@water.ca.gov if you have any questions related to the Department's assessment or implementation of your GSP.

Thank You,

Paul Gosselin
Paul Gosselin
Deputy Director
Sustainable Groundwater Management

Attachment:

1. Statement of Findings Regarding the Determination of Incomplete Status of the Santa Clara River Valley – Piru Subbasin Groundwater Sustainability Plan

**STATE OF CALIFORNIA
DEPARTMENT OF WATER RESOURCES**

**STATEMENT OF FINDINGS REGARDING THE
DETERMINATION OF INCOMPLETE STATUS OF THE
SANTA CLARA RIVER VALLEY – PIRU SUBBASIN
GROUNDWATER SUSTAINABILITY PLAN**

The Department of Water Resources (Department) is required to evaluate whether a submitted groundwater sustainability plan (GSP or Plan) conforms to specific requirements of the Sustainable Groundwater Management Act (SGMA or Act), is likely to achieve the sustainability goal for the Subbasin, and whether the GSP adversely affects the ability of an adjacent basin or subbasin to implement its GSP or impedes achievement of sustainability goals in an adjacent basin or subbasin. (Water Code § 10733.) The Department is directed to issue an assessment of the GSP within two years of its submission. (Water Code § 10733.4.) This Statement of Findings explains the Department's decision regarding the submitted Plan by the Fillmore and Piru Basins Groundwater Sustainability Agency (GSA or Agency) for the Santa Clara River Valley – Piru Subbasin (No. 4-004.06).

Department management has reviewed the enclosed Staff Report, which recommends that the identified deficiencies should preclude approval of the GSP. Based on its review of the Staff Report, Department management is satisfied that staff have conducted a thorough evaluation and assessment of the Plan and concurs with, and hereby adopts, staff's recommendation and all the corrective actions provided. The Department thus determines the Plan Incomplete based on the staff assessments and recommendations. In particular, the Department finds:

A. The GSA should modify its sustainable management criteria and must provide a more detailed explanation and justification regarding the selection of the sustainable management criteria for groundwater levels, particularly the undesirable results and minimum thresholds, and the effects of those criteria on the interests of beneficial uses and users of groundwater. The minimum thresholds should indicate a depletion of supply at a given location that may lead to undesirable results. Department staff recommend the GSA address the following:

1. The GSA should revise the GSP to sufficiently and clearly explain the undesirable results that the GSA aims to avoid and what it considers to be a significant and unreasonable level of impact, such as a number or percentage of wells going dry. In support of said explanation, the GSP should clearly discuss and disclose the anticipated impacts on beneficial uses and users of groundwater in the Subbasin.

2. The GSA should revise the minimum thresholds and explain how the minimum threshold groundwater levels are consistent with avoiding undesirable results the GSA aims to avoid. If, for example, the GSA seeks to avoid domestic wells going dry, the GSP should explain how the minimum threshold at each representative well will avoid impact to nearby domestic and other production wells. The GSP should also explain how the Agency has determined that basin conditions at minimum threshold water level conditions will avoid undesirable results for other sustainability indicators.
 3. Provide an evaluation of how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests.¹ Identify the number and location of wells that may be negatively affected when minimum thresholds are reached. Compare well infrastructure for all well types in the Subbasin with minimum thresholds at nearby, suitably representative, monitoring sites. Document all assumptions and steps clearly so that it will be understood by readers of the GSP. Include maps of potentially affected well locations, identify the number of potentially affected wells by well type, and provide a supporting discussion of the effects.
- B. The GSA must set preliminary sustainable management criteria for depletions of interconnected surface water associated with groundwater use, as required by the GSP Regulations,² based on best available information and science. The GSA should evaluate and disclose, sufficiently and thoroughly, the potential effects of the Plan's sustainable management criteria for depletions of interconnected surface water on beneficial uses of the interconnected surface water and on groundwater uses and users.

¹ 23 CCR § 354.28 (b)(4).

² 23 CCR §§ 354.26, 354.28, 354.30.

Statement of Findings
Santa Clara River Valley – Piru Subbasin (No. 4-004.06)

January 18, 2024

Based on the above, the GSP submitted by the Agency for the Santa Clara River Valley – Piru Subbasin is determined to be incomplete because the GSP does not satisfy the requirements of SGMA, nor does it substantially comply with the GSP Regulations. The corrective actions provided in the Staff Report are intended to address the deficiencies that, at this time, preclude approval. The Agency has up to 180 days to address the deficiencies outlined above and detailed in the Staff Report. Once the Agency resubmits its Plan, the Department will review the revised GSP to evaluate whether the deficiencies were adequately addressed. Should the Agency fail to take sufficient actions to correct the deficiencies identified by the Department in this assessment, the Department shall disapprove the Plan if, after consultation with the State Water Resources Control Board, the Department determines the Plan inadequate pursuant to 23 CCR § 355.2(e)(3)(C).

Signed:



Karla Nemeth, Director
Date: January 18, 2024

Enclosure: Groundwater Sustainability Plan Assessment Staff Report – Santa Clara River Valley – Piru Subbasin

State of California
Department of Water Resources
Sustainable Groundwater Management Program
Groundwater Sustainability Plan Assessment
Staff Report

Groundwater Basin Name:	Santa Clara River Valley – Piru Subbasin (No. 4-004.06)
Submitting Agency:	Fillmore and Piru Basins Groundwater Sustainability Agency
Submittal Type:	Initial GSP Submission
Submittal Date:	January 26, 2022
Recommendation:	Incomplete
Date:	January 18, 2024

The Sustainable Groundwater Management Act (SGMA)¹ allows for any of the three following planning scenarios: a single groundwater sustainability plan (GSP) developed and implemented by a single groundwater sustainability agency (GSA); a single GSP developed and implemented by multiple GSAs; and multiple GSPs implemented by multiple GSAs and coordinated pursuant to a single coordination agreement.² Here, as presented in this staff report, a single GSP covering the entire basin was adopted and submitted to the Department of Water Resources (Department) for review.³

The Fillmore and Piru Basins Groundwater Sustainability Agency (the GSA) jointly submitted the Piru Basin Groundwater Sustainability Plan (GSP or Plan) to the Department for evaluation and assessment as required by SGMA and the GSP Regulations.⁴ The GSP covers the entire Santa Clara River Valley – Piru Subbasin (Subbasin) for the implementation of SGMA.

Evaluation and assessment by the Department is based on whether an adopted and submitted GSP, either individually or in coordination with other adopted and submitted GSPs, complies with SGMA and substantially complies with the GSP Regulations. Department staff base their assessment on information submitted as part of an adopted GSP, public comments submitted to the Department, and other materials, data, and reports that are relevant to conducting a thorough assessment. Department staff have evaluated the GSP and have identified deficiencies that staff recommend should preclude its approval.⁵ In addition, consistent with the GSP Regulations, Department staff have

¹ Water Code § 10720 *et seq.*

² Water Code § 10727.

³ Water Code §§ 10727(b)(1), 10733.4; 23 CCR § 355.2.

⁴ 23 CCR § 350 *et seq.*

⁵ 23 CCR §355.2(e)(2).

provided corrective actions⁶ that the GSAs should review while determining how and whether to address the deficiencies. The deficiencies and corrective actions are explained in greater detail in Section 3 of this staff report and are generally related to the need to define sustainable management criteria in the manner required by SGMA and the GSP Regulations.

This assessment includes four sections:

- **Section 1 – Evaluation Criteria**: Describes the legislative requirements and the Department’s evaluation criteria.
- **Section 2 – Required Conditions**: Describes the submission requirements, GSP completeness, and basin coverage required for a GSP to be evaluated by the Department.
- **Section 3 – Plan Evaluation**: Provides a detailed assessment of identified deficiencies in the GSP. Consistent with the GSP Regulations, Department staff have provided corrective actions for the GSA to address the deficiencies.
- **Section 4 – Staff Recommendation**: Provides staff's recommendation regarding the Department’s determination.

