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Ojai Basin Groundwater Management Agency
Groundwater Management Plan Update

1. Background

Two critical facts underline the importance of the Ojai Basin Groundwater Management Agency (OBGMA) and this management plan update.

- Chronic drought is a climatic reality. Over the last 100 years there have been several serious droughts, and climate change may likely bring an increase in the number and intensity of years with below average rainfall. Local precipitation, the only source of water in the Ventura River watershed, is predicted by several models to decrease in annual averages. Extended periods of drought are likely.

- The Ventura River watershed is depended on by numerous competing interests. Most water allocated to the various water purveyors in the watershed is accounted for; it has been predicted that, in a long- term drought, Lake Casitas could go dry. Existing wells already in the Ojai Basin are producing groundwater at a rate that is considered to be at or near the safe yield of the basin, and it is predicted (with historical precedence) that in a long-term drought a significant number of the existing wells will go dry. Stakeholders in the Ojai Basin cannot depend on any economically reasonable new source of water.

The OBGMA is responsible for managing the Ojai groundwater basin and, working with the well operators in the basin, for conserving that groundwater. The intent of this plan update is to avoid (where possible) and minimize the adverse economic and social impacts facing our valuable but limited water supply.

1.1 Mission Statement

The Ojai Basin Groundwater Management Agency's mission is to preserve the quantity and quality of groundwater in the Ojai Basin so that the long-term water supply is protected and maintained for the common benefit of the water users in the basin.

The mission of the OBGMA is derived from its enabling legislation, the Ojai Basin Groundwater Management Agency Act, which became law in 1991. The Act was approved as a response to the needs and concerns of local water agencies, water users, and well owners of the Ojai Basin. OBGMA was established in the fifth year of a drought, amidst concerns for potential Ojai Basin overdraft. The mission is in keeping with the history of the Ojai Basin and the circumstances existing when the OBGMA was formed. Since that time, although there have been some good water years and the Ojai Basin has continued to provide sufficient water for its well owners, competition for scarce water resources in Southern California and Ventura County is ever expanding, water resource planning is intensifying, and the importance of OBGMA's mission is even greater today.

Based upon the studies conducted by and for OBGMA, and due to a relatively wet period over the past 15 years, the water and demand in the Ojai Basin is largely in balance and capable of meeting the annual demands of overlying landowners and in-basin water users under present conditions. However, after a series of dry years, water in some wells drop to the point where an alternative water source must be used. In part, that is why water users presently import some 3,750 (1981 to 2005 average) acre-feet of Casitas Municipal Water District (Casitas) water into the Ojai Basin annually, mostly for irrigation. If Casitas water was not available or not used during a series of dry years, considering the present understanding of the hydrology of the basin and the existing water uses, some shallower and peripheral wells would probably not produce water. As a result, pumping lift costs to pump groundwater would be excessive, some wells would produce excessive amounts of sand, water quality of pumped groundwater would likely be compromised, and other detrimental effects of a reduced amount of groundwater storage in the Ojai Basin could occur.

Therefore, the focus of the OBGMA's efforts is on protecting and preserving the Ojai Basin groundwater resource for in-basin use and guarding against harmful export of water from the basin.

1.2 Current Fiscal Situation

The OBGMA is funded by extraction charges levied on pumpers in the Ojai Basin. The present legislative ceiling on extraction charges of $7.50 per acre-foot limits the capacity of OBGMA to

meet its obligations and goals. The OBGMA is attempting to amend the Ojai Basin Groundwater Management Agency Act in the 2007 legislative session to increase the extraction charge ceiling, but any actual extraction charge change must be voted upon by the board, which consists of representatives of the stakeholders. Further fiscal details are presented in Section 3.5.

