

Shandon-San Juan Water District

Shandon-San Juan Groundwater Sustainability Agency

May 5, 2020

Re: Comments on the proposed San Luis Obispo County Water Neutral Ordinance Amendments

Fallowing:

Voluntary fallowing is one of the best ways to reduce groundwater use at no public cost. This concept should be implemented immediately and the mechanism for the registration of fallowing should be easy for the landowner. There should be no time limit for how long fallowing can be implemented without losing any right to the use of groundwater under the ordinance. Landowners who plan to resume irrigation, having demonstrated their prior use during the fallowing registration process, will need to register their planned new use and assure they are extracting groundwater within their current allocation or right.

Offsite water offsets:

Offsite water offsets can be challenging to implement and administer, but can also be valuable in maintaining economic vitality. We support a fair, transparent system for offsite water offsets, which can only be achieved if each and every offset can be completed without adverse consequences to both the overall groundwater basin and to neighboring landowners. Proposed offsets that increase pumping in an area of probable overdraft should generally be denied. Since offsets are susceptible to abuse, each transaction should include verification of historic use, so the County can independently determine the validity of the proposal.

Area of severe decline map:

The red zone is now a central issue to the Paso Robles Groundwater Sustainability Plan and all of the Basin's Groundwater Sustainability Agencies (GSAs) have agreed to cooperate in the management of the Basin. Therefore, the Paso Basin Coordinating Committee, acting on behalf of the GSAs, should determine which data should be used to define the Area of Severe Decline and the data sources should be public, transparent and consistent. The red zone map should not be revised arbitrarily and the County should not be unilaterally redetermining the location and extent of the "red zone" and picking winners and losers.

The current data supporting the defined red zones are opaque and based on an admittedly inadequate number of monitoring wells measured only twice a year (causing extrapolation that may or may not be correct and are at best speculative). Any definition of areas of severe decline needs to be fully supported by adequate data. We therefore need immediate and significant expansion of the monitoring network. We support the extensive addition of County monitoring wells to be commenced immediately, with the conversion of twice annual monitoring to continuous recording devices. Shandon-San Juan Water District is committed to fully participating in a quality monitoring program and is prepared to assist the County in identifying and securing access to existing wells and additional well sites as needed for these monitoring purposes.

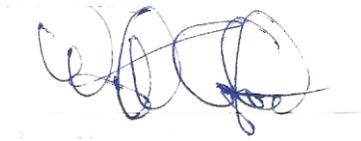
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Comments on the proposed San Luis Obispo County Water Neutral Ordinance Amendments (cont'd)

Exemptions for one-time new irrigation development (Phase 2):

The idea of allowing the expansion of irrigation from 5 AFY to 25 AFY is irresponsible. The Paso Robles Groundwater Sustainability Plan already proposes that irrigated agriculture curtail water use by a substantial amount which will cause significant economic impact throughout the region. Any County proposal to encourage the expansion of irrigation (or any other new water use of the basin) is appalling. The amount of additional demand created by any County sanctioned expansion of pumping will have an immediate adverse impact on existing farmer and rancher operations and magnify the adverse impact on the economy. The extent of the damage caused by this proposal would depend on the final definition of the area to which it is applied. If the expansions of allowed pumping were applied on a per parcel basis, the impact on existing operations could be disastrous.

Sincerely,



Willy Cunha, President of the Board
Shandon-San Juan Water District / Shandon-San Juan Groundwater Sustainability Agency