⁶ 23 CCR §355.2(e)(2)(B).

1 EVALUATION CRITERIA

The Department evaluates whether a Plan conforms to the statutory requirements of SGMA⁷ and is likely to achieve the basin's sustainability goal.⁸ To achieve the sustainability goal, the Plan must demonstrate that implementation will lead to sustainable groundwater management, which means the management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results.⁹ Undesirable results are required to be defined quantitatively by the GSAs overlying a basin and occur when significant and unreasonable effects for any of the applicable sustainability indicators are caused by groundwater conditions occurring throughout the basin.¹⁰ The Department is also required to evaluate whether the Plan will adversely affect the ability of an adjacent basin to implement its groundwater sustainability program or achieve its sustainability goal.¹¹

For a Plan to be evaluated by the Department, it must first be determined that it was submitted by the statutory deadline¹² and that it is complete and covers the entire basin.¹³ Additionally, for those GSAs choosing to develop multiple GSPs, the Plan submission must include a coordination agreement.¹⁴ The coordination agreement must explain how the multiple GSPs in the basin have been developed and implemented utilizing the same data and methodologies and that the elements of the multiple GSPs are based upon consistent interpretations of the basin's setting. If these required conditions are satisfied, the Department evaluates the Plan to determine whether it complies with SGMA and substantially complies with the GSP Regulations.¹⁵ As stated in the GSP Regulations, "[s]ubstantial compliance means that the supporting information is sufficiently detailed and the analyses sufficiently thorough and reasonable, in the judgment of the Department, to evaluate the Plan, and the Department determines that any discrepancy would not materially affect the ability of the Agency to achieve the sustainability goal for the basin, or the ability of the Department to evaluate the likelihood of the Plan to attain that goal."¹⁶

When evaluating whether the Plan is likely to achieve the sustainability goal for the basin, Department staff review the information provided for sufficiency, credibility, and consistency with scientific and engineering professional standards of practice.¹⁷ The Department's review considers whether there is a reasonable relationship between the

⁷ Water Code §§ 10727.2, 10727.4, 10727.6.

⁸ Water Code § 10733(a).

⁹ Water Code § 10721(v).

¹⁰ 23 CCR § 354.26.

¹¹ Water Code § 10733(c).

¹² 23 CCR § 355.4(a)(1).

¹³ 23 CCR §§ 355.4(a)(2), 355.4(a)(3).

¹⁴ 23 CCR § 357.4.

¹⁵ 23 CCR § 350 *et seq.*

¹⁶ 23 CCR § 355.4(b).

¹⁷ 23 CCR § 351(h).

information provided by the GSAs and the assumptions and conclusions presented in the Plan, including: whether the interests of the beneficial uses and users of groundwater in the basin have been considered; whether sustainable management criteria and projects and management actions described in the Plan are commensurate with the level of understanding of the basin setting; and whether those projects and management actions are feasible and likely to prevent undesirable results.¹⁸ The Department also considers whether the GSAs have the legal authority and financial resources necessary to implement the Plan.¹⁹

To the extent overdraft is present in a basin, the Department evaluates whether the Plan provides a reasonable assessment of the overdraft and includes reasonable means to mitigate it.²⁰ When applicable, the Department will assess whether coordination agreements have been adopted by all relevant parties and satisfy the requirements of SGMA and the GSP Regulations.²¹ The Department also considers whether the Plan provides reasonable measures and schedules to eliminate identified data gaps.²² Lastly, the Department's review considers the comments submitted on the Plan and evaluates whether the GSAs have adequately responded to the comments that raise credible technical or policy issues with the Plan.²³

The Department is required to evaluate the Plan within two years of its submittal date and issue a written assessment.²⁴ The assessment is required to include a determination of the Plan's status.²⁵ The GSP Regulations provide three options for determining the status of a Plan: approved,²⁶ incomplete,²⁷ or inadequate.²⁸

Even when the Department determines a Plan is approved, indicating that it satisfies the requirements of SGMA and is in substantial compliance with the GSP Regulations, the Department may still recommend corrective actions.²⁹ Recommended corrective actions are intended to facilitate progress in achieving the sustainability goal within the basin and the Department's future evaluations, and to allow the Department to better evaluate whether implementation of the Plan adversely affects adjacent basins. While the issues addressed by the recommended corrective actions in an approved Plan do not, at the time the determination was made, preclude its approval, the Department recommends that the issues be addressed to ensure the Plan's implementation continues to be consistent with SGMA and the Department is able to assess progress in achieving the

¹⁸ 23 CCR §§ 355.4(b)(1), (3), (4) and (5).

¹⁹ 23 CCR § 355.4(b)(9).

²⁰ 23 CCR § 355.4(b)(6).

²¹ 23 CCR § 355.4(b)(8).

²² 23 CCR § 355.4(b)(2).

²³ 23 CCR § 355.4(b)(10).

²⁴ Water Code § 10733.4(d); 23 CCR § 355.2(e).

²⁵ Water Code § 10733.4(d); 23 CCR § 355.2(e).

²⁶ 23 CCR § 355.2(e)(1).

²⁷ 23 CCR § 355.2(e)(2).

²⁸ 23 CCR § 355.2(e)(3).

²⁹ Water Code § 10733.4(d).

basin's sustainability goal.³⁰ Unless otherwise noted, the Department proposes that recommended corrective actions be addressed by the submission date for the first periodic assessment.³¹

After review of the Plan, Department staff may conclude that the information provided is not sufficiently detailed, or the analyses not sufficiently thorough and reasonable, to evaluate whether it is likely to achieve the sustainability goal for the basin. If the Department determines the deficiencies precluding approval may be capable of being corrected by the GSAs in a timely manner,³² the Department will determine the status of the Plan to be incomplete. A Plan deemed incomplete may be revised and resubmitted to the Department for reevaluation of whether all deficiencies have been addressed and incorporated into the Plan within 180 days after the Department makes its incomplete determination. The Department will review the revised Plan to evaluate whether the identified deficiencies were sufficiently addressed. Depending on the outcome of that evaluation, the Department may determine the resubmitted Plan is approved. Alternatively, the Department may find a formerly deemed incomplete GSP is inadequate if, after consultation with the State Water Resources Control Board, it determines that the GSAs have not taken sufficient actions to correct any identified deficiencies.³³

The staff assessment of the Plan involves the review of information presented by the GSAs, including models and assumptions, and an evaluation of that information based on scientific reasonableness. In conducting its assessment, the Department does not recalculate or reevaluate technical information provided in the Plan or perform its own geologic or engineering analysis of that information. The recommendation to approve a Plan does not signify that Department staff, were they to exercise the professional judgment required to develop a Plan for the basin, would make the same assumptions and interpretations as those contained in the Plan, but simply that Department staff have determined that the assumptions and interpretations relied upon by the submitting GSAs are supported by adequate, credible evidence, and are scientifically reasonable.

Lastly, the Department's review and assessment of an approved Plan is a continual process. Both SGMA and the GSP Regulations provide the Department with the ongoing authority and duty to review the implementation of the Plan.³⁴ Also, GSAs have an ongoing duty to reassess their GSPs, provide annual reports to the Department, and, when necessary, update or amend their GSPs.³⁵ The passage of time or new information may make what is reasonable and feasible at the time of this review to not be so in the future. The emphasis of the Department's periodic reviews will be to assess the GSA's progress toward achieving the basin's sustainability goal and whether implementation of

³⁰ Water Code § 10733.8.

³¹ 23 CCR § 356.4.

³² 23 CCR § 355.2(e)(2)(B)(i).

³³ 23 CCR § 355.2(e)(3)(C).

³⁴ Water Code § 10733.8; 23 CCR § 355.6.

³⁵ Water Code §§ 10728, 10728.2.

the Plan adversely affects the ability of GSAs in adjacent basins to achieve their sustainability goals.