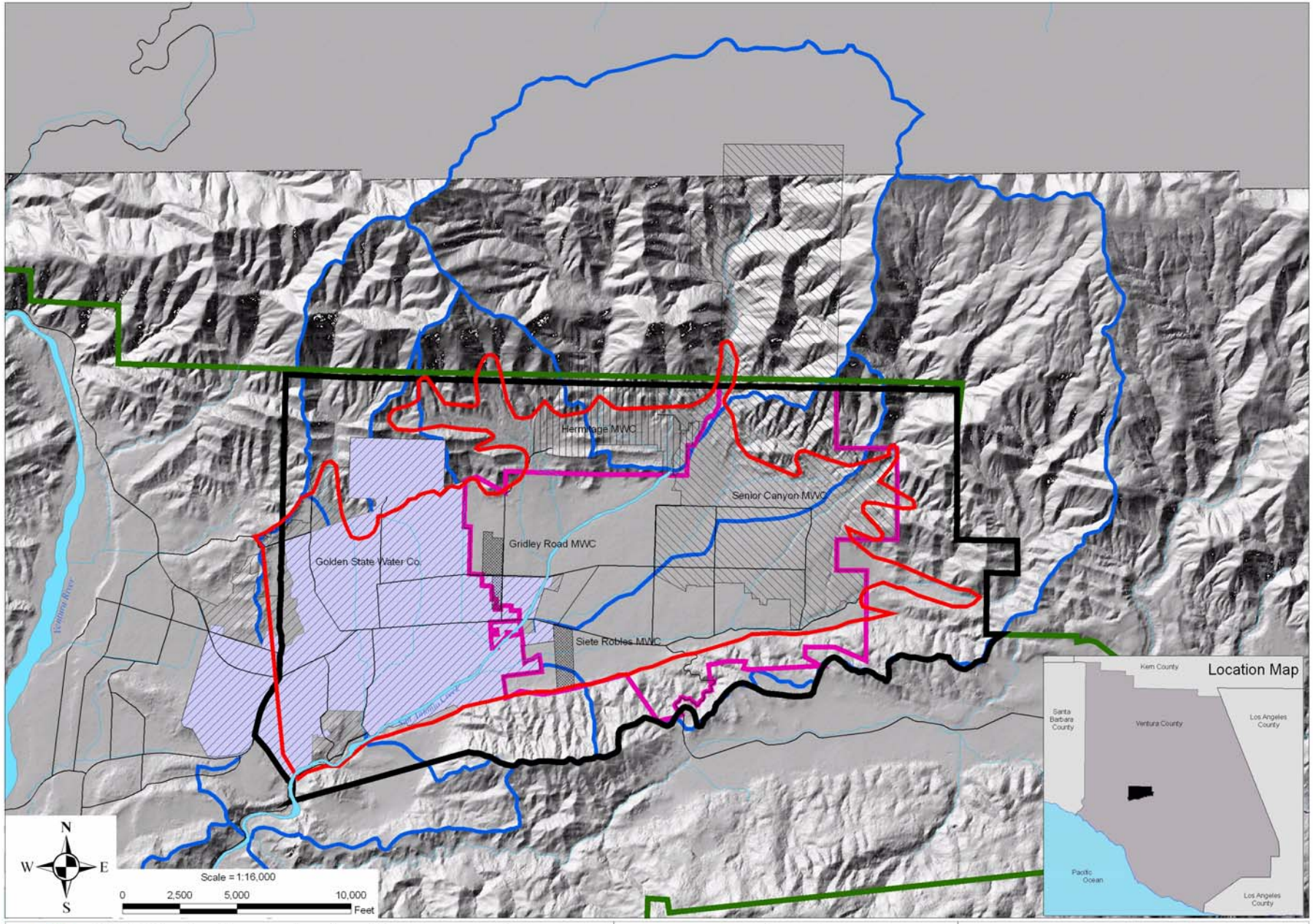
With adequate funding OBGMA will meet its responsibilities as required by law, will be able to carry out its mission to protect Ojai Basin groundwater in the interests of its water users, and will be able to achieve the goals of this management plan update.

2. General Approach

The OBGMA is required by law to have a Groundwater Management Plan (Plan) to guide its operations. The initial Plan was prepared and published in 1995. This 2007 update provides additional information and has been developed based on studies done for the OBGMA by its hydrogeologists and engineering contractors, input from well owners and water users, and recommendations made by the OBGMA's advisory committee and the State of California Department of Water Resources. Figure 1 provides a map of the OBGMA area of purview and service areas of other local agencies.

Since the Plan publication in 1995, numerous studies and projects have been conducted in the Ojai Basin within the jurisdiction of the OBGMA and have led to a better understanding of basin hydrogeology, water demands, and hydrologic fluctuations that affect the stakeholders. Continually improved understanding provides an additional level of detail to the goals and objectives of the Plan update. As understanding of the Ojai Basin improves over the years, updates to the Plan will be incorporated. It is anticipated that the Plan will be updated every five years.

This Plan update describes five broad goals. Each goal includes a number of action elements. Tables for each goal indicate when various action elements were completed or are planned for completion. While the five broad goals will provide the structure to the OBGMA's management efforts for several years, the OBGMA anticipates that the detailed action elements will evolve as the OBGMA's efforts continue to progress. Elements approved with this Plan update will be



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Legend

- San Antonio Watershed
- Cities
- Ojai Water Conservation District
- Casitas MWD
- OBGMA Boundary
- Ojai Valley Groundwater Basin

Figure 1: OBGMA Agency Location Map

implemented in the form of rules, regulations, or ordinances. Prior to implementation, additional criteria to guide these actions will be developed in a public process by the OBGMA Board of Directors (OBGMA board) and added to this management plan update. Some elements as noted herein require more study and public review before specific implementation actions are approved. Additions will be made to this Plan update as actions to implement these elements are reviewed by the water users and well owners in the basin and approved by the OBGMA board. Amendments to the approved Plan update will be made only after full review, consideration of any advisory recommendation, and formal approval by the OBGMA board.

