Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Sheila Lyons	**Ch. 1 Introduction to Paso Robles Subbasin Groundwater Sustainability Plan** 1.2 Description of Paso Robles Subbasin	Please read on as this comment does apply to Chapter 1. Chapter 3, Figure 3-14 Indicates current Land Use Planning subareas. There needs to be an additional Figure indicating the PR Groundwater Basin Subareas such the one from Fugro, 2002 Basin Boundary showing subareas of the Basin. This can be found on the front page of the June 10, 2015 report "Achieving Sustainability in the PR Groundwater Basin. If not in this section, the Basin subarea map from Fugro needs to be included in the GSP somewhere....Chapter #1? This is important....land use planning areas are significantly different from basin planning areas. They have different characteristics and land use planning areas would be inappropriate for basin management. Creston participated early on in meetings for setting voluntary Basin Management Objectives and we are clear that the Creston Sub-Area has different management objectives from other parts of the basin due to our location (leading head of much of the recharge water going into the aquifer). We were much more aggressive and conservative about what course of action we think needs to be implemented to obtain basin sustainability. We believe the Creston Sub-area must be considered separate from the El Pomar-Estrella Land Use Planning Area because they are very different from one another and have very different management requirements.	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 2:40:00 PM	
Laurie Gage, District Administrator	**Ch. 1 Introduction to Paso Robles Subbasin Groundwater Sustainability Plan**	The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 1 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	pasogcp.com	10/11/2018 8:59:00 PM	
Verna Jigour	**Ch. 1 Introduction to Paso Robles Subbasin Groundwater Sustainability Plan** 1.2 Description of Paso Robles Subbasin	I advise expanding the text and figure 1.1 to include the watersheds/catchments feeding the pertinent subbasins. I realize that SGMA does not require planning outside the basins of concern but, especially in the case of the Paso Robles Subbasin, opportunities to augment groundwater recharge and storage will be left out of the equation if planning is confined solely to the basins. GSA stakeholders correctly identified potential watershed approaches at the third GSP informational meeting May 14, 2018, according to the documented results of the Projects and Management Actions Rotating Group Stations. Following are pertinent excerpts: Despite that Station 1 was titled In-Basin Supply Projects some of the documented suggestions do, in fact, consider the broader watershed context, as follows: "Ideas from the small groups related to in-Basin water supply projects: Slow down flows in Salinas River Optimize Salinas River recharge Incentive-based recharge Improve local stream recharge Recharge on floodplains (with environmental benefit) Forest management Recharge above the basin/higher up in basin Station 2 Out of Basin Supply Projects Ideas from the small groups related to out-of-Basin water supply projects: Watershed restoration projects “Management “Restore after fires/reseed with native vegetation Study Salinas Watershed at headwaters for potentialStation 4 Conservation Measures Ideas from the small groups related to conservation measures: Watershed management Forest management Promote healthy soils (pastures, root crops), carbon farming While this especially pertains to CHAPTER 9. Projects and Management Actions, Chapter 1 sets the stage for all subsequent chapters, does it not? If Chapter 1 considers solely the basins, projects and management actions relevant to the watersheds/ catchments will be left out. I consider it a mistaken artifact of reductionism that SGMA dictates apply solely to the (alluvial) groundwater basins [sinks], considering that those basins are actually fed by their respective watersheds/ catchments [source]. Alas, this reductionistic paradigm, one of several documented in the Alternate Paradigms section of my website, has dominated water resources thinking for most of the past century but that was not always the case. Excerpts from the Proceedings of a Conference of Governors in the White House, Washington, D.C., convened by President Theodore Roosevelt in 1908, shared in my third blog post, How Watersheds Relate to Groundwater, demonstrate that livestock managers of that era correctly recognized that the forests and vegetation serve the same purpose as artificial reservoirs, made by dams or otherwise. They were similarly attuned to the minimum flow a.k.a. baseflow as a measure of watershed health. I offer additional details and links in the file attachments to my comments, but suffice it to state here that the approach proposed on my Rainfall to Groundwater website, based on my doctoral dissertation, Watershed Restoration for Baseflow Augmentation [Jigour 2008 (2011)], abstract attached, is literally tailor-made for the Paso Robles Subbasin GSP Chapter 11. Projects and Management. The Paso Robles Subbasin is the poster child for the Rainfall to Groundwater Approach. I only hope the GSAs will avail themselves of this nearly singular opportunity to restore watershed/catchment functions for groundwater sustainability, including restoration of steelhead habitats among other ecological benefits.		pasogcp.com	10/15/2018 9:58:00 PM	Link: 20181015_Jigour
Laurie Gage, District Administrator	**Ch. 2 Agencies' Information**	The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 2 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	pasogcp.com	10/11/2018 8:59:00 PM	
Verna Jigour	**Ch. 2 Agencies' Information** 2.1 Agencies' Names and Mailing Addresses	Change to include watersheds/ catchments feeding the subbasins as noted for Chapter 1.		pasogcp.com	10/15/2018 9:58:00 PM	Link: 20181015_Jigour
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.4 Land Use	Section 3.4.2 and Figure 3-6, of the same name "Water Use Sectors" show the distribution of sectors but there is no table or text with the actual numbers by acres for each of these sectors, nor is there any estimate of their usage. Perhaps the second part (usage) of this will come in later chapters but the first (acreage) should be shown here.	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 3:40:00 PM	
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.4 Land Use	Table 3-1 Land Use Summary - data from DWR 2014 is obviously out of date. Much has changed since. The SLO Department of Agriculture surely has more recent data (see there annual reports). An update of current info should be done. We believe there are closer to 40,000 or more acres in vineyards today.	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 2:40:00 PM	
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.5 Existing Well Types, Numbers, and Density	Table 3-2 Types of Wells - data appears to be entirely too low. CAB members believe this number should be revisited with numbers acquired from our Public Works department rather than DWR data.. 99 productions wells is way too low. We know there are 200 wineries in North County, admittedly all are not over the PR Basin, but many are. Windfall Farms which is here is Creston has around 6 wells alone that are production wells.	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 2:40:00 PM	
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.6 Existing Monitoring Programs	Section 3.6.4 Climate MonitoringTable 3-4 Average Month Climate Summary Avg of 2010-2017 If this data is to be used for any calculations going forward the more important number would be the slope of the line for the average increase in monthly temperatures over time. Fixed numbers are not really useful for predicting future events. Or, at a minimum if this is a "for information only" section, the rate of temperature increases should be calculated and included as part of this section.	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 2:40:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.10 Land Use Plans	Figure 3-14 Indicates current Land Use Planning subareas. There needs to be an additional Figure indicating the PR Groundwater Basin Subareas such the one from Fugro, 2002 Basin Boundary showing subareas of the Basin. This can be found on the front page of the June 10, 2015 report "Achieving Sustainability in the PR Groundwater Basin. If not in this section, the Basin subarea map from Fugro needs to be included in the GSP somewhere....Chapter #1? This is important....land use planning areas are significantly different from basin planning areas. They have different characteristics and land use planning areas would be inappropriate for basin management. Creston participated early on in meetings for setting voluntary Basin Management Objectives and we are clear that the Creston Sub-Area has different management objectives from other parts of the basin due to our location (leading head of much of the recharge water going into the aquifer).We were much more aggressive and conservative about what course of action we think needs to be implemented to obtain basin sustainability. We believe the Creston Sub-area must be considered separate from the El Pomar-Estrella Land Use Planning Area because they are very different from one another and have very different management requirements.	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 2:40:00 PM	
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.5 Existing Well Types, Numbers, and Density	CAB recently submitted a comment regarding Table 3-2 Wells over the Basin stating that we didn't believe the numbers shown in this table. We have since located an Excel file provided to CAB from the SLO PW Dept in recent months showing that there are 3945 production wells over the PR Basin. This indicates that there are many many more wells than the Table 3-2 of the Chapter 3 draft of the GSP would suggest. See attached file.	County of San Luis Obispo GSA	pasogcp.com	9/30/2018 8:51:00 AM	Link: 20180930_Lyons
Dennis Loucks	**Ch. 3 Description of Plan Area** 3.4 Land Use	See attachment regarding Chapter 3.4 Land Use -- specifically Table 3-1, Land Use Summary.Notes:Comment uploaded by consultant via scanned hard copy. Because physical address is required to submit form, address for Dennis Loucks was found online posted in the SAN LUIS OBISPO LOCAL AGENCY FORMATION COMMISSION MEETING MINUTES FOR THURSDAY September 17, 2015. Therefore, address may be dated or incorrect. Because comment was uploaded by consultant, and the interested party's email address was not known to the consultant, the email address provided with this form belongs to uploading party.	County of San Luis Obispo GSA	pasogcp.com	9/30/2018 4:30:00 PM	Link: 20180725_Loucks
Laurie Gage, District Administrator	**Ch. 3 Description of Plan Area**	The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 3 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	pasogcp.com	10/11/2018 8:59:00 PM	
Verna Jigour	**Ch. 3 Description of Plan Area** 3.1 Paso Robles Subbasin Introduction	This GSP covers the entire Paso Robles Subbasin.This GSP covers the entire watershed/ catchment area feeding the Paso Robles Subbasin.Figure 3-1: Area Covered by GSP:Change to include watershed/ catchment area.		pasogcp.com	10/15/2018 9:58:00 PM	Link: 20181015_Jigour
Verna Jigour	**Ch. 3 Description of Plan Area** 3.4 Land Use	3.4.2 WATER USE SECTORS Please correct the following patently incorrect statement: Native vegetation. This is the largest water use sector in the Subbasin by land area.This sector includes rural residential areas. Again, this largest water use sector is dominated by nonnative annual grasslands., as stated above. Figure 3-6: Water Use SectorsPlease correct the erroneous label stating Native Vegetation		pasogcp.com	10/15/2018 9:58:00 PM	Link: 20181015_Jigour
Verna Jigour	**Ch. 3 Description of Plan Area** 3.4 Land Use	The following statement is flat-out incorrect: The balance of the approximately 438,000 acres in the GSP Plan Area is largely native vegetation and could include dry farmed land. Surely the County of San Luis Obispo has its own Geographic Information System (GIS) it can use to test the veracity of the above claim. The GSP should not rely on erroneous information, even if it comes from DWR. My own past GIS work with landcover layers derived from the California Gap Analysis (explained in greater detail in my accompanying file attachment) showed me that a vast proportion of what I then referred to as upper Salinas River watershed is clothed with nonnative annual grasslands. While DWR may have referred to these lands as native vegetation they certainly not known for their discernment of vegetation types.The Land Use section should include at least a summary of historical and prehistorical (Native American) land use to fully establish the environmental setting of human cause changes in vegetative land cover. For example, the charcoal industry is known to have thrived later in SLO County than in many other regions of California. Historical removal of native oaks used in the charcoal should ideally be mapped to correlate historical changes to watershed land cover. The spatial locations of other documented impacts on native vegetation (and its watershed/ catchment functions), such as those mid- 20th Century state-sanctioned projects aimed at removing woody vegetation for rangeland improvement summarized in my blog post, Ball and Chain & Other Links, should be mapped. Historical impacts for which spatial documentation may not be forthcoming should at least be considered as part of the planning process.		pasogcp.com	10/15/2018 9:58:00 PM	Link: 20181015_Jigour
Sheila Lyons	**Ch. 3 Description of Plan Area** 3.1 Paso Robles Subbasin Introduction	CAB voted at our Oct 17th meeting to echo the sentiments of the public present at the Oct. 8, 2018 Workshop held in Creston, that Creston is unique and should not be lumped in with El Pomar, Estrella, or any other part of the PR Basin, but should be considered a sub-area unto itself. Our hydrology is different and our view on basin management is more conservative than other areas of the basin.	County of San Luis Obispo GSA	pasogcp.com	10/20/2018 9:27:00 AM	
Dick McKinley	**Ch. 4 Hydrogeologic Conceptual Model** 4.3 Regional Geology	Explain transmissivity. Is 400ft fast or slow?	City of Paso Robles GSA	pasogcp.com	10/5/2018 1:06:00 PM	
Dick McKinley	**Ch. 4 Hydrogeologic Conceptual Model** 4.7 Groundwater Recharge and Discharge Areas	We may need to date this page at a later date because it is an amended page.	City of Paso Robles GSA	pasogcp.com	10/5/2018 1:06:00 PM	
Dana Merrill	**Ch. 4 Hydrogeologic Conceptual Model** 4.9 Data Gaps in the Hydrogeologic Conceptual Model	In my opinion options for cutbacks that won't cause major reverse economic impacts across our presently robust local economy are very limited, I am most interested In Supply and Recharge options. The upper range of the PR (below the Alluvial) has experience the most decline. It is where the majority of domestic and smaller capacity agricultural wells are located, mostly drilled 20+ years ago. A major effort to recharge that zone would accomplish a great deal and should be an area of major focus immediately. What's needed to focus on this aspect? Vertical zone basin studies for one. There are a good many wells in this range and some could be converted to recharge wells since they don't pump water anymore. Figure a way to comply with regulations on recharge. If the upper range could be restored and regularly recharged it helps rural landowners, agriculture and really everyone.Let's get to meaningful work ASAP. Background efforts I realize are required in the process but the challenges are pretty obvious after decades of study and recent history of wells going dry.	County of San Luis Obispo GSA	pasogcp.com	11/12/2018 7:15:00 AM	
John Thompson	**Ch. 4 Hydrogeologic Conceptual Model** 4.9 Data Gaps in the Hydrogeologic Conceptual Model	Since well logs are readily available, it would seem a model could be made (realizing that someone has to gather the data and create the map and probably would not do it for free). I have noticed that well drillers do not always describe formations the same. But if you took a driller of 40 years who has drilled all over the basin and mapped using his/her logs you could have a GOOD map. You could go onsite with said driller and see what they call cemented gravel and everyone could be on the same page.		pasogcp.com	12/6/2018 1:00:00 PM	
John Thompson	**Ch. 4 Hydrogeologic Conceptual Model** 4.1 Subbasin Topography and Boundaries	Bottom of Page 4. "...very little well data in this portion of the subbasin." Is the lack of data something that is looking to be corrected? It would seem that a local well drilling company could be a huge source of data and information. I do not know the legalities of such things, just an idea.		pasogcp.com	12/6/2018 1:00:00 PM	
Patricia Wilmore	**Ch. 4 Hydrogeologic Conceptual Model** 4.5 Primary Users of Groundwater	Municipal use, when addressed in future chapters, should indicate, outline and encourage opportunities where in the City of Paso Robles can utilize other sources besides groundwater. This should be one of the highest priority means of balancing the basin.	County of San Luis Obispo GSA	pasogcp.com	12/9/2018 3:16:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Patricia Wilmore	**Ch. 4 Hydrogeologic Conceptual Model** 4.7 Groundwater Recharge and Discharge Areas	Figure 4-16 provides an excellent basis for bringing additional water into the basin via recharge.	County of San Luis Obispo GSA	pasogcp.com	12/9/2018 3:16:00 PM	
Verna Jigour	**Ch. 4 Hydrogeologic Conceptual Model** 4.7 Groundwater Recharge and Discharge Areas	Re: the last sentence of 4.7.1: "this map provides good guidance on where natural recharge likely occurs" it actually offers only a partial picture considering solely recharge occurring from strictly vertical infiltration/percolation from surfaces directly above the identified recharge areas. It fails to consider *interflow* from natural infiltration/percolation on uplands draining to those apparently optimal areas. See the catchment model on my web page, Stream Networks vs Watersheds/ Catchments: https://rainfalltogroundwater.net/stream-networks-vs-catchments/		pasogcp.com	12/10/2018 5:48:00 PM	
Verna Jigour	**Ch. 4 Hydrogeologic Conceptual Model** 4.9 Data Gaps in the Hydrogeologic Conceptual Model	Another method for ascertaining aquifer continuity and/or fault influence on groundwater flow is isotope analysis, e.g., see the following: Zdon, A., M. L. Davisson, and A. H. Love. 2018. Understanding the source of water for selected springs within Mojave Trails National Monument, California. Environmental Forensics 19:99-111 https://doi.org/10.1080/15275922.2018.1448909		pasogcp.com	12/10/2018 5:48:00 PM	
Verna Jigour	**Ch. 4 Hydrogeologic Conceptual Model** 4.2 Soils Infiltration Potential	The first sentence, Saturated hydraulic conductivity of surficial soils is a good indicator of the soils infiltration potential may have been assumed true by many in the early 20th century, but by mid-century empirical observations began to show that woody plant roots and their decay products strongly influence both infiltration and percolation. Furthermore, soil structure mediated by especially woody plant roots, along with their soil ecosystems, also influences infiltration and percolation rates. Ecohydrology emerged around the turn of this current century/ millennium and it's past time to be integrating it into such public planning processes as this. Remember, infiltration and percolation begin in the unsaturated a.k.a vadose zone (not the saturated zone) and the properties of the vadose zone are highly influenced by the vegetation there. While inferences based on the purely physical property of saturated hydraulic conductivity offer some insight, they tell far from the whole story. Infiltration and percolation may be greatly enhanced by restoring native woody plants to historically degraded watersheds the case for most in this subbasin, as per my comments on earlier chapters. If this GSP overlooks that it will be overlooking important opportunities to enhance sustainability. For some pertinent insights, please see the following pages on my website: Plants in an Ecohydrology Context: https://rainfalltogroundwater.net/plants-in-an-ecohydrology-context/ and Surface-Groundwater Systems in a Holistic Water Cycle: https://rainfalltogroundwater.net/surface-groundwater-systems/		pasogcp.com	12/10/2018 5:48:00 PM	
Dennis Loucks, Fred Hoey & Greg Grewal	**Ch. 5 Groundwater Conditions** 5.4 Subsidence	(See attachments)		Other	10/17/2018	Link: 20181017_LouGreHoe Link: 20181017_USGS
Todd Beights	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	A neighbor nearby has recently installed 30,000 gallons of water storage tanks with another 10,000 gallons of storage about to be installed. Our water wells are only a few hundred feet apart and they have to run their well around the clock to continually fill these storage tanks that are used for agricultural benefits. I am nervous that over drafting is occurring and potentially jeopardizing the future of our domestic well use. Is unlimited storage and well pumping a sound practice that you endorse or do you view it some other way that might warrant addressing the issue?		pasogcp.com	11/26/2018 3:00:00 PM	
Todd Beights	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	A neighbor nearby has recently installed 30,000 gallons of water storage tanks with another 10,000 gallons of storage about to be installed. Our water wells are only a few hundred feet apart and they have to run their well around the clock to continually fill these storage tanks that are used for agricultural benefits. I am nervous that over drafting is occurring and potentially jeopardizing the future of our domestic well use. Is unlimited storage and well pumping a sound practice that you endorse or do you view it some other way that might warrant addressing the issue?		pasogcp.com	11/26/2018 3:00:00 PM	
Kevin Peck	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Paragraph 1 of 5.1.2.2 explains that there is a lack of publicly available ground water data. Has there been an effort during this GSP process, to contact basin landowners to access their wells for acquiring additional water levels data?	Shandon San Juan GSA	pasogcp.com	11/26/2018 3:59:00 PM	
Molly Scott	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	Good morning, With mutual respect for the effort that has been put into writing these chapters, it would be my recommendation to ensure there is a glossary defining critical terms such as: Alluvial Aquifer, Groundwater Storage, Groundwater pumping, etc. Having a specific outlined definition for terms such as these would be beneficial for all parties and allow for greater consistency when discussing and ready future chapters. Thank you, Molly Scott, Grower Relations Manager JUSTIN Vineyards & Winery	County of San Luis Obispo GSA	pasogcp.com	12/6/2018 11:44:00 AM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	From page 5-23, "This suggests that the loss in groundwater storage is not due to increased pumping, but is more likely a result of lock of recharge during low precipitation years." Figures 5-14 and 5-15 are supposed to visually describe this, but I think they do not help with comprehending the above statement. It seems obvious in figure 5-14 but is unclear in 5-15. I think the visual of the chart/graph can be better represented or the statement should be modified.		pasogcp.com	12/6/2018 1:28:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	Is there such a thing as groundwater storage potential? Does this change? Is this where subsidence comes into play?		pasogcp.com	12/6/2018 1:28:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Some items that could use another paragraph to put more in layman's terms: Standardized precipitation Index Vertical Groundwater Gradients		pasogcp.com	12/6/2018 1:28:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	The map of monitoring wells seem to be lacking some of the most critical areas such as Jardine, Ground Squirrel Hollow, and Independence Ranch. IDEA: Waive water offset fee/tax for continued monitoring allowance.		pasogcp.com	12/6/2018 1:00:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Is there a better map available to see where the monitoring wells are or does that violate certain rights?		pasogcp.com	12/6/2018 1:00:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Overlay figures 5-7 & 5-1 to really see where data is lacking and where it is really needed.		pasogcp.com	12/6/2018 1:00:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Regarding Hydrographs, I have noticed that everyone wants to think of water levels in terms of feet below ground surface instead of feet above sea level. I think both could be represented on the graph so all could see the correlation. For instance, feet above sea level could stay on the left hand vertical axis and the right hand vertical axis could be stated in feet below ground surface.		pasogcp.com	12/6/2018 1:00:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.3 Seawater Intrusion	Regarding subsidence. On the surface it seems a trite item if we can stabilize groundwater levels. However, if it persists, are we harming how much water our aquifer can potentially hold? If so, maybe our minimal threshold should be geared more towards this type of data. Is there any plans to measure this? Is there a way to differentiate between natural and pumping causes?		pasogcp.com	12/6/2018 1:28:00 PM	
John Thompson	**Ch. 5 Groundwater Conditions** 5.6 Groundwater Quality Distribution and Trends	Last paragraph. Is there any examples of this happening? Is this a legitimate concern?		pasogcp.com	12/6/2018 1:28:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
John Thompson	**Ch. 5 Groundwater Conditions** 5.6 Groundwater Quality Distribution and Trends	Of your groundwater constituents, it is not clear why each of them is being considered as a constituent. For example, "elevated chloride concentrations in groundwater can damage crops and affect plant growth," is strait forward and I could see why you would measure it. However, TDS, sulfate, and gross alpha radiation are not adequately explained as to their usefulness as groundwater quality constituents. And gross alpha radiation is not adequately defined so that I would even know what it is.		pasogcp.com	12/6/2018 1:28:00 PM	
Patricia Wilmore	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	5.21. Alluvial Aquifer Notes that Figure 5-14 "suggests that the loss in groundwater during low precipitation years is not due to increased pumping but is more likely a result of lack of recharge during low precipitation years" is a key point for future planning.	County of San Luis Obispo GSA	pasogcp.com	12/9/2018 3:16:00 PM	
Patricia Wilmore	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Significant data gaps are indicated due to lack of publicly available groundwater level data. How can this be remedied? Since confidentiality appears to be important, pursue getting additional agreements.	County of San Luis Obispo GSA	pasogcp.com	12/9/2018 3:16:00 PM	