2 REQUIRED CONDITIONS

A GSP, to be evaluated by the Department, must be submitted within the applicable statutory deadline.³⁶ The GSP must also be complete and must, either on its own or in coordination with other GSPs, cover the entire basin. If a GSP is determined to be incomplete, Department staff may require corrective actions that address minor or potentially significant deficiencies identified in the GSP. The GSAs in a basin, whether developing a single GSP covering the basin or multiple GSPs, must sufficiently address those required corrective actions within the time provided, not to exceed 180 days, for the GSP to be reevaluated by the Department and potentially approved.

2.1 SUBMISSION DEADLINE

SGMA required basins categorized as high- or medium-priority as of January 1, 2017 and to submit a GSP no later than January 31, 2022.³⁷

The GSA submitted the Piru Subbasin GSP to the Department on January 26, 2022, in compliance with the statutory deadline.

2.2 COMPLETENESS

GSP Regulations specify that the Department shall evaluate a GSP if that GSP is complete and includes the information required by SGMA and the GSP Regulations.³⁸

The GSA submitted an adopted GSP for the entire Subbasin. Department staff found the Piru Subbasin GSP to be complete and include the required information, sufficient to warrant an evaluation by the Department. Therefore, the Department posted the GSP to its website on February 7, 2022.

2.3 BASIN COVERAGE

A GSP, either on its own or in coordination with other GSPs, must cover the entire basin.³⁹ A GSP that intends to cover the entire basin may be presumed to do so if the basin is fully contained within the jurisdictional boundaries of the submitting GSAs.

The GSP intends to manage the entire Piru Subbasin and the jurisdictional boundaries of the submitting GSA appear to cover the entire Subbasin.

³⁶ Water Code § 10720.7.

³⁷ Water Code § 10720.7(a)(2).

³⁸ 23 CCR § 355.4(a)(2).

³⁹ Water Code § 10727(b); 23 CCR § 355.4(a)(3).

3 PLAN EVALUATION

As stated in Section 355.4 of the GSP Regulations, a basin “shall be sustainably managed within 20 years of the applicable statutory deadline consistent with the objectives of the Act.” The Department’s assessment is based on a number of related factors including whether the elements of a GSP were developed in the manner required by the GSP Regulations, whether the GSP was developed using appropriate data and methodologies and whether its conclusions are scientifically reasonable, and whether the GSP, through the implementation of clearly defined and technically feasible projects and management actions, is likely to achieve a tenable sustainability goal for the basin.

Department staff have identified deficiencies in the GSP, the most serious of which preclude staff from recommending approval of the GSP at this time. Department staff believe the GSA may be able to correct the identified deficiencies within 180 days. Consistent with the GSP Regulations, Department staff are providing corrective actions related to the deficiencies, detailed below, including the general regulatory background, the specific deficiency identified in the GSP, and the specific actions to address the deficiency.

3.1 DEFICIENCY 1. THE GSP DOES NOT ESTABLISH SUSTAINABLE MANAGEMENT CRITERIA FOR CHRONIC LOWERING OF GROUNDWATER LEVELS IN A MANNER SUBSTANTIALLY COMPLIANT WITH THE GSP REGULATIONS.

3.1.1 Background

It is up to the GSA to define undesirable results and describe the effect of undesirable results on the beneficial uses and users of groundwater.⁴⁰ From this definition, the GSA establishes minimum thresholds, which are quantitative values that represent groundwater conditions at representative monitoring sites that, when exceeded individually or in combination with minimum thresholds at other monitoring sites, may cause the basin to experience undesirable results.⁴¹ Put another way, the minimum thresholds represent conditions that, if not exceeded, should prevent the basin from experiencing the undesirable results identified by the GSA. Minimum thresholds for chronic lowering of groundwater levels are the groundwater elevation indicating a depletion of supply at a given location that may lead to undesirable results.⁴² Quantitative values for minimum thresholds should be supported by information and criteria relied upon to establish and justify the minimum threshold,⁴³ and a quantitative description of

⁴⁰ 23 CCR § 354.26 (b)(3), § 354.28 (b)(4).

⁴¹ 23 CCR § 354.28, DWR Best Management Practices for the Sustainable Management of Groundwater: Sustainable Management Criteria (DRAFT), November 2017.

⁴² 23 CCR § 354.28 (c)(1).

⁴³ 23 CCR § 354.28 (b)(1).

how conditions at minimum thresholds may affect the interests of beneficial uses and users of groundwater.⁴⁴

3.1.2 Deficiency

Department staff believe that the GSP contains flaws that do not sufficiently comply with the GSP Regulations and must be addressed to consider beneficial uses and users in the Subbasin. The GSP's presentation of undesirable results is unspecific and indeterminate regarding the number or depth of dry wells that are considered significant and unreasonable. The GSA's decision to establish minimum thresholds at the lowest possible elevation in each representative monitoring well, the bottom of well perforations, is technically flawed and would render the GSA unable to monitor groundwater levels if the minimum thresholds were exceeded during Plan implementation. The GSP has failed to provide information about how the proposed minimum thresholds indicate a depletion of supply that would lead to undesirable results. The selected minimum thresholds appear arbitrary and not supported by historical or projected groundwater levels. Also, the GSP fails to describe why the minimum thresholds, as proposed, are completely disconnected from the projected future water levels that the GSA anticipates will be experienced in the Subbasin. The GSP's approach is problematic because most of the selected minimum thresholds⁴⁵ are hundreds of feet lower than historical low water levels and deeper than many domestic well depths identified in the GSP,⁴⁶ which means this Plan would allow an unknown number of production wells to go dry with constituting an undesirable result.

3.1.3 Deficiency Details

Based on its review, Department staff conclude the Plan has not defined sustainable management criteria for chronic lowering of groundwater levels in a manner required by SGMA and the GSP Regulations. Generally, the GSP does not provide clear descriptions of what constitutes undesirable results and does not establish its minimum thresholds with consideration of the interests of beneficial uses and users and sufficient supporting information. The lack of this information limits Department staff's ability to evaluate whether the criteria are reasonable or whether the GSA plans to operate the Subbasin to avoid undesirable results.⁴⁷

The GSP provided minimum thresholds that are not related to a depletion of supply and were not developed with consideration of beneficial uses and users. Rather, the GSP states that it selected these minimum thresholds to "maximize the operational flexibility of the basins"⁴⁸ by selecting the bottom of the screened interval of the monitoring well.⁴⁹ Because of this approach, the GSA would not be able to monitor groundwater levels in a

⁴⁴ 23 CCR § 354.28 (b)(4).

⁴⁵ Piru GSP, Table 3.5-3, p. 133.

⁴⁶ Piru GSP, Figure 2.1-4, p. 165.

⁴⁷ 23 CCR §§ 354.28 (b)(1), 354.28 (b)(2), 354.28 (b)(3), 354.28 (b)(4), 354.28 (c)(1).

⁴⁸ Piru GSP, Appendix J, Section 5, p. 1513.

⁴⁹ Piru GSP, Section 3.3.1, p. 113; Appendix J, Section 3.3.3, p. 1505.

representative monitoring well when groundwater levels drop below minimum thresholds, which is technically flawed and would limit the GSA's capability to manage the Subbasin.

