

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 County should not be unilaterally redetermining the location and extent of the "red zone" and picking winners and losers. 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. 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.