



Estrella-El Pomar-Creston Water District
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May 12, 2020

Via Electronic Mail and Online Submission

Mr. Craig Altare
Supervising Geologist
California Department of Water Resources
901 P Street, Room 213
Sacramento, CA 94236
Email: Craig.Altare@water.ca.gov
Portal Submission: <https://sgma.water.ca.gov/portal/#gsp>

Paso Basin GSP
Mr. John Diodati, Interim Director
County of San Luis Obispo
Public Works
976 Osos Street, Room 206
San Luis Obispo, CA 93408
Email: jdiodati@co.slo.ca.us

Subject: Comment on the Paso Robles Subbasin Final Groundwater Sustainability Plan

Dear Mr. Altare and Mr. Diodati:

The Estrella-El Pomar-Creston Water District would like to submit the following Comment Letter for your review.

Sustainable Groundwater is an important for the health and welfare of the North County of San Luis Obispo. Estrella-El Pomar-Creston Water District is dedicated to support the important role that the Department of Water Resources plays in implementing the Sustainable Groundwater Management Act.

Estrella-El Pomar-Creston Water District Background

The Estrella-El Pomar-Creston Water District (EPCWD or "District") is a California Water District that was formed in late 2017. The District respectfully submits this comment letter regarding the Paso Robles Subbasin Groundwater Sustainability Plan (the "GSP" or "Plan").

The primary purpose of the District was to become a Groundwater Sustainability Agency (GSA) and the San Luis Obispo County LAFCO approved formation of the District with that understanding. Stakeholders in the Paso Robles Subbasin (the "Subbasin") agreed that one Groundwater Sustainability Plan would be created by the Subbasin's GSAs. EPCWD was not formed in time to meet the State's filing deadline for GSA status by July 1, 2017. However, it was widely understood that if EPCWD became a water district and met the County's formation deadline of December 31, 2017, the San Luis Obispo County Board of Supervisors would

withdraw from exercising its Sustainable Groundwater Manage Act (SGMA) authority over the lands included in the EPCWD service area. EPCWD is referenced in the original Memorandum of Agreement among various agencies and municipalities in the Subbasin pertaining to SGMA implementation (MOA), as well as in the current amended MOA. EPCWD met the required December 31, 2017 deadline and became a water district. Ultimately, the County Board of Supervisor reversed its previous determination regarding SGMA participation pertaining to lands within the EPCWD Service Area

Consequently, EPCWD is therefore not a GSA and its members have not had input in developing the GSP beyond attendance at Paso Robles Basin general meetings. The District welcomes this opportunity to inform the Department of Water Resources of its views on the GSP by way of this letter.

EPCWD is an active Water District meeting on a monthly basis. The District has funded a number of studies, retained a hydrogeologist and is represented on a number of local advisory committees. The District’s members account for 38% of all groundwater extractions from the Subbasin. EPCWD represents the largest group of extractors by volume in the Subbasin (see the table below).

Agency Extraction	Percentage of
Estrella-El Pomar-Creston Water District	38%
Shandon/San Juan Water District & GSA	30%
County GSA, Ag extractors not including EPCWD	22%
City, CSD and County GSA Rural Residential	10%

As a significant stakeholder in the Paso Robles Subbasin, sustainable groundwater is critical to EPCWD. In our comments, we hope to offer suggestions, solutions and improvements to increase the likelihood of a sustainable Subbasin. EPCWD believes everyone benefits from having the best possible Plan.

Executive Overview

Agriculture in the Subbasin coupled with its symbiotic relationship with travel and tourism is by far the largest contributor to our local economy. Agriculture accounts for 90% of groundwater pumping in the Subbasin, and due to lack of alternative sources of water, is completely dependent on groundwater pumping. As such, the GSP is central to the health and wellbeing of our region for decades to come. The GSP document is necessary to present the broad range of management options that we will need to employ to bring our Subbasin to sustainability, including but not limited to more surface water storage, groundwater recharge projects, conservation, use of recycled water, capture and reuse of stormwater, better integrated regional projects, securing grant money on behalf of the GSAs to pay for projects, and the reduction of groundwater pumping. Alternative sources of water such as the County's allocation from the State Water Project for example, for which county residents have been assessed for but have not received benefit, must be prioritized in the GSP as sources of supplemental water to offset groundwater pumping.

General Comments on the GSP

The EPCWD is currently implementing or intends to implement the following actions. We feel that the GSAs should seriously consider these items as well for inclusion in the GSP as management actions that will benefit our Subbasin.

Funding Mechanism

A funding mechanism for implementation of the GSP is not clearly identified. The Plan must include a budget with clear accounting for implementation expenses and identifying the source of revenue to fund those expenses, including a list of the parties within the Subbasin who will bear financial responsibility for GSP implementation, along with a breakdown of their respective shares of responsibility.

Implement a Better Monitoring Network

Currently there is no detail in the GSP's plan to expand our monitoring network. Both EPCWD and Shandon/San Juan Water District have funds available to put into place a far more robust monitoring network capable of accounting for extractions. With the GSP as a living document, resulting data could be used to revise measurable objectives and minimum thresholds.

Clearly Identify Potential Opportunities to Offset Groundwater Pumping

It is widely known and agreed upon that in order to be sustainable, efforts to solve our groundwater overdraft will require a broad range of management options. Immediately after approval, our GSP must be expanded upon to identify and make plans to execute the following opportunities:

- Supplemental water from the State Water Project and Nacimiento Pipeline
- Expand surface water storage capacity
- Develop and construct groundwater recharge projects
- Encourage water conservation and enhance education
- Reduction of groundwater pumping
- Use of recycled and/or blended water
- Capture and re-use of stormwater
- Better integration of regional projects to benefit the whole Subbasin
- Plans to secure grant money on behalf of GSAs

Promote Voluntary Fallowing of Agricultural Land

Many farmers face a dilemma. In market downturns they would like to fallow fields to cut back on expenses. However, the current County offset ordinance prevents them from doing so as they would lose their pumping rights, preventing them from returning to farming when the market recovers. A reasonable fallowing program would reassure farmers of continuing pumping rights, while benefitting our Subbasin with reduction in pumping.

Identify Consequences to Local and Regional Economy

The potential economic effects of reduced groundwater pumping could be enormous. Following so closely on the heels of the economic strain put on our region following the shelter-at-home order resulting from COVID-19, we are concerned about the ability of our community to shoulder the weight of such a blow. It would be wise to explore the consequences of reduction in groundwater pumping on the economy of our area which relies heavily on tourism brought by the vineyard and winery industry.

Consider a Change in Board Membership

Expansion of Board Membership to Include Under-Represented Groups

In order to ensure representation all interests in the Subbasin, a change in management structure might be considered. Similar to those of our neighbors in Monterey and Cuyama, we suggest that in addition to a board member from each of the GSAs, that the MOA group also include representatives from agriculture, an at-large member with a business/economic focus, and an at-large member with a community/environment focus.

As we move into working as a team to implement our Groundwater Sustainability Plan in Paso Robles, the EPCWD and its members look forward to maintaining our intent to be meaningful partners in the journey to sustainability. Thank you for the opportunity to collaborate, comment and engage in protecting the health and wellness of the North San Luis Obispo County region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dana Merrill', with a stylized flourish at the end.

Dana M. Merrill, President
Estrella-El Pomar-Creston Water District