John Onderdonk	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	The last sentence of the first paragraph of Section 5.1.2.2 states: The lack of publicly available groundwater level data for the Paso Robles Formation Aquifer is a significant data gap. This data gap combined with uncertainty with regard to aquifer continuity within the Subbasin (Section 4.9) and continuity with neighboring Subbasins, particularly given the Northern boundary of the Subbasinis defined by the county line not by a physical barrier to groundwater flow (Section 4.1), highlights the limited understanding of aquifer attributes and current conditions. The GSP must establish a clear protocol for how this uncertaintywill be addressed. According to Section 5.1.2.1, the lack of data will be partially addressed through a recommended expansion of the Subbasin monitoring network which will be detailed in Chapter 8. It would be beneficial if the GSP explicitly states a timeline for this monitoring expansion and provided specific guidance on whether or not the additional monitoring and data collection will be done before or after the adoption of the GSP and how new monitoring data will be incorporated during GSP implementation. Specific procedures for how the GSP can be refined, modified and challenged as new data is presented should be clearly defined in advance. While the collection of additional data will improve the development and implementation of the GSP, uncertainly will still remain. Given that fact, the GSP should clearly define where the burden of proof for compliance/non-compliance lies (with the landowneror GSA). Additionally, clear procedures for demonstrating compliance in light of limited data and uncertainty should be defined.	County of San Luis Obispo GSA	pasogcp.com	12/10/2018 8:59:00 AM	
Timothy Cleath	**Ch. 5 Groundwater Conditions** 5.1 Groundwater Elevations	Fig 5-2: as shown should not be included in the alluvial aquifer map as these areas are typically on elevated terraces and are not saturated. Paso Robles Formation aquifer infers that there is only one aquifer. In fact, within the Paso Robles Formation there are many aquifers. Modify the title to say Aquifers. Fig 5-3, -4, -5 and -6 contours extend considerably beyond where well water level information occurs (Fig. 5-1) northeast of Whitley Gardens and east of the San Juan River. Either show the basis for these contours (on Figure 5-1) or remove or dash the contours in these areas on Fig 5-3. Showing the "inferred groundwater flow direction" can be misleading (the gradient of the interpreted contours may be due to various factors and is not always the direction of flow) and should be removed. Fig 5-6 and 5-7 similarly include areas where the contours have extended beyond the water level information. The depression west of Creston is based on one data point and may not be representative of other wells in this area (the basin is shallower in this area and may show significant variability in water levels from one well to another). This should be noted in the text. The water level rise along the western edge of the basin near Paso Robles is acknowledged to be a result of limited data and it is best to not try to guess why in the text (delete last sentence on para. 1 of page 5-13). 5.1.2.2 Identify where the 18 monitored wells are located. In light of the potential need for "key wells" as a basis for groundwater management, further discussions should be included regarding available publicly reviewable groundwater level hydrographs. With respect to the hydrographs, Fig 5-11 shows the water level at nearly the bottom of the well. This well, in the Creston area, would not be good for a future water level monitoring well. The well water level for the Shandon area shows stability during the recent dry period, while the other two hydrographs (Creston and Estrella subareas) show a 40- to 50-foot decline. Please consider including some comment on this in the text. 5.1.3 Historically an upward vertical gradient in the Estrella River valley near Shandon has been indicated by flowing wells in this area. As groundwater levels decline in the lower aquifers, the vertical gradient will change. Similarly, wells in the Creston area have flowed during wet periods.		pasogcp.com	12/10/2018 11:29:00 AM	
Verna Jigour	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	5.2.1 ALLUVIAL AQUIFER, 3rd paragraph: Some text seems to be missing here: As indicated on _____ presumably Figure 5-14?		pasogcp.com	12/10/2018 5:48:00 PM	
Jerry Reaugh	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	Comments Pertaining to Chapter 5 of the Paso Robles Subbasin Groundwater Sustainability Plan	County of San Luis Obispo GSA	pasogcp.com	12/10/2018 12:49:00 PM	
Jerry Reaugh	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	This comment should be referred to the SLO County Paso Basin GSA. The EPC WD is in the County GSA but the way you do the addresses prevents this comment from being assigned to the proper GSA. Jerry Reaugh	County of San Luis Obispo GSA	pasogcp.com	12/10/2018 12:31:00 PM	
Herb Rowland	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	In regards to Figures 5-14 and 5-15, how is the annual groundwater pumping determined? How was this measured historically and how will it be estimated going forward? If wells are not metered, and even the ones that are metered aren't being reported, how is that number established? It is a very crucial number to determine the water budget for the basin and will affect a large number of people and businesses if it is incorrect. There needs to be a high level of confidence and consensus in this number, throughout the basin, if the overall plan is to succeed. This number is too important to just make generalizations and the assumptions that whatever model you use takes, must be vetted under a very high level of scrutiny.	County of San Luis Obispo GSA	pasogcp.com	12/10/2018 11:50:00 AM	
Timothy Cleath	**Ch. 5 Groundwater Conditions** 5.2 Change in Groundwater Storage	For comparison purposes, use the same scales for the alluvial aquifer and Paso Robles Formation plots. The net change in storage in the alluvial aquifer is highly dependent on inflows from rainfall runoff, releases from reservoirs and wastewater discharges. This should be noted. The lack of alluvial aquifer water level data in the various stream valleys limits the verification of the modeled change in storage. This should be noted. fourth para p. 5-23: "As indicated on" ?? what? Total groundwater in alluvial aquifer storage should be stated to understand the impact of the "cumulative change in storage". This would also be appropriate for the Paso Robles Formation aquifers. page 5-25 first sentence: Fig 5-15 shows climate periods not precipitation data.		pasogcp.com	12/10/2018 11:29:00 AM	
Timothy Cleath	**Ch. 5 Groundwater Conditions** 5.4 Subsidence	Comment on whether subsidence is significant for groundwater management of this basin. What is the level at which it is significant? Has there been any impacts to date?		pasogcp.com	12/10/2018 11:29:00 AM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Timothy Cleath	**Ch. 5 Groundwater Conditions** 5.5 Interconnected Surface Water	Why wouldn't groundwater elevations in the alluvial wells at or above the stream channel at any time suggest interconnectivity between the surface water and the groundwater? Paso Robles Formation wells would not necessarily indicate interconnectivity based on water levels. Water levels for model simulation time step durations are not be the best indicator of connectivity. Are the surface water areas and the alluvial aquifers not interconnected if they are not shown in red on Fig. 5-17? The depletion of interconnected surface water across the basin is much more complex than is depicted in this section. A discussion of the factors and their significance in different areas of the basin would be a good start toward a more thorough analysis of this interconnectivity.		pasogcp.com	12/10/2018 11:29:00 AM	
Verna Jigour	**Ch. 5 Groundwater Conditions** 5.6 Groundwater Quality Distribution and Trends	5.6.1 GROUNDWATER QUALITY SUITABILITY FOR DRINKING WATER, last sentence: Please explain the likely source for exceedance of mercury in 1990 and whether/why it may no longer be an issue (?)		pasogcp.com	12/10/2018 5:48:00 PM	
Timothy Cleath	**Ch. 5 Groundwater Conditions** 5.6 Groundwater Quality Distribution and Trends	Since the 2002 report, changes to MCLs and additional water quality data has occurred. Arsenic has been found at levels above the MCL. More information about boron is available in the western portion of the basin between San Miguel and Paso Robles. These should be discussed and possible recommendations made to further delineate areas/aquifers where these occur. The quality of wastewater discharges has changed but current discharges can be a significant source of salt to the groundwater recharge. This should be discussed and potential management measures to evaluate and reduce this source of salt contribution to the basin. TDS and Chloride concentrations are shown to be high on Figs 5-20 and -21 in the area near Paso Robles. Groundwater recharge is also high in this area. Sustainability projects and management actions could result in improvements to this condition. Average Boron Concentration as noted in table 5-6 is probably not correct for most of the Estrella subarea (high boron does occur in the underlying formations beneath the Paso Robles Formation and in the area west of Highway 101).		pasogcp.com	12/10/2018 11:29:00 AM	
Patricia Wilmore	**Ch. 6 Water Budgets** 6.5 Future Water Budget	General Comment: Future Water Budgets should use well data, gathered from more wells than 12 (as noted in Chapter 7) rather than a GSP model. The monitoring network, to produce valid information on which to base actions, should be at least 50 wells. 6.5.1. States that "a portion of the City's future groundwater demand will be offset by Nacimiento water." The beneficial use of Naci water is a key point of this entire GSP. There needs to be a more serious effort/plan to either have the City use more of the 6,500 AFY entitlement, either via a greater treatment capacity than it has now and/ or additional supplies into the Salinas to be recovered by recovery well(s) and/or a viable plan to deliver and sell the water to agriculture. In other words, the difference between what the city is entitled to and what it currently uses needs to be accounted and planned for in the GSP. The GSP should and the County should actively support and promote the Basin's access to Nacimiento water.	County of San Luis Obispo GSA	pasogcp.com	4/15/2019 10:42:00 AM	
TImothy Cleath	**Ch. 6 Water Budgets** 6.3 Historical Water Budget	Table 6-3 and ensuing tables: Wastewater pond "leakage" should be better referred to as "percolation". Leakage sounds like it is unintentional. Table 6-3 (and ensuing tables): Rather than not having the numbers add up and saying some difference relates to water year/calendar year values, it would be better to make some adjustments to the numbers and not have this discrepancy. 6.3.2.2Table 6-4: Shouldn't riparian ET have some variation (max/min), even if it is not much? Some of the hydrologic budget components have appreciable increases over the historic period. Therefore, a discussion of the trends would be useful in determining if the "average" values should be used to compare historic and recent uses. 6.3.2.3 Figure 6-4: 1986 does not have a value- I'd assume that is because it is "0" but perhaps some way of showing that on the graph would be good. 6.3.2.4 The report should identify a "balanced" hydrologic period during which sustainable yield should be determined in addition to using the full base period. This is important since the time interval for appreciable recharge (10-12 years) is longer than in many other basins.		pasogcp.com	4/15/2019 12:21:00 PM	
TImothy Cleath	**Ch. 6 Water Budgets** 6.4 Current Water Budget	6.4.1.1 Imported Nacimiento water should be aggregated into the surface water budget in light of the fact that this source will be increasingly used to the benefit of the basin. 6.4.1.2 Are the Salinas River releases based on flow at the Niblick bridge or are they releases from the dam? In light of the extractions between the dam and the down flow stream gage, value may be appreciably different. Tables 6-6 and 6-7 Groundwater discharge to the river is more than the percolation of surface water to groundwater during this drought period. It would seem to me that the opposite should be true. 6.4.1.4 Figure 6-5 should have the same vertical scale as Figure 6-4 6.4.2.3 Comparing historic average to current average would be better if it considered the trends of water use over the historic time period (particularly for rural domestic). Figure 6-7 could be better presented as a bar graph considering the limited number of datapoints and the fact that they represent the entire year.		pasogcp.com	4/15/2019 12:21:00 PM	
Sandi Matsumoto	**Ch. 6 Water Budgets** 6.4 Current Water Budget	Please clarify what assumptions and data were used to calculate Riparian Evapotranspiration. Why was evapotranspiration only calculated for riparian vegetation? In Chapter 3.4.2 ofthe Draft GSP, native vegetation was identified as the largest water use sectorin the subbasin by land area. Please estimate evapotranspiration for allnative vegetation in the subbasin for the water budget.		pasogcp.com	4/15/2019 1:20:00 PM	Link: 20190415_Matsumoto
Stephen Sinton	**Ch. 6 Water Budgets** 6.5 Future Water Budget	A groundwater basin which is at or beyond its safe yield is allocated according to water rights with the priority given to domestic and agricultural uses overlying the basin. Projections for the City's future groundwater demand must be limited to any prescriptive rights determined to be held by it, but may not be expanded. Therefore, under current water law, the City and SMCSD's future water demands are limited in the basin and will need to be satisfied by other sources. Because we don't know what a judge might do with regard to the City's and SMCSD's rights, this section should be removed.	Shandon San Juan GSA	pasogcp.com	4/15/2019 12:00:00 AM	
Verna Jigour	**Ch. 6 Water Budgets** 6.1 Overview of Water Budget Development	1st paragraph: This chapter includes one appendix Please state specifically which appendix here (presumably D?). Figure 6-1. Hydrologic Cycle:The labels for Infiltration are incorrect. The associated arrows in the diagram depict *Interflow*, rather than infiltration. *Infiltration* should be shown at watershed surfaces. *Percolation* follows infiltration through the vadose and saturated zones.		pasogcp.com	4/15/2019 9:48:00 PM	
Verna Jigour	**Ch. 6 Water Budgets** 6.3 Historical Water Budget	The largest groundwater inflow component is streamflow percolation, which accounts for approximately 38% of the total average inflow. Especially since surface-groundwater interflows operate in both directions, how were the figures for Streamflow Percolation derived? Perhaps this is revealed in one of the earlier models but it is not apparent in Chapter 6 nor in Appendix D. Does that high percentage of inflows attributed to streamflow percolation apply primarily on certain streams or is it consistent throughout the watershed? Given that the combined substrate area of all streams comprises a fraction of the area of watershed uplands, this predominance of Streamflow Percolation over Deep Percolation of Direct Precipitation and Subsurface Inflow contributions seems to suggest a fairly high rate of runoff. That supports the historical degradation of the watersheds Iv'e pointed to in previous comments.That is, the detention (infiltration and percolation) storage capacity of regional watersheds has become degraded through historical human impacts on land cover (vegetation) such that runoff became enhanced. This comment is intended to connect with my previous and current input that watershed restoration could serve some of the purpose intended by flood water capture.		pasogcp.com	4/15/2019 9:48:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
National Marine Fisheries Service - Rick Rogers	**Ch. 6 Water Budgets**	Section 6.2.1 (Model Assumptions and Uncertainty) stated: “Results of the previous calibration process demonstrated that the model-simulated groundwater and surface water flow conditions were similar to observed conditions. After updating for the GSP, the calibration of the GSP model was reviewed. Results of the review indicated that the GSP model was sufficiently calibrated for use in the GSP.” Since the evaluation of interconnected surface water are based on the results of simulated streamflow and groundwater levels from the GSP model, we would like to obtain a detailed information about the results of the calibration process and the differences between observed and simulated streamflow and groundwater levels. In this way, we will have a better understanding of the uncertainty in the interconnected surface water results associated with the GSP model results.		email		
Patricia Wilmore	**Ch. 7 Monitoring Networks** 7.2 Groundwater Level Monitoring Network	12 wells in the monitoring network is woefully insufficient data on which to base decisions. Significant and dedicated outreach needs to be done to get this number up to about 50. The GSP should have a section detailing how this will be achieved. As for the percentage of monitoring wells that will trigger action, the current draft uses 15%; we recommend 25%.	County of San Luis Obispo GSA	pasogcp.com	4/15/2019 10:42:00 AM	
TImothy Cleath	**Ch. 7 Monitoring Networks** 7.2 Groundwater Level Monitoring Network	7.2 Available alluvial aquifer groundwater level monitoring data should be obtained for the wastewater discharge monitoring sites. This provides good information on alluvial aquifer groundwater levels- particularly for City of Paso Robles, San Miguel CSD and Camp Roberts. This information is publicly released and can be used without a confidentiality agreement. This information can also be used in evaluating surface water/groundwater flow conditions. The bmp criteria for monitoring well networks and the data gaps in Table 7-2 might be better connected with Figure 7-3 if specific data gap locations are related to specific bmp criteria (e.g., well data density for storage calculations, wells located to address alluvial aquifer/surface water interconnectivity, wells used to monitor groundwater recharge activities, wells to monitor conditions along the borders with other subbasins).The Camp Roberts wells tapping the Paso Robles Formation can serve to address some of the data gap issues on the northern boundary of the basin as discussed in the data gaps on Table 7-2. This information was used in defining the basin structure in the 2002 basin study. City of Paso Robles has formed a GSA and will need to provide groundwater level data for their GSP. This data should be considered as available. The City has wells in the alluvial deposits and the Paso Robles Formation that are monitored. Table 7-2 states that in the future "only publicly available data will be used to develop contour maps". This will severely limit the accuracy of the contour maps. Other basin management agencies have used data in-house to develop contour maps without releasing the specific well water level data. This section refers to "confidential" wells. It is important to use appropriate terminology. The wells themselves are not confidential.Â The water level data collected is considered "confidential" where no release has been given to share the data to the public. It may also be good to define the term "confidential".Table 7-2 The last item says that the "network will be expanded". Say the "network will need to be expanded"7.4 If not reviewed already, the 2015 CCGWC Groundwater Quality Characterization report should be reviewed to identify areas of known high nitrate concentrations and verify that groundwater quality monitoring is sufficient to address the impact of the sources of nitrate on the basin groundwater. Recent water quality investigations have noted arsenic concentrations exceeding the current MCL at quite a few wells in the basin. These were not identified in the 2002 basin study because there was a higher MCL at the time. Groundwater quality monitoring in the future should better define the extent of this natural constituent.7.5 While no documented subsidence has been found, the existing monitoring network for subsidence is insufficient to evaluate subsidence due to groundwater pumping in the basin. Three sites are along the northern border of the subbasin where little pumping is occurring and there are only two others in the remainder of the basin area: one south of Whitley Gardens and the other in Camatta Canyon. Only the Whitley Gardens site is in the main area of pumping. The long term monitoring of these locations should be verified as some subsidence monitoring is tied to research activities that do not have long term funding.7.6 As a professional hydrogeologist working in this area for 35 years, I am not part of the consensus that there is "no interconnection between surface water and groundwater in the Subbasin". Since the GSP is saying that further evaluation of interconnectivity will need to be performed, the monitoring program should be developed if further evaluation establishes interconnectivity. As I mentioned earlier on data collection, there are existing monitoring wells in the "datagap" areas that have been monitored for many years and whose data is publicly available.Streamflow data is typically less abundant but some may be available from the City of Paso Robles near the wastewater treatment plant. Inquiry with the City should be done to see if they have this information.		pasogcp.com	4/15/2019 12:21:00 PM	
Sandi Matsumoto	**Ch. 7 Monitoring Networks** 7.2 Groundwater Level Monitoring Network	Data must be able to characterize conditions and monitor adverse impacts to beneficial uses andusers identified within the basin. Aside from GDEs mapped in the basin (Figure 4-18), environmental surfacewater users have not been identified in the GSP thus far. SGMA requires that potential effects on GDEs andenvironmental surface water users be described when defining undesirableresults. In addition to identifying GDEs inthe basin, The Nature Conservancy recommends identifying beneficial users ofsurface water, which include environmental users. This is a critical step, asit is impossible to define significant and unreasonable adverse impacts without knowing what is being impacted, nor is possible to monitor ISWs in a way that can identify adverse impacts on beneficial uses ofsurface water[23 CCR, §354.34(c)(6)(D)]. For your convenience, we've provided a list of freshwater species within the boundary of the Paso Robles basin in Attachment C of our letter. Our hope is that this information will help your GSA better evaluate and monitor the impacts of groundwater management on environmental beneficial users ofsurface water. We recommend that after identifying whichfreshwater species exist in your basin, especially federal and state listed species, that you contact staff at the Department of Fish and Wildlife (DFW), United States Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Services (NMFS) to obtain their input on thegroundwater and surface water needs of the organisms on the freshwater specieslist, and how best to monitor them. Because effects to plants and animalsare difficult and sometimes impossible to reverse, we recommend erring on theside of caution to preserve sufficient groundwater conditions to sustain GDEs and ISWs. Please identify appropriate biological indicators that can be used to monitor potential impacts to environmental beneficial users as a current data gap, and make plans to reconcile these in Chapter 10 (Plan Implementation).		pasogcp.com	4/15/2019 1:20:00 PM	Link: 20190415_Matsumoto
Sandi Matsumoto	**Ch. 7 Monitoring Networks** 7.6 Interconnected Surface Water Monitoring Network	The first sentence in this section is contradictory to the ISW mapping conducted in Chapter 5 do exist in the Paso Robles Subbasin (Figure 5-17). Depletions of surface water were also estimatedin Section 5.5.1, and the statement that there is no need for a monitoring network that quantifies surface water depletion from is false and goes against SGMA requirements. SGMA requires tha twhen monitoring depletions of interconnected surface water that spatial and temporal exchanges between surface water and groundwater are necessary to calculate depletions of surface water caused by groundwater extraction [23CCR §354.34(c)(6)] and that the monitoring network shall be designed to ensure adequate coverage of sustainability indicators [23CCR,§ 354.34(d)]. Where minimum thresholds for ISWs are to be quantified by the location, quantity, and timing of depletions of interconnected surface water [23 CCR, §354.28(c)(6)(A)]. Thus, there is a need for a monitoring network that quantifies surface water depletion from interconnected surface waters. In addition to the need for additional shallow monitoring wells in the Alluvial aquifer to map ISWs, there is also a need to enhancing monitoring of stream flow and vertical groundwater gradients by installing more stream gauges and clustered/nested wells near streams, rivers or wetlands. Ideally, co-locating stream gauges with clustered wells that can monitor groundwater levels in both the Alluvial and Paso Robles Formation aquifers would enhance understanding about where ISWs exist in the basin and whether pumping is causing depletions of surface water or impacts on beneficial users of surfacewater and groundwater.There is a need to integrate biological indicators that can monitor adverse impacts to beneficial uses of surface water and groundwater within ISWs.		pasogcp.com	4/15/2019 1:20:00 PM	Link: 20190415_Matsumoto

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
National Marine Fisheries Service - Rick Rogers	**Ch. 7 Monitoring Networks**	Section 7.6 (Interconnected Surface Water Monitoring Network) stated: “As discussed in Chapter 5, the consensus among local groundwater experts is that there is no interconnection between surface water and groundwater in the Subbasin. Therefore, there is no need for a monitoring network that quantifies surface water depletion from interconnected surface waters. However, there is a need to verify whether or not there are interconnected surface waters in the Subbasin. The assessment of whether or not there are interconnected surface waters will be evaluated by monitoring surface water and groundwater in areas where interconnected surface water conditions may exist.” We have reviewed Chapter 5 and have not found any statement or references regarding the consensus among local groundwater experts (which are not identified) indicated in the previous paragraph. Chapter 5 stated: “Limited and ephemeral surface water flows in the Subbasin over the last 40 years make it difficult to study the interconnectivity of surface water and groundwater and to quantify the degree to which surface water depletion has occurred. The spatial extent of interconnected surface water was evaluated based on results from the basin-wide groundwater flow model of the Paso Robles Subbasin.” Also, Chapter 6 (Section 6.2.1) stated: “During early implementation of the GSP, additional data will be collected to refine Subbasin understanding and recalibrate the GSP model. New hydrologic data and the recalibrated model will be used to adaptively implement sustainability management actions and projects to ensure that progress toward sustainability goals is being achieved.” Therefore, the first statement in Section 7.6 (regarding non-interconnected surface waters) is not properly justified and should not be mentioned at this time. More definitive conclusions should be provided after the GSP model is refined and recalibrate.				
