



Michael Winn Sue Luft Courtney Howard
Chairperson **Vice Chairperson** **Secretary**
Room 207, County Government Center PH (805) 781-1016
San Luis Obispo CA 93401 FAX (805) 788-2182

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- Marilee Hyman
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Environmental At-Large
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- Edralin Maduli
Cuesta College
- Mark Zimmer
Golden State Water

May 5, 2010

Honorable Frank Mecham
Chairperson, Board of Supervisors
County of San Luis Obispo
976 Osos Street
San Luis Obispo, CA 93408-2040

Subject: Water Resources Advisory Committee Comments on the Public Review Draft of the Shandon Community Plan

Dear Chairperson Mecham:

On April 7, 2010, the Water Resources Advisory Committee (WRAC) formed an ad hoc subcommittee to review the water-related sections of the public review draft of the Shandon Community Plan. On May 5, 2010, the WRAC reviewed the ad hoc subcommittee's comments on the draft Shandon Community Plan, made minor changes, and voted to submit the attached comments to you for consideration.

Ad hoc subcommittee members included Ray Allen (Agriculture At-Large), Della Barrett (District 5), Sue Luft (Environmental At-Large), Steve Sinton (District 1), and Michael Winn (District 4). Member Sinton served as subcommittee chair.

Respectfully,

MICHAEL WINN
Chairperson, Water Resources Advisory Committee

cc: SLO County Board of Supervisors
 SLO County Planning Commission
 Jay Johnson, County Department of Planning and Building

Attachment: WRAC Recommendations for the Public Review Draft of the Shandon Community Plan

Purpose of the Committee:
To advise the County Board of Supervisors concerning all policy decisions relating to the water resources of the SLO County Flood Control & Water Conservation District. To recommend to the Board specific water resource programs. To recommend methods of financing water resource programs.

Excerpts from WRAC By-Laws dated 3/6/07

**Report
of the
San Luis Obispo County Water Resources Advisory Committee
Subcommittee to review the Shandon Community Plan Update
May 2010**

The subcommittee met on April 23, 2010, to discuss the plan. In attendance were Ray Allen, Della Barrett, Courtney Howard, Sue Luft, Steve Sinton (subcommittee chair) and Mike Winn. Subsequent participation through email included Eric Greening.

The primary concern with regard to the planned expansion of the town of Shandon is that it is impossible for this development to not violate Ag Policy 11. The proposed “buildout” would require an estimated 1,100 acre feet per year. Even if Shandon were to reacquire and use the annual 100 acre foot entitlement to the State Water Project, that would only provide 9% of the anticipated need. Except for groundwater, which the town currently uses exclusively, there is no other obvious alternative water source for Shandon. That means that Shandon would have to greatly expand its use of groundwater, which AGP11 states should be maintained for production agriculture, not municipal uses.

Another policy that may be violated is Ag Policy 24. Among the findings under AGP24 that must be made for conversion of land “from agriculture to non-agricultural land uses” is that “the conversion would not materially reduce groundwater recharge.” The applicability of this policy should be reviewed.

If the Shandon Community Plan is approved and increased development is allowed, the wastewater plant should be designed to discharge to the underlying groundwater basin in a manner which offsets pumping, to the maximum extent possible. The Update does not state how much treated water would be expected to be discharged at buildout, but by adding that water back into the basin, the impact of growth on the groundwater potentially could be reduced by as much as 50%.

The map of the “Change in Groundwater Levels in the Shandon Subarea for the 1997 to 2009 Period” (page 9 of the Paso Robles Groundwater Management Plan, Overview of Shandon Subarea, dated February 25, 2010) shows a 60 to 70 foot decline in groundwater elevation during the 12-year period studied, and the same report at page 7 states that a well “just west of Shandon” has experienced a decline of almost 90 feet. Therefore, even if the town reacquires the 100 acre feet of State Water Project Water and returns treated waste water to the groundwater basin, it should be assumed that a population growth from 1,200 people to 8,200 people will have a significant adverse impact on groundwater levels in the area. The primary agricultural production surrounding Shandon is vineyards, which would experience the main impact of a lowered water table. However, because the entire Paso Robles Groundwater Basin is in decline, the possible approval of so many additional homes that will be relying solely on groundwater raises grave concerns – not just for the immediate area, but for the larger Groundwater Basin as well.

The Shandon Community Plan Update is well thought out and contains many desirable goals and policies, but the subcommittee is concerned that in the event the plan is approved in spite of the groundwater concerns, there are some advisory provisions that

should be mandatory. In addition to the preeminent concern stated above, the subcommittee had some specific recommendations:

1. Before any homes are constructed pursuant to this plan, the wastewater treatment facilities should be designed, construction contracts signed and construction on the plant should be started to assure that it will be built to accommodate all new construction.
2. Self-generating water softeners should be prohibited.
3. Wastewater should be discharged to the groundwater basin to help offset groundwater pumping.
4. Specific standards should be established which limit the amount of high water demand landscaping that is planted, especially with regard to turf.
5. Homes and businesses should be designed to provide optimum on-site percolation of rainfall to maximize groundwater recharge and minimize runoff.

It should be noted that the Subcommittee made these recommendations prior to the EIR's release, and reserves the right to re-review them after the EIR is available.

The Shandon Community Plan does not reflect prudent water planning, and contradicts current basin management efforts and established land use policies. It is for these reasons that the WRAC strongly objects to the proposed plan.