GSP Regulations require that GSAs define undesirable results caused by the chronic lowering of groundwater levels by identifying a significant and unreasonable depletion of supply that is present when an undesirable result occurs.⁵⁰ The GSP describes an undesirable result as: "groundwater level declines that result in...: loss of ability to pump groundwater from water wells..., die-off of riparian vegetation... due to groundwater levels declines below the critical water level... attributable to groundwater pumping."⁵¹ The GSP also restates the undesirable result in Appendix J: "The undesirable results to be avoided for this sustainability indicator have two segments: the loss of the ability to pump groundwater from the existing well network (Table 3-1 and Figure 3-3) and significant and unreasonable GDE vegetation die-off due to implementation of the GSP."⁵² The GSP states that an undesirable result would occur "when groundwater elevations drop below the bottom of well perforations (i.e., screen) in 25 percent of the representative monitoring sites..."⁵³

Department staff have identified flaws with how the GSA has defined undesirable results. To begin, the Plan's definition of undesirable results is unspecific and does not specify the number of dry wells that are considered significant and unreasonable,⁵⁴ yet the GSP considers it acceptable to dewater wells that are shallower than 100 feet deep.⁵⁵ Staff conclude the GSP uses undefined qualifying language that renders the meaning of its description of undesirable results indeterminate. In other words, the GSA has not made it clear whether dewatering one well, wells shallower than 100 feet deep, or more wells, including those deeper than 100 feet, are considered significant and unreasonable effects of lowering of groundwater levels in the Subbasin.

Additionally, the Plan defines undesirable results as a function of minimum threshold conditions necessary to reasonably satisfy beneficial uses and users of groundwater, but does not explain how they were determined. This is compounded by the fact that the Plan does not demonstrate how or whether the interests of those beneficial uses and users were considered. As a result, it would not be possible for staff to determine whether it was appropriate to the needs of beneficial uses and users in the Subbasin, as determined by the GSA. The Plan's quantification of undesirable results as 25 percent or more of the representative monitoring wells in the Subbasin fall below their minimum groundwater elevation threshold levels is unsatisfactory because the Plan does not explain why this threshold would avoid effects the GSA has determined to be significant and unreasonable.

⁵⁰ 23 CCR § 354.26 (a).

⁵¹ Piru GSP, Section 3.2.2, p. 109.

⁵² Piru GSP, Appendix J, Section 3.3.1, p. 1501.

⁵³ Piru GSP, Section 3.2.3.1, p. 110.

⁵⁴ Piru GSP, Section 3.2.2, p. 109.

⁵⁵ Piru GSP, Section 3.3.1, p. 114.

Department staff conclude the GSA must reevaluate and clearly define and provide its rationale for when undesirable results occur in the Subbasin, based on a thorough consideration of the interests of beneficial uses and users of groundwater, as required by the GSP Regulations ([see Corrective Action 1a](#)).

GSP regulations require GSAs to provide the information and criteria relied upon to establish and justify the minimum thresholds.⁵⁶ The GSP discusses minimum thresholds in Section 3.3.1,⁵⁷ however Department Staff note that the discussion in Section 3.3.1 is focused on a model evaluation of future conditions and does not discuss the criteria used to select the GSP's minimum thresholds. The GSP provides additional discussion of sustainable management criteria in Appendix J, and indicates minimum thresholds were set at the base of the screen in each representative monitoring well,⁵⁸ but does not provide further details about the criteria. Further, the GSP fails to describe why the minimum thresholds, as proposed, are completely disconnected from the projected future water levels that the GSA anticipates will be experienced in the Subbasin. Because of this lack of clear criteria Staff conclude the GSP has not adequately provided the information and criteria used to establish this minimum threshold.⁵⁹ Staff recommend the GSA clearly describe and document each step of its process to develop minimum thresholds, and provide tables, figures, maps, and supporting data as necessary to fully explain all steps used to develop the criteria ([see Corrective Action 1b](#)).

Furthermore, GSP Regulations require GSAs to consider how conditions at minimum thresholds may affect the interests of beneficial uses and users of groundwater.⁶⁰ The GSP evaluated well infrastructure and projected conditions, but did not evaluate well infrastructure at minimum thresholds. The GSP uses a numerical model to project future groundwater conditions and compares those conditions to the Subbasin's well infrastructure, and states that the groundwater model predicts that future low groundwater level conditions will not result in wells going dry.⁶¹ The GSP does not indicate the relationship between projected groundwater levels and minimum thresholds.

The GSP does include a qualifying statement that the GSA considers it acceptable to dewater wells that are shallower than 100 feet deep,⁶² and indicates that wells less than 100 feet deep are most susceptible to dewatering.⁶³ However, the GSP does not provide any estimate of how many wells are shallower than 100 feet and apparently acceptable to dewater. The GSP then sets minimum thresholds⁶⁴ for 6 of the 8 representative monitoring sites over 250 feet deep below ground surface. These values are lower than

⁵⁶ 23 CCR § 354.28 (b)(1).

⁵⁷ Piru GSP, Section 3.3.1, pp. 113-114.

⁵⁸ Piru GSP, Appendix J, Section 3.3.1.1, p. 1501.

⁵⁹ 23 CCR 354.28 (b)(1).

⁶⁰ 23 CCR § 354.28 (b)(4).

⁶¹ Piru GSP, Section 3.2.3.2, p. 110.

⁶² Piru GSP, Section 3.3.1, p. 114.

⁶³ Piru GSP, Appendix J, Figure 3-9, p. 1531.

⁶⁴ Piru GSP, Table 3.5-3, p. 133; Appendix K – Appendix A, pp. 1724-1840.

the historical low water level measurements⁶⁵ in each respective well by 145 to 356 feet. The GSP does not describe how lowering groundwater levels by hundreds of feet may impact beneficial uses and users and staff are concerned that the selected minimum thresholds would allow an unknown number of production wells to go dry because they appear to be deeper than many domestic well depths identified in the GSP⁶⁶. Staff are also concerned that basin conditions at groundwater level minimum thresholds may lead to undesirable results for other sustainability indicators.

Department Staff conclude that the forecast analysis of impacts to beneficial uses and users provided in the GSP based on future conditions is not sufficient because the GSP sets minimum thresholds hundreds of feet below the modeled future conditions. The GSA must directly evaluate the effects on beneficial uses and users in the basin at the minimum threshold conditions. The GSA must identify the number, location, depths, and percentage of all wells that may be impacted at the proposed minimum thresholds and explain how the interests of beneficial uses and users were considered ([see Corrective Action 1c](#)).

3.1.4 Corrective Action 1

The GSA should modify its sustainable management criteria and must provide a more detailed explanation and justification regarding the selection of the sustainable management criteria for groundwater levels, particularly the undesirable results and minimum thresholds, and the effects of those criteria on the interests of beneficial uses and users of groundwater. The minimum thresholds should indicate a depletion of supply at a given location that may lead to undesirable results.⁶⁷ Department staff recommend the GSA consider and address the following:

- a. The GSA should revise the GSP to sufficiently and clearly explain the undesirable results that the GSA aims to avoid. The GSA should sufficiently and clearly explain what it considers to be a significant and unreasonable level of impact, such as a number or percentage of wells going dry. In support of the explanation, the GSP should clearly discuss and disclose the potential effects on uses and users of drinking water wells and all other beneficial uses and users of groundwater in the Subbasin.
- b. The GSA should revise the minimum thresholds and must explain how the minimum threshold groundwater levels are consistent with avoiding undesirable results the GSA aims to avoid. If, for example, the GSA seeks to avoid domestic wells going dry, the GSP should explain how the minimum threshold at each representative well will avoid impact to nearby domestic and other production wells. The GSP should also explain how the Agency has determined that basin

⁶⁵ Piru GSP, Appendix K – Appendix A, pp. 1724-1840.

⁶⁶ Piru GSP, Figure 2.1-4, p. 165.

⁶⁷ 23 CCR § 354.28 (c)(1).

conditions at minimum threshold water level conditions will avoid undesirable results for other sustainability indicators.

- c. Provide an evaluation of how minimum thresholds may affect the interests of beneficial uses and users of groundwater or land uses and property interests.⁶⁸ Identify the number and location of wells that may be negatively affected when minimum thresholds are reached. Compare well infrastructure for all well types in the Subbasin with minimum thresholds at nearby, suitably representative, monitoring sites. Document all assumptions and steps clearly so that it will be understood by readers of the GSP. Include maps of potentially affected well locations, identify the number of potentially affected wells by well type, and provide a supporting discussion of the effects.