Andrew Christie	**Ch. 8 Sustainable Management Criteria** 8.9 Depletion of Interconnected Surface Water SMC	As set forth below, Chapter 8 claims that that the proposed minimum thresholds would not impact interconnected surface waters because, Chapter 8 claims, there are no interconnected surface waters. Depletion of interconnected surface waters. The assessment of local groundwater experts is that there are not interconnected surface waters in the Subbasin. Therefore, there are no current minimum thresholds or undesirable results that could be affected by the groundwater elevation minimum thresholds. Changes in groundwater elevations, however, could reconnect surface waters. If this occurs, minimum thresholds will be established for depletion of interconnected surface waters and the relationship between those new minimum thresholds and all other sustainability indicators will be reassessed. Chapter 5, however, shows that the basin does include areas of surface water connection. See Figure 5-17, at 5-29. Accordingly, Chapter 8 must analyze the relationship between the proposed minimum thresholds and surface water connections. Chapter 8 claims, Groundwater elevation minimum thresholds effectively protect the groundwater resource including those existing ecological habitats that rely upon it. As noted above, groundwater level minimum thresholds may limit both agricultural and rural residential growth. Ecological land uses and users may benefit by this reduction in agricultural and rural residential growth. The claim that the thresholds effectively protect ecological habitats, however, is not supported by any analysis of data. As such, Chapter 8 must be revised to include analysis of the relationship between the groundwater levels and ecological habitats and discuss whether and the extent to which the proposed minimum thresholds affect ecological habitats.		pasogcp.com	4/1/2019 3:46:00 PM	
Patricia Wilmore	**Ch. 8 Sustainable Management Criteria** 8.4 Chronic Lowering of Groundwater Levels Sustainable Management Criteria	8.3 relies on a survey (also referred to in other parts of the document) that represents a small sample and asks for opinions on matters for which there was no accompanying data on which to base an opinion. Therefore, its analysis and conclusions should not be used to set standards which by their nature require study and expertise, including knowledge of the consequences of each decision. 8.4.2. Minimum Thresholds. These need to be reset at a reasonable level that doesn't put us behind at the outset. They should protect the resource while also giving the GSA's time to collect and analyze data, allow for public input on specific actions under consideration and create specific funding mechanisms. 8.4.2.7. Effects on Beneficial Users and Land Uses. As noted, "many parts of the local economy rely on a vibrant agricultural industry and they too will be hurt proportional to the losses imparted to agricultural businesses." Indeed! The entire GSP needs a more thorough economic analysis of its proposals. Our most recent study, done by the UC Davis Agricultural Issues Center, indicated in 2016 a total of $1.65 Billion economic impact for the Paso AVA. Of that, in 2015 the year on which the study was based, property tax assessments to vineyards and wineries represented 28% of the total in SLO County and the sales tax revenue collected from those same entities was 10% of the SLO County total. It would be well worth it to factor in the proportional benefits to increasing supply with realistic projects based on clear defensible data. There are challenges ahead and concerned citizens, landowners and interested parties need to be part of the process to make it successful.	County of San Luis Obispo GSA	pasogcp.com	4/15/2019 10:42:00 AM	
Patricia Noel	**Ch. 8 Sustainable Management Criteria** 8.3 General Process for Establishing Sustainable Management Criteria	Please allow the enforcing agencies to have adequate time (at least five years) to start implementation and observe the results before more drastic measures are commenced.Water levels should be given adequate time to stabilize after the historic drought.Any undesirable results should be addressed locally, not throughout the basin. Bottom line: I support the Shandon-San Juan Water District's comments on the Basin Plan as posted on its website.	Shandon San Juan GSA	pasogcp.com	4/15/2019 12:53:00 PM	
Sandi Matsumoto	**Ch. 8 Sustainable Management Criteria** 8.3 General Process for Establishing Sustainable Management Criteria	Stakeholder involvement is crucial whenestablishing sustainable management criteria. The role of the GSA is to represent and balance the needs of all groundwater beneficial uses and users in the basin, which has been expressed in the Sustainability goal in Section 8.2. According to p.6, only rural residents, farmers, and local cities were surveyed to gather input on sustainable management criteria. Please specify what information or efforts have been used/made to protect the interests of environmental users and disadvantaged community members. SGMA requires that sustainable management criteria are consistent with other state, federal or local regulatory standards [23 CCR, §354.28(b)(5)]. Please describe what process was used to identify other regulatory standards that need consideration when establishing minimum thresholds for sustainability criteria.		pasogcp.com	4/15/2019 1:20:00 PM	Link: 20190415_Matsumoto

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Sandi Matsumoto	**Ch. 8 Sustainable Management Criteria** 8.4 Chronic Lowering of Groundwater Levels Sustainable Management Criteria	[8.4.1] The definition of significant and unreasonable is a qualitative statement that is used to describe when undesirable results would occur in the basin, such that a minimum threshold can be quantified. Potential effects on all beneficial users of groundwater in the basin need to be taken into consideration. According to the California Constitution Article X, water resources in California must be put to beneficial use to the fullest extent of which they are capable. Please modify the local definition for significant and unreasonable (provided on p. 6), so that it also specifies potential effects on environmental beneficial users of groundwater in the basin, and addresses how water rights amongst beneficial users will be prioritized when establishing thresholds. [8.4.2.1] The use of 2017 groundwater elevations to establish minimum thresholds for the Paso Robles Formation Aquifer is inadequate, since the SGMA benchmark date is January 1, 2015. Also, no scientific rationale was explained for using 2007 groundwater elevation data to establish initial minimum thresholds for the Alluvial Aquifer. SGMA is based on the use of best available science, and selecting minimum thresholds solely on public opinion from a select group of stakeholders (e.g., domestic well users, irrigators, municipalities) in the basin, is not a scientifically-based approach nor does it consider potential effects on environmental beneficial users of groundwater. A better approach is to use 10-year baseline period of groundwater elevation data (2005-2015) to establish how groundwater conditions during that time period affect different water users across the basin. Please document the consideration of the following when establishing minimum thresholds for chronic lowering of groundwater levels:- Are groundwater elevations between 2005-2015 above the max screen depth for domestic, agriculture, municipal wells?- Are the proposed minimum thresholds preserving water rights? [Water Code ,§10720.5(b)]- Are the proposed minimum thresholds consistent with other state, federal or local regulatory standards? [23 CCR, §354.28(b)(5)]- Are there environmental beneficial groundwater users that need consideration, particularly those that are legally protected under the United States Endangered Species Act or California Endangered Species Act? (See Attachment C in the attached letter for a list of freshwater species located in the Paso Robles Subbasin).- Is the equity being applied across different beneficial user groups (e.g., domestic, agriculture, municipal, environmental) when establishing minimum thresholds? [8.4.2.1] Please provide a description for how the initial minimum threshold groundwater elevations for the Alluvial Aquifer (Figure 8-3) may impact environmental beneficial users of groundwater (e.g., GDEs) in the basin. When converting groundwater elevations to depth to groundwater contours, please use the USGS digital elevation model (see Attachment D in the letter). [8.4.2.1] Please make a back-up plan in the Monitoring network chapter on how the GSA will install shallow monitoring wells in the Alluvial Aquifer if confidentially agreements still prevent existing wells from being used as representative monitoring wells for the Chronic Lowering of Groundwater sustainability indicator. [8.4.2.5] Depletions of interconnected surface waters do exist in the Paso Robles Subbasin (Figure 5-17). Depletions of surface water were also estimated in Section 5.5.1, and the statement that there are no current minimum thresholds or undesirable results for interconnected surface water is inadequate and goes against SGMA requirements. Thus, there is a need to establish sustainable management criteria for interconnected surface waters in the basin. (See further comments in attached letter regarding Interconnected Surface Waters)..		pasogcp.com	4/15/2019 1:20:00 PM	Link: 20190415_Matsumoto
		[8.4.2.7] The description of how the groundwater elevation minimum thresholds affect ecological land uses and users (Section 8.4.2.7 p.17) is inadequate for the following reasons:- The draft GSP has failed to describe current and historical groundwater conditions with GDE areas. Thus, it is impossible to assess how the proposed minimum thresholds relate to historical groundwater conditions in the GDE and whether potential adverse effects could occur to the GDEs as a result of groundwater conditions. - Legally protected species located with GDEs have not been identified. Thus, it is impossible to evaluate whether federal, state, or local standards exist for groundwater elevations needed to protect these listed species (see Section 8.4.2.8). [8.4.3.1] Under SGMA, Measurable Objectives are to be established to achieve the sustainability goal of the basin within 20 years of Plan implementation [23 CCR ,§ 354.30 (a)]. Please modify the methodology for setting measurable objectives for groundwater levels (p.18-19) so that it helps attain the sustainability goal defined on p. 4 (Section 8.2): sustainably manage the groundwater resources of the Paso Robles Subbasin for long-term community, financial, and environmental benefit of residents and business in the Subbasin. This GSP outlines the approach to achieve a sustainable groundwater resource free of undesirable results within 20 years, while maintaining the unique cultural, community, and business aspects of the Subbasin. In adopting this GSP, it is the express goal of the GSAs to balance the needs of all groundwater users in the Subbasin, within the sustainable limits of the Subbasins resources. [8.4.4.1] Please elaborate how the 15% exceedance criteria balances the interests of environmental beneficial users in comparison with other groundwater users in the basin				
Sandi Matsumoto	**Ch. 8 Sustainable Management Criteria** 8.9 Depletion of Interconnected Surface Water SMC	According to Chapter 5, interconnected surface waters exist in the Paso Robles Subbasin (Figure 5-17). Depletions of surface water were also estimated in Section 5.5.1. While there is certainly data gaps and a need for additional shallow monitoring wells inthe Alluvial aquifer to map ISWs, there is also a need to enhancing monitoring of stream flow and vertical groundwater gradients by installing morestream. SGMA is based on best available science and adaptive management, thusthere should be an attempt to identify some minimum thresholds for ISWs, which are to be quantified by The location, quantity, and timing of depletions of interconnected surface water [23 CCR, §354.28(c)(6)(A)]. [8.9.2] There is a need to evaluate potential effects on beneficial uses of surface and groundwater. Please refer to Attachment C (in the attached letter) for a list of freshwater species in Paso Robles Subbasin that may be existwithin ISWs. We recommend that after identifying which freshwater species exist in your basin, especially federal and state listed species, that you contact staff at the Department of Fish and Wildlife (DFW), United States Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Services (NMFS) to obtain their input on the groundwater and surface water needs of the organisms on the freshwater species list. Because effects to plants and animals are difficult and sometimes impossible to reverse, we recommend erring on the side of caution to preserve sufficient groundwater conditions to sustain GDEs and ISWs.		pasogcp.com	4/15/2019 1:20:00 PM	Link: 20190415_Matsumoto
Martha Noel	**Ch. 8 Sustainable Management Criteria** 8.3 General Process for Establishing Sustainable Management Criteria	I want the Basin Plan to provide for the following: 1. That the agencies that have to enforce the plan have adequate time (at least five years) to start implementation and observe the results before more drastic measures are commenced. 2. That water levels be given adequate time to stabilize after the historic drought. 3. That "undesirable results" not include shallow wells going dry. 4. That any undesirable results be addressed locally, not throughout the basin. I am in support the Shandon-San Juan Water District's comments on the Basin Plan as posted on its website.	Shandon San Juan GSA	pasogcp.com	4/15/2019 1:49:00 PM	
William Noel	**Ch. 8 Sustainable Management Criteria** 8.1 Definitions	Here are my requests about definitions. Thank you. Will 1. That water levels be given adequate time to stabilize after the historic drought. 3. That "undesirable results" not include shallow wells going dry. 4. That any undesirable results be addressed locally, not throughout the basin. I support the Shandon-San Juan Water District's comments on the Basin Plan as posted on its website. All my best. Will	Shandon “San Juan GSA	pasogcp.com	4/15/2019 2:12:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Julie Pruniski	**Ch. 8 Sustainable Management Criteria** 8.3 General Process for Establishing Sustainable Management Criteria	Overall, I support the Shandon-San Juan Water District's comments on the Basin Plan as posted on its website. Specifically, the Basin Plan should 1) provide the agencies that have to enforce the plan with adequate time (at least five years) to start implementation and observe the results before more drastic measures are commenced; 2) that water levels be given adequate time to stabilize after the historic drought; 3) that "undesirable results" not include shallow wells going dry, and 4) that any undesirable results be addressed locally, not throughout the basin.	Shandon San Juan GSA	pasogcp.com	4/15/2019 2:18:00 PM	
Laurie Gage	**Ch. 8 Sustainable Management Criteria** 8.1 Definitions	Multiple sections addressed in attached document	County of San Luis Obispo GSA	pasogcp.com	4/15/2019 4:51:00 PM	Link: 20190415_Gage
Timothy Cleath	**Ch. 8 Sustainable Management Criteria** 8.7 Degraded Water Quality Sustainable Management Criteria	8.7.2 Water Quality: Arsenic is a naturally occurring constituent that should be monitored. 8.7.2 Previous statement that there are no mapped plumes is repeated here. The treated wastewater effluent discharges introduce higher NO3 water to the groundwater. There is also a nitrate high concentration near Creston. These have been documented in the 2015 CCGWC report prepared for the irrigated lands program monitoring.		pasogcp.com	4/15/2019 4:53:00 PM	
Timothy Cleath	**Ch. 8 Sustainable Management Criteria** 8.9 Depletion of Interconnected Surface Water SMC	8.9.1 I believe there is some interconnectivity.8.9.4 Impacts can occur based on interconnectivity.		pasogcp.com	4/15/2019 4:53:00 PM	
Timothy Cleath	**Ch. 8 Sustainable Management Criteria** 8.10 Management Areas	Groundwater management for specific management areas within the Subbasin is highly recommended to address impacts more appropriately.		pasogcp.com	4/15/2019 4:53:00 PM	
Timothy Cleath	**Ch. 8 Sustainable Management Criteria** 8.4 Chronic Lowering of Groundwater Levels Sustainable Management Criteria	8.4.2.1 Water level in the alluvium is very sensitive to time of year. State specific time of year when water level data is to be used for threshold. The water level should be specific to the monitored well-simulated information is not accurate enough. 8.4.2.4 I question the accuracy of the water levels in OSWCR wells with the minimum thresholds because often these wells do not have accurate ground surface elevations. 8.4.2.5 Water Quality Degradation: It is possible (and likely) that some upflow may already be occurring from the poor quality water at depth in some locations due to low water levels. 8.4.2.5 Subsidence: It is not reasonable to establish a zero subsidence threshold because some subsidence is possible without causing an unacceptable impact. Subsidence is very site specific, so if subsidence is to be a criteria for management, the location of monitoring sites is critical and the amount of subsidence causing an unacceptable impact should be applied to that location based on impact to local structures.		pasogcp.com	4/15/2019 4:53:00 PM	
Stephen Sinton	**Ch. 8 Sustainable Management Criteria** 8.1 Definitions	Minimum thresholds as used are a problem because they put us in violation the moment they are adopted. GSA's need time to implement measures to arrest groundwater level declines and even after 5 years, may need additional leeway in setting minimum thresholds to allow time for the design, permitting and construction of water supply enhancement projects. Appropriate Minimum thresholds are at best a guess at this point. The historic excess pumping (as calculated by the Model) are very small amounts compared to the total amount of water in storage in the basin. I don't think that point is well described, but should be in order for interested and concerned citizens to understand the situation. I suspect that hydrographs that don't show the depth to the bottom of the groundwater formation give a false sense of urgency. We definitely need to stop the downward trend, but the real question is how much time do we have before we risk undesirable results.	Shandon San Juan GSA	pasogcp.com	4/15/2019 5:38:00 PM	
Stephen Sinton	**Ch. 8 Sustainable Management Criteria** 8.2 Sustainability Goal	Public surveys in the absence of facts about costs and other impacts have limited value and shouldn't be relied upon as the primary basis for setting standards. The outreach for this GSP was valuable, but reached a relatively small sample of the total basin groundwater users. The comments received are valuable, but scientific information should be the real basis for decisions made. I think the projects and management actions should be stated as options, not requirements. I think the Figure 8-2 map is wrong and troublesome and should be deleted. We might want to show measureable objectives, but I'm not even sure about the value of doing that.	Shandon San Juan GSA	pasogcp.com	4/15/2019 5:38:00 PM	
Stephen Sinton	**Ch. 8 Sustainable Management Criteria** 8.1 Definitions	It would help if the acronyms used were defined, either in the definitions sectionÂ or when they first appear in the text. I would think this would be a good practice at the beginning of each chapter.	Shandon San Juan GSA	pasogcp.com	4/15/2019 5:38:00 PM	
Stephen Sinton	**Ch. 8 Sustainable Management Criteria** 8.4 Chronic Lowering of Groundwater Levels Sustainable Management Criteria	8.4.2.6 Third paragraph refers to "two" GSAs, but there are four of us and one more in Monterey County. The language about minimum thresholds should be replaced with measureable objectives.Going back to minimum thresholds, I think they are essential for preventing undesirable results, but since we don't know where orÂ at what water levels that is going to occur, I think it's essential that the GSP be clear that minimum thresholds are an estimate and shouldn't be considered as fixed or absolute.	Shandon San Juan GSA	pasogcp.com	4/15/2019 5:38:00 PM	
Stephen Sinton	**Ch. 8 Sustainable Management Criteria** 8.5 Reduction in Groundwater Storage Sustainable Management Criteria	There are two itemized points under 8.5.1 and #2 says that pumping should be reduced in dry years is a highly ranked concession. The fact is that pumping should be reduced in wet years, when less "added" water from irrigation is required. In dry years farmers have to use more water to make up for the lack of rain. 8.5.2.4 I couldn't understand the opening sentence. Same with 8.5.4.3.	Shandon San Juan GSA	pasogcp.com	4/15/2019 5:38:00 PM	
Stephen Sinton	**Ch. 8 Sustainable Management Criteria** 8.7 Degraded Water Quality Sustainable Management Criteria	8.7.2.1 & .2 If a new monitoring well is added to the system and it has water quality that exceeds the established limits, does that constitute an exceedance?	Shandon San Juan GSA	pasogcp.com	4/15/2019 5:38:00 PM	
John Onderdonk	**Ch. 8 Sustainable Management Criteria** 8.4 Chronic Lowering of Groundwater Levels Sustainable Management Criteria	This theme is reiterated in Chapters 7 and 8. Given that uncertainty, it seems reasonable to expect that management thresholds be set conservatively. The proposed decision to base individual well minimum thresholdson single points in time (2007 or 2017) based on survey responses doesn't seem to reflect appropriately conservative decision making in the face ofuncertainty. A more prudent approach would be to set minimum thresholds more conservatively (lower elevation) than suggested in the GSP and adjust those minimum thresholds, to become more stringent (higher elevation) as additional data dictates. Perhaps an appropriate methodology for this would be to add trend lines to the hydrographs in Appendix G, extend that trend out five years and set theminimum threshold at that point. Another concern is the reliance on 12 wells to be representative of the entire Subbasin. Here again, choosing 15% (two wells) as the limit on minimum threshold exceedance in the chronic lowering of groundwater level is overly aggressive and presumptuous. A more reasoned decision would acknowledge the small sample size and increase the percentage appropriately. It seems a 33% (four wells) threshold would be significantly more representative of the entire Subbasin. Alternatively, the threshold could be set at a lower percentage, say 25% (three wells), if management action were triggered only in the event those wells were each in a geographically distinct area of the Subasin. Of course these numbers may not be nor are they based on rigorous mathematics, but they do allow for the early adoption of management criteria, collection of additional data to further inform decision making and time for regulated entities to participate and adapt to the GSP management actions. Importantly, this processof continued refinement and data informed regulation is consistent with the intention of SGMA and US environmental case law.	County of San Luis Obispo GSA	pasogcp.com	4/15/2019 8:50:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
