

Comments of Chapter 6,7 & 8

I would like to submit the following comments on these Chapters.

Minimum Thresholds

I am against using the 2017 well level reading as the Minimum Thresholds. This will put the GSP at risk of going below the minimums before the GSP even starts to implement actions in the Basin. The two Water Districts, S/SJ and EPC have looked at a number of alternatives and I urge the CC Technical Staff to address this issue and set Minimum Thresholds below the 2017 levels.

Criteria for Defining Undesirable Results, 8.4.4.1

The current Chapter 8 suggest 15% as a trigger for management actions because of undesirable results. With only 12 wells in the GSP at this point, 15% of 12 wells is one perhaps two wells and is not a large enough of a sample to make decisions. I believe the number threshold of 15% is way too low. 30% might be a more realistic number. Also, as the number of wells increases in the monitoring network, the CC Technical Staff might consider a more refined methodology for determining exceedances.

The Number of Well in the Monitoring Network

It is my understanding that only 12 wells are included in the Monitoring Network at this point. Clearly this number is way too small. I am aware that Shandon/San Juan WD is working to increase this number in their area. EPC WD is also working with our Hydrologist, Paul Sorenson, to identify wells in the EPC area that can become candidates for monitoring well. EPC hopes to identify a dozen new wells that can be included. I would hope that the County GSA works on this as well.

Sustainability Goals, 8.2

The primary components of creating a Sustainability Plan for the Paso Robles Groundwater Basin are reduced extraction of groundwater and the availability of new sources of water.

It is my hope that these Chapters as well as Chapters 9 & 10 will include active management actions, programs, and recommendations that will incent pumpers to change their practices and pump less water or provide financial encouragement to farmers to fallow land which has become economically marginal.

In addition, it is my hope the CC and the GSP will help to create a political and social environment that will allow the Basin to pursue sources of 'new' water that are economically viable. The ability to have new supplemental water to offset the pumping deficit will be essential to maintaining agriculture as the economic pillar of our Basin and Community. We all use the same water and we must all participate in the solutions necessary for our Basin's health.

Policy and Survey Results

Early in the process, the CC conducted a survey of interested landowners and water users. The results were interesting but not meaningful for setting policy. The Survey was not scientific and with a small number of respondents. Questions were asked in a vacuum. It's easy to say yes to the question of would you like to see groundwater levels maintained or rise. But without consideration of the corresponding tradeoffs, the answer is meaningless.

I would encourage the CC to base their deliberations on facts and science and not preferences.

Equal Treatment

I would encourage the CC to make sure that all classes of 'extractors' are treated the same within their class and regardless of what jurisdiction they are in. Classes might be such things as agricultural pumpers, rural resident pumpers (de minimis), commercial pumpers and others. Also, any requirements of reporting usage and limits on extraction should also be the same within each class.

Access versus Availability of Groundwater

This is a simple but important distinction to these two aspects of groundwater. Access means how does a person get access to groundwater or more basically what kind of a well does one have. Availability means how much water is readily available in the Basin.

Agricultural pumpers solve their access problem on a routine basis by lowering their pumps, enhancing their equipment, drilling new wells or other efforts. It's just the price of doing business. On the other hand, agricultural users have an availability problem. How much water can our Basin support for agricultural use? That's what SGMA and GSP are all about.

De minimis users have the reverse situation. They have an access problem but not an availability problem. Because de minimis users use a relatively small amount of water, the Basin should be able to provide for their needs in the future.

However, some de minimis users do have a real access problem, their wells are going dry and this problem will likely continue until the Basin is stabilized. Many rural residents have older and/or shallow wells and groundwater levels have been declining.

I encourage the CC and the GSP to address the 'access' problem of rural residents with proposals for projects, managements actions and other efforts. A rural water company could be a cost-effective solution to wells going dry. Rural residents along with all pumpers of groundwater share the responsibility of a sustainable basin and should participate in the solutions. A GSP that does not address the needs and solutions of rural residents could be viewed as an incomplete plan.

Jerry Reaugh, personal comments, not EPC WD comments
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