3.2 DEFICIENCY 2. THE GSP DOES NOT SET SUSTAINABLE MANAGEMENT CRITERIA FOR DEPLETIONS OF INTERCONNECTED SURFACE WATER.

3.2.1 Background

SGMA identifies six effects of groundwater conditions occurring throughout the basin that GSAs must evaluate to achieve sustainable groundwater management. The GSP Regulations refer to these effects as sustainability indicators, which are chronic lowering of groundwater levels, reduction of groundwater storage, seawater intrusion, degraded water quality, land subsidence, and depletions of interconnected surface water.⁶⁹ Generally, when any of these effects are “significant and unreasonable,” as defined in SGMA, they are referred to as “undesirable results.”⁷⁰ SGMA requires GSAs to sustainably manage groundwater, which requires GSAs to avoid undesirable results for any sustainability indicator during the planning and implementation horizon.⁷¹ For each sustainability indicator, GSAs must develop sustainable management criteria, describe the process used to develop those criteria, and establish a monitoring network to adequately monitor conditions.⁷² SGMA identifies undesirable results related to depletions of interconnected surface water as those “that have significant and unreasonable adverse impacts on beneficial uses of the surface water.”⁷³

The GSP Regulations state that if a GSA is able to demonstrate that undesirable results related to one or more sustainability indicators are not present and are not likely to occur in the basin, the GSA is not required to develop sustainable management criteria for those indicators.⁷⁴ Absent a conclusive explanation of why a sustainability indicator is

⁶⁸ 23 CCR 354.28 (b)(4).

⁶⁹ 23 CCR § 351(ah).

⁷⁰ Water Code § 10721(x).

⁷¹ Water Code §§ 10721(v), 10721(r).

⁷² 23 CCR §§ 354.22, 354.32.

⁷³ Water Code § 10721(x)(6).

⁷⁴ 23 CCR §§ 354.22, 354.26 (d), 354.28 (e).

inapplicable, the Department assumes all sustainability indicators apply.⁷⁵ Demonstration of non-applicability of sustainability indicators must be supported by best available information and science and should be provided in descriptions throughout the GSP (e.g., information describing basin setting, discussion of the interests of beneficial users and uses of groundwater).⁷⁶

The Department's assessment of a GSP's likelihood to achieve its sustainability goal for its basin is based, in part, on whether a GSP provides sufficiently detailed and reasonable supporting information and analysis for all applicable indicators. The GSP Regulations require the Department to evaluate whether establishment of sustainable management criteria is commensurate with the level of understanding of the basin setting.⁷⁷

3.2.2 Deficiency

The GSA presents conclusive evidence that interconnected surface waters and beneficial uses and users of surface water exist in the Subbasin. However, the GSA chose to not develop sustainable management criteria for this sustainability indicator by claiming that there are no significant and unreasonable effects of depletions of interconnected surface water (i.e., undesirable results are not present and are not likely to occur). Department staff believe that the GSA's determination that undesirable results for depletions of interconnected surface water are not present and not likely to occur is inaccurate, not supported by best available information and science, and lacks consideration of all beneficial uses and users. Thus, the GSA's decision to not establish sustainable management criteria for depletions of interconnected surface water in this Subbasin does not comply with the GSP Regulations, and could potentially adversely impact beneficial uses and users of surface water due to groundwater pumping during Plan implementation.

3.2.3 Deficiency Details

The GSP identifies interconnected surface water being present in the Subbasin and estimates the amount of depletion due to pumping.⁷⁸ The GSP identifies a groundwater discharge area near the western Subbasin boundary along the Santa Clara River and states that "during most climate conditions, rising groundwater near the western [sub]basin boundary keeps this reach of the Santa Clara River flowing".⁷⁹ The GSP acknowledges data gap regarding the "extent and timing of interconnectedness" along Piru Creek and central and eastern portions of the Santa Clara River.⁸⁰ The GSP also identifies recharge areas where surface water infiltrates to contribute recharge to the groundwater system,⁸¹ and provides a map identifying stream channel recharge areas

⁷⁵ DWR Best Management Practices for the Sustainable Management of Groundwater: Sustainable Management Criteria (DRAFT), November 2017.

⁷⁶ 23 CCR §§ 355.4 (b)(1), 355.4 (b)(4).

⁷⁷ 23 CCR § 355.4 (b)(3).

⁷⁸ Piru GSP, Section 2.2.2.7, pp. 81-83; Figure 2.2-26, p. 200.

⁷⁹ Piru GSP, Section 2.2.1.5.6, p. 62.

⁸⁰ Piru GSP, Section 2.2.2.7, p. 83.

⁸¹ Piru GSP, Section 2.2.1.5.4, pp. 60-61.

and agricultural return flow areas that recharge groundwater.⁸² The GSP estimates that more surface water recharges groundwater than groundwater discharges to the surface in the Subbasin.⁸³ The GSP also describes beneficial uses and users of surface water in the Subbasin, which includes freshwater habitat, migration habitat, wetlands, and habitat for endangered species.⁸⁴ Based on this information, Department staff believe that the GSP provides sufficient evidence that both interconnected surface water and beneficial uses and users of surface water are present in the Subbasin.

Regardless of the GSA's clear identification of the presence of interconnected surface water in the Subbasin, the GSP does not establish sustainable management criteria for depletions of interconnected surface water because "the Agency does not consider depletions of interconnected surface water [causing] a significant and unreasonable effect."⁸⁵ For example, the GSP considered loss of the *O. mykiss* (known as steelhead or rainbow trout)⁸⁶ species of fish's rearing and spawning habitat as an undesirable result, but provides alternative reasons for not managing depletions due to pumping (such as variability of flows in the Subbasin, a lack of instream flow requirements from other regulatory entities, and other factors) and claims that *O. mykiss* only use the Santa Clara River when it is fully connected with surface water flow.⁸⁷ Department Staff note that the reasoning provided (fish will use the river when its surface water flow is fully connected), is an indicator of a beneficial use or user being affected by conditions (i.e., stream depletion due to pumping) in the Subbasin. Staff also note that the GSP lacks sufficient consideration on the beneficial use of surface water of fish migration, and the reasoning regarding the lack of beneficial uses of surface water by *O. mykiss* fish is flawed because it contradicts with best available information and science, including those presented in other parts of the GSP⁸⁸. For example, the GSP's basin setting section acknowledges beneficial users of surface water in the Subbasin which includes Southern California steelhead,⁸⁹ describes the critical habit for Southern California steelhead,⁹⁰ and lists the existing habitat management and special-status species recovery plans in the Fillmore and Piru Subbasins, including the Southern California Steelhead Recovery Plan.⁹¹ Staff further note that the GSA has not explained how it determined that impacts to other beneficial uses and users of surface water were not considered as undesirable results of depletions of interconnected surface water, such as impacts to wetland habitat and impacts to surface water diversions by water rights holders. Department staff conclude that the GSA does not sufficiently demonstrate that significant and unreasonable effects

⁸² Piru GSP, Figure 2.2-9, p. 183.

⁸³ Piru GSP, Section 2.2.3.3.2, p. 95.

⁸⁴ Piru GSP, Section 2.2.1.5.6, pp. 62-63.

⁸⁵ Piru GSP, Section 3.2.1, p. 108.

⁸⁶ Piru GSP, Appendix D, p. 378.

⁸⁷ Piru GSP, Section 3.2.1, p. 108.

⁸⁸ Piru GSP, Section 2.2.1.5.6, pp. 62-63; Section 2.2.2.8, pp. 85-86; Appendix D, pp. 318-462.

⁸⁹ Piru GSP, Section 2.2.1.5.6, pp. 62-63.

⁹⁰ Piru GSP, Table 2.2-7, p. 85; Figure 2.2-30, p. 204.