National Marine Fisheries Service - Rick Rogers	**Ch. 8 Sustainable Management Criteria**	Page 48 states “As described in Chapter 4, Hydrogeologic Conceptual Model and Chapter 5, Groundwater Conditions, the prevailing belief of local residents and experts in the Subbasin based on observation and some hydrologic data, is that interconnected surface water and groundwater does not currently exist in the Subbasin.” This conclusion is not supported by Chapter 5, which clearly shows interconnected surface water in Figure 5-17. In fact, the process used in Chapter 5 to identify groundwater/surface water interconnection likely underestimates the extent and distribution of this connection – “If model simulated groundwater elevations in any aquifer were above the bottom of the stream or river for at least half of the time between 2010 and 2016, then the surface water was considered interconnected with the groundwater.” First, no explanation is given as to why modeled groundwater elevations must be above the streambed elevation for “at least half of the time” for streamflow depletion to be realized. Without further explanation, this assumption is not scientifically appropriate or justified. Also, why was the time period of 2010-2016 (a historic drought) chosen as the period of analysis? Given the likely depressed groundwater elevation expected during a drought and the resultant underestimation of groundwater/surface water connectivity, using this time period is inappropriate. In Chapter 6 the draft GSP acknowledges as much, stating that using the period 2012-2016 for the current water budget “represents a more extreme condition in the basin and is not appropriate for sustainability planning in the Subbasin.” Thus, the Paso GSP should begin developing a threshold and measureable objective for streamflow depletion at this time, in addition to planning for further data analysis in the future that will help refine those values.		pasogcp.com	4/15/2019 12:00:00 AM	
Daniel Sinton	**Ch. 8 Sustainable Management Criteria** 8.3 General Process for Establishing Sustainable Management Criteria	1. That the agencies that have to enforce the plan haveadequate time (at least five years) to start implementation and observe the results before more drastic measures are commenced.2. That water levels be given adequate time to stabilizeafter the historic drought. 3. That "undesirable results" not include shallow wells going dry. 4. That any undesirable results be addressed locally, notthroughout the basin. I support the Shandon-San Juan Water District's comments on the Basin Plan as posted on its website.	Shandon San Juan GSA	pasogcp.com	4/16/2019 7:18:00 AM	
Laurie Gage	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	Section 9.4.2.3 references "Re-locating pumping allowances provides pumpers with flexibility and maintains consistency with San Luis Obispo County's current Agriculture Offset Program." I fully agree that there needs to be a program that allows transition from the current offset ordinance to something that provides equal or better protection in terms of total water use. But the fly in the ointment is that the ordinance must have an extension in order to remain in effect, or there will be a gap between the sunset date of the ordinance (upon adoption of the GSP by the last GSA), and the time that any GSP-defined replacement could take place. We have seen a rush to plant in the past when a gap opportunity presented itself and at that time, it was on the order of months, and not a few years. BUT MORE IMPORTANTLY, allowing the ordinance to sunset presents another more immediately critical issue: the deed restrictions in place on properties which provided the offset credit fall away as of the sunset date. Which means that if the current sunset date is not extended, then EVERY FALLOWED ACRE COULD IMMEDIATE COME BACK ON LINE FOR IRRIGATION. The total number of acre-feet used for agricultural irrigation offset credits (according to County GSA staff) is approximately 12,000 acre-feet. That is the amount that could feasibly come back on line into irrigation the day after the GSP is adopted. With a projected annual deficit of 13,000 acre-feet, we are looking at DOUBLING the deficit if those acre-feet are reclaimed for use upon the sunset date of the offset ordinance. As an even nastier side effect of not extending the ordinance and having fallowed acreage come back online, that acreage could be used AGAIN for a future offset credit under the relocation and transfer or pumping allowances program outlined in this section. At the very minimum, GSP staff should be aware of the potential 12,000 acre-feet that could come back online after the sunset date without extension of the offset ordinance, and to utilize that figure in all projections of annual use in calculations for the GSP. Please consider the extreme degree to which the choice not to extend the sunset date of the offset ordinance could potentially impact the annual deficit.	County of San Luis Obispo GSA	pasogcp.com	5/26/2019 1:24:00 PM	
Stephen Sinton	**Ch.9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	In 9.4.2, carryover pumping credits, recharge credits and transfer allowances must always be limited in location to the area within the basin that is impacted. One approach might be to have a general rule that transfers can only be used within a stated distance from a well, but allow a pumper to appeal that rule if the facts support allowing a more distant transfer. 9.4.2.1: I don't support stating that a GSA "will" or "would" do something. That isn't appropriate to the plan in my opinion. The plan should say "may" or "could". That shows up in the first sentence of 9.4.2.1 and the first & third sentences of the third paragraph. 9.4.2.3 I want to reiterate that moving pumping allowances must be limited first to the basin and second, to a location close to the sending source. 9.4.3: I have a HUGE problem with this section. While the proposal may be good for water conservation, it is a disaster for the land, our communities, open space, wildlife, water and air quality, sedimentation, percolation and a whole range of social and environmental issues. This is a policy matter that is regularly before the County and our cities, but converting agriculture to rural residential use - rural sprawl - damages everything noted above as well as our food supply. In addition, if we suppress agriculture, but foster residential growth, we will see our water use grow and our sustainability decline. This is a terrible idea.	Shandon San Juan GSA	pasogcp.com	6/19/2019 4:15:00 PM	
Stephen Sinton	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.2 Implementation Approach and Criteria for Management Actions and Projects	These comments are my own, as I have not had an opportunity to discuss them with the Board of the Shandon-San Juan Water District. One of the mechanisms that may help not only with the implementation of best management practices, but also with funding for projects is to look for ways to both incentivize pumpers and penalize them for failure to measure water use. If the basic fee for pumping an acre foot is X, then those who don't measure could be charged the assumed consumption rate for the crops grown plus 50% (or some other %). On the other hand, GSAs could seek grants to help pumpers pay for and install meters, provide training and even maintenance. 9.2 talks about GSAs implementing management practices as soon as possible, which is fine to a point, but my view is that we will need time to improve monitoring and reporting (and while that is going on, refine our evaluation of projects) before we know clearly what it is that must be done. So I don't support the the statement that management actions will be implemented before projects. Some projects may get started (planning, CEQA, engineering, budgeting) very quickly. Also, the above referenced statement doesn't make clear whether you project Level 1 or Level 2 management to precede project work. I have a similar reaction to the statement that Level 2 management will begin soon after GSP adoption. We need time to refine our assessment of the magnitude of the problem and vastly improve our monitoring so we can more accurately measure our progress, or even our lack of progress. We also need to understand where Level 2 actions will be effective and where they will not. To me, Level 2 addresses the situation after we know more.	Shandon San Juan GSA	pasogcp.com	6/19/2019 4:15:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Stephen Sinton	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.5 Projects	I think the list of projects is very good, but I strongly disagree (and I believe the Shandon-San Juan Water District will too) that capturing flood flows is a "lower priority". In fact, I believe it may be the lowest hanging fruit and with willing landowners and some cooperation from regulatory authorities, could be implemented relatively soon. So whatever bias there is against capturing and percolating flood flows, it should not be in the GSP. This entire section, showing the expected costs of every new acre foot of water, shows that there really isn't any such thing as de minimis use. 9.5.1.2: Speaking with some confidence that I am not alone in this, the current assumption is that any project using direct recharge will NOT be initiated and or owned by the County GSA. The County has never supported agriculture in this way and the primary reason for the existence of two new water districts in the County is not to become GSAs, but to do projects because we farmers and ranchers have been repeatedly ignored when it comes to water projects. Those projects go to urban voters, not we who provide the food and jobs. 9.5.2.2: In the same line of thought, I believe the projects will not be led by the Cooperative Committee. The cities probably won't need these projects, so it won't be the Cooperative Committee that leads it. The Water Districts are more likely to assume leadership with projects, since that is what they were created to do. 9.5.3.5 There are several references to Figures that seem to be the wrong ones. 9.5.4: The name "Substitute Projects" implies less valuable concepts. Substitute for what? All projects are valuable when we need water - and should be preferred only based on price, water availability and feasibility. 9.5.4.2: Why does this project assume the use of treated water from the SWP? That makes no sense to me. One possible recharge project would be to divert the water just before the treatment facility, pipe it to the nearest available recharge point on Cholame Creek or the Estrella River and discharge for percolation. Treated water is more expensive and without apparent added value.	Shandon San Juan GSA	pasogcp.com	6/19/2019 4:15:00 PM	
Stephen Sinton	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.3 Level 1 Management Actions	In encouraging BMPs, we need to engage with entities that aren't currently part of this process, such as NRCS, RCDs and the UC Cooperative Extension. In 9.3.2 Well Interference Mitigation, I wish it were so, but doubt that alternating pumping days will save water. It may avoid well interference, but I expect that farmers would end up using the same amount of water during the growing season. 9.3.4: I support the voluntary fallowing program, but have always felt that we might have to pay for some fallowing. In fact, paying someone to fallow ground that is growing a high water use crop may be by the far the least expensive way to reach sustainability. GSAs will need to plan for buying irrigation rights. Having said that, it is critical that any purchase of irrigation rights not be transferable. They need to be retired. The same applies to the Conservation Program in 9.4.2.	Shandon San Juan GSA	pasogcp.com	6/19/2019 4:15:00 PM	
Lee Nesbit	**Ch. 9 Projects and Management Actions** (Revised May 2019)	(See attachment)	County of San Luis Obispo GSA	pasogcp.com	6/20/2019 4:04:00 PM	Link: 20190621_Nesbitt
James Anderson	**Ch. 9 Projects and Management Actions** (Revised May 2019)	Chapter 9 of the draft GSP provides that land is not under irrigation when the GSP is adopted may not be provided an initial pumping allowance if a Groundwater Conservation Program is established because the GSP assumes that there will be no increase in demand on the Subbasin. Chapter 9 goes on to provide that, if owners of such non-irrigated land wish to begin pumping in the future consistent with their overlying rights, they must either (i) acquire pumping allowance from willing sellers subject to GSA approval, (ii) but into a project that delivers surface water to the same area of the Subbasin, and/or (iii) pay surcharges associated with pumping above their pumping allowance. William & Doris Land & Energy Co., LLC is the owner of approximately 2,440 acres of open land in San Luis Obispo County identified as Assessor's Parcel Nos. 037-321-016 and 037-331-014. That land is flat and farmable, and we intend to farm it in the immediate future. Indeed, we have engaged a hydrologist to locate the best locations for new wells. However, while the property has been irrigated with groundwater in the past, there has been no recent irrigation of the property. It could therefore be considered "non-irrigated" for purposes of Chapter 9 of the Draft GSP. That would result in an inequitable and illegal impact on our land. As drafted, Chapter 9 fails to recognize our overlying groundwater rights or our right to pump groundwater in the future and instead imposes a penalty on us simply because we have not yet commenced our planned extractions. Effectively precluding the exercise of our overlying rights simply because they have not recently been exercised would amount to an unconstitutional taking of those rights that could result in an enormous reduction in our land value. Should that occur, we would have no alternative but to bring an action for inverse condemnation and other claims to recover that lost value. We want to avoid that outcome. We therefore urge you to recognize the rights of our property and similarly situated lands to pump groundwater regardless of whether those rights have been recently exercised, and to not adopt and GSP that interferes with those rights or discriminates between currently irrigated land and land that has not recently been irrigated.		pasogcp.com	6/26/2019 12:52:00 PM	
Estrella Dosrios	**Ch. 9 Projects and Management Actions** (Revised May 2019)	(See attachment)		email / pasogcp.com	6/27/2019 0:00	Link: 20190427_Dosrios
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.3 Level 1 Management Actions	9.3.2 in the first version of Chapter 9 was called Groundwater Management Program. This has now changed to Interference Mitigation Program which is not as clear as the original. This is an example of what we perceive to be unnecessary changes from the original draft, which the consultant and his team say it took 3 months to write, to a revised version prepared in just a few weeks. This change in process has made stakeholders uneasy and has left our constituents questioning the transparency of the process. We continue to support a reasonable plan which allows for a collaborative approach to prevent negative effects on the Basin in a way that benefits all users.	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.2 Implementation Approach and Criteria for Management Actions and Projects	9.3.2.4. Public noticing. It is stated here that the Interference Mitigation Program (please change back to Groundwater Management Program) "will be developed in an open and transparent process...to include interested stakeholders." We have many members who farm over the Basin and they would like to have a session with the consultant and our County GSA representative. So far, meetings with specific outreach to agriculturists have not occurred and this is the most effected group of stakeholders. Is this up to us to arrange or could County staff do so?	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	It is critical that during the Level 1 phase, which we understand to be five years, we also explore projects to bring water to the Basin. Without this effort, the potential reductions outlined in Level 2 may be onerous to the point of destroying a very viable and significant part of our economy. Again, agriculturists need to be involved in getting a clear understanding of the effects of mandatory pumping reductions. A portion of the Groundwater pumping fees from Level 1 should be earmarked for working on new supplies and not just a time to figure out how the pumping reductions would work.	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.5 Projects	9.5.3 changes the term "Priority Projects" to "Conceptual Projects." This change of terminology dilutes the very real need to be serious about bringing new supplies to the Basin. There seems to be a lack of understanding that most of our grower members are not "big guys." During the first five years of the plan, we need to expend time and money looking at the opportunities for additional water and prioritize the most doable.	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.6 Other Groundwater Management Activities	9.6.1. When new supplies are identified and prioritized, rural residents should share in the cost since they will also share in the benefits.	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.7 Demonstrated Ability to Attain Sustainability	Bottom line, for us, is that the plan is feasible and meets State requirements. Since we are a High Priority Basin, our plan will certainly be scrutinized. It is essential that the consultant and his team, hired as the experts, have a say in every step of the process. It is also important that specific groups of stakeholders are able to have input in a focused stakeholder meeting. Additionally, a more thorough study of the economic effects of the GSP needs to be done.	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	
Patricia Wilmore	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.8 Management of Groundwater Extractions and Recharge and Mitigation of Overdraft	Please note that although the PRWCA offices are in the City of Paso Robles, our constituents are primarily in the County.	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 8:36:00 AM	
Jerry Lohr	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.5 Projects	I would like to submit the attached PDF file as my comments on Chapter 9. Regards, Jerry Lohr	County of San Luis Obispo GSA	pasogcp.com	6/28/2019 2:07:00 PM	Link: 20190628_Lohr
Craig Finster	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.1 Introduction	Please see attached comment.		pasogcp.com	6/29/2019 10:02:00 AM	Link: 20190629_Finster
Jerry Reaugh	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.2 Implementation Approach and Criteria for Management Actions and Projects	Thank you for this opportunity to submit these comments. Regards, Jerry Reaugh	County of San Luis Obispo GSA	pasogcp.com	6/30/2019 4:16:00 PM	Link: 20190630_Reaugh
Sandi Matsumoto	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.3 Level 1 Management Actions	This attachment summarizes our comments on Chapters 9-11 of the Paso Robles Subbasin Draft GSP. In this section, we refer to our previous comments, dated 15 April 2019, on Chapters 4-8 and Appendix B of the Draft GSP. Chapter 9 Management Actions and Projects [Checklist Items #50-51]: Since these conceptual projects are location-specific, please highlight the benefits of these conceptual projects on specific mapped GDEs and ISWs. For more case studies on how to incorporate environmental benefits into groundwater projects, please visit our website: https://groundwaterresourcehub.org/case-studies/recharge-case-studies/		pasogcp.com	7/1/2019 12:21:00 PM	Link: 20190701_Matsumoto
Sandi Matsumoto	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	This attachment summarizes our comments on Chapters 9-11 of the Paso Robles Subbasin Draft GSP. In this section, we refer to our previous comments, dated 15 April 2019, on Chapters 4-8 and Appendix B of the Draft GSP. Chapter 9 Management Actions and Projects [ChecklistItems #50-51]: Since these conceptual projects are location-specific, please highlight the benefits of these conceptual projects on specific mapped GDEs and ISWs. For more case studies on how to incorporate environmental benefits into groundwater projects, please visit our website: https://groundwaterresourcehub.org/case-studies/recharge-case-studies/		pasogcp.com	7/1/2019 12:38:00 PM	Link: 20190701_Matsumoto
Sandi Matsumoto	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.5 Projects	This attachment summarizes our comments on Chapters 9-11 of the Paso Robles Subbasin Draft GSP. In this section, we refer to our previous comments, dated 15 April 2019, on Chapters 4-8 and Appendix B of the Draft GSP. Chapter 9 Management Actions and Projects [ChecklistItems #50-51]: Since these conceptual projects are location-specific, please highlight the benefits of these conceptual projects on specific mapped GDEs and ISWs. For more case studies on how to incorporate environmental benefits into groundwater projects, please visit our website: https://groundwaterresourcehub.org/case-studies/recharge-case-studies/		pasogcp.com	7/1/2019 12:40:00 PM	Link: 20190701_Matsumoto
Sandi Matsumoto	(Submitted with comments on Chapter 9-12)	Lands that are protected as open space reserves, habitat reserves, wildlife refuges, etc. or other lands protected inperpetuity and supported by groundwater or ISWs should be identified and acknowledged.		pasogcp.com	7/1/2019 12:43:00 PM	Link: 20190701_Matsumoto
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	HFS supports the development of carryover pumping allowances to provide flexibility in meeting hydrologic conditions. Â Maximum flexibility in the management and transfer of pumping allowances, subject to the avoidance of undesirable results as defined by SGMA, will provide opportunity to manage and address needs within the Basin.		pasogcp.com	7/1/2019 1:56:00 PM	
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	Implementation of pumping rampdown should be initiated only upon assessment of groundwater level trend and pumping data, and then limited to specific areas where the contribution of pumping reductions to Basin sustainability objectives can be quantified through modeling and other analysis.		pasogcp.com	7/1/2019 1:56:00 PM	
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	Fees developed within the proposed Tiered Pumping Fee structure must be developed based on legal principles of equity, economic impacts, cost of replenishment water, demand reduction and other quantifiable components.		pasogcp.com	7/1/2019 1:56:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	HFS supports continuation of the current Agriculture Offset Program. This Program is understood and provides a solid mechanism for establishing pumping allowances under the GSP, as well as conditions for use and transfer of those allowances.		pasogcp.com	7/1/2019 1:56:00 PM	
