

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

Fallowing:

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 are susceptible to abuse. We concur with the current moratorium on offsite offsets. At a minimum, offsets should be between closely located properties and never from an area of identified severe groundwater level decline (the “red zones”) to areas outside those areas. Because of the very slow movement of groundwater over long distances and uneven connectivity below ground, it makes good sense to keep transfers within short distances and within areas with good hydrologic connectivity. Given the complicated nature of family farm ownership, any prohibition against offsite offsets must be drafted to allow offsets within a unified operation notwithstanding the exact ownership of integrated family parcel ownership.

Area of severe decline map:

The “red zone” map keeps moving, making operational and remedial plans more difficult. The 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). Any definition of areas of severe decline needs to be fully supported by adequate data. 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 assisting the County in identifying and securing access to existing wells as needed for these monitoring purposes.

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.