

Shandon-San Juan Water District

Shandon-San Juan Groundwater Sustainability Agency

June 15, 2020

Chairman Jean-Pierre Wolff
Central Coast Regional Water Quality Board
895 Aerovista Place, Ste. 101
San Luis, Obispo, CA 93401-7906

Re: Comments on Draft Ag Order 4.0

Dear Chairman Wolff and Members of the Board:

The Shandon-San Juan Groundwater Sustainability Agency (SSJ GSA) and Shandon-San Juan Water District (SSJWD) were created specifically to protect the groundwater and surface water resources of our area. All of us who live and work in the Paso Robles Groundwater Basin are highly reliant upon the annual precipitation that falls upon the Basin and surrounding watersheds to refill the Basin each year. SSJ GSA strongly supports the mission of the Central Coast Regional Water Quality Board and hopes to see an effective, practical, and achievable Ag Order 4.0 Final Draft that recognizes and protects this important water resource and the many benefits that arise from the multiple uses of that water.

The Paso Robles Groundwater Basin, actively managed under a single GSP by four active GSAs and dominated by wine grapes with small amounts of vegetable and tree crops, **deserves a separate designation and less burdensome Regulation under AG Order 4.0.**

- a. 3rd Party groups working collaboratively with farmers, UC Researchers and Regional Board Staff would manage data collection, reporting and developing best management practices, but with less stringent requirements.
- b. Crop specific guidance and rules would be applied to all crops and those with higher N application needs would be required to comply with the more stringent regulations applicable in other growing areas.
- c. Ongoing testing and reporting of ground and surface waters is a critical component of GSP implementation and for compliance with our Regional Ag Order. This effort is open and public. These GSAs managing the Paso Robles Groundwater Basin and the Regional Board working through local 3rd Parties will continue to collect and make available in a local and publicly accessible fashion groundwater and surface water data including quality, extraction, and use.
- d. There are very real reasons why people and businesses want to keep their private data private. With the current level of compliance with Water Board objectives and the limits contained in the proposed Order it is more than justifiable to allow Paso Basin operations working under the auspices of a 3rd party to **aggregate data** for reporting purposes. Detailed site-specific data would be available if testing suggested a need to verify or disaggregate data and sources.

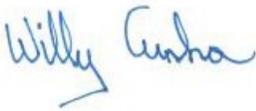
Shandon-San Juan Water District Shandon-San Juan Groundwater Sustainability Agency

Comments on the draft Ag Order 4.0 (cont'd)

- e. Much of the Nitrogen in the groundwater in the Paso Basin is a legacy, an artifact of practices from the 1950's through the 1970's when much of the Paso Basin and the surrounding watershed was actively cultivated and fertilized.
- f. Measurements of preexisting legacy constituents in the groundwater should not be used to rate or grade current growing practices. More refined techniques to measure and understand the impacts of current agricultural inputs are needed.
- g. When an area such as the Paso Basin, does things right, it should be recognized and rewarded. Not punished. The Regional Board should be encouraging all their growing areas to take as much care.

Thank you for considering input from the Shandon-San Juan GSA.

Sincerely,

A handwritten signature in blue ink that reads "Willy Cunha". The signature is written in a cursive, flowing style.

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