⁹¹ Piru GSP, Section 2.2.2.8, p. 86.

of stream depletion due to pumping on beneficial uses of surface water are not present and are not likely to occur in the Subbasin.

The GSP also reasons that “[u]ndesirable results related to surface water depletions were considered significant, yet not unreasonable, because natural climate variability (i.e., [prolonged] droughts) is a significant cause of depleted surface waters (i.e., dry streams), that are not eliminated with pumping reductions (Appendix J). Climate conditions are considered to have a more significant impact on surface water flows than groundwater pumping.”⁹² However, climate variability does not negate the presence of historical or future impacts of groundwater pumping on surface water depletions, and the impacts of pumping on beneficial uses and users of surface water, such as Southern California steelhead, are generally most severe during dry periods.⁹³ In fact, the basin setting section of the GSP acknowledges historical impacts of pumping by stating that “[t]he diversion of surface water and pumping of groundwater resources of the Santa Clara Valley River Basin since the late 1800s has resulted in streamflow depletion (Hanson et al., 2003)”.⁹⁴ Moreover, the analysis and discussions of stream depletion in Appendix J⁹⁵ focuses on flow rates at the rising groundwater areas along the Santa Clara River but neglects potential impacts to beneficial uses and users such as special-status fish and water rights holders in this and downstream subbasins especially during dry periods. Therefore, the GSP has not sufficiently and thoroughly considered all beneficial uses and users of surface water in its evaluation of undesirable results.

Department staff conclude that interconnected surface water and beneficial uses of surface water exist in the Subbasin, and the GSA’s decision to not develop sustainable management criteria for depletions of interconnected surface water is incompliant with GSP regulations.⁹⁶ Therefore, the GSA must establish initial sustainable management criteria for depletions of interconnected surface water as required by GSP Regulations to manage the sustainability indicator ([see Corrective Action 2](#)). Department staff also conclude that the GSA’s determination that undesirable results for depletions of interconnected surface water are not present and are not likely to occur is flawed, not supported by best available information and science, and lacks consideration of all beneficial uses and users of surface water.

Department staff understand that estimating the location, quantity, and timing of stream depletion due to ongoing, subbasin-wide pumping is a complex task and that developing suitable tools may take additional time; however, it is critical for the Department’s ongoing and future evaluations of whether GSP implementation is on track to achieve sustainable groundwater management. The Department plans to provide guidance on methods and approaches to evaluate the rate, timing, and volume of depletions of interconnected

⁹² Piru GSP, Section 3.2.2, p. 109.

⁹³ NOAA’s National Marine Fisheries Service comments on the Groundwater Sustainability Plan for the Piru Subbasin, April 19, 2022, pp. 2 and 12-13.

⁹⁴ Piru GSP, Section 2.2.2.7, p. 82.

⁹⁵ Piru GSP, Appendix J, Sections 3.6 - 3.6.2.2, pp. 1509-1511.

⁹⁶ 23 CCR § 354.28 (e).

surface water and support for establishing specific sustainable management criteria in the near future. This guidance is intended to assist GSAs to sustainably manage depletions of interconnected surface water. Department staff recommend that the GSA anticipate updating its sustainable management criteria for interconnected surface water after the guidance is released, as part of its next periodic update.

3.2.4 Corrective Action 2

The GSA must set preliminary sustainable management criteria for depletions of interconnected surface water associated with groundwater use, as required by the GSP Regulations,⁹⁷ based on best available information and science. The GSA should evaluate and disclose, sufficiently and thoroughly, the potential effects of the Plan's sustainable management criteria for depletions of interconnected surface water on beneficial uses of the interconnected surface water and on groundwater uses and users.

4 STAFF RECOMMENDATION

Department staff believe that the deficiencies identified in this assessment should preclude approval of the GSP for the Santa Clara River Valley – Piru Subbasin. Department staff recommend that the GSP be determined incomplete.

⁹⁷ 23 CCR §§ 354.26, 354.28, 354.30.

PIRU SUBBASIN - RESPONSES TO DWR IDENTIFIED GSP DEFICIENCIES

DEFICIENCY 1. THE GSP DOES NOT ESTABLISH SUSTAINABLE MANAGEMENT CRITERIA FOR CHRONIC LOWERING OF GROUNDWATER LEVELS IN A MANNER SUBSTANTIALLY COMPLIANT WITH THE GSP REGULATIONS		
CORRECTIVE ACTIONS	REVISED SECTIONS	
	PIRU SUBBASIN GSP	TECHNICAL APPENDICES
<p>Corrective Action 1a - revise the GSP to sufficiently and clearly explain the undesirable results that the GSA aims to avoid. Discuss potential effects on uses and users of drinking water wells and all other beneficial uses and users of groundwater.</p> <p>Corrective Action 1b - revise the minimum thresholds and explain how the MT groundwater levels are consistent with avoiding undesirable results. Explain how it was determined that basin conditions at MT water level conditions will avoid undesirable results for other sustainability indicators.</p> <p>Corrective Action 1c – evaluate how MTs may affect interest of beneficial uses and users of groundwater or land uses and property interests. Identify number and locations of wells that may be negatively affected when MTs are reached. Compare well infrastructure for all well types with MTs at nearby suitably representative monitoring sites. Document all assumptions. Include maps of potentially affected wells. Identify number of affected wells by well type and discuss the effects.</p>	<ul style="list-style-type: none"> • Section 2.1.3 Land Use Elements or Topic Categories of Applicable General Plans • Section 2.2.2 Current and Historical Groundwater Conditions • Section 3.2.1 Processes and Criteria to Define Undesirable Results • Section 3.2.2 Description of Undesirable Results • Section 3.2.3 Cause of Groundwater Conditions that Would Lead to Undesirable Results • Section 3.2.4 Multiple Minimum Thresholds Used to Determine Undesirable Results • Section 3.2.5 Chronic Lowering of Groundwater Levels • Section 3.3.1 Chronic Lowering of Groundwater Levels • Section 3.3.6 Depletions of Interconnected Surface Waters • Section 3.4 Measurable Objectives • Section 4.8 Project #8 Drought Vulnerability Assessment 	<p>Appendix J – Sustainable Management Criteria Technical Memorandum</p> <ul style="list-style-type: none"> • Section 3.3 Chronic Lowering of Groundwater Levels • Section 3.3.1 Impacts to Domestic, Municipal, and Agricultural Production Wells • Section 3.3.3 Minimum Thresholds • Section 3.3.11 Impacts to Domestic, Municipal, and Agricultural Production Wells • Section 3.6.3 Undesirable Results • Section 3.6.5 Minimum Thresholds

