

September 27, 2019

Paso Robles Groundwater Subbasin Cooperative Committee
San Luis Obispo County, Paso Robles Groundwater Subbasin GSA
1055 Monterey Street
San Luis Obispo, CA 93408

Dear SLO County Paso Robles GSA,

Re: Comments of the Paso Roble Groundwater Subbasin GSP

I would like to thank all those who spent endless hours in developing the Groundwater Sustainability Plan (GSP). I appreciate this opportunity to submit my comments of the final version of the GSP.

I have been involved in the Subbasin's groundwater issues for almost a decade now. I was a leading figure in proposing the failed AB2453 Water District. I was a founding member of the group that formed the Estrella-El Pomar-Creston Water District (EPC WD). I currently serve on the Board of Directors of the EPC WD. I am a resident in the area for 21 years and a former winegrape grower for 18 years. I also served on the Board of Directors of the Paso Robles Wine Country Alliance for 6 years. My comments are presented as a concerned citizen and stakeholder and my comments do not represent any official position of the EPC WD.

I would like to split my comments into two categories. First, I'd like to discuss my general thoughts about the GSP and its shortcomings. Secondly, I'd like to comment on management actions that can be taken immediately and need to be pursued now as the GSP implementation begins.

General Comments

The GSP is a weak document and almost all important decisions have been delayed to the future.

The GSP does not define a new management structure or the decision-making process necessary to implement the GSP. It seems clear that the current MOA structure has not been able to resolve the many critical decisions that have to be made. There needs to be a new MOA or some other governance structure.

Similar to the item above, the GSP provides little insight into how the GSP implementation is going to be funded. Like myself, I suspect that Subbasin stakeholders would like to know who pays for what and how much?

The GSP makes clear that pumping cutbacks are coming but doesn't say where, when, or by how much. Predictable and stable rules are essential for farmers to plan and make informed decisions. For this reason, the GSP should spell out clearly a process, to begin immediately upon adoption of the plan, to determine future groundwater allocations. This process should ensure that agriculture, like all groundwater users, have meaningful input and involvement. Allocating groundwater will be doomed to failure if those who must sacrifice are not included in the decision-making process.

The GSP seems to list projects in a perfunctory manner with pie in the sky generalities and hefty budgets. There is one project that's real, doable and has already received significant funding from private sources to development preliminary engineering plans, reviewed pipeline routes and has begun environmental

studies. This ‘real’ project is the Blended Water Project which utilizes Nacimiento Lake Water along with the City of Paso Robles’ Recycled Water. The Blended Water Project has the ability to bring needed supplemental water to the Paso Robles Subbasin. This project along with any other ‘real’ projects should receive the endorsement of the GSP and start immediately. Supplemental water is a key component to help solve the Subbasin’s declining water levels.

The GSP is unclear and insufficiently aggressive in setting schedules and deadlines for its management actions. The GSP does not address who does what next? Who’s in charge?

The GSP states that the GSAs will “promote” voluntary fallowing, but does not explain how. Fallowing of land could have a significant positive influence in groundwater levels but there is little in the GSP to ensure that pumpers who choose to fallow will be protected in the future in preserving their pumping allocations. In other word, if I stop irrigating a crop today, will I be able to pump in the future?

The GSP, for example, says that the GSAs will “promote” BMPs, but does not say how.

Without any sort of timetables or specific management action goals, the subbasin remains at risk of further decline while solutions are pondered. The GSP provides no timetable for implementing important actions of the GSP. The GSP commits to do nothing.

The GSP does not mandate metering and extraction reporting. How can you manage a basin if you don’t know what’s being pumped? Fair and equitable decisions about extraction must be backed up by a vigorous monitoring system and a policing mechanism. The GSP is mostly silent on this issue.

The GSP gives a pass to de minimis users and does not address future growth of de minimis users.

Immediate Management Actions Needed

There are certain management actions that need to start immediately. The following are several of these actions.

The GSP needs to establish a metering and groundwater pumping reporting system and it needs to start now. On April 1, 2020, our Subbasin will be required to report its groundwater status. Our Subbasin has very little ‘data’ on who pumps and how much. As we move towards possible pumping cutbacks, the GSP has to have answers to these basic facts. Monitoring and report must start now.

As a corollary to the previous item, the GSP needs to define and fund an immediate effort to determine what other data gaps exist and identify other informational needs that will be necessary in the decision-making process as GSP implementation proceeds.

Projects need to be identified, endorsed and started

Concluding Comments

As an early member of the group that formed the EPC WD and now as an EPC WD Board of Directors Member, I am particularly distressed about actions of County Supervisors that undermined the efforts of a legitimate and significant group of stakeholders in their efforts to participate in the SGMA/GSP process. EPC WD represents 40% of groundwater pumping in the subbasin. EPC WD is the largest group of pumpers in the subbasin and EPC WD was prevented from becoming a GSA and consequently denied the opportunity to represent its members in the GSP process. This is contrary to the spirit and intent of the SGMA Law.

Additionally, EPC WD members have been committed to working to achieve a sustainable Subbasin and have self-assessed themselves with Prop 218 votes to fund efforts in support of a sustainable Subbasin.

The County acting as the GSA for the so called “white area” has failed to properly represent the agricultural pumpers in the GSA. The County GSA did not hold a single outreach meeting. County GSA did not create any sort of ag advisory position for their GSA. The County GSA did not create any sort of forum where there could be open dialogue and exchange of ideas between stakeholders and public officials. Individuals speaking in 3-minute time slots at CC meetings does not constitute outreach by the County.

The irrigated agriculture community in the County’s white area accounts for 55% of groundwater pumping in the Paso Robles Subbasin. The County has demonstrated its unwillingness or its inability to include this very large and significant group of groundwater pumpers in developing the current GSP. In addition, irrigate agriculture is one of the major economic drivers in the North County and continued success of the irrigated ag community must be considered.

Since irrigated ag in the white area represents more than 50% of the total pumping in the Subbasin, irrigated agriculture’s interests should not be ignored by the lack of a 'seat at the table', a seat that has been unaccounted for in the GSP process to date as the County GSA has had virtually no outreach to these stakeholders. In that regard, the County GSA has severely underrepresented these constituents in the Subbasin by denying them any effective voice in the proceedings. Going forward, irrigated agriculture's input to the GSP will be vital to ensure the Subbasin moves towards sustainability while maintaining the economic powerhouse that is irrigated agriculture in the Subbasin. In conclusion, there needs to be an equal participant "seat" for irrigated agriculture on the new MOA which will define implementation of the Plan.

Thank you for this opportunity to submit my comments and I look forward to working with a newly constituted Memorandum of Agreement where irrigate ag is properly represented.

Regards,

A handwritten signature in black ink that reads "Jerry Reaugh". The signature is written in a cursive, flowing style.

Jerry Reaugh