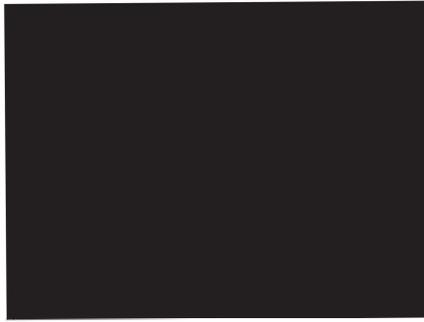


Frederick C. Hoey



October 12, 2018

Mr. Derrick Williams
Montgomery & Associates
1232 Park Street, Suite 201B
Paso Robles, CA 93446

Derrick:

I am writing as a follow-up to your recent meeting in Creston. Water issues have been front and center in Creston for quite some time and the turnout for the meeting was an indication of the intensity of our passion regarding protecting our water resources. I hope you discovered during the meeting that those of us in Creston are always up to date regarding the operation of our wells and the level of our water.

I also hope that you quickly discovered that Creston residents are familiar with the general condition of the Paso Robles Groundwater Basin and are protective of Creston's unique position within the basin. Therefore, we are offended when Creston data are co-mingled with data from other areas.

Several individuals who asked questions at the meeting were not necessarily familiar with the difference between a GSA and a Planning Sub Area or the fine points of writing the GSP, but that doesn't matter. What they do know is that including data from El Pomar, an area with existing groundwater problems, is a fraud on Creston's data¹. A radius originating near the intersection of El Pomar and South El Pomar covering roughly 4,000 acres or greater, which comprises several very large vineyard operations, identifies an area with issues not found in Creston.

Creston landowners have always been concerned that our water resources could be used to alleviate problems in other areas of the Paso Basin such as Estrella; however, the co-mingling of Creston and El Pomar data has raised new fears among many Creston landowners that the El Pomar area may actually be the target. If you want people to trust your representations you must think in terms of "how will my audience actually

¹ With regard to the issue of data in general, all data that are referenced in your documents should be footnoted as to the sources of data and where and when published. When you have adjusted data that fact should also be noted along with the purpose and method of adjustment. When data are unreferenced or adjusted without explanation that calls into question the correctness and reliability of your work product.

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interpret what I am presenting or saying”?

Before the meeting in Creston, I posted on your groundwater communications portal, comments making the case that the Creston area should be designated a separate Planning Sub Area, a copy of which is enclosed. Clearly, the existing outline of the El Pomar-Estrella Sub Area identified in Figure 3-14 of Chapter 3 is what apparently made it convenient to co-mingle Creston data with El Pomar data. Creston is unique and deserves to be a separate Planning Sub Area.

Last Monday you discussed the need for more monitoring wells. In discussing that topic and related issues with some of my colleagues we have developed specific general thoughts based on the following thesis:

Given the size, the variety of topography, and the geological complexity, the Paso Robles Groundwater Basin presents a wide range of localized issues best managed by several localized Planning/Management areas in order to provide long term reliability to the Paso Robles Basin GSP, therefor:

- Rather than only a few Planning/Management areas a larger number of smaller separate areas should be created each sharing common conditions and issues.
- Ideally, each area would have 5 to 10 monitoring wells depending on the size of the area and specific conditions.
- With several smaller Planning/Management areas throughout the basin comparisons of progress or failure of specific policies, practices or tactics between areas could be easily compared and modified to achieve improved area results on a forward basis, thus contributing to improved basin wide results.
- Conversely, measuring the performance results of very large geographic areas is much more problematic in terms of understanding the actual causes of either over or under performance.

On a related matter I am sure that you are aware of subsidence of nearly two inches in the Shandon, Red Hills areas documented in the 1997 USGS report. However, the issue has not been addressed in subsequent reports, etc. My colleague Dennis Loucks and I believe that the matter deserves critical examination as do other areas of the basin

with known significant lowering of water levels that may be prone to subsidence.