3. Groundwater Management Plan--Detailed Action Plan

3.1 Goal 1. Understanding the Basin

OBGMA must have a comprehensive understanding of the hydrology of the basin under its jurisdiction in order to carry out its mission. This understanding will continue to evolve as additional goal elements are implemented. Table 1 describes selected Goal 1 elements that have been completed, are scheduled, or are planned.

3.1.1 Monitoring

OBGMA has at its disposal several studies of the basin hydrology, including conceptual models. These models must be tested and updated regularly under a continuing monitoring program to serve as a basis for informed decision making. Monitoring will also be conducted to identify changing conditions and implement management programs when needed. Monitoring will include:

- Surface water entering the basin
- Recharge of the basin from rainfall
- Streamflow seepage
- Evapotranspiration
- Discharge from the basin as surface flow from San Antonio Creek and subsurface flow
- Extractions from the basin via public and private wells

Table 1. Selected Completed, Scheduled, and Planned Future Elements
Goal 1, Understanding the Basin

Element	Description	Completion Date (Actual or Anticipated)
Completed Element		
Basin studies	Study of basin water records developed by county technicians to monitor basin water quantity and quality, well permits, stream flows, and precipitation	1996
Monitoring	Conducted ongoing meetings and monitoring with county hydrologists	2000
Jim Capito, basin study	Located wells of record, obtained GPS coordinates of each, plotted surface altitudes of wells, determined conditions of abandoned wells, performed hazard screening, recorded well data sheets, provided QA/QC of county well records with OBGMA records	September 2001 to Spring 2002
Database creation	Established database	2004
Kear, 2005, Masters Thesis	Hydrogeology of the Ojai Groundwater Basin: Storativity and Confinement, Ventura County, California	December 2005
Daniel B. Stephens & Associates, Inc.	Hydrologic assessment, San Antonio Creek Sub-watershed, Ventura County, California	June 2006
Extraction reporting	Reporting of basin groundwater extractions	Twice annually
Scheduled Element		
Extraction reporting	Reporting of basin groundwater extractions	Twice annually
Basin studies	Depth discrete monitoring well construction and monitoring	2007-2010
Basin studies	Monitoring San Antonio Creek flow into basin	2007-2010
Monitoring	Key wells for water quality	Annually
Monitoring	Key wells for groundwater levels	Every other month
Future Element		
Extraction reporting	Reporting of basin groundwater extractions	Twice annually
Monitoring	Conversion of inactive production wells into depth-discrete monitoring wells	2008
Groundwater model	Generation of a MODFLOW type of groundwater model for the basin	2009
Basin studies	Evaluate and augment recharge along creek channels	2008
Basin studies	Geophysical survey of the basin to identify aquifer and bedrock morphology	2010