Molly Saso	**Ch.9 Projects and Management Actions** (Revised May 2019) 9.3 Level 1 Management Actions	The proposed implementation of Level 1 and Level 2 Management Actions is reasonable given the limited amount of data and understanding of Basin Conditions as discussed in the Chapter 6 draft. Additional monitoring data must be developed and is required to support Level 2 Actions. The GSP should consider financial and other incentives to promote and maximize the sustainability benefits of Level 1 Management Actions.		pasogcp.com	7/1/2019 1:56:00 PM	
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.1 Introduction	The impact of de minimis groundwater users is defined as significant, yet the draft GSP proposes that they should not be regulated. SGMA defines a de minimis extractor as once who extracts, for domestic purposes, two acre-feet or less per year. [WC 10721(e)]. De minimis extractors are not exempt from the full provisions of SGMA, rather they are provided limited protections relative to metering and reporting and the imposition of regulatory fees. Careful consideration and evaluation should be given to the impact of de minimis extractors on the Paso Basin sustainability objectives and various financial and demand reduction alternatives that are available to mitigate those impacts.		pasogcp.com	7/1/2019 1:56:00 PM	
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.7 Demonstrated Ability to Attain Sustainability	The ability to attain sustainability has been modeled using all of the conceptual projects and management actions set forth in Chapter 9 and pumping reductions to meet measurable objectives by 2040. Further analysis on the economic benefit and viability of these projects is needed to support inclusion in that modeling. It is highly probable that some projects will not meet basic economic targets, thus impacting the timing and amounts of future pumping reductions. The GSP should include a discussion of various alternatives and project/pumping mixes to show a range of possibilities that would result in sustainable groundwater management.		pasogcp.com	7/1/2019 1:56:00 PM	
Molly Saso	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.5 Projects	HFS appreciates the analysis of Project alternatives in Section 9.5. HFS supports strategic investment at the GSA and individual level to expand the Water Budget for the Basin by constructing economically viable projects.		pasogcp.com	7/1/2019 1:56:00 PM	
John Onderdonk	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.4 Level 2 Management Actions	While Chapter 9 does not mandate specific management actions and projects nor does it define all aspects of those management actions or projects, it will form the basis for future implementation. Because of that fact, Section 9.4 Level 2 Management Actions should either explicitly state that the order management actions are listed does not imply a prioritization of those actions or Section 9.4 should be reorganized to more accurately reflect implementation priority. It seems reasonable to assume that mandatory pumping reductions would be the last management action to be implemented after all other actions have failed to achieve desired results. A reasonable reorganization of Section 9.4 would be groundwater conservation program (9.4.2) followed by agricultural land and pumping allowance retirement (9.4.3) followed by mandatory pumping reductions (9.4.1).The discussion in Section 9.4.2.4 of how non-irrigated land will be treated should a Groundwater Conservation Program be implemented is concerning in that it suggests initial pumping allowance will be denied thereby unfairly penalizing non-irrigated landowners by curtailing their future rights to pump groundwater. This could create a perverse incentive for non-irrigated landowners to immediately installirrigation to maintain their future rights. The three options listed for ways non-irrigated landowners can acquire pumpingallowances are in effect the same: purchase those allowances at marke tvalue. These again could potentially create perverse incentives where by early actors are reward with lower market prices. Because section 9.4.2.4 will establish a basis for how non-irrigated landowners are treated under a Groundwater Conservation Plan, the section should explicitly state there may be other reasonable ways to fairly allocate initial pumping allowances and the list provided is meant to be illustrative not complete. For example, consideration should be given to an opt-in option for non-irrigated landowners to voluntarily opt-in to the groundwater conservation program to attain and secure initial pumping allowances. Alternatively, non-irrigated landowners could be given credit for positive contributions to the health of the groundwater basin (groundwater recharge, monitoring well installation, watershed and riparian protection/management, etc.) any of which could be used to satisfy future pumping allowance. The main point is that all the details of specific management actions should be thoroughly discussed at a point in time when those actions are warranted, and action planning is required. Chapter 9 must not curtail or preemptively define the scope or parameters of the future development of those actions.	County of San Luis Obispo GSA	pasogcp.com	7/1/2019 4:06:00 PM	
John Onderdonk	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.3 Level 1 Management Actions	Section 9.3.3 highlights the importance of on-farm recharge of local water as a beneficial action landowners could take to meet the goals of the GSP. A primary means for achieving groundwater recharge is through the construction and use of stock ponds and other surface impoundments. However,given SB 88 and portions of the California Water Code, there seems to be significant confusion among landowners with regards to their rights to construct and use stock ponds and surface impoundments. It would be beneficial if this section provided more guidance on stormwater capture best practices (surface impoundment and other methods) to help landowners balance local GSP goals with State regulations.	County of San Luis Obispo GSA	pasogcp.com	7/1/2019 4:06:00 PM	
Sheila Lyons	**Ch. 9 Projects and Management Actions** (Revised May 2019) 9.3 Level 1 Management Actions	There needs to be more emphasis on water conservation and living within our means. Suggesting that historical usage be a justification for future allowances is nonsensical. Here in Creston, we have seen many properties significantly over pumping (sprinklers when it is raining, overflow onto the roads, major pipe leaks, continuing to plant more and more lush landscaping around wineries, etc.) to establish their usage numbers. Whereas other folks, particularly those with shallow wells or wells slow to recharge have made significant efforts to conserve...allowing landscaping to die, etc. Those who have conserved in an attempt to protect us all are not all de minimus users. Many folks chose not to plant knowing full well where we were headed. They should not be penalized. The proposal set forth rewards those who have over-pumped by allocating to them larger claims to water up front. Any mandatory cut backs will not begin to have any immediate impact to them because they have built in a cushion. Meanwhile their over-pumping continues to harm their immediate neighbors. Also, they have set up high usage numbers which they can then decide to "sell off, move to other properties, or trade". There should be no selling off or trading. Crop duty factors must enter into the equation to restrict the folks who have been over-pumping throughout our rising crisis of a declining basin. Whereas, folks who have been conserving all along will feel the immediate effect IF mandatory cut backs are implemented. Additionally, no one with a parcel of land should be water starved. The obstacles for building a family home on a blank parcel are already tremendous. Property owners should not have to "buy" water for a de minimus use. Having to do so has a significant impact on property values. All existing legal parcels should have access to de minimus levels of water usage. For many people their blank parcel was an investment for their futures, either an eventual family home or a retirement property. They should not bear the financial burden of those who have continuously over-pumped the Basin.	County of San Luis Obispo GSA	pasogcp.com	7/2/2019 15:43	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Sandi Matsumoto	**Ch. 10 Plan Implementation** 10.2 Monitoring Networks	Section 10.2.5 Evaluating Interconnected Surface Water (p. 14-15) [Checklist Item #48]: sustainable management criteria and an associated monitoring network for interconnected surface water and groundwater do need to be developed in the GSP, as stated in our comments on Chapter 9 above, and depletion of ISWs should be monitored. The Draft GSP states that an initial hydrogeologic investigation will be conducted. Please provide sufficient detail for the investigation and monitoring program including stream gauges, screened intervals and aquifers of the shallow wells and frequency of monitoring, in order to describe monitoring of both the extent of ISWs and the quantity of surface water depletions from ISWs. As stated in TNCs previous comments in our previous letter on Chapter 7, the Nature Conservancy recommends identifying beneficial users of surface water, which include environmental users. This is a critical step, as it is impossible to define significant and unreasonable adverse impacts without knowing what is being impacted, nor is possible to monitor ISWs in a way that can identify adverse impacts on beneficial uses of surface water. For your convenience, we've provided a list of freshwater species within the boundary of the Paso Robles basin in Attachment C. Please identify appropriate biological indicators that can be used to monitor potential impacts to environmental beneficial users as a current data gap and explain how this data gap will be filled.		pasogcp.com	7/1/2019 12:41:00 PM	Link: 20190701_Matsumoto
Laurie Gage, District Administrator	**Ch. 11 Notice and Communications**	The Board of Directors of the Estrella-El Pomar-Creston Water District has reviewed Chapter 11 and concluded that it has no comments on this chapter at this time. Individual Board directors may choose to personally comment on this chapter separately and independently from the Board as a whole.	City of Paso Robles GSA	pasogcp.com	10/11/2018 8:59:00 PM	
Dan Penkauskas	**Ch. 11 Notice and Communications** 11.1 Communications and Engagement Plan	Hi All. We're in the Creston area and have a single domestic well for our drinking water. We vote for maintaining levels as they are today. Also, please sign us up to monitor our well. Thank you, Dan	County of San Luis Obispo GSA	pasogcp.com	10/12/2018 6:41:00 AM	
Sheila Lyons	**Ch. 11 Notice and Communications** 11.1 Communications and Engagement Plan	Anywhere in the GSP where there is a reference to interested parties, including the Appendix D of Chapter 11, all Citizen Advisory Groups over the Paso Basin should be listed. CAB is writing to ask specifically that we be added throughout, including Appendix D of this chapter.	County of San Luis Obispo GSA	pasogcp.com	10/20/2018 9:26:00 AM	
Joe Plummer	**Draft GSP** Executive Summary	We have significant concerns about the proposed document and how it was prepared. The document, as written, is vague with respect to impacts and timing of same on irrigated agriculture. This is not surprising, as the Water District representing irrigated agriculture was prohibited from direct participation in the preparation and drafting of the document. In place of direct participation in the process, our "elected officials" chose to insert themselves, having the "County" represent our interests. In fact, the "County" has never, to my knowledge, held any input sessions or requested any input, including from the PRWCA or IGGA (representatives of our industry) from our industry. As a result, the presented draft document does not adequately represent the interests of irrigated ag and, in fact, goes a long ways towards decimating our industry. I believe this document should not be finalized and submitted until a broad representation of the ag community have had an opportunity to provide, in an open forum, their input.	County of San Luis Obispo GSA	pasogcp.com	9/25/2019 2:10:00 PM	
Stuart Suplick	**Draft GSP** Executive Summary	***ES 4.4 Interconnected Surface Water and Groundwater*** There are no available data that establish whether or not the groundwater and surface water are connected through a continuous saturated zone in any aquifer. The potential for interconnected surface water and groundwater in the Subbasin will be assessed during GSP implementation. COMMENT: The GDE determination methods from Rohde et al., 2018 do not indicate these interconnections? Or only to too limited a capacity, e.g. alluvial aquifers? Apologies if I misunderstood/did not read in detail enough Appendix C in this regard.		pasogcp.com	9/24/2019 8:52:00 PM	
Donald Morris	**Draft GSP** Executive Summary	The objectives of the approach to achieving sustainability should state that all property water rights should be equally respected, regardless of the current usage. Allotment of the quotas should be done by acreage and the free market would allow leasing/sellilng of usage rights between those wishing to use higher amounts and those using below their quota. To do otherwise would be outright confiscation of deeded water rights without compensation and a public gift to other/adjacent properties. This could be phased in over a period of years(suggest 5 or less) in which at the end of the time those not using their quota could be leasing their quota or just adding to the amount not being pumped. This guidance/goal may be applicable to other sections in the documents provided for review.	County of San Luis Obispo GSA	pasogcp.com	9/26/2019 10:58:00 AM	
Carter Collins	**Draft GSP** Executive Summary	1. As a whole, the GSP is unclear as to what exactly the GSAs will tangibly do to ensure the elimination of the current overdraft in the Paso Robles Basin. This not only risks the health of the basin, but it increases the chances that the California Department of Water Resources will not approve the GSP. The GSP needs to clearly state what and how the GSAs will act. 2. A hallmark of SGMA is the call for including all stakeholders in the decision-making process. The County GSA, however, did not hold any outreach meetings with the Ag Community. Since the EPC WD represents 44% of the agriculture based pumped water, there should be more active involvement in developing the GSP. Successfully reducing the Ag pumping to benefit the groundwater basin will have to include the understanding and support of the Ag Community. 3. Groundwater pumping allocations, monitoring, and enforcement need to be clearly planned out. The implementation process will be doomed to failure if those who must sacrifice are not included in the decision to cutback pumping. Water use should be measured by meters to ensure accuracy. Violations must be enforced through both civil orders and penalties. 4. Most of the projects listed in the current GSP are purely conceptual. Moving forward, the GSP needs to explain how it will ensure and promote the construction of projects generating significant new useable water. 5. The risk of growth in de minimis groundwater users needs to be fully addressed. The GSP notes that the current number of de minimis users is significant and that their growth could warrant regulation in the future, but it does not say how it will ensure that the growth will not eat into the rights of other existing users. Perhaps a cap should be placed on the total number of de minimis users, requiring that any growth is acquired voluntarily from others.	County of San Luis Obispo GSA	pasogcp.com	9/26/2019 13:52	20190926_Collins

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Anthony Riboli	**Draft GSP** Executive Summary	Please see attached letter.	County of San Luis Obispo GSA	pasogcp.com	9/26/2019 5:48:00 PM	Link: 20190926_Riboli
James Green	**Draft GSP** Executive Summary	Please see the attached letter.		pasogcp.com	9/27/2019 10:58:00 AM	Link: 20190927_Green
Hilary Graves	**Draft GSP** Executive Summary	My comments pertain to the entire GSP document and the process that agricultural overliers have endured to arrive at the current version available to the public. As an agriculturist, I have not felt well represented by the County of SLO as my GSA. In addition, the County has, in my opinion, failed to satisfy the SGMA requirement of outreach and education. The County as my GSA has not held a stakeholder meeting soliciting input from agriculture or sharing their vision for supporting our industry through the SGMA implementation process. Three minutes of one-directional public comment at the Board of Supervisors and/or the Paso Basin Cooperative Committee meetings is not sufficient to serve as outreach and education. This process is important enough to all overliers that it requires the opportunity for outreach and education in the form of back-and-forth dialogue with the option of asking questions and robust debate when warranted. One only has to read the comments from other commenters to see that the County has failed in its role as educator to overlying property owners. The confusion and misinformation being shared without correction is disappointing, to say the least. The County's lack of commitment in the GSP to a multi-faceted and truly sustainable approach to solutions, including options such as groundwater recharge, water conservation, increased surface storage, increased use of recycled water, capture and reuse of stormwater, and better implementation and integration of regional projects, further complicates our situation and highlights the County's lack of ambition and ability to think proactively about the health of our groundwater basin. For example, if the County is unable to receive and distribute our State Water Project allocation due to lack of forethought and planning, at least sell the water to other users and use the money to pay for projects that benefit our Basins in SLO County. Even that suggestion is met with a list of reasons why it cannot be done instead of a list of ways that we might be able to make it happen. Agriculture is not only the primary driver of the economy in SLO County, but an important part of our Countys heritage. Farmers in California are leaders in implementing some of the most efficient irrigation methods in the world. The broad consensus in our state, and in our county as well, is that our water management system is unprepared to meet the needs of agriculture, industry, the environment, and our growing population. I am committed to collaborating and contributing to a solution for the long term health of our basin. There is no easy fix and it is going to be expensive, but sustainability means that we must all work together to come up with solutions that support a stable economy, protect the environment, and provide for public health and safety.	County of San Luis Obispo GSA	pasogcp.com	9/28/2019 10:50:00 AM	
Ralph J. Herman Sr.	**Draft GSP - Volume 1** Chapter 1	In reviewing the material on the GSP Volume 1, I did not find any mention or any indication that there are double Faults running parallel, East and West, from approximately Hog Canyon, Westerly to apparently San Miguel. The Faults are therefore just South of the end of Ranchita Canyon. As a result, we believe that is the main reason that at least the area of Ranchita Canyon, North to and beyond the SLO County line, has generally maintained adequate ground water for the wells over the yeas, including the past dry seasons. Further, it has been more recently recognized by the Superior Court, that the single Fault separating the Paso Robles Basin from the Atascadero Basin, is a physical barrier between the two Basins. As a result of this legal determination, why has the Paso Robles Basin, annexed all lands to the North County Line into the Paso Robles Basin when there is a double Fault Block? In addition, the only brief mention of any Faults in the material that I could locate, was in Volume 1, 4.9.2 Fault Influence on Groundwater. In addition to the above, I have a suggestion for you. It would be easier reading the material presented when in Draft form, that the word DRAFT that appears on every page, be reduced from Black to maybe a light gray, or simply an outline of the letters so that the underlying material is not blocked out. Thank you.	County of San Luis Obispo GSA	pasogcp.com	9/28/2019 11:29:00 PM	
Sheila Lyons	**Draft GSP - Volume 1** Chapter 3	The math doesn't seem to bear out on page 3-34 top paragraph. If build out 75% of all RR parcels results in pumping of 37,000 AFY, then 100% would be 49,300 AFY. Final paragraph says that 16,504 AFY would be 44% of ultimate build out, but doing the math it only comes out to be 33%.	County of San Luis Obispo GSA	pasogcp.com	9/3/2019 11:10:00 AM	
Sue Harvey	**Draft GSP - Volume 1** Chapter 4	Re 4.9 Data Gaps in the Hydrogeological Conceptual Model: We are assuming that the underlying data supporting the inflow and outflows are accurately interpreted within the limitations of the data gaps that are laid out in the Plan. Once the GSP is adopted the first project to be undertaken must be in-fill of data for monitoring wells to collect the information necessary to plug the data gaps.		pasogcp.com	9/27/2019 2:52:00 PM	
Stuart Suplick	**Draft GSP - Volume 1** Chapter 4	Section 4.7.1 Groundwater Recharge Areas Inside the Subbasin "Figure 4-16 is a map that ranks soil suitability to accommodate groundwater recharge based on five major factors that affect recharge potential, including: deep percolation, root zone residence time, topography, chemical limitations, and soil surface condition. The map was developed by the California Soil Resource Lab at UC Davis and the University of California Agricultural and Natural Resources Department." COMMENT: Consider pairing with information provided in the Cal Poly Senior Project https://digitalcommons.calpoly.edu/nrmsp/57/ to identify areas where, especially during droughts, promoting beaver damming with beaver dam analogs or local resident educational efforts can help with at least alluvial aquifer recharge. Or where runoff or deliberately added water can create additional "reservoirs" or "recharge ponds" that are seasonal, relatively cheap, and (besides the need to monitor for/control invasives) provide a boon for birds and local endangered species.		pasogcp.com		
