

Worst. Ordinance. Ever.



Mr. Thomas Berg
California Department of Water Resources
901 P Street, Room 213
Sacramento, CA 94236
Via Email: Thomas.Berg@water.ca.gov sgmps@water.ca.gov

December 14, 2022

RE: Paso Robles Land Use Management Ordinance
Paso Robles Basin Subbasin Groundwater Sustainability Plan
3-004.06 PASO ROBLES AREA

Dear Mr. Berg:

On Dec. 6, 2022, the San Luis Obispo County Board of Supervisors voted to amend the "water neutral" 1:1 offsets policy in Title 8 and Title 22 of the San Luis Obispo County Code regarding planting permits for crop production irrigated from groundwater wells within the Paso Basin Land Use Management Area (PBLUMA). As amended, the "PBLUMA Planting Ordinance" allows a 25-acre-feet per year exemption per site, also amending and weakening protections for groundwater in the Agriculture and Conservation elements of the San Luis Obispo County General Plan to render it consistent with the PBLUMA Planting Ordinance.

The environmental review of the ordinance acknowledged that it will result in 250 new 20-acre vineyards over the next 20 years, pumping about 10,000 acre feet of water per year out of the overdrafted Paso Robles groundwater basin. Fifteen DEIR comment letters to the County cited the ordinance's negative impacts to the feasibility and success of the County's Groundwater Sustainability Plan in bringing the basin into balance.

From the Program EIR:

15. Impact HYD-2: The proposed planting ordinance would result in a combination of decreasing water levels and increasing pollutant amounts throughout the PBLUMA that may degrade groundwater quality.
16. Impact HYD-3: The proposed planting ordinance would decrease groundwater supplies such that sustainable groundwater management of the Paso Robles Subbasin would be impeded.
17. Impact HYD-5: The proposed planting ordinance may result in water quality impacts within the Paso Robles Subbasin that conflict with goals reducing water quality pollution, achieving water quality objectives, and maintaining beneficial uses identified in the Basin Plan.
18. Impact HYD-6: The proposed planting ordinance would allow increased groundwater extraction that would conflict with the GSP's goal of sustainable groundwater management and with the GSP's projections for groundwater extraction within the Paso Robles Subbasin.
19. The proposed planting ordinance's contribution to significant cumulative impacts to hydrology and water quality, except for surface water quality, would be considerable.

In its comments on the Draft PEIR, the National Oceanic and Atmospheric Administration wrote "We are perplexed that the county would consider adopting an ordinance that could...impede sustainable groundwater management." The County has now adopted the ordinance.

The additional pumping of groundwater and drawdown of the Paso Robles Subbasin allowed by the new ordinance renders moot the measures proposed in the Groundwater Sustainability Plan and assures that the critical overdraft of the basin will continue due to an increase in irrigated acreage in a basin that is in overdraft and has experienced a decline of 80,000 acre-feet of storage in the last two years.

We urge you to reject the GSP and assert authority over the Paso Robles Subbasin in order to impose the measures necessary to bring the basin back into balance.

Thank you for your attention to this matter,

A handwritten signature in black ink, appearing to read 'SAH', with a long horizontal flourish extending to the right.

Susan Harvey, Chair
Conservation Committee

Santa Lucia Chapter, Sierra Club