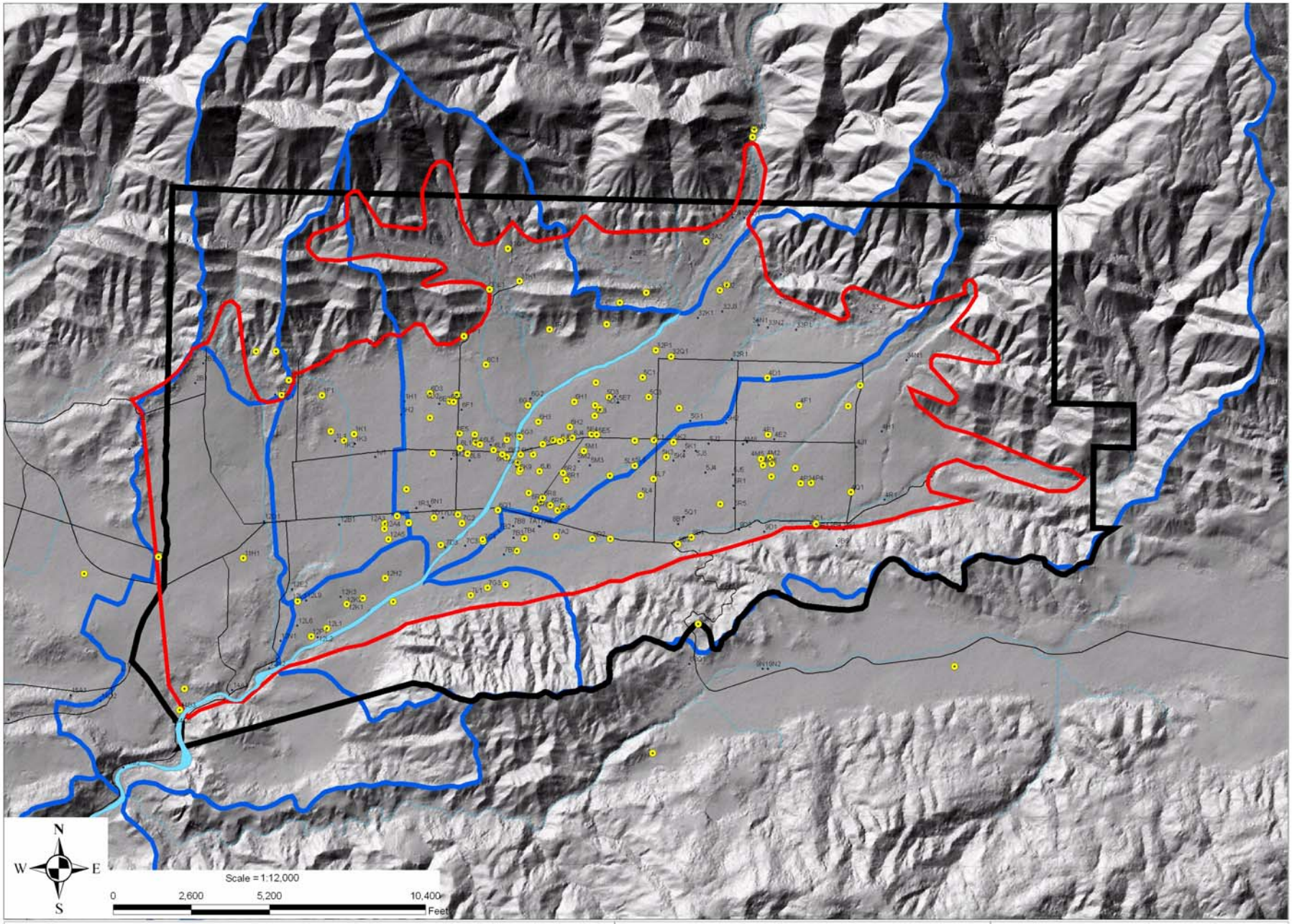
Monitoring results will be shared annually by the OBGMA with owners, water users, and the public.

3.1.2 Data Collection

Previous studies identified significant gaps in the current monitoring activities in the Ojai Basin. Specific areas identified for increased data collection are basin water level, water quality monitoring in stratified aquifers known to be present in the basin based on aquifer testing, and geophysical log correlations. In cooperation with the OBGMA, the Ventura County Watershed Protection District (VCWPD) may measure key wells routinely for water levels and water quality. OBGMA will obtain permission from the well owners prior to conducting monitoring not already being conducted by Ventura County. This data will be analyzed and reported annually by OBGMA to stakeholders via annual reports, the website, or other publications. Additional data collection actions, including surface water discharged from San Antonio Creek and surface water inflow into the basin, have been assessed and will be considered in greater detail in the future. This data will be analyzed and reported annually by the OBGMA. All results from each well measurement are to be shared with the respective well owner either through direct communication and/or provision of any OBGMA publication that contains such data.

3.1.3 Well Registration

The OBGMA adopted Ordinance No. 1, April 29, 1993 which required all wells in the basin be registered with the OBGMA. There are currently 145 registered wells in the Ojai basin, of which 125 are reported to be active and the remaining 20 are inactive. Approximately 60 additional wells are reported to have been destroyed, bringing the total number of historically known wells in the basin to over 200. OBGMA will continue seeking to have all wells in the basin registered under a formal agreement with Ventura County to ensure that their well records are made available to the OBGMA and that any new well permits are registered with the OBGMA. Such an agreement ensures that well permits in the OBGMA area of jurisdiction will not be issued by Ventura County without proof that the applicant has properly notified OBGMA and been advised of the requirements for well operators in the Ojai basin. Figure 2 presents a map of active wells and Figure 3 depicts wells that are registered as inactive and destroyed. The OBGMA is also planning to obtain delegated authority from the State Water Resources Control Board, Water Rights Division to handle groundwater production recordation within OBGMA area of jurisdiction.