Sue Harvey	**Draft GSP - Volume 2** Chapter 8	The Plan relies on identifying exceedances of minimum thresholds (groundwater levels or water quality) for purposes of triggering pumping cutbacks. How will exceedances be addressed while an ordinance is being enacted? Violations of exceedances will be meaningless and cannot be remedied without an intermediate plan. Ground water levels will continue to decline.		pasogcp.com	9/27/2019 2:52:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Sue Harvey	**Draft GSP - Volume 2** Chapter 9	The Plan estimates that it will take five years to enact a pumping reduction ordinance. Five years is too long to wait to start to reverse over-pumping. The Plan correctly emphasizes that pumping cutbacks are necessary as extensive over-pumping is already occurring.There must be some intermediate plan of action identified to mitigate current over-pumping during the period before an ordinance is adopted. As listed in 9.5, the Projects, while possible and of benefit, are too far distant to be viable management options for addressing the immediate problem of reversing depletion of the basin. Chapter 9 offers little realistic planning, cost, or engineering information. Projects 2, 3, 4, and 5 dangerously offers overproduction surcharges as a reliable funding mechanism for the projects. Over-pumping (overproduction) cant be managed through a system of surcharges because entities will merely treat this as a cost of doing business and make no effort to change their business model, while "overproduction surcharges will end up becoming a necessary component of the financial survival of the agency leveling the surcharge. Hence there will be little incentive on anyones part to come into compliance. The history of Fox Canyon Water District should provide ample caution in this regard. Chapter 9 should be relegated to the Appendix.		pasogcp.com	9/27/2019 2:52:00 PM	
Stuart Suplick	**Draft GSP - Volume 2** Chapter 9	Concerned that the Northern Chumash and Salinan tribes will not be encouraged sufficiently (or their relationship with the GSAs/County is not being prioritized or invested in) to collaborate in the process for promoting voluntary fallowing with farmers, environmental users, County government. Or other recharge/demand reduction methods. Section 3.3.2 Tribal Jurisdiction states "These two tribes do not have any recognized tribal land in the Subbasin" seeming to imply that they are a low-impact or low-priority stakeholder - but this does not account for the lands they occupied prior to any state- or federal-specific recognitions of governance. Appendix I also does not describe the degree to which tribes were notified and followed-up upon (unless I missed this elsewhere). Perhaps the members really aren't interested, but given that they managed this land historically/prehistorically, it seems an insult to not prioritize their incorporation or give them a bigger platform for sharing and integrating and respecting any traditional ecological knowledge they may have, on their terms as much as possible. I also have reservations about the lack of information at the moment on how the meetings and community consultations for voluntary fallowing/mandatory supply cuts will be directed or run to best encourage cooperation on what can become a highly political and emotion-filled topic very fast. At least some solid research should go into providing a lower-level picture of how these sessions could be run on a human-dimensions level. Especially if none of the GSA/GSP consultant staff come from a agricultural background. For instance, in terms of voluntary fallowing, thinking more holistically https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.2367 could be key if combined with the recognition that a good number of farmers would not want to fallow their land for more than economic reasons - e.g. a rewarding sense of stewardship, for instance. In this sense, finding ways to accompany fallowing with restoration/riparian buffer expansion/environmental and traditional indigenous knowledge education of kids and the community could be one idea for farmers to maintain their sense of identity during seasons or the long-term when they fallow.		pasogcp.com	9/24/2019 8:52:00 PM	
Ruthie Redmond	Draft GSP **Volumes 1 & 2** **Executive Summary**	(See attached letter for specific comments on each section)		pasogcp.com	9/27/2019 12:27:00 PM	Link: 20190927_Redmond
Robert Woodland	**Draft GSP - Appendices**	Please see attachment	City of Paso Robles GSA	pasogcp.com	9/27/2019 2:10:00 PM	Link: 20190927_Woodland
Mackenna Buchholz	Additional Comments	(See attachment)		Other	5/3/2018	Link: 20180503_Buchholz
Greg Grewal	Additional Comments	(See attachment)		Other	5/14/2018	Link: 20180514_Grewal
Donald Morris	Additional Comments	(See attachment)		Other	5/21/2018	Link: 20180521_Morris
Sheila Lyons	Additional Comments	Please find enclosed below a letter and an attachment with input from the Creston Advisory Body representing the Creston Community and Rural Residents across the Basin. The vote of endorsement for the contents of this letter by the CAB member at last night's CAB meeting was unanimous. We hope you will find this information helpful when making decisions on Basin management. Thank you for your attention to our input. Sheila Lyons CAB Chairperson		Other	7/19/2018	Link: 20180719_Lyons
William Enholm	Additional Comments	(See attachment)		Other	7/25/2018	Link: 20180725_Elholm
Tommy & Kathy Carter	Additional Comments	(See attachment)		Other	7/26/2018	Link: 20180727_Carter
Dianne Jackson	Additional Comments	Supervisors Peschong & Arnold, and Chairperson Hamon, I am in complete agreement and support the comments CAB submitted to the Paso Basin Cooperative Committee. CAB has been working on this topic for over a decade and has tried to include the many comments that they have received from the public, over the years. The new groundwater sustainability plans require each basin to reverse groundwater overdraft. There is only one way to get that accomplished, stop over pumping. Hoping you will take into serious consideration every point that was addressed. Grace and Peace, Dianne Jackson		Other	7/26/2018	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Carol & Harold Rowland	Additional Comments	(See attachment)		Other	7/26/2018	Link: 20180726_Rowland
Sheila Lyons	Additional Comments	In reading the notes from various PR Basin Cooperative Committee meetings we don't see anywhere that the local Citizen's Advisory Councils are included for receiving notices or communications. Additionally in those lists we have seen all entities listed have specific addresses by which the organizations or agencies may be noticed, however, Rural Residents are simply called out as Rural Residents. It seems greatly amiss to us that Rural Residents who are the great majority of the people living over the Paso Basin and who will be impacted the very most are not being communicated with directly. At the very least all Citizen Advisory Councils over the Basin should be noticed. Please add the Creston Advisory Body (CAB) to your contact lists. All notices may be sent directly to our chairperson, Sheila Lyons, (removed)	County of San Luis Obispo GSA	pasogcp.com	9/22/2018 2:47:00 PM	
Leslie Jordan	Additional Comments	(See attachment)		Other	9/25/2018	Link: 20180925_Jordan
Melenie Ristow	Additional Comments	Hello, I'm on vacation & won't be able to attend the water meeting in Creston. I wanted you to know I'm extremely worried about what will happen to my residential water well for my home & 20 acres. I've lived on Huer Huero rd for 38+ yrs with a mix of drought, normal & wet years & so far never run out of water, but I'm a lucky one. We've always known water is life out here & we have chosen a variety of ways to be responsible & conserve our water to be able to live here. I too worry about my investment in my property & realize my investment will be compromised if my well runs dry. Not being a big or corporate water user I have very few alternatives or be financially able to truck water to my home. And thus count on my representatives to protect my water interests. I implore you to do just that. Please protect mine & the thousands of residential water user wells in our Creston area. Thank You, Melenie Ristow		Other	10/1/2018	
Sheila Lyons	Additional Comments	Hello Supervisor Arnold, I submitted the following Excel file, that CAB received from the Public Works Dept back in the spring, to the Paso Basin Groundwater Sustainability Cooperative Committee through the GCP Portal. You may recall that CAB questioned the table in Chapter 3 of the GSP (Table 3-2, page 22) because it didn't appear to be up to date. In fact Table 3-2 of Chapter 3 showed only about 1/3 of the total wells that the SLO PW Dept indicated as being in production over the PR Basin, as given to CAB earlier this year. Sheila Lyons CAB Chairperson (See attachment)		Other	10/2/2018	Link: 20181002_Lyons
Dick McKinley	Additional Comments	Figures 4.6-4.10 have print that is too small to read.	City of Paso Robles GSA	pasogcp.com	10/5/2018 1:06:00 PM	
Frederick Hoey	Additional Comments	These comments relate to 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 area; 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 areas 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 concentrations 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 Sub Area, 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 Sub Area, a view shared by all of my Creston friends and connections.	County of San Luis Obispo GSA	pasogcp.com	10/6/2018 4:03:00 PM	
James Green	Additional Comments	Good afternoon, Micki: Please distribute the attached letter regarding County Groundwater Sustainability Agency (GSA) Meetings to the Supervisors, all districts. Thank you. Warm Regards, James Green Government Affairs Specialist		Other	10/8/2018	Link: 20181008_Green
Dennis Loucks	Additional Comments	Dear Mr Peschong, Attached are my comments pertaining to the GSP plan to date. Please refer them to your Cooperative Committee. (See attachment)		Other	10/8/2018	Link: 20181008_Loucks
Frederick Hoey	Additional Comments	(See attachment)		Other	10/12/2018	Link: 20181012_Hoey

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Dennis Loucks	Additional Comments	(See attachment)		Other	10/15/2018	Link: 20181017_USGS
Stephen Sinton	Additional Comments	Figure 4-12 makes zones look simple and continuous when they are probably more complicated and multi-layered with impervious and semi-impervious layers scattered both vertically and horizontally. I believe our newest well on Shell Creek was 592' with almost continuous sandfrom surface to the bottom of the formation. It test pumped more like 1500 gpm, although we don't use it at thatlevel. The transmissivity information could be very significant. Is there a source for where this came from? Artesian wells existed within the boundaries of Shandon itself. Overall Much of the information available for this GSP is uncertain, but we will know a lot more as we begin implementation. The risk, therefore, is that facts will become immovable and immutable if we don't repeatedly state our uncertainties and the need forrefinement. The Plan needs to be clear that our understanding of the basin is likely to change over time, numbers will have to be changed, basin limits will undoubtedly be revised and many other aspects will be altered by new information. So we need to be unambiguous that each "fact" may potentially require updating and decisions and actions based on those facts may need to bealtered.	County of San Luis Obispo GSA	pasogcp.com	10/15/2018 8:01:00 AM	
Verna Jigour	Additional Comments	This is just to note my apologies if you received two copies of my comment addendum file. My comment on this web input function is that I could not tell how many files I had attached the screen only shows the most recent attachment. I intended/ attempted to attach two files 1. my comments addendum and 2. my doctoral dissertation abstract. If you did not receive both files, please advise me and I will provide them again. Thanks for the opportunity to comment! Verna Jigour, PhD Rainfall to Groundwater		pasogcp.com	10/15/2018 9:58:00 PM	Link: 20181015_Jigour
Dana Merrill	Additional Comments	RE Survey While the comments are interesting to read and seem to suggest in general experience with falling water levels and concern for more to follow, they have several shortcomings in my opinion. 1. Done in a vacuum as no mention of cost or who would pay renders them useless without follow up 2. Sample size is likely too small and cannot be verified as to authenticity 3. Time and cost hopefully was minimal as time is passing while the drought continues and meaningful measures and strategies are urgently needed for individuals and businesses to plan and budget for the future. 4. More critical work is needed, asking whether Utopia is desired is of minimal interest without quoting a cost Sorry but that's my feeling on the Survey. Maybe a well intentioned legislative mandate that it be included but we need to get on to the real issues and strategies. Every stakeholder, landowner, and even cities will feel the impact of severe pumping cutbacks in the Paso Basin as economic multipliers in reverse mean higher taxes, less jobs, tourism and lower property values. The Urgency Ordinace is an example of how land values plummet if water is restricted. Let's get going on solutions and figure out whether we can find a way to pay for them!	County of San Luis Obispo GSA	pasogcp.com	11/12/2018 7:56:00 AM	
John Thompson	Additional Comments	This probably seems tedious, but when reviewing the draft, the dark "DRAFT" across the page is distracting. Possibly lighten the text across the page or put "DRAFT" as a header.		pasogcp.com	12/6/2018 1:00:00 PM	
John Thompson	Additional Comments	In general, when a source is referred to in the text, it would be nice if it were properly cited. I do not know that we need a literature cited at the end of each section, but one online literature sited page would suffice. For instance, on page 5-38 the map is cited as RMC, 2015, but that resource is hard to find without a proper literature cited appendix or reference. Better yet, a website that could digitally link you to all cited works.		pasogcp.com	12/6/2018 1:00:00 PM	
Steve Sinton	Additional Comments	Can the chapter draw any conclusions as to what would happen to groundwater levels if we had a period of above normal rainfall years? 2. Can you further clarify the different aquifers? Most readers are familiar with the deep sulfur water and the aquifer above it, but Chapter 5 seems to further divide the upper aquifer in a way that isn't perfectly clear. 3. Figure 5-8 does not reflect the groundwater elevation conditions I experience on Shell Creek. Perhaps the extrapolation used in the figure covers too wide an area. 4. In 5.1.3 there is discussion of upward vertical groundwater flow. What is this based on and what does it mean to the management of the basin? 5. It may just be me, but I find Figures 5-15 and 5-16 very confusing. 5-15 makes it look like water use (the black lines coming down) is declining, but the text says the opposite. 6. Section 5.5 talks about gaining streams, but other than a few places where underflow is forced to the surface, I don't know of anything that is a gaining stream. The same applies to 5.5.1 where the chapter talks about groundwater discharge to surface water. I don't know of any place where it exists. The conclusion that the mean annual surface water depletion was about 8500 af/year seems impossible. If that statement (and Figure 5-18) is based solely on the model, that only makes the model seem less valid.	Shandon San Juan GSA	pasogcp.com	12/9/2018 9:55:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Timothy Cleath	Additional Comments	Specific Edits: P. 7 Para 4: Delete sentences 5 and 6 (King City fault?). Fig 4-6: Geologic Map does not agree with portions of this cross section. P. 17 Delete last sentence of first paragraph: not necessary and not significant. P. 17 para 2: Identify arsenic as a constituent of concern. P. 19 para 1: Poor quality water in the Pancho Rico is not necessarily associated with the tar sands. We don't see tar sands in the Pancho Rico underlying the basin. P. 19 para : The Santa Margarita Formation varies inpermeability but is typically much lower than the Paso Robles Formation. That is the basis for not including it in the basin sediments. Where the geothermal water is present, groundwater quality is more brackish. P. 19 para 4: Vaqueros Formation groundwater is typically brackish. Fig 4-12 to 4-15: Reference map showing locations of cross sections. Aquifers shown in blue stop abruptly in some areas. Please explain why. P. 25 para 2: sentence 4: Not shown on Figure 14-4. Last sentence: Not clear what is meant by the "shallow aquifer.... may be an isolated aquifer area". Please explain. Table 4-1: Define Q/s. Note that the hydraulic conductivity is an average based on the full perforated interval and is not a specific aquifer hydraulic conductivity. P. 26 Para 2: Is the reference to the Paso Robles Formation and the shallow aquifer zone correct? This seems to be conflicting. P. 27 The specific yield for the Paso Robles Formation gravels is appropriate in light of the flatness and compaction of these gravel beds. P. 27 last para: Folds and faults do affect groundwater flow in the Subbasin. Consider particularly the Red Hills/San Juan faults and the folds near the Rinconada fault. P. 28 para 1: Municipal demands are significantly met by Nacimiento and State Water Project waters (Paso and Shandon) Fig 4-16: This map is incomplete and also not a good representation of where groundwater recharge can occur to the Paso Robles Formation. The alluvial areas are obvious. It may be best to exclude this figure and provide more discussions related to factors for recharge such as is discussed in the Huer Huero and Paso banking studies. P. 31 The areas identified as "discharge areas" just happen to be near where wastewater discharges occur and may not be areas of groundwater discharge. The areas of mapped springs and seeps are likely to be due to stratigraphic and structural conditions and not shallow and perched aquifer units. P. 34 Include the Nacimiento River and Shell Creek in the surface water features. Surface Water Bodies would seem to refer to lakes and ponds and not so much streams. It would be better to take out "bodies" from the title. P. 36 Recommendations should be for a geostatistical analysis of well completion reports and for general geophysics, not just aerial geophysics. Also, note that there is one nested well as is discussed in Chapter 5.		pasogcp.com	12/10/2018 9:36:00 AM	
Timothy Cleath	Additional Comments	General comments: Paso Robles Aquifer suggests there is only one aquifer-change to Aquifers. In light of the need to adjust the basin boundaries, there should be a discussion and illustration showing the 2002 basin boundary and the San Juan/Red Hills faults should be shown. The Base of the Permeable Sediments map from the 2002 Paso study is in need of a revision based on more recent information. The deep basin area near San Miguel is much shallower than was shown in that map. Soils infiltration rates in the table are not quantitative and the clay content and sand and gravel content do not add up. Explain why. Figure 14 has extensive areas where no soil infiltration information is available. Explain why.		pasogcp.com	12/10/2018 9:36:00 AM	
Green River Mutual Water Company	Additional Comments	(See attachment)		Other	1/2019	Link: 20190101_GRM
Dana Merrill	Additional Comments	My comments in brief are: 1. Better detailed data is needed before selecting specific projects by area. Shandon and Creston (depending on where Creston extends) seem to have stable water levels vs the Red Zone. So recharge or supplemental water needs to be likely worth the cost to areas in better shape. Or prove taking there does help the Red Zone. 2. Many small users is Jardine, Squirrel Hollow, etc may need regional systems which could be a few deep Wells or supplemental water. Domestic and AG May have different solutions. Antiquated subdivisions have special challenges that require solutions different than commercial Agriculture. Those are a failure of good Planning which didn't exist when the lots created. Government should now help resolve but wells and septic systems on 1 acre parcels not sound planning. Same as Los Osos faced only worse. 3. More spending on dedicated monitoring has been promised for years but never built. Do that first to be sure the solutions will work. 4. Prioritize getting the County Naci share, where the County Paso Basin was left out, into the Basin. Get the city Paso Robles to take its full allotment which would lessen the salt level of its effluent. More purple pipe water could then go to vineyards . Basin landowners could subsidize the lake water treatment plant expansion cost for the city. 5.there should be an alternative to take State water before treatment at Polonio Pass. Maybe pipe to Estrella River then pump out by Whitley Gardens. Save pipeline costs perhaps. More water at lower cost is available although more pipeline is needed. 6. Get representative monitoring well system going and build projects as results of monitoring dictates. Figure out where our projects should be concentrated.	County of San Luis Obispo GSA	Other	2/25/2019	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
		7. Get Irrigated Land Ordinance renewed for 5 years for stability. Expiring is not going to be good in 2020. County has a system and while it's not perfect it's a start we have experience with. 8. An Economic Study needs to be included to know whether Ramp Down or Supplemental water is best. A Ramp Down is not possible as we have few annual irrigated crops, the economic multiplier factor in reverse will devastate the local economy based on the wine and tourist industry. Winegrapes use so little water we have no lower use crop alternatives. 9. Get the Paso Basin on a priority list for State Water, otherwise urban uses will grab it and its gone. Buy a base amount the add annual purchases on high rainfall years at lower prices for recharge. Continue to rely on wells but support groundwater levels with supplemental water. 10. Adopt a Monterey County mandatory reporting system based on meters for Ag Wells 5 inch or larger. Exempt true non commercial de minimous users. They should contribute a minimal fixed admin fee to the system. Commercial Ag pay based on usage to incentivize efficiency. Group by zones as Monterey does. 11. Get more sophisticated data. Water levels have dropped most in the Red Zone but the Basin is deepest there. So many Wells still produce well. If we were to simply concentrate on the Red Zone and have the whole basin pay, would that be logical or fair? Do we know? If not, find out before proposing projects that likely can't pass a 218 election for funding anyway. 12. Our first 5 years post GSP submission need a vast improvement in data. Measure changes is water levels across the basin so we all have confidence in the data. And know the Economic impacts on us all, farmers, retired folks, city residents. That should help with buy in. Other than the Purple Pipe city of Paso project and getting on the State Water reservation list we are not ready for projects or drastic Ramping Down. Those two projects might be all we need. I may have further comments but wanted to get these in. Thanks for the opportunity. Dana Merrill Paso Robles, CA				
Dana Merrill	Additional Comments	(See attachment)	County of San Luis Obispo GSA	Other	2/26/2019	Link: 20190225_DMerril1_Ch9
