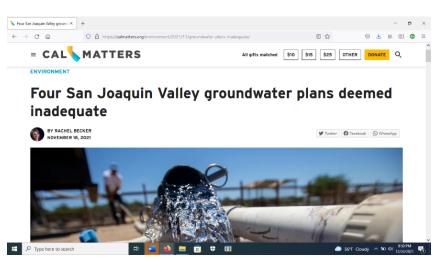
## **Last Chance for the Paso Basin**

On November 18, Cal Matters reported that the California Department of Water Resources had "lambasted groundwater plans drafted by some of California's largest and most powerful agricultural water suppliers in the San Joaquin Valley, indicating that they fail to protect drinking water supplies from over-pumping."

Prominent among those failed plans was the one submitted for the Paso Robles Groundwater Basin.



Local agencies have had seven years to come up with sustainable management plans. Now, "the basins with deficient plans will have another six months to fix the problems after the department releases its January assessment. And if they're still deficient, another agency, the State Water Resources Control Board, <u>can step in to manage the basin</u>."

"The criticisms from the state agency add to those already leveled against groundwater districts in the <u>Cuyama Valley and Paso Robles</u>, whose plans were previously sent back for more work. They echo those raised by the State Water Resources Control Board in letters about three of the basins that pushed for deeper analysis of potential drinking water impacts."

"Felicia Marcus, who chaired the State Water Resources Control Board under Gov. Jerry Brown during the last drought, applauded the Department of Water Resources for requiring plans to better protect drinking water. 'The relative equity of the thing suggests that the agricultural users should help avoid wells going dry for the domestic users. That's just the neighborly thing to do,' she said."

No argument there. To that end, we have some suggestions:

November 23, 2021

Department of Planning and Building ATTN: Planting Ordinance/Kylie Hensley 976 Osos Street, Room 300 San Luis Obispo, CA 93408 Sent Via Email: khensley@co.slo.ca.us

RE: Comments Draft Paso Basin Land Use Planting Ordinance

Dear Ms. Hensley,

We believe that adoption of this ordinance is not in the best interest of the overliers and residents of the Paso Robles groundwater basin who rely solely on groundwater pumping for their water needs. The additional allowance of 25 af/y



for an indeterminate number of parcels /sites has the potential to further disrupt DWR approval of the Groundwater Sustainability Plan, will threaten the water supply of over 15,000 basin residents, and result in even greater cutbacks for existing large pumpers.

To ensure that permits do not "adversely affect water supplies, watershed yields, or water quality", we urge the County to make these additions to the ordinance in order to aid the County in oversight and enforcement of the ordinance language.

22.30.205 D (3) As a condition of the permit, County shall require applicant to install a water meter at the pumping site and applicant shall submit an annual report of meter readings (water pumped) at the site to County Planning and Building.

The County needs some mechanism to ensure that verifiable metering and monitoring are a condition of the permit. Such metering and reporting will be the only verifiable evidence to the Department of Water Resources that this proposed ordinance might not impair or prevent a successful implementation of the Groundwater Sustainability Plan over the 20 year span of the GSP. Failure to show progress to restore balance to basin will burden all ag and large pumpers.

22.30.205 E (6) As a condition of the permit, County shall require holders of permits under this ordinance to immediately cut back pumping in the event that the Groundwater Sustainability Plan is not meeting its timetable or thresholds for restoring basin to 2015 levels as required by SGMA, or if impacts to the basin from droughts or over-pumping are significant and unreasonable.

The Paso Robles Basin Plan has already been identified as deficient by DWR. In addition to initial rejection of the Paso Robles Plan and Cuyama Plan, DWR has just identified four additional Plans as deficient. Basin GSPs found to be deficient have six months to rewrite the Plans. If revised Plans fail to meet DWR standards for sustainability, the State Water Resources Control Board has the option to step in and manage the Basin. Of particular interest to DWR is the threat that over-pumping poses to domestic wells in the deficient basins. The Paso Robles Basin has over 1,000 domestic wells that are the only water supply to over 15,000 residents.

Thank you,

Susan Harvey, Chair Conservation Committee

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Santa Lucia Chapter, Sierra Club