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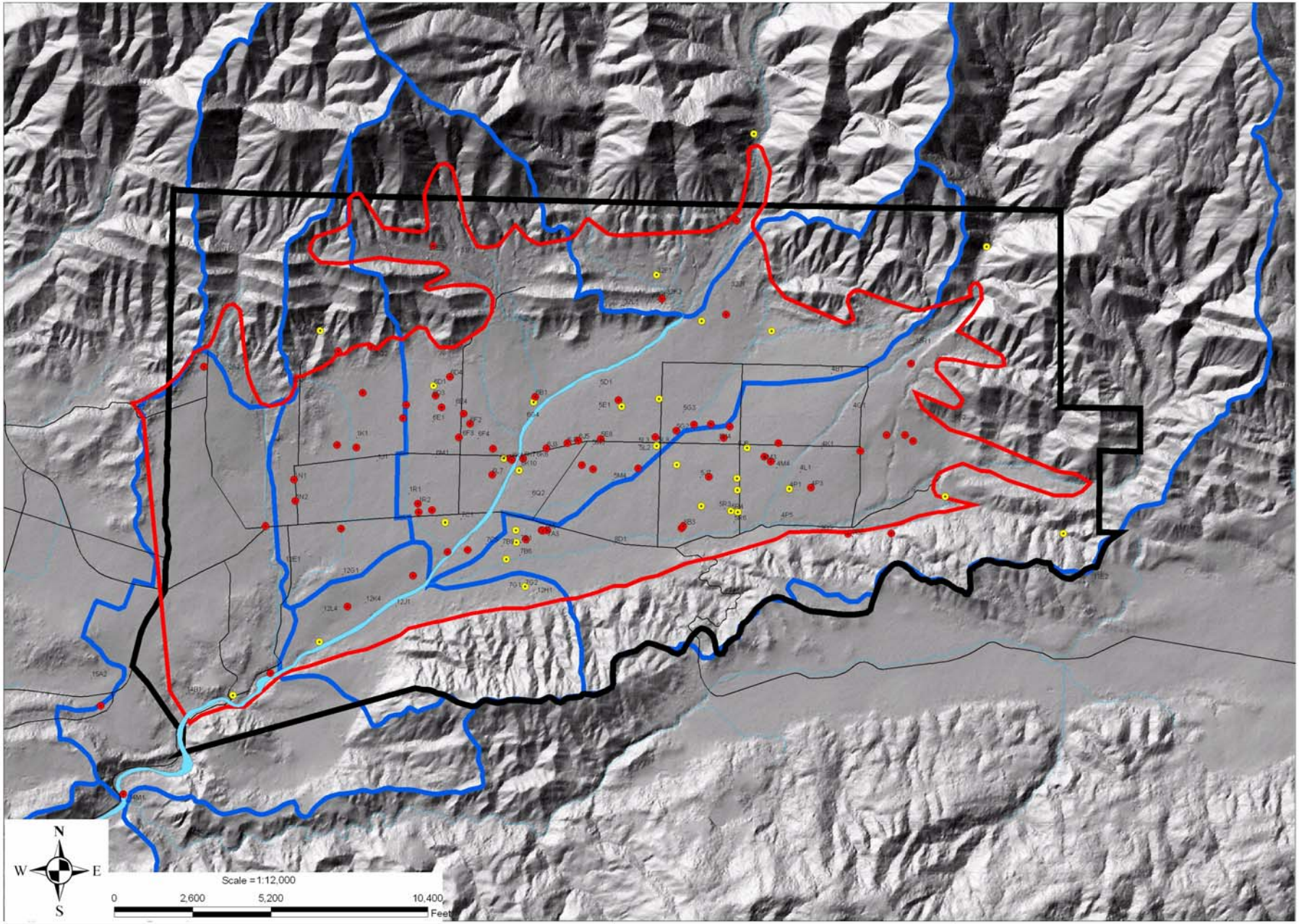
Legend

- San Antonio Watershed
- Ojai Valley Groundwater Basin
- OBGMA Boundary
- Active Wells

Figure 2: Active Well Location Map



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Legend

- San Antonio Watershed
- OBGMA Boundary
- Ojai Valley Groundwater Basin
- Ojai_inactive_wells
- ojai_destroyed_wells

Figure 3: Inactive and Destroyed Well Location Map

3.1.4 Extraction Measurement

The OBGMA is mandated by its enabling Act to monitor groundwater extractions. Key parameters that allow the OBGMA to manage basin balance, prevent overdraft, and evaluate the amount of groundwater in storage include the amount of water extracted from the basin, precipitation, recharge data, and water level monitoring. OBGMA is also committed to implementing an effective, reliable method of monitoring well extractions. Currently, well owners are required to report, as precisely as possible, using meters or a variety of methods such as electrical power usage or crop factor, their annual water extractions. OBGMA will consider requiring metering of new wells and metering of all wells within a 3-year time frame. OBGMA will conduct an internal audit of its groundwater extraction reports to determine whether those reports accurately reflect actual extractions. In addition, OBGMA will institute steps, including assisting well operators with accurate reporting, to ensure the most efficient and effective ways to determine the actual withdrawals of water from the basin semi-annually.