PIRU SUBBASIN - RESPONSES TO DWR IDENTIFIED GSP DEFICIENCIES

DEFICIENCY 2. THE GSP DOES NOT SET SUSTAINABLE MANAGEMENT CRITERIA FOR DEPLETIONS OF INTERCONNECTED SURFACE WATER		
CORRECTIVE ACTIONS	REVISED SECTIONS	
	PIRU SUBBASIN GSP	TECHNICAL APPENDICES
<p>Corrective Action 2 – set preliminary sustainable management criteria for depletions of interconnected surface water associated with groundwater use. Evaluate and disclose, sufficiently and thoroughly, the potential effects of the GSP’s sustainable management criteria for depletions of interconnected surface water on beneficial uses of the interconnected surface water and on groundwater uses and users.</p>	<ul style="list-style-type: none"> • Section 2.1.3 Land Use Elements or Topic Categories of Applicable General Plans • Section 2.2.2 Current and Historical Groundwater Conditions • Section 3.1 Sustainability Goal • Section 3.2.1 Processes and Criteria to Define Undesirable Results • Section 3.2.2 Description of Undesirable Results • Section 3.2.3 Cause of Groundwater Conditions that Would Lead to Undesirable Results • Section 3.2.4 Multiple Minimum Thresholds Used to Determine Undesirable Results • Section 3.2.5 Chronic Lowering of Groundwater Levels • Section 3.3.6 Depletions of Interconnected Surface Waters • Section 3.4 Measurable Objectives 	<p>Appendix G – GDE and ISW Technical Memorandum</p> <ul style="list-style-type: none"> • Section 5.2.1 Beneficial Uses • Section 5.2.2 Special-Status Species • Section 7 GDE Monitoring <p>Appendix J – Sustainable Management Criteria Technical Memorandum</p> <ul style="list-style-type: none"> • Section 3.6 Depletions of Interconnected Surface Waters • Section 3.6.1 Areas of Interconnected Surface Water and Groundwater (including Del Valle, Cienega Springs, and East Grove areas with ISW) • Section 3.6.2 Impact of Groundwater Extractions on Surface Water Flow • Section 3.6.3 Undesirable Results • Section 3.6.5 Minimum Thresholds <p>Appendix K – Monitoring Program and Data Gap Analysis Technical Memorandum</p> <ul style="list-style-type: none"> • Section 5.4.1 Well Spatial Density • Section 5.5.1 Groundwater Reporting • Section 5.6 Interconnected Surface Water and Beneficial Uses • Section 5.6.1 National Marine Fisheries (NMFS) Designated Beneficial Uses • Section 5.6.2 Los Angeles Regional Water Quality Control Board (LARWQB) Designated Beneficial Uses • Section 5.6.3 FPBGSA Designated Interconnected Surface Waters and Beneficial Uses



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June 27, 2024

Anthony Emmert
Executive Director
Fillmore and Piru Basins Groundwater Sustainability Agency
PO Box 1110
Fillmore, CA 93016

Submitted via email: evai@unitedwater.org

Re: Public Comment Letter on the Fillmore and Piru Basins Groundwater Sustainability Plan Revisions

Dear Mr. Emmert and Board of the Directors:

Thank you for the opportunity to provide comments to guide the revision of the Fillmore and Piru Basin Draft Groundwater Sustainability Plans (GSPs) prepared in accordance with the Sustainable Groundwater Management Act (SGMA). As you are aware, Friends of the Santa Clara River represents the Santa Clara River Environmental Groundwater Committee and local environmental interests in the development of the GSPs, to ensure that Groundwater Dependent Ecosystems (GDE) are identified and that significant and unreasonable adverse impacts on all recognized beneficial uses and users of groundwater and related surface waters are adequately considered. Furthermore, Friends of the Santa Clara River was an implementing agent for the Watersheds Coalitions of Ventura County's Integrated Regional Water Program Disadvantaged Community Involvement grant, doing focused outreach to underserved communities in the Piru and Fillmore basins.

Friends of the Santa Clara River provided comments to the Fillmore and Piru Basins Groundwater Sustainability Agency (FPBGSA) on November 22, 2021, to inform the GSP development. These comments can be summarized as follows:

- 1 - *Implement a Southern steelhead limiting factors analysis to better inform assumptions about steelhead presence, absence and usage of critical steelhead habitat.*
- 2 - *Provide a timeline as to when data gaps will be addressed.*
- 3 - *Improve focused outreach to underserved and Disadvantaged Communities (DACs) to ensure human right to water considerations protected in the Water Code, as well as safe and affordable drinking water. Consider a risk analysis to underserved DAC's as a project in the GSP.*
- 4 - *Climate change consideration remains lacking, especially in light of megadrought trends and future conditions and allocation from both the Colorado River and Delta.*

5 These comments were wholly disregarded in the finalization or implementation of the plans. As a result, the environmental stakeholders were not supportive of the plans because they lacked necessary minimum thresholds and sustainable management criteria when they were submitted to the California Department of Water Resources (DWR).

On January 18, 2024, the DWR notified the Fillmore and Piru Basins Groundwater Sustainability Agency that the GSPs for the two basins were determined to be incomplete. Notably, DWR cited the insufficient justification for reductions in groundwater storage, the associated potential impacts on well users, the depletion of interconnected surface water, and the associated impacts on groundwater-dependent ecosystem users and uses. Thus, DWR reinforced the concerns summarized by Friends of the Santa Clara, National Marine Fisheries, The Nature Conservancy, and California Department of Fish and Wildlife, and others, that without appropriate measurable objectives, the GSA could not ensure that undesirable results would not occur for underserved communities (domestic, municipal, and/or agricultural) and groundwater dependent ecosystem users and uses, including several threatened and endangered species.

We are encouraged to see the incorporation of impacts to domestic and agricultural production wells and a commitment to a project to assess well vulnerability. We are further encouraged to see a more robust GDE analysis of the East Grove for Southern California steelhead. However, the plan revisions have cost the GSA approximately \$240,000 in consultant fees, contributing a roughly \$0.50/acre foot increase to pumpers. Water 6 affordability is a concern for both agricultural viability but also the very underserved communities who still lack a 7 voice in the SGMA process, and the environment that is not a business, but underpins the biodiversity on which all life depends. We offer these additional comments for the Piru Basin GSP to consider while revising the GSPs to ensure a complete classification by DWR, as the remain very problematic.

As mentioned by E.J. Remson and The Nature Conservancy, nearly 400 acres of GDEs (riparian vegetation) were 8 decimated in the drought period of 2011-2017. This was caused by unabated pumping for agriculture and domestic uses. The damage would likely have been much reduced if pumping had been greatly reduced. While balancing water needs for domestic, agricultural, and environmental needs is challenging, the GSP must specifically address this problem, which it currently does not. The plans commit to minor actions that may be helpful to the Cienega Springs restoration project and implies that these actions mitigate the loss of the GDEs in the Piru Basin mentioned above. However, the Cienega Springs restoration project is not located in the Piru Basin, 9 and falls in the Fillmore Basin of the Cienega GDE, and thus is not an appropriate mitigation action to address the problem. It will do nothing to mitigate the prior and future loss of GDEs in the Piru Basin. Furthermore, the Cienega Springs restoration is half the area of the GDEs lost in the Piru Basin.

The Piru GSP does contain one proposed project (Project #6) that could help address the loss of GDEs in that basin. However, the text of the project is noncommittal with terms such as “consider”... “assisting others”... “if deemed appropriate” “evaluating the cost benefit”, etc. This project should be a commitment by the GSA and directed at the Piru Basin GDE loss. It will ensure that native GDEs will have the ability to recover by preventing non-native plants from permanently establishing in the area. This would be constitute additional analysis similar to what the GSA is proposing for Del Valle.

It is also paramount, that if the GSA commits to addressing gap analysis and projects these are implemented on a timely basis. Projects without implementation timelines will not deliver the desired results of sustainability.

FSCR appreciates the opportunity to comment on the revisions of the Fillmore and Piru GSPs . These are intended to be and are preliminary comments; FSCR reserves its rights to submit other, different and/or additional comments on the Draft Final GSPs following its release and, where appropriate, throughout subsequent phases of the Agencies' review process for the plan. If you have any follow up questions regarding this letter, please contact Candice Meneghin on (805) 628-2250 or contact@fscr.org. Thank you in advance for considering these concerns.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Meneghin', written in a cursive style.

Candice Meneghin
Board Member

REVISED FILLMORE AND PIRU GSPs - RESPONSE TO COMMENTS

Letter 1 - Friends of the Santa Clara River, dated June 27, 2024

This letter included review comments originally contained in their letter dated November 22, 2021 and a few new comments. The GSP revision effort is only focused on the GSP deficiencies identified by the CA Department of Water Resources and is NOT a complete review or revision of the entire GSPs. Many of the comments offered in this letter have been addressed in previous Board of Director meetings or stakeholder workshops and are not germane to the DWR deficiencies, however, the GSA has offered responses to their comments to clarify how the GSA has addressed their comments either in the original GSPs or the revised GSPs. Opportunities to address their concerns were provided at stakeholder workshops and monthly board of director meetings during the preparation of the revised GSPs. The GSA would have appreciated the opportunity to respond to these comments during the document preparation phase rather than after the revised documents have been completed.

