



Upper Salinas-Las Tablas Resource Conservation District

65 S. Main St. Ste. 107 Templeton, CA 93465 | 805.434.0396 x 5 | www.us-ltrcd.org

May 15, 2015

Sue Luft
Paso Basin Advisory Committee

Dear Ms. Luft,

The County of San Luis Obispo is preparing an Environmental Impact Report (EIR) for the San Luis Obispo Countywide Water Conservation Program. The proposed project is two-fold consisting of a Water Neutral New Development (WNND) and Water Waste Prevention Program. These two programs will be amended into the County General Plan and County Code. The WNND program is for Level of Severity (LOS) III, which are basins that meet or exceed dependable supply due to current demand. The three LOS III groundwater basins in San Luis Obispo County are the Paso Robles Groundwater Basin, the Los Osos Groundwater Basin, and the Nipomo Mesa Management Area. The Upper Salinas – Las Tablas Resource Conservation District (RCD) has reviewed the EIR and has the following comments and recommendations to make to San Luis Obispo County Planning Department (hereafter referred to as “County”) for the Agricultural Water Offset program.

Proposed Preferred Agricultural Water Offset Program

In the proposed project for Agricultural Water Offset program, the County proposes a simplified version. The RCD’s Agricultural Offset Program for the Paso Robles Groundwater Basin provided a framework for the County to adopt and implement for a 1:1 offset program. The program proposed by the County is an overly simplified version of the Agricultural Offset Program. For instance, the proposed project by the County eliminates much of the technical level of analysis and assessment needed to verify a 1:1 offset for irrigated agriculture. Although this may be in an effort to simplify the process for applying and receiving offset credits, it does not take into account the hydrologic connection between sending and receiving sites nor does it provide for accountability between sites, especially in Category II: Off-site Offsets. Furthermore, the proposed project by the County lacks the mechanism to quantify and verify offsets credits. Without a monitoring component, it is nearly impossible to verify compliance a 1:1 offset is achieved. The one requirement in the County’s proposed project for monitoring is installation of a well meter. This is an important first step, yet the programs fails to ensure a 1:1 Agricultural Water Offset is maintained throughout the program without verification (e.g. annual reporting).

If the County proceeds with a simplified version of the Agricultural Water Offset Program, it should continue to include the essential elements of the Paso Robles Agricultural Water Offset Program developed by the RCD. The RCD would strongly encourage the County to incorporate more components of the RCD’s Agricultural Offset Program into their proposed program for two reasons. First, the RCD provided varied levels of technical information necessary to apply for an



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agricultural offset. These were developed and designed with the understanding of the diversity of agricultural users and application types (*i.e.* Categories). Removing these components from a permit application process does not enable the County the ability to accurately quantify where groundwater is being offset and applied within the Paso Robles Groundwater Basin. This is likely to become an intrinsic component in a Groundwater Sustainability Plan (GSP) and feels shortsighted by the County to not incorporate those elements into the proposed project. Secondly, because the County's proposed program eliminates many of the technical aspects of the RCD's Agricultural Water Offset Program, impacts to shallow aquifer wells or to hydrogeologically connected sub-basins cannot be assessed and mitigated for. The proposed program should envelop some of this analysis in the offset application process to avoid or minimize environmental and economic impacts to local stakeholders in the Paso Robles Groundwater Basin.

Summary of Significance of Impacts

The proposed project, and every alternative, have a multitude of potentially significant impacts. The DEIR states the only two significant impacts would be to *Agricultural Resources* and *Land Use*. The Countywide Water Conservation program should also evaluate impacts to hydrology, water quality, and biological resources in the final EIR. It is unclear how the DEIR can make the determination one alternative is environmentally preferred than another when environmental resources such as hydrology and biological resources were not evaluated. The County should, before proceeding with the proposed program, assess and evaluate the impacts to these resources to determine if the proposed program is the preferred alternative.

General Comments

The proposed Agricultural Water Offset component of the Countywide Water Conservation Program is not likely effective for providing a 1:1 offset that is protective of current water users in the Paso Groundwater Basin, nor does it resolve the issue of alleviating the severity of groundwater depletion. As an organization committed to natural resource conservation and management, the program, as currently proposed, does not meet the goals of providing a means to, "substantially reduce groundwater extraction and lowering of groundwater levels in the Paso Robles Groundwater Basin," as stated in the Executive Summary (ES-2). Instead, the proposed program authorizes and permits new irrigated agriculture without assessment of impacts to neighboring wells, quantifying interactions between hydrogeologic strata, or verification the permitted new irrigated agriculture is achieving a 1:1 offset in the Paso Robles Groundwater Basin. Lastly, the DEIR is meager in its analysis of the summary of significant environmental impacts associated from the alternatives proposed. The additional environmental impacts listed above should also be analyzed and, if needed, mitigated for in the DEIR.

The RCD would like to offer its services and expertise to the County. If you have any questions please feel free to contact Mr. Devin Best by phone at (805) 434-0396 ex. 5 or via email at devin@us-ltrcd.org.

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Sincerely,

A handwritten signature in black ink, appearing to read "Devin Best". The signature is written in a cursive style with a long horizontal stroke at the end.

Devin Best
Executive Director