3.2 Goal 2. Controlling Exports: Protecting and Managing the Basin

In order to preserve the groundwater in the Ojai Basin OBGMA will take direct management actions based on factual knowledge of the basin and the needs and concerns of water users and well owners in the basin. Table 2 describes selected Goal 2 elements that have been completed, are scheduled, or are planned.

3.2.1 Exports of Water from the Basin

OBGMA's enabling legislation mandates that no groundwater shall be exported from the basin except under permit issued by the OBGMA in full compliance with the policy and intent of the law. The law mandates the preservation of the groundwater for the common benefit of water users within the basin. Based on present hydrologic facts and circumstances, the OBGMA finds that there is no surplus water available for export. Under natural conditions, when surplus water is present in the basin, water flows under artesian pressure from wells and from exposed aquifers into San Antonio Creek along gaining reaches of the stream. Because this surplus has value to downstream stakeholders, and the surplus conditions are ephemeral (occurring only during years of heavy rainfall such as 1993, 1995, 1998, and 2005) and can change rapidly to conditions of deficiency, it is likely that surplus conditions will not exist in the foreseeable future.

Table 2. Selected Completed, Scheduled, and Planned Future Elements
Goal 2, Controlling Exports: Protecting and Managing the Basin

Element	Description	Completion Date (Actual or Anticipated)
Completed Element		
Export controls	Reviewed Matilija Dam removal issues, attended stakeholder meetings and EIR certification	2005
Database creation	Established database	2004
Scheduled Element		
Establish triggers	Establish basin triggers such as the relationship between groundwater levels and drought conditions to generate and adopt a water conservation plan	2008
Managing the basin	Update Groundwater Management Plan	2012 (every five years)
Future Element		
Maintain thresholds	Quantify relationship between basin storage and outflow into San Antonio Creek	2009

Nevertheless, OBGMA will review the existence of surplus from time to time, as dictated by the receipt and review of its annual report or as new, reliable information becomes available. OBGMA will establish the conditions and criteria under which it would contemplate granting a permit for export, should a surplus be determined to exist. These conditions and criteria will include at least the following:

- The applicant for a permit will bear the full financial, regulatory, and legal burden of demonstrating that a surplus of water exists, which, if exported, would not cause harm to any existing groundwater user in the basin, now or in the future.

- The export permit will be suspended in the event of a declared water shortage, basin storage threshold level, or other pre-established condition.

- All export permits will contain conditions and criteria that will otherwise protect the in-basin users to the fullest extent allowable under the law.

3.2.2 Establishment of Thresholds and Triggers

Water levels in the basin fluctuate considerably in response to pumping and recharge from seasonal rainfall. The Ojai Basin is considered largely in balance. Review of precipitation, accumulative departure curves, and water level responses over time indicate that the basin has the hydrologic characteristics of quick discharge and quick recharge when precipitation occurs. Also, based on aquifer testing, there is a significant amount of overlap of cones of depression created in the potentiometric surface by pumping wells. These features must be considered when establishing action levels of groundwater elevations or streamflow.

Groundwater use between 1981 and 2005 averaged approximately 5,170 acre-feet, of which some 1,820 acre-feet was pumped by Golden State Water Company for municipal and domestic supply (35 percent). In addition, three mutual water companies and approximately 100 active private wells supply both agricultural and domestic water in the basin. There is a great variation in location and depth of the wells in the basin, and their relative access to groundwater at low points in the hydrologic cycle. There is also variation in water quality in different parts of the basin. Taking into account the needs of the water users in the basin, overlying landowners and well operators, and the existing conjunctive relationship between the groundwater used in the basin and the Casitas water imported into the basin, OBGMA will establish basin storage thresholds which will trigger special action by the OBGMA to ensure protection of groundwater supplies in the basin.

OBGMA will develop triggers and the conservation measures that must be implemented at those points, and will also develop the procedures and pass the ordinances needed to put the conservation measures into effect. This will be done with full communication with, involvement, and understanding of the basin well operators.

3.3 Goal 3. Encouraging Supporting Activities

With its limited resources, OBGMA must strive to achieve its goals in cooperation with and through the supporting activities of other agencies, and through the encouragement of supportive actions by water users. Table 3 describes selected Goal 3 elements that have been completed, are scheduled, or are planned.