Bill Stansbury	Additional Comments	It is good to see a concrete plan taking place. I am a deminimis user. It appears I will not be financially impacted by the GSP. I do fear a large political backlash by land owners, particularly in the Creston area. They always seem to have their alternate version of the facts and refuse to believe there is an overdraft problem. I am 70 years old, survive on a pension and live alone. When my wife was alive, we had to drill a new well in 2006 after moving in in 1992. Our well was 250 feet. The water table was at 135 feet when we moved here in 1992. Our new well is 500 feet deep and the water is now at 320 feet. I cannot afford to drill to 1,000 feet and what guarantee is there that there is potable water at this depth in our area? As you can see the "little guy" is in a tough spot here. I wish you the best and I hope I live to see this plan come to fruition. Thanks, Bill Stansbury		Other	2/27/2019	
George Tracy	Additional Comments	Thanks for sending this. There are a few typos in some of the draft documents but I found them very interesting. The minimal users appear to be exempt from the GSA as the law allows. I hope this will be true in the future too. I assume the county is to be the overriding GSA for the purposes of implementation. I am curious on how the other water purveyors will react to that. Since there is not a written agreement for the implementation of the Paso Basin GSA how are you planning to get it implemented by all the GSA agencies. I have heard there will be an agreement but I have not seen one. As a county resident I have watched my well levels fall year after year. I measure the well every year since 2013 when I had to replace my pump at the level it had been installed in 1997. That level was 252 feet. The initial water level when installed was 150 feet.It has fallen every year. Last year it was at 307 below the ground some 200 feet above the replaced well pump. The plan does not mention what the county ordinance that limits planting will be once the plan has been implemented. Will a new ordinance be put in place to limit installation of new plantings again? Not all crops are listed in the SLO county ordinance. Specifically Hemp and Marijuana are missing, there may be others as well. Brewers are also not listed but several use groundwater for their source of water. Do you have a list of facilities that will be implicated as pumpers? I hope to attend the March 6 meeting but the notice does not indicate time or place. could you send that to me?		Other	2/27/2019	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Laurie Gage	Additional Comments	To the Paso Basin Cooperative Committee: I am writing in support of the letter to be considered by the Paso Basin Cooperative Committee as Item #8 in its March 6, 2019 meeting. As the holder of an onsite offset clearance, I have carefully reviewed the language of the termination clause in the deed restriction that was required of me by the clearance, and it would appear that without modification of the sunset date of the ordinance, it might be possible for me to begin irrigating the acreage that I fallowed in order to create the credit. I have no intention of pursuing reirrigating fallowed land, but it begs the question whether any owner of property fallowed to create an offset credit needed on that property or transferred/sold elsewhere, would feel the same reluctance to begin irrigating again. If the ordinance sunset date is not modified, I believe it might lead to having the clearance-fallowed land be irrigated again, completely negating any benefit of the one-to-one offset put in place to protect the basin. Add that to the increased water demand by having a gap between the sunset date and some future and, as of yet, unknown and undetermined program in the GSP, and the consequences could be long-lasting and very, very negative. Look to history and the 6-week gap in the ordinance process and what kind of advantage was taken back then. Thank you for your consideration and again, I urge your support of the letter in Item 8 of your March 6 agenda. Laurie Gage Full Sail Farm		Other	3/3/2019	
Sue Luft	Additional Comments	Paso Basin Cooperative Committee, I have reviewed the letter on page 59 of the agenda package for your March 6, 2019 meeting. I ask that your Committee approve this request that the SLO County Board of Supervisors modify the sunset date of the County's Water Conservation Ordinance related to the Paso Basin to when conservation provisions in the adopted Groundwater Sustainability Plan are implemented. Without modifying the sunset date of the County's Water Conservation Ordinance, there will be a gap which may result in increased water demand in the Paso Basin. This increased demand would increase the projected deficit in the basin and would impact the ability to comply with the Sustainable Groundwater Management Act. Thank you. Sue Luft Landowner, El Pomar area of Paso Basin		Other	3/3/2019	
Greg Grewal	Additional Comments	(See attachment)		Other	3/6/2019	Link: 20190306_Grewal
Douglas Brown	Project and Management Actions - Concepts	Appreciate your taking the time to speak with me yesterday. Here are the comments I last submitted on the website on Chapter 9 of the GSP which you indicate have not come through to you and others: I would request that the following alternatives be included as potential projects/management actions for study and implementation: 1.Reducing or eliminating exports of Salinas river water outside of the basin, particularly exports from Santa Margarita to the City of San Luis Obispo. These exports have negative environmental effects on the river as well as the groundwater basin and reduce recharge to the groundwater basin. The County, through the SLOCFCWCD, has significant obligations and control over these exports; 2.Require Shandon to participate in the SWP, as was envisioned in the early 1990's when a contract was executed for that purpose, prior to requiring other water users to participate in the SWP or other supplemental water projects. The County, through the SLOCFCWCD, was a significant, if not the lead, actor involved in such contract; 3.Require the urban agencies to use Nacimiento water for current water users rather than for new development prior to requiring other water users to participate in Nacimiento, SWP or other supplemental water projects. The County, through the SLOCFCWCD, has significant obligations and controls over the Nacimiento project and contracts with the urban agencies. While I understand that these proposals may not be popular options for various of the urban agencies, I do believe that failure to consider them would be inconsistent with the obligations that the GSAs have under state statutes. On the call you indicated that there had been no discussion of the environmental process for the GSP or projects or actions proposed to be undertaken. If true, I believe this is unfair to land owners and water users overlying the Paso Robles groundwater basin who deserve a clear explanation of this process and when they have a right to object. I reiterate my request to speak with the attorney in the county counsel office advising the County on environmental compliance with respect to the GSP. Douglas S. Brown		pasogcp.com	3/21/2019 5:12:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Douglas Brown	Project and Management Actions - Concepts	Courtney, Thank you for your response. The public trust doctrine in California can operate to require additional releases above and beyond the permit conditions if necessary for instream or groundwater basin protection. I would respectfully request that the County (and the other GMAs) analyze this issue as an alternative. I have been told (but do not know) that Shandon does not take its full allocation of SWP water. I would respectfully suggest that the County and the other GMA's study of any SWP water alternative not include any project paid for by rural or agricultural users until Shandon takes its full allocation of SWP. I would respectfully suggest that the GMAs study urban use of Nacimiento water for existing users rather than new development. While I appreciate that other studies may have considered certain of these options, I would respectfully suggest that the GMAs need to re-review these options as part of their statutory duties under the groundwater management act. How much (or little) they can depend on the prior work will presumably depend of whether that prior work meets the standards applicable to the groundwater management act. Douglas S. Brown		pasogcp.com	3/21/2019 5:20:00 PM	
Sheila Lyons	Project and Management Actions - Concepts	Comments from both public and members at CAB Meetings - Administration, Accounting and Management - Ag pumping data collection states that one way would be for the Ag pumpers to report metered pumping to their GSA. How will this be verified? Management Actions - Although land use restrictions are mentioned there is no reference to working with the Planning and Building Dept. at the County to align new ordinances and policies to protect water resources. CAB has recently reviewed proposed ordinance changes for growing cannibis (not considered an ag crop) and for agricultural worker housing. Offsets are stated to be the source of water in one case...offsets do not make water and there aren't enough replacement toilets for the program to do any good. Ag operators agree that giving off-sets is not the answer for cannabis projects. No mention of water source in proposed Ag worker housing ordinance at all and the allowance for this type of housing is being expanded hugelyokay on lots down to 5 acres in size, 1 worker per 1 acre of grapes, expanded zoning allowance, etc. ALL new or modified County ordinances need to have conditions for where the water will come from in new plantings or development. Existing rural residents, most of which will be de minimis users with shallow wells, are still going to be impacted by allowing additional planting and development and no amount of money is going to compensate them for these infractions. Available Water Supplies - State Water Project - Although there is 14,500 AFY currently unused that number will drop in drought years when we would most need it due to increased demand from the subscriber. We would still have to pay for 14,500 AFY, not 8900 AFY to insure that we still get 8900 AFY. Or else, if we only contract for 8900 AFY we will get only 5160 AFY (58% of 8900). Who currently owns the Salinas Dam? What about down stream properties that were dependent on this run off water in the past - legal commitments? Options to Deliver New Water Supplies - Is there consideration that any new recharge basins be covered to prevent excess evaporation? Development of Project Alternatives for GSP - General Assumptions - For direct delivery projects, pipeline alignments were selected to deliver water to the largest users closest to the water source. Do these users pay the most for this benefit? They should. Direct Injection of		pasogcp.com	3/25/2019 5:03:00 PM	
Sheila Lyons	Project and Management Actions - Concepts	CAB felt that the discussion questions are rather vague and non-specific so hard to comment upon in some cases. Here are the comments we were able to obtain.		pasogcp.com	3/25/2019 5:03:00 PM	
Sheila Lyons	Project and Management Actions - Concepts	Introduction - Second point, #4 - and throughout...there appears to be a focus on Growers and how they are impacted. What will be the fall out for Rural Residents who have animals, orchards, etc. and use more than de minimis users?		pasogcp.com	3/25/2019 5:03:00 PM	
Andrew Rainey	Ch. 1003 Summary of Model Update and Modification 1003.5 Comparison of Groundwater Budgets	I do not see how a change in the lines on a map will defy gravity & the change in elevation from a higher point to lower point.if you say that a fault line will act to separate the water basins some how, maybe like a geological dam eventually the water will either come over the dam or fine a way to seep through the dam if the elevation goes from higher to lower.common logic would say that the water shed above the PR water basin has to effect the inflow into the PR water basin area.I do not see how you can not include the Atascadero water area into the PR water basin. they must be linked as the watershed is headed down hill.seems very strange to me to come to any other conclusion.	City of Paso Robles GSA	pasogcp.com	3/29/2019 9:32:00 AM	
Dana Merrill	Project and Management Actions - Concepts	My comments to this Chapter are: Page 4, paragraph 1. Exempting de minimous from water charges is fine but not necessarily from "assessments" as they are users who have a stake in the Basin health. Cumulatively they are a significant use of water. Page 6, Management Action, second paragraph "adversely affecting the local economy" is a significant point. The wine industry and resulting tourism boom has benefitted beyond the ag water users. Cutback will negatively impact the economy and a measurement of that impact should be carried out to help decide what cost of supplemental water or idling of irrigated farming really costs our community. Same paragraph: Water charging framework should prioritize water efficiency and higher water use crops should not be subsidized or favored because of historic use. Page 7: Paragraph 1, last sentence dealing with idled and to save water, should have added "...beneficial uses of the acquired land given its water use limitation." Page 8, Paragraph 2, Naci Water Project: The Naci Water Partners potentially could consider selling to a new partner: the Paso Robles Basin, whether the County entity or other. Perhaps there are willing sellers to carve out a base entitlement which could be augmented by shorter term purchases from other partners' shares. Page 9 "Important Considerations", line 2, what are "Potential water quality issues" associated with Naci lake water that would be limiting as a source?Page 10: General Assumptions: "Local groundwater deficits" require more precise determinations of boundaries, perhaps related to the same issue with "Zones" Page 10 SWP Assumptions: Need to determine definitively whether heavier pumping beyond the Red Zone impacts the Red Zone. And whether adding Supplemental Water to non Red Zone can improve Red Zone water levels. Same paragraph: Buying untreated SWP water farther east pre treatment would be cheaper and allow for more quantity to be acquired potentially. Cost of additional pipeline would have to be evaluated as part of viability review	County of San Luis Obispo GSA	pasogcp.com	3/29/2019 11:53:00 AM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Dana Merrill	Project and Management Actions - Concepts	Topics of Discussion section 1. Equity bullet point page 1; define "heavy pumper"; is that volume based upon acreage or by crop (alfalfa vs winegrapes etc)? Projects should be paid via a combination of Capital Project funding and operational charges for recurring operating expenses. 2. Equity bullet #2: monitoring wells, negotiating water charges framework, video logging wells (determining Zone Boundaries), extraction system monitoring etc. could be funded at last initially by a per acre charge, probably on irrigated lands. 3. Bullets page 2: deminimus pumpers: Yes and No to complete exemption. Lower base fee of their own is logical. 4. Pumping allowances: Set a base fixed amount, likely between 1 ac ft/acre/year and 1.25 ac ft/acre/year regardless of irrigated crop grown. Use economics as a tool to encourage water to move to most efficient use within Ag uses. 5. Standarized uses should be Paso Basin oriented. Battany study a good source for one at least. 6. Ramp downs: 10 years to complete, start in 5 at soonest. Need to see what Supplemental water is required. A given hopefully is current County Ordinance regarding new irrigated land is renewed for 5 years or GSAs choose a new approach (don't let it expire and start land development and well drilling rush to put us farther behind). 7. Ramp downs need to be equal until Zone boundaries are established with research. 8. Don't cap carryover or users will make sure to pump to avoid losing 9. County fine to be State Water Contractor IF they will take action to get it going. If not, get different entity motivated to get this going asap to know if it is a viable option supported by those who will pay for it. County record so far is too little, too late on Supplemental sources to Basin in general. 10. State Water contractor could be paid with usage charges and property tax in combination. Many examples statewide to select from	County of San Luis Obispo GSA	pasogcp.com	3/29/2019 12:10:00 PM	
Dana Merrill	Project and Management Actions - Concepts	Re: changes in Pumping Allowance from Ag to M and I: most non Ag uses including Manufacturing and Industrial (M and I) which was mentioned and conversion to urban housing or ranchettes can attract a higher financial return on pumped water than Agriculture, Even tree crops, wine grapes and vegetables cannot compete with non Ag buyers of water whether groundwater or supplemental sources. Agriculture needs to be appreciated when it comes to pricing water. Ag is a key economic contributor today helping to drive the strong local economy. It is possible go the way of southern CA and other regions that can converted to non Ag uses. That could happen is Paso Robles if the combination of cutbacks and high price supplemental water makes it an obvious choice to convert to non Ag uses. Plus pressure from the state to build more housing. Those with high priced water to sell will profit in the near term but the agricultural character will change dramatically from the present. The allure of Paso Robles is not only the town but its setting, led by it becoming a world class wine destination. So be careful about moving Ag water to M and I or other uses, as mentioned as an possible strategy, as our very unique character could be lost.	County of San Luis Obispo GSA	pasogcp.com	3/30/2019 6:12:00 PM	
Dan Penkauskas	Additional Comments	I really like the job you've done - good research and analysis of the current state and several proposed solutions with their costs worked out. I particularly like the proposed cost of water for growers - a nominal cost for the first 12", but sharply (10x?) higher for drafts over that. Some growers have very deep pockets indeed, and only draconian rates after the first 12" will encourage them to comply.Thank you.	County of San Luis Obispo GSA	pasogcp.com	4/5/2019 12:29:00 PM	
Allen Duckworth	Ch. 9 Projects and Management Actions Fact Sheet and Discussion Points 9.2 Discussion Points	It appears that the priorities of the Draft Projects Summaries are in reverse order. Even in a bad year, the Paso Robles Basin and surrounding water shed, receives more than enough good clean rain water to meet our needs so it makes no sense to let that water run down the Salinas River to the Pacific Ocean then purchase water from the unreliable State Water Project that could potentially contaminate our pristine basin. Water from the State Water Project should never be at the top of the list as they have already allocated way more water than they will ever have so we could never count on that water being available when most needed. The pipeline projects are very expensive,should require an Environmental Impact Report and would best serve a limited group of property owners. Such projects would not meet the stated goal of providing equity between who benefits from projects and who pays for projects therefore should only be considered by the individual water districts whose members would be the primary benefactors ratherthan being part of the GSP. Taking advantage of natural recharge methods such as installing check dams in natural percolation areas to redirect more runoff water into the basin would be much more cost effective and benefit a larger portion of the basin. One project that should be at or near the top of the list is enlarging the Salinas Dam because that could restore the Salinas River to the required, year around surface flow which would greatly increase the basin recharge. This project would be financially advantageous because it would be eligible for Proposition 1 grants as well as Federal funds from the RAIL act which will be redirecting money from the failed highspeed rail project to California water storage projects. Let's get our priorities straight and concentrate on providing a sustainable water supply for all the residents rather than a water banking opportunity for a selectgroup of investors. This DRAFT plan looks just like the Assembly Bill 2453 that nearly 80% of the area voters have already rejected. Please listen to the will of the people!	County of San Luis Obispo GSA	pasogcp.com	4/13/2019 1:03:00 PM	
Sheila Lyons	Ch. 9 Projects and Management Actions Fact Sheet and Discussion Points 9.1 Fact Sheet	Has consideration been given to charging cannabis projects for their ability to irrigate from the PR Basin? The state is apparently already doing this. With all the cannabis projects coming into North County this should be considered. See link to state charges: https://www.waterboards.ca.gov/resources/fees/water_rights/docs/fy1819_finalfeeschedulesummary.pdf	County of San Luis Obispo GSA	pasogcp.com	4/11/2019 3:47:00 PM	
Verna Jigour	Ch. 9 Projects and Management Actions Fact Sheet and Discussion Points 9.1 Fact Sheet	"Local Rivers/Streams" Localized recharge of rainfall runoff before it enters a stream or river is also possible. Restoring detention storage functions on *vast areas of rangelands in the watershed* could capture excess stormwater flows more efficiently than engineered structures. Restored native woody and perennial plants, their root systems and associated soil ecosystems, would capture and route more precipitation directly to groundwater right where it falls circumventing the need to capture and divert flood flows to human-maintained basins. [See RainfalltoGroundwater for elaboration.] This is not a small source, as suggested in the second paragraph under Local Rivers/Streams. Applied to the entire watershed/catchment, this is an enormous potential source, as I've strived to point out in my comments on your process.		pasogcp.com	4/15/2019 9:48:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Jerry Reaugh	Combined comments on Chapters 6, 7 & 8	The attached are my comments on Chapters 6,7,& 8. Regards, Jerry Reaugh	County of San Luis Obispo GSA	pasogcp.com	4/15/2019 11:52:00 AM	Link: 20190415_Reaugh
