

I appreciate the changes made to Chapter 9, especially Section 9.3.4. In addition, I have the following comments and questions about, and recommendations for Chapter 9 of the proposed Paso Robles Groundwater Area Sub-basin Management Plan:

Section 9.2

Modify the criteria for inclusion in the well-monitoring network; monitoring needs to be extended to wells that do not meet all the current criteria for being included in the monitoring network. All wells, to the extent feasible, should be in the network.

Define “individual entities” who ... “may choose to develop programs that would raise funds for alternative approaches...”

Section 9.3

Define by whom “Level 1 management actions will be developed and implemented”

Section 9.3.1:

Define “ET estimates”

Section 9.3.1.4

I request that this section, and all subsequent relevant sections, be re-titled “Public Notification,” as “noticing” has other connotations, and “notification” is unequivocal.

Section 9.3.2

Define “well interference.”

Section 9.3.3

Will “temporary diversions of storm flows from streams” require California Department of Fish and Wildlife approval? Will SLO County or GSA’s have protocols for obtaining, or for helping obtain, such approval, and for designing said diversions?

Section 9.3.4

I most earnestly ask The Committee to adopt this section. This proposal will save water by not forcing users to pump from the basin when land is fallowed or when planted to a crop with less water demand. Also, it provides protection of irrigation rights for landowners, whom for whatever reasons, have decreased their water demand compared to their historical use.

Section 9.4.1

I reiterate here my request that more wells be monitored.

Section 9.4.2

Define “exempt” and “non-exempt” groundwater pumpers.

Section 9.4.2.3

I am adamantly opposed to permanent transfer/relocation of pumping allowances. Permanent removal of pumping rights from a property is the equivalent of condemnation. Previously productive sites will be unusable, and will become the equivalent of rural slums.

Temporary transfer/relocation of irrigation rights should be allowed only on neighboring or near-neighboring properties, as physical transfer of the water itself does not actually take place. Transferring **credits** to an area with historically low groundwater will not put more water into the sub-basin of that low-water area, and therefore will not reduce withdrawal pressure or basin depletion in that area.

Section 9.4.2.4

I am strongly against any interpretation of this section that does not comply with Section 9.3.4. I would agree to this section if it pertains only to land that has never been irrigated.

Section 9.4.2.9

Is it possible to include a brief summary of the requirements of Propositions 218 and 26 referred to?

Section 9.4.3

I feel very strongly that productive farmland should remain productive farmland. Once it is lost to even low-density development, the increased price per acre will prevent its return to agriculture, and small acreages are almost never dedicated to production. While I recognize that housing for an ever-increasing human population lags behind demand, productive land is all the more necessary to sustain that population. Marginally productive or non-productive land should be the highest priority for development.

Section 9.5

I do not support, and I doubt that the general public would support, general funding of any project that benefits mainly one or two growers.

The six potential sources for groundwater recharge or in-lieu use are highly suspect:

- State Water Project water is completely allocated.
- Nacimiento Water Project water is near complete allocation and has no infrastructure for individual delivery.
- Salinas Dam/Santa Margarita Reservoir water is needed to recharge the Salinas River. Communities at the northern end of the river are experiencing salt water intrusion, and less water delivered to the delta means more salt water in one of the nation's most productive growing areas.
- No infrastructure exists for private delivery of recycled water from either Paso Robles or San Miguel.
- Flood flows from local rivers and streams is subject to CA DFW regulation

Section 9.5.3.3.3

One monitoring well is entirely insufficient to trigger implementation of any project. Furthermore, no project should be initiated for the benefit of only one user. Allowing one monitoring well to be the trigger gives no incentive to reduce groundwater pumping if that user will then have the benefit of pooled funds to build a private delivery system. San Miguel CSD may improve the quality the town's waste effluent, but use thereof should benefit the entire community.

I, personally, would like to know the location and ownership of monitoring well 25S/12E-1605 and why it merits such individual consideration. Indeed, if pooled funds are to be used for this project, then the public has the right to know this information.

Section 9.5.3.3.5

Do Montgomery and Associates and The Committee expect the public to pay for bonds that benefit only one or two users?

Section 9.5.3.4

This proposal is pure pork. If Figure 9-14 shows the route of the proposed delivery line, the route is nowhere near the confluence of the Salinas and Estrella. In addition, the three wells in the figure are south, southeast, and farther southeast of the confluence. Since both rivers run north, I fail to see how such delivery would recharge the areas of the wells. To top it off, I KNOW WHO OWNS THE PROPERTY situated at the confluence. NEVER ONCE HAS THE LANDOWNER BEEN QUESTIONED ABOUT THE NEED FOR SUCH A PROJECT. Indeed, the immediate Salinas River corridor appears to be a high-recharge area, with little fluctuation in groundwater levels. Again I am compelled to ask who devised this project, to whom the three listed wells belong, and who stands to benefit.

Section 9.5.3.4.3

Many more wells need to be monitored in any proposed project area to trigger implementation. Also, having the prospect of increased water delivery does not appear to be an incentive to decrease groundwater pumping. It seems to reward those who have been injudicious.

Section 9.5.3.6

I have the same objections as listed in Sections 9.5.3.3.3 and 9.5.3.4.3

Section 9.5.3.7

As above in Section 9.5.3.6. Additionally, this ain't gonna happen. Any alteration of Salinas Dam will be initiated by SLO County, and subject to years of study and permitting.

I think the first, best step for diminishing groundwater depletion is capping irrigation in historically non-irrigated locations at perhaps 80% of current usage. All wells pumping in such areas would be tested prior to the initiation of such measures, and again after one year, and pumping limits would be adjusted accordingly.

Thank you for your attention to my considerations.

dosrios