Table 3. Selected Completed, Scheduled, and Planned Future Elements Goal 3, Encouraging Supporting Activities

Element	Description	Completion Date (Actual or Anticipated)
Completed Element		
Well inventories	Worked with well owners to increase number of Ventura County key wells in Ojai	1994
Joint meetings	Casitas, Ojai Water Conservation District (OWCD), and Ojai Basin Groundwater Management Agency explore interests in common	1995
Meetings	Participated with and followed progress of Ventura countywide Stormwater Quality Management Program	1996
Integrated regional watershed management planning (IRWMP) efforts	Participated in IRWMP, pursuit of Proposition 50 water bond funding	2006
Scheduled Element		
San Antonio Creek Spreading Grounds Rehabilitation Project	Rehabilitate abandoned spreading grounds in cooperation with OWCD, Ventura County Watershed Protection District (VCWPD)	2007-2010
Ventura River watershed planning	Study Ventura River watershed in cooperation with VCWPD	2007-2010
Future Element		
Grant funding pursuit	As available and targeted to basin issues	Annually

3.3.1 Data Collection and Storage

Ventura County already routinely collects information on water levels and quality from wells in the basin. In cooperation with OBGMA, this effort is planned to continue to meet the monitoring needs of the basin.

3.3.2 Water Conservation

OBGMA encourages water conservation practices by both agricultural users and urban users. Market forces, as well as good management practices, are moving most agricultural users in the basin toward implementation of water conservation measures. Likewise, Golden State Water Company, the largest municipal supplier in the basin, has initiated a conservation plan approved by the Public Utilities Commission and supported by the City of Ojai. OBGMA will encourage the development, publication, and sharing of information with these users that will encourage

the optimum use of water resources in the basin. Further, OBGMA will seek the assistance of various local, state, federal and private organizations to provide water conservation services and education programs for in-basin water users, including the pursuit of grant funds as available. OBGMA will encourage in-basin water users to incorporate conservation practices and will consider development of a conservation plan in anticipation of drought conditions. Water meters on all wells will be needed to effectively measure sharing of conservation efforts.

3.3.3 Abandoned Wells

Ventura County has a program to address abandoned wells as part of the water well ordinance. OBGMA encourages implementing a program in the Ojai Basin to identify all abandoned wells, to determine if they pose any hazard to the quantity or quality of groundwater in the basin, to identify the actions needed, and to help obtain the resources to rectify any problems. OBGMA supports evaluation of abandoned or idle wells to determine whether they can be converted to monitoring wells, rehabilitated, or properly destroyed in accordance with Ventura County standards. OBGMA will also seek to obtain grant funds to assist well owners in proper destruction of abandoned wells, or in conversion to monitoring wells if appropriate.

3.3.4 Artificial Recharge

The Ojai Water Conservation District (OWCD) was involved in importing water from Matilija Reservoir via gravity flow pipeline and a program of enhanced percolation of streamflow on San Antonio Creek until 1985. This involved the diversion of surface flows into a series of percolation basins and was highly successful. The program was discontinued after the emergency construction of a debris basin on San Antonio Creek by Ventura County using FEMA funds, following a major fire in the watershed. The result of that construction was the destruction of most of the percolation basins, which were never restored.

The artificial recharge of the basin from San Antonio Creek by the Ojai Water Conservation District is endorsed by the OBGMA. To rehabilitate these spreading grounds, the OBGMA supports the San Antonio Creek Spreading Grounds Rehabilitation Project (SASGRP), one of the key projects of the Watersheds Coalition of Ventura County (WCVC) suite of applications. Under its enabling legislation, OBGMA must regulate any groundwater storage, recapture, and/or replenishment project in the Ojai Basin, and, accordingly, will be processing a permit for the SACSGRP. Other partners in the SASGRP endeavor include the OWCD, the VCWPD,

Casitas Municipal Water District, and Golden State Water Company. This project will strive to augment basin storage by restoring the percolation basins and diversion and intake structures that were destroyed by the emergency construction. This was a key goal element on the OBGMA 1995 Plan.

The SASGRP may offset some of the losses associated with the proposed Matilija Dam decommissioning, known as the Matilija Dam Ecosystem Restoration Project (MDERP). The MDERP proposes to replace the water supply loss resulting from the dam's removal prior to its obsolescence date. The SASGRP, if successful, can only partially mitigate the loss of water supply resulting from the MDERP. Other measures should be evaluated and implemented to more completely mitigate the removal of the Matilija Dam and the elimination of its storage volume.

3.3.5 Watershed Management

OBGMA will work with other stakeholders in the Ventura River Watershed to effectively understand and manage the drainage area that includes Ojai. Such a project is also included in the suite of tasks applied for by the WCVC, under the Ventura River Watershed Protection Plan. OBGMA supports this endeavor and the understanding of the basin will be enhanced with additional monitoring wells in the basin provided under the project.

3.4 Goal 4. Effective Communication

The effectiveness of OBGMA will depend upon its ability, within its limited means, to meet the needs of the water users and well owners of the basin. This will depend on effective, two-way communication between OBGMA and the users it serves. Table 4 describes selected Goal 4 elements that have been completed, are scheduled, or are planned.