GSP	Letter No.	Comment No.	Commenter(s)	Date	Section	Page No.	Line No.	Topic	Comment	Response
Fillmore and Piru	1	1	Friends of the Santa Clara River	6/27/2024	NS	NS	NS	Steelhead	Implement a Southern steelhead limiting factors analysis to better inform assumptions about steelhead presence, absence and usage of critical steelhead habitat	The suggestion for the GSA to perform a limiting factors analysis for Southern steelhead/rainbow trout (<i>O. mykiss</i>) has been previously discussed in meetings with the Board of Directors and stakeholders. The Board consensus was that implementation of this level of biological study by the GSA was outside of the SGMA regulations and more appropriately undertaken by the regulatory agencies (e.g., NMFS, CDFW) with direct authority on the species. Nonetheless, the GSA has committed to perform a habitat suitability assessment in the East Grove GDE area (reference Section 4.9 of the revised Fillmore GSP) to provide preliminary information regarding steelhead presence/absence and the general habitat conditions (e.g., water temperature, dissolved oxygen, etc.) during the coming fiscal year. The findings of the preliminary habitat suitability assessment will be used to prepare a workplan and schedule for future studies, as deemed appropriate.
Fillmore and Piru	1	2	Friends of the Santa Clara River	6/27/2024	NS	NS	NS	Data Gaps	Provide a timeline as to when data gaps will be addressed	Actions to reduce data gaps were included in the original versions of the GSPs and some have been completed (e.g., installation of shallow monitoring wells at Cienega Springs and East Grove GDE areas) and collection of data. Additional efforts to address data gaps are proposed in the revised GSPs (reference Appendix K Data Gap Analysis Technical Memorandum). The timelines for completion of the activities proposed to address the data gaps (e.g., preliminary habitat suitability assessment to be performed within the next few months) have been discussed with the Board of Directors and stakeholders at previous public meetings and workshops. Schedules will be updated after the initial habitat suitability analysis and evaluation of potential new shallow monitoring wells that could be added to the monitoring network.

GSP	Letter No.	Comment No.	Commenter(s)	Date	Section	Page No.	Line No.	Topic	Comment	Response
Fillmore and Piru	1	3	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	Underserved and DACs	Improve focused outreach to underserved and Disadvantaged Communities (DACs) to ensure human right to water considerations protected in the Water Code, as well as safe and affordable drinking water. Consider a risk analysis to underserved DAC's as a project in the GSP	The DACs for the Fillmore and Piru basins have been included in GSA outreach activities during the original GSP development efforts, as well the revised GSP efforts. The entire population of the City of Fillmore and community of Piru are defined by the State of California as disadvantaged. Due to the County of Ventura's orderly growth requirements, there is not a significant rural disadvantaged population within the two basins. The GSA purposed to be representative of the recognized disadvantaged communities by establishing the makeup of its Board of Directors. For example, the disadvantaged population within the City of Fillmore is represented by the Director representing the City of Fillmore, the disadvantaged population within the community of Piru and the balance of the unincorporated area is represented by the Director representing the County of Ventura. If the disadvantaged population members are groundwater pumper, then their interests may be represented by the Directors appointed by the Pumpers Associatons. The GSA would appreciate specific recommendations on additional actions that could be taken to communicate better with the residents of Fillmore, Piru and the unincorporated area of the basins. The GSA will take this into consideration in its upcoming outreach to shallow well owners regarding drought vulnerability.
Fillmore and Piru	1	4	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	Climate Change	Climate change consideration remains lacking, especially in light of megadrought trends and future conditions and allocation from both the Colorado River and Delta	The original GSPs included the consideration of future drought conditions including the scenario of a 20-year drought. Additionally, the proposed Drought Vulnerability Assessment project includes using a refined groundwater flow model to further evaluate groundwater extraction scenarios, as well as potential climate change impacts. The Fillmore and Piru basins do not receive water from the Colorado River; however, they do receive a small amount of water from the State Water Project (SWP) from United Water Conservation District's (UWCD) allocation. It is well known that the availability of water from the SWP is variable and that allocations have diminished, therefore UWCD is purchasing significant amounts of SWP water when it is available, and utilizes the water to recharge the Fillmore and Piru basins, as well as the basins downstream. Keeping the basins fuller when SWP water is available is a way to keep the basins better prepared for droughts. The GSA will include this in its modeling.
Fillmore and Piru	1	5	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	NS	These comments were wholly disregarded in the finalization or implementation of the plans	Coment noted, however the GSA does not agree with this assessment as evidenced by the responses provided to Comments 1-4.
Fillmore and Piru	1	6	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	Water Costs	Water affordability is a concern for both agricultural viability...	The GSA agrees that water affordability should be considered when composing a groundwater resource management program. The GSA has attempted to keep groundwater extrction fees low and minimize or spread out expenditures on scientific studies, monitoring, and development of projects and programs. This GSA has done its best to prioritize and focus on tasks that are "needs" required by SGMA versus those that are "wants". The agency's fiscal responsibility has been demonstrated by its careful deliberation to identify those potential studies or actions that provide it with insight on how to best manage the groundwater resources within the basins.

GSP	Letter No.	Comment No.	Commenter(s)	Date	Section	Page No.	Line No.	Topic	Comment	Response
Fillmore and Piru	1	7	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	Underserved and DACs	...the very underserved communities who still lack a voice in the SGMA process..."	The GSA disagrees with this statement. See the response to Question 3 above. The GSA remains open to specific recommendations that could be taken to better communicate with disadvantaged members of the local population.
Fillmore and Piru	1	8	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	GDEs	...nearly 400 acres of GDEs (riparian vegetation) were decimated in the drought period of 2011-2017. This was caused by unabated pumping for agriculture and domestic uses. The damage would likely have been much reduced if pumping had been greatly reduced.	The GSA agrees that the Sespe Cienega area riparian habitat was severely damaged during the extremely dry drought period of 2011 - 2017; however, it is inaccurate to state that the damage was caused by groundwater pumping. The modeling included in the original GSPs indicated that the lowered water levels were caused by a combination of extreme drought and pumping. The modeling scenario simulating an approximately 50% reduction in pumping from the Piru and Fillmore basins during the drought period indicated that doing so would not have been sufficient to prevent the damage to the riparian habitat. As noted by DWR in its comments, the GSA needs to better quantify the impacts of pumping on interconnected surface water flows. The GSA has committed to doing so within the next year utilizing an updated regional groundwater model with increased discretization and utilizing NDVI/NDMI monitoring data to better quantify effects upon the riparian vegetation. Updated scenarios evaluating potential management actions will be included in the five-year progress reports.
Fillmore and Piru	1	9	Friends of the Santa Cara River	6/27/2024	NS	NS	NS	Cienega Springs, GDEs	...the Cienega Springs restoration project is not located in the Piru Basin, and falls in the Fillmore Basin of the Cienega GDE, and thus is not an appropriate mitigation action to address the problem. It will do nothing to mitigate the prior and future loss of GDEs in the Piru Basin.	The Cienega Springs GDE is located in both the Piru basin and Fillmore basin. The Del Valle GDE area is also located within the Piru basin. Approximately 1.5 acres of the Cienega Springs Restoration Project is located within the Piru basin, and the balance is located within the Fillmore basin. The GSA does not expect that the implementation of its GSP and its Project and Management Actions to induce significant and unreasonable impacts to the GDEs in the Piru basin. Proposed projects in the GSP to address water level data gaps in the Del Valle area, as well as the upper Sespe Creek reach within the Fillmore basin can help assess when (e.g., only in multiyear droughts) these GDE areas may be subject to stress from declining water levels. As mentioned in the response to Comment 8, the GSA will utilize NDVI/NDMI monitoring to better assess effects on riparian vegetation.