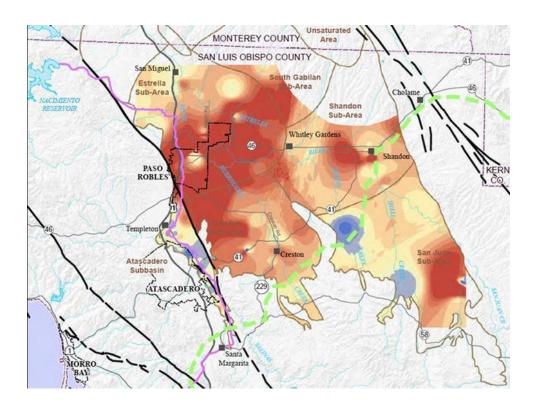
Paso Basin Still Wishing and Hoping



On January 21, the California Department of Water Resources informed the four Groundwater Sustainability Agencies charged with managing the rapidly depleting Paso Robles Groundwater Basin that the Groundwater Sustainability Plan (GSP) they had submitted for approval failed to meet the requirements of the Sustainable Groundwater Management Act.

DWR found that the plan did not include an adequate assessment of potential impacts to domestic wells associated with the chronic lowering of groundwater levels and did not adequately assess the potential for depletion of interconnected surface waters.

The SLO County GSA's, serving Paso Robles, Shandon, and San Miguel, <u>amended the plan</u> in an attempt to meet state requirements. On July 12, the County Board of Supervisors will hold a public hearing to consider adopting the updated Paso Robles Subbasin Groundwater Sustainability Plan and trying their luck again with the Dept. of Water Resources.

They shouldn't, for reasons the Sierra Club pointed out to the County at the end of May.

The draft GSP revisions make no effort to correlate timing of pumping levels – "more, less, or the same" – with aerial photos and data specific to the areas where "more, less, or the same" vegetation was indicated. (For example, do County Ag Department records indicate if new irrigated crops were planted in the areas; or were high water use crops removed from production acreage in the area; or were previously planted mature vines removed and replaced with higher

density planting grids that would require higher irrigation levels than older established vineyard grids?)

Any effort to broaden understanding of the cause for changes in riparian vegetation would help to differentiate the impacts to riparian vegetation that might be caused by variable drought conditions or groundwater pumping demands until such time as additional monitoring wells are in place and actual agricultural metering is instituted.

The plan should include a timetable for filling in data gaps affecting well verification, water extraction monitoring, and well interference.

The plan asserts that the state does not require that Groundwater Dependent Ecosystems be restored to any condition that existed prior to 2015. This raises two problems. The conditions of the ecosystem are an indicator of the poor and declining health of the basin and should not be passed over. Evidence from Basin studies dating back at least two decades indicate a condition of over-drafting, and that decline has increased irrespective of weather or drought conditions. The additional 30 feet of water-level decline the plan allows under the water-level Minimum Threshold is reckless and unacceptable. Every effort, including mandatory temporary or permanent cutbacks in pumping, should be required to hold the line at 2015 levels or better as a maximum of decline.

The project fixes proposed in the grant funding for a limited area of the basin will take years to implement and may not result in adequate basin wide improvements. When the levels start to slip dramatically and fall below the minimum thresholds, what's the plan for addressing that? Side stepping the ubiquitous problem of declining water levels, current and increasing levels of demand, and impacts of new drought weather patterns is courting failure. The 30-foot minimum decline does not indicate a good faith effort to address the Basin problems long-term. It is an unfounded wish-list approach.

Further indications of a lack of good faith effort are the County's proposed planting ordinance for the basin that would rescind the 1:1 offset program – which currently is included in the GSP as a vital tool to slow depletion – and replace it with an unrealistic, untethered pumping allocation for currently non-irrigated parcels.

The proposed planting ordinance is <u>at odds with the goals and intent</u> of the Groundwater Sustainability Plans required by the state. As we go to press, the County is preparing to approve the Environmental Impact Report for the ordinance. If the County retains its current destructive provisions, it must make a legal Finding of Overriding Considerations – meaning the "benefits" of the ordinance outweigh its destructive impacts. That will require magical thinking.

More magical thinking was in evidence regarding the benefits of the initial GSP – plans based on poor or no data and no realistic schedule for implementation – which resulted in the notice of inadequacy from the Department of Water Resources.

The state's twenty-year timeline is a small window in which to fix decades of degradation, and the climate is working against us. More must be done to restore the vitality of the Basin and its riparian and its riverine ecosystems.