3.4.1 Advisory Committee

Ad hoc advisory committees with representatives of the well owners and water users in the basin have been periodically created by the OBGMA board and have been a means of developing a dialogue between users and OBGMA. The advisory committees are used by OBGMA board as a nucleus of interested and affected users to consider and develop the details of actions proposed under this groundwater management plan update.

Table 4. Selected Completed, Scheduled, and Planned Future Elements
Goal 4, Effective Communication

Element	Description	Completion Date (Actual or Anticipated)
Completed Element		
Public workshops	Two workshops to hear and record well owner concerns	1994
Advisory committee	Explored basin issues	1994
Public workshop	Sponsored "Well Maintenance and Rehabilitation" Seminar	1998
Outreach	Displayed "Pollution Prevention House" on Ojai Day and at local elementary schools	1999
Website	To inform stakeholders of Agency operations and Basin issues	2007
Scheduled Element		
Maintain and update website	To inform stakeholders of Ojai Basin Groundwater Management Agency operations and basin issues	Ongoing
Future Element		
Awareness campaign	Increase public awareness of water issues in the basin through workshops, forums, newsletters, etc.	2008 and ongoing

3.4.2 Annual Report

OBGMA will prepare an annual report as required by law that it will self-publish at minimum expense. Technical contractors will only be used if required to perform technical analysis of data collected during the year.

3.4.3 Information Sharing

Information learned about the basin and water use in the basin will be shared by OBGMA with all well owners directly and with water users in the basin through the general news media and the publications of local water purveyors. Actions or items of special interest will be shared with well owners by direct mail newsletters, which will also include notice of OBGMA meetings and agendas. OBGMA board members will be available to meet with basin water users to address issues of concern and the ongoing management activities of OBGMA. OBGMA has established a website through which information is shared freely with the public. OBGMA's web address is www.obgma.com.

3.5 Goal 5. Efficient Administration

The resources available to OBGMA to carry out its mission and serve the water users of the basin are limited. Therefore, cost containment measures are essential. These measures will be developed and made part of this Plan update. Table 5 describes selected Goal 5 elements that have been completed, are scheduled, or are planned.

Table 5. Selected Completed, Scheduled, and Planned Future Elements Goal 1, Efficient Administration

Element	Description	Completion Date (Actual or Anticipated)
Completed Element		
Finance committee	Formed finance committee of board members and well owners, prepare fiscal budget	1994 (annually thereafter)
User fees	Established a system to fund Ojai Basin Groundwater Management Agency (OBGMA) based on well user fees	1995
Revenue evaluation	Evaluated expenses and revenue, to reach goal of operating on revenue from extraction fees only, grants of $3,500 from Casitas, Southern California Water Co. and the City of Ojai were encumbered as seed monies for OBGMA advancement.	1996
Scheduled Element		
Funding increase	Increase extraction charge ceiling to a reasonable amount through legislation.	2007
Administration	Hire a professional, qualified manager, on a part-time basis, to efficiently and effectively provide staff support for the agency.	2008
Future Element		
Donations	Solicitations of donations from stakeholders and other benefactors	Ongoing

3.5.1 Funding

OBGMA is funded by extraction charges levied on pumpers in the Ojai Basin. The present legislative ceiling on extraction charges is $7.50 per acre-foot. In a typical year with 5,000 acre-feet extracted, the OBGMA budget is roughly $37,500 per year. OBGMA operates from a one-room office, with one part-time office assistant who also acts in the capacity of secretary and treasurer. These expenses, along with regular audits and required insurance, consume the

majority of the funding. OBGMA should have one professional, technically qualified staff person as a manager at least part time. OBGMA should also participate in funding projects that are within its purview (such as the proposed SACSGRP, operation and maintenance, matching funds for grants, hiring consultants). OBGMA is seeking legislation in the 2007 session to amend its enabling Act to increase the extraction charge ceiling to $25. Any change in actual extraction charge will be voted upon by the OBGMA board, which consists of representatives of the stakeholders. The OBGMA board has estimated that an actual extraction charge of $15 per acre-foot would provide the funding needed to carry out their basic responsibilities and that an additional charge of $4 per acre-foot would be need to pay the OBGMA share of the operation and maintenance of the proposed SACSGRP.

With adequate funding, OBGMA will meet its responsibilities as required by law, will be able to carry out its mission to protect Ojai Basin groundwater in the interests of the water users in the basin, and will be able to achieve the goals of this management plan update.

3.5.2 Minimum Requirements

The OBGMA's enabling legislation requires the Plan to establish a minimum amount of extraction below which the requirements of the Act will not be applied. The OBGMA will establish these criteria.