



SAN LUIS OBISPO COUNTY FARM BUREAU

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September 27, 2019

Paso Basin Cooperative Committee
City of Paso Robles
San Miguel Community Services District
County of San Luis Obispo
Shandon-San Juan Water District

Submitted via pasogcp.com

RE: Draft Paso Robles Groundwater Sustainability Plan

Dear Committee Members & Staff:

San Luis Obispo County Farm Bureau (Farm Bureau) thanks committee members and staff for their continued work to create a plan under the complex Sustainable Groundwater Management Act (SGMA). As you know, many of the 800 Farm Bureau members we represent will be directly impacted by the Paso Robles Groundwater Sustainability Plan (GSP). The \$1 billion in annual crop and livestock sales produced in San Luis Obispo County drives our local economy, and the GSP must reflect an understanding by our local leaders that partnering with agriculture is essential to make meaningful progress towards sustainability.

Farm Bureau acknowledges that the Basin, or parts of the Basin, are in decline, and that workable, targeted solutions will come best from collaboration with all stakeholders. Clearly, there is no one, all-inclusive project, requirement, or regulation that can solve the overdraft conditions within the Basin.

We believe the Basin needs to be better defined by gathering more scientific data throughout different areas of the Basin over an extended period of time. It is not possible to address the Basin's challenges without accurate data, and we recognize the GSP as the framework for gathering data needed to develop real solutions. The GSP is a "roadmap" that must be flexible and able to change over time as new data becomes available. Currently, there are simply many unknowns, such as needed watershed data. Recognizing that a perfect picture of the Basin may never be attained, we still recommend the continuation of geographical data collection and analysis so that the Basin is as accurately defined as possible. This will help ensure groundwater users in noncritical areas do not incur unsubstantiated cuts that will potentially be economically disastrous yet do nothing to solve the problem.

As an organization made up of diverse interests, Farm Bureau knows first-hand the importance of having everyone at the table for discussion and especially when it comes to action. Exclusion of affected parties is a recipe for failure, and never more so than when it comes to water. This GSP, understandably, focuses on the largest water users, agriculture, but does not clearly bring them to the discussion. We strongly recommend that there be an open seat for irrigated agriculture on the Paso Basin Cooperative Committee, and ultimately, on whatever agency is charged with implementing the GSP. If all of agriculture is committed to working together, we are confident that meaningful solutions will be uncovered. But, if the responsibility to address the Basin's water issues is placed solely on agriculture, or on any single segment of agriculture, it will cripple the economic vitality of Paso Robles and the region.

There can be viable solutions achieved in the GSP through a combination of more data on pumping practices, increased adoption of Best Management Practices at the farm level, and the inclusion of realistic projects to introduce new water to the basin. In addition to the supply of potential existing resources like Nacimiento and State Water, and municipal recycling projects being developed, the development of streamflow capture projects

could be key components in the journey towards basin balance. It is crucial to have water supply portfolio diversification and cooperative efforts among agencies to develop water sources. Agriculture is dedicated to doing our part, but we alone cannot solve the problem.

Farm Bureau looks forward to continuing being a partner in and helping to improve and refine the GSP so that all agriculture can continue to contribute to the economic vitality of the region.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Graves", is centered on a light gray rectangular background.

Hilary Graves, President
San Luis Obispo County Farm Bureau