Since land subsidence is a sustainability indicator requiring examination under SGMA, it is recommended that the USGS report be updated to determine if land subsidence has been curtailed or if subsidence has continued to occur. The historical data that could be obtained by USGS would indicate areas in the basin that are in need of additional management. I strongly suggest that the Cooperative Committee be asked to make a formal written request to USGS to update their 1997 report. An updated report would be a vital management tool, and since it would be completed by another government entity presumably there should be no cost.

Another matter which concerns several of us is the potential for water banking schemes by very large landowners with high production wells located in strategic areas of the basin. There appear to be several candidates for this activity who would profit from their groundwater resources. A related activity is the sale of paper water allowing a purchaser to exceed their pumping limits in their physical location in exchange for the seller reducing pumping in an equal amount. I am acquainted with many landowners who are vehemently opposed to water banking, which the GSP should prohibit.

A related matter, which is prevalent in our basin, is the fact that the general lowering of groundwater has created void areas above the groundwater level as it may fluctuate season to season. Access to this “space” is attractive to entities wanting to engage in water banking activities. Something that you should present at your next workshops is data on how much of this space exists and how the basin can be protected from water banking activities utilizing this space.

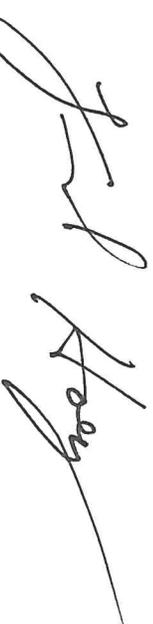
Lastly, my colleagues and I request that you reconsider the management of your Groundwater Communications Portal. We learned on Monday that comments posted on the portal would be reviewed by staff and directed to appropriate GSP representatives. Moreover, the comments would not be available for public review until the plan is at the completion stage, several months hence. If what we understand is in fact accurate, this would be detrimental to the creation of the plan as it would be difficult to revisit chapters that were believed to have been completed. The process as outlined will be frustrating for the public as well as having a limiting influence on basin citizen comment and presumably a burdensome process for your staff. One can only conclude that the process has been designed to intentionally limit public interference with your development of the GSP. The GSP process is, after all, intended to be conducted with significant citizen input not a process principally influenced by large landowners with major water resources under their control.

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In reality Your process effectively excludes several thousand landowners reliant on wells who essentially have no responsibility for the current condition of the Paso Robles Groundwater Basin. When thinking about how you should change the Portal process you should review the events surrounding the rejection of the AB2453 mandatory water district, which was overwhelming rejected by basin voters in March 2016. Don't tell me that landowners don't understand basin water issues just because they don't flock to Cooperative Committee meetings. They understand very clearly the nature of the interests who want to control our basin water.

I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Hoag". The signature is fluid and cursive, with a long horizontal stroke at the end.

Attachment: GCP Posting of October 6, 2018

Cc: Supervisor Debbie Arnold
Supervisor John Peschong

GSP Chapter 3 Comments

By

Fred C. Hoey

A Creston resident

Posted to the Paso Robles Groundwater Communications Portal

In reference to Chapter 3, Figure 3-14 North County Planning Subareas: I object to the El Pomar-Estrella-Sub Area as defined. Interestingly, this Sub Area is startlingly similar to the boundaries of the “area of influence” of the Estrella-El Pomar-Creston Water District as defined by SLO-LAFCO. I expect this harmony is deliberate.

The Creston area is distinctly different from both the El Pomar and Estrella areas; accordingly, actions that are appropriate and necessary for the El Pomar and Estrella areas will not be appropriate for Creston. For instance within the Estrella area a significant “cone of depression” has been created by the egregious groundwater pumping by the City of Paso Robles, which has been compounded by the local concentration of large vineyard operations.

Many Creston landowners have long been concerned that Creston groundwater would ultimately be utilized to remedy the damage that has been done to the Estrella groundwater levels.

By combining three geographic areas, each with their own unique issues, into a Planning Subarea the authors of Chapter 3 wrongly assumed that the citizens of Creston would not rise up in strong opposition to such blatant, potential piracy of our water resources to cover the sins of the City of Paso Robles through the exploitation of the Estrella area.

I strongly urge that the Creston area be identified as a separate Planning Subarea, a view shared by all of my Creston friends and connections.

October 6, 2018