Sandi Matsumoto	Ch. 1001 Methodology for Identifying Potential Groundwater Dependent Ecosystem 1001.1000 N/A	Please specify what field verification methods (e.g., isotope analysis, enhanced shallow groundwater monitoring) will be used to definitively determine whether potential GDEs are true GDEs. It is highly advised that multiple depth to groundwater measurements are used to verify whether an iGDE (or NC dataset polygon) is connected to groundwater, so that fluctuations in the groundwater regime can be adequately represented. The analysis described on p.7 to create Figure B-3 only relies on Spring 2017 depth data, which is also after the Jan 1, 2015 SGMA benchmark date. Also, according to the shallow monitoring well data gaps described in Chapter 5 and 7, there is insufficient data to confidently remove data for NC polygons that are >5km away from a shallow well. See Attachment D of this letter for six best practices when using groundwater data to verify the NC dataset.The NC dataset needs to be ground truthed with aerial photography to screen for changes in land use that many not be reflected in the NC dataset (e.g., recent development, cultivated agricultural land, obvious human-made features). Grouping multiple GDE polygons into larger units by location (proximity to each other) and principal aquifer will simplify the process ofevaluating potential effects on GDE due to groundwater conditions under GSP Chapter 7: Sustainable Management Criteria. Groundwater conditions within GDEs should be briefly described within the portion of the Basin Setting Section where GDEs are being identified. Not all GDEs are created equal. Some GDEs may contain legally protected species or ecologically rich communities, whereas other GDEs may be highly degraded with little conservation value. Including a description of the types of species (protected status, native versus non-native), habitat, and environmental beneficial uses (Refer to Attachment C for a list of freshwater species found in the Paso Robles Subbasin and refer to Worksheet 2, p.74 of GDE Guidance Document) can be helpful in assigning an ecological value to the GDEs. Identifying an ecological value of each GDE can help prioritize limited resources when considering GDEs as well as prioritizing legally protected species or habitat that may need special consideration when setting sustainable management criteria. Decisions to remove, keep, or add polygons from the NC dataset into a basin GDE map should be based on best availablescience in a manner that promotes transparency and accountability with stakeholders. Any polygons that are removed, added, or kept should be inventoried in the submitted shapefile to DWR, and mapped in the plan. We recommend revising Figure 4-11, Appendix B, and including it in Chapter 5 to reflect this change.		pasogcp.com	4/15/2019 1:20:00 PM	
Gail Schoettler	Additional Comments	Steve Sinton has been critical to the development of the local groundwater plan for the Paso Robles Basin, which desperately needs such a plan. I have watched the groundwater level fall for decades and now, with all the vineyards in the area, the time is more important than ever to ensure that the Basin can sustain all the agricultural and domestic uses. Agencies involved need time to implement the plan and evaluate how it is working so they can make adjustments as necessary. Given the long drought in California, the plan should also ensure that water levels be given time to stabilize. It is imperative that existing wells not go dry, so please take this into account as well. If results are not good, localities need to be given the opportunity to fix the problems before the Basin takes charge.	Shandon San Juan GSA	pasogcp.com	4/15/2019 3:20:00 PM	
Greg Grewal	Additional Comments	See attachment on county rainfall data.		PBCC Meeting	4/24/2019	Link: 20190425_Grewal
Dick McKinley	City of Paso Robles GSA public hearing: Chapters 5-8	These are public comments from the City of Paso Robles GSA public hearing regarding Chapters 5-8. 1. Dale Gustin “Asked about the relationship of this draft GSP to the Steinbeck litigation. Noted that there has been a lot of rain in 2019, and if the GSP took that into account. The answer was given that the GSP was based on data prior to 2019 per DWR guidelines. 2. Gerry Stover “Asked about wastewater and was informed about the Recycled Water project currently underway, and the recent completion of the Tertiary Treatment portion of the Wastewater Treatment Plant.	City of Paso Robles GSA	Public Meeting; submitted via pasogcp.com	5/2/2019 9:07:00 AM	
William & Doris Land & Energy Co LLC	Additional Comments	Re: Sustainable Groundwater Management Act Ladies and Gentlemen: William & Doris Land & Energy Co., LLC is the owner of approximately 2,440 acres of open land in San Luis Obispo County identified as Assessor's Parcel Nos. 037-321-016 and 037-331-014. While that property has been irrigated with groundwater in the past, there has been no recent irrigation of the property. We have just become aware that the groundwater sustainability plan (the "GSP") being developed for the subbasin underlying our property under Sustainable Groundwater Management Act may deny our property the right to pump groundwater in the future because groundwater has not been applied to the property for a number of years. We write to express our strenuous opposition to any GSP that fails to recognize our overlying groundwater rights or our right to pump groundwater in the future. Precluding the exercise of our overlying rights simply because they have not recently been exercised would amount to an unconstitutional taking of those rights that could result in an enormous reduction in our land value. Should that occur, we would have no alternative but to bring an action for inverse condemnation and other claims to recover that lost value. We want to avoid that outcome. We therefore urge you to recognize the rights of our property and similarly situated lands to pump groundwater regardless of whether those rights have been recently exercised, and to not adopt any GSP that interferes with those rights or discriminates between currently irrigated land and land that has not recently been irrigated. Very Truly Yours, (signed) Manager		Letter to the County Board of Supervisors Office	5/8/2019	
Various Stakeholders	Additional Comments	Supervisor Peschong provides a summary of comments received from various stakeholders and community members.	County of San Luis Obispo GSA	PBCC Meeting	5/22/2019	Link: 20190522_Summary_of_Comments

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Submitted by Dick McKinley; comments by Dale Gustin, Gary Dunnican, Cody Furguson, and Patty Smith	City of Paso Robles GSA public hearing - comments on Chapters 9-12	Public comments on Chapters 9-12 from the 6/18/2019 Paso Robles City Council/GSA Meeting (See attachment). To view the agenda for this meeting, please click **here**.	City of Paso Robles GSA	City Council/GSA Meeting, submitted via pasogcp.com	6/19/2019 2:18:00 PM	Link: 20190620_PRCityCouncil
County of San Luis Obispo Department of Public Works	Additional Comments	See attached handout on the Paso Basin Aerial Groundwater Mapping Pilot Study distributed during the August 21, 2019 Paso Basin Cooperative Committee Meeting.		PBCC Meeting	8/21/2019	Link: 20190821_PilotStudy
Steve Lohr Jerry Reaugh Jerry Lohr	Additional Comments	See attached presentation received during the public comment period of the August 21, 2019 Paso Basin Cooperative Committee Meeting.		PBCC Meeting	8/21/2019	Link: 20190821_LohrReaugh
Sheila Lyons	Additional Comments	Many things seem to be missing from this plan. How are water sheds going to be handled? What if someone just outside the basin boundary puts in a well and pumps all they want? What if a lot is 1/2 in the basin and 1/2 out of the basin? There doesn't seem to be any recommendation for making use of the County's land use authority for assisting in managing the Basin. The County should review all land use polices for impact on the basin. Implementation of new policies could help with management. Disallowing new ag ponds? Cannabis farms? Another management tool that should be considered is a computer app requiring irrigators to coordinate watering times to limit the impact of well draw down happening all at once. Salinas Valley has such a system...strawberry growers initiated this...in their case it was due to salt water intrusion issues...but it could be used to manage pumping here in Paso Basin to protect rural residential wells adjacent to large ag operations. The growers must log on and reserve times for irrigating. This would seem like a good growing practice as well.	County of San Luis Obispo GSA	pasogcp.com	9/3/2019 11:10:00 AM	
Jerry Lohr	Additional Comments	I would like to submit the project map for the BVB Blended Water Backbone System. Regards, Jerry Lohr	County of San Luis Obispo GSA	pasogcp.com	9/27/2019 11:34:00 AM	Link: 20190927_Lohr3
Jerry Lohr	Additional Comments	On September 9th, my son Steve Lohr and myself met with Supervisors Peschong and Arnold along with Wade Horton and Courtney Howard. We discussed some of our ideas about how to move the Paso Robles Groundwater Subbasin towards sustainability. I was asked at that meeting to prepare a 1-page summary letter. Attached is that letter which was submitted to the Supervisors and the County. I would like to submit that letter to the Cooperative Committee as well. I am attaching the letter. In a subsequent Comment, I will be sending a copy of the Blended Water Backbone Project Map. Regards, Jerry Lohr	County of San Luis Obispo GSA	pasogcp.com	9/27/2019 11:26:00 AM	Link: 20190927_Lohr2
Jerry Lohr	Additional Comments	Please find attached my Comment Letter to the Cooperative Committee. Regards, Jerome J. Lohr	County of San Luis Obispo GSA	pasogcp.com	9/27/2019 10:50:00 AM	Link: 20190927_Lohr
Jerry Reaugh	Additional Comments	I am pleased to submit the attached comment letter to the CC. Regards, Jerry Reaugh	County of San Luis Obispo GSA	pasogcp.com	9/27/2019	Link:20190927_Reaugh
Sheila Lyons	Additional Comments	Many things seem to be missing from this plan. How are water sheds going to be handled? What if someone just outside the basin boundary puts in a well and pumps all they want? What if a lot is 1/2 in the basin and 1/2 out of the basin? There doesn't seem to be any recommendation for making use of the County's land use authority for assisting in managing the Basin. The County should review all land use polices for impact on the basin. Implementation of new policies could help with management. Disallowing new ag ponds? Cannabis farms? Another management tool that should be considered is a computer app requiring irrigators to coordinate watering times to limit the impact of well draw down happening all at once. Salinas Valley has such a system...strawberry growers initiated this...in their case it was due to salt water intrusion issues...but it could be used to manage pumping here in Paso Basin to protect rural residential wells adjacent to large ag operations. The growers must log on and reserve times for irrigating. This would seem like a good growing practice as well.	County of San Luis Obispo GSA	pasogcp.com	8/23/2019 11:10:00 AM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Steven Carter	Additional Comments	My family owns and operates a property that has been in irrigated agriculture since the late 1980's. The pumping water level in our well has not significantly dropped since we purchased the property in 2002. It seems evident however that there is a problem basin-wide with the over pumping of our groundwater. This was especially apparent during the recent drought years. I have attended many of the GSA meetings that have now culminated in the proposed GSP. I have been very disappointed in the lack of communication with the SLO County GSA which is supposed to represent my interest. While the individual County Supervisors have been available for one-on-one meetings, the GSA staff have had almost no outreach to the 'white-area' agricultural pumpers who represent more than 50% of the total water usage in the basin. Moreover, the County BOS went out of their way to prohibit the EPC Water District from acting as a GSA. This has essentially left the largest single group of Paso Robles basin water users, the very ones who will be impacted the most by the GSP, on the outside looking in. I believe that going forward, the basin should be managed as a single unit. If cutbacks in pumping are proposed as a method of bringing the basin into sustainability then they should be implemented basin wide. Any proposal that draws lines in the sand will only pit neighbor against neighbor and surely lead to wasteful litigation. As the GSP is being finalized and presumably adopted, for agriculturists life goes on. It is evident to me that I should plan on pumping less groundwater in the future and so have started transitioning my property from growing alfalfa to growing deciduous trees. This should result in a net savings of irrigation usage but at a considerable cost per acre. One of the costs by the way, was a fee paid to the SLO County Planning Department for permission to change irrigated crops. Still, with the proposed GSP, there are many unanswered questions and the following are a few that are of interest to me. What agency is going to monitor water usage and at what cost? Will credit be given to savings in water usage that are implemented before the GSP is adopted? Best management practices, BMP's, are mentioned but not specified. Will there be penalties for pumpers who don't follow BMP's? What is the fate of land owners who don't have historical water usage on their properties? What happens if there is a significant increase in de minimis groundwater users?	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 4:46:00 PM	
Dana Merrill	Additional Comments	Comments on GSP and the formation process	County of San Luis Obispo GSA	pasogcp.com	9/24/2019 3:01:00 PM	Link: 20190924_Merrill
Richard Woodland	Additional Comments	My name is Richard Woodland. I am a native of Paso Robles and have been involved in irrigated farming in or near Paso Robles for approximately 45 years. This farming has included alfalfa farming, where the Woodland Plazas I & II are located today, to current vineyard operations in the north county. First, I would like to thank SLO Co and the other GSAs for their extensive time and effort they have put into the current draft Groundwater Sustainability Plan. I understand the complexity of the situation as I was involved with and a part of the Upper San Gabriel Valley Municipal Water District in So. Calif. for approximately 30 years. I also understand that there may not be a perfect solution for all involved. What I am concerned about are several issues that appear to not have been addressed and are somewhat in the "kick the can down the road" mode. I am concerned that there is virtually no agriculture related representation nor inclusion in the various GSP meetings nor involvement in the draft policies. I am concerned that growth doesn't appear to have been considered regarding de minimis users. I am concerned that there does not appear to be a method for monitoring or policing water use. I am concerned that nothing has been addressed regarding the significant difference between those who use best farming practices, who are already addressing minimal water usage versus those who do no use the latest technology. Should there be a blanket reduction in water use, those who have invested in and have upgraded to the most modern practices stand to be hurt the most. I am really troubled in that San Luis Obispo Co., which is still an agricultural county, has no agricultural voice. There really needs to be at least 1 voting representative from the agriculture community. Thank you once again to the County of SLO and other GSAs for your hard work and dedication in this matter. The GSP will definitely impact everyone in the region and therefore should be represented by all facets of the region. Respectfully, Richard Woodland	City of Paso Robles GSA	pasogcp.com	9/24/2019 10:35:00 AM	
Dana Merrill	Additional Comments	Comments on GSP (see attached letter)	County of San Luis Obispo GSA	pasogcp.com	9/26/2019 2:47:00 PM	Link: 20190926_Merrill
Joe Irick	Additional Comments	Please see attached letter.	County of San Luis Obispo GSA	pasogcp.com	9/26/2019 10:42:00 AM	Link: 20190926_Irick
Fred Hoey	Additional Comments	Supervisor Peschong, & Angela Ruberto: I am sending the attached document as requested. Fred Hoey	County of San Luis Obispo GSA	via email	9/27/2019 0:00	Link: 20190927_Hoey

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Robin Chapman	Additional Comments	RE: Draft GSP Remarks on specific sections of Draft GSP: Definitions: ¨Best available science refers to the use of sufficient and credible information and data, specific to the decision being made ¦. that is consistent with scientific and engineering professional standards of practice. I hereby state unequivocally that Best Science Available was not implemented in determining the San Miguel Area of Severe Decline. The majority of the area thus designated is owned by the Galbraith family and the Galbraith Family Trust, and as a member of that family, I know that no information or data whatsoever was collected regarding well tests, historic water use and/or levels, nor any other information that would indicate decline. The Galbraith family has for years, and routinely continues, to test well levels, and test results show that standing water levels are identical today to those of 1969. I demand that the designation as an Area of Severe Decline be withdrawn unless and until sufficient and credible information and data proves otherwise. Section 3.4 SLO Co. Ag Commissioners office is not fully aware of crop production in the county. The following categories need to be added to Irrigated Crop list: 1) Rotation crops 2) Irrigated grain 3.4.2 I am baffled by the assertion that Most industrial use is associated with agriculture and is lumped into the ag water use sector. What? There are scores of manufacturers and industries in the Subbasin, including within and around the city of Paso Robles, that have nothing to do with agriculture. Examples are: *Firestone Brewing *JIT Companies *Custom Tube and Manufacturing Inc *Trelleborg * Hogue Tool and Machine Industrial use and manufacturing are different than, and should be listed separately from, Agriculture.	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	
Robin Chapman (continued)	Additional Comments	Section 3.6.2 States that USGS has only one (1) water sample and that sampling frequency is unknown. This source is too vague to be used when deciding policy. Section 3.6.4 ETo information rates have been gathered from Atascadero, a site which is not in the Paso Robles Subbasin, and therefore possibly irrelevant. Section 3.10.2 Quotes SLO County General Plan : ¦ as countywide growth declines¦ Is this a mistake? Humans show no trend toward stabilizing their population growth, and SLO County will likewise have its share of population increase. Should it read as the rate of growth declines? Section 7.1.4 Monitoring networks are limited to locations with data that are publicly available and not under confidentiality agreements. Actually, none of the well monitoring information has been available. In attempting to pinpoint the locations of the listed monitoring wells, my inquiries elicited from County staff the explanation that most, or all, of the privately owned wells had confidentiality agreements, and thus no information about them could be shared. It was no easier to obtain information about public wells. After an unusually helpful member of county staff showed me an aerial view of the wells that were used to create the San Miguel Area of Severe Decline, that person was warned by the division supervisor not to provide me with any more information. If well data, or any other information, is used to make public policy, the public has a right to that information. Section 7.1.2 ¦ quantity and density of monitoring sites ¦ shall be sufficient to evaluate conditions of the Subbasin setting ¦ The number of monitoring wells is way too small to characterize such a large area. Section 7.2 SLOFCWCD removed 130 wells from its monitoring program because of privacy agreements. So how many wells remain in the monitoring program? Where are they located?	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Robin Chapman (continued)	Additional Comments	Section 7.2.1 Data gaps will be addressed during implementation ¦ When? How? By whom? How will it be guaranteed that data gathering and analysis is done by conscientious and informed personnel? One alluvial well is not enough ¦ If one well is not enough to represent alluvial aquifer(s), how can one be enough to monitor groundwater flow directions? How many more wells do you anticipate adding? When, and where? Section 7.2.2 Galbraith Family Farm should be monitored as an area of rapid recharge. Section 7.3 It is hard to judge from the scale of the illustration, but monitoring well 25S/12E-16K05 appears to be an alluvial aquifer well. Section 7.3.1 Data gap will be addressed by whom, when? How will it be guaranteed that data gathering and analysis is done by conscientious and informed personnel? Section 7.4.1 I dispute that there are no spatial data gaps in the network . The highest density of monitoring wells in any area of the Subbasin is three (3)! That leaves a lot of territory either underrepresented or not monitored at all. Section 7.6 More monitoring is needed than the one currently acceptable well. Section 8 The criteria defining .. is pretty vague.	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	
Robin Chapman (continued)	Additional Comments	Section 8.1 Management Area refers to an area within a basin for which the Plan may identify different minimum thresholds, measurable objectives, monitoring, or projects and management actions based on differences in water use sector, water source type, geology, aquifer characteristics, ¦ or other factors. I suggest that the SM Area of Severe Decline be re-evaluated under this clause. Section 8.1 Shouldnt this sectioned be numbered 8.2, and all following sections be amended accordingly? Section 8.1 Conceptual Projects NWP delivery at confluence of the Salinas and Estrella Rivers. My husbands family has owned this specific property for the past 54 years. These are the facts about this location: 1)NO ONE has approached the Galbraith Family about situating any project on their property. 2)Said property is in one of the highest recharge areas in the Subbasin, and has never had a shortage of water, and therefore no need, for supplemental water. This project was supposedly vetted through an outreach program. Nobody reached out to the landowner. Table 8.1 The shallowest well listed is at 490 feet. Galbraith Family Farm stands at, and has historically stood at, 157 feet. Does that sound like an area of severe decline? Section 8.3.4.4 States that should it determined that water quality is degraded, measures will be taken to avoid any undesirable effect. If water is found to be degraded, it is too late to AVOID. The correct term is mitigated. Ditto on the paragraphs mentioning subsidence and impacts on the Upper Valley Subbasin (8.3.4.5).	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Robin Chapman (continued)	Additional Comments	Section 8.3.4.6 Domestic land uses and users ¦ limited water in some of the shallowest domestic wells may require owners to drill deeper wells. I strongly feel that property owners whose private wells are depleted through no fault of their own should not have to bear the financial burden of drilling a new well. Where it can be shown that irrigation of crops in areas that were previously dry-farmed, or never farmed at all, contributed to depletion of a pre-existing well, surrounding irrigators should either have to supply property owners with water or provide funds for a new well. Policies allowing offsets of existing use to allow new construction ¦. If we assume that the PR Subbasin is in decline (which is the foundation of this Plan, is it not?) then offsets will not reduce groundwater depletion. Offsets do nothing more than maintain the status quo, which equals a continuing cycle of overdraft. Limitations should be imposed on users of great quantities of groundwater before de minimus users are required to cut water use. Section 8.3.5.2 The first sentence doesnt make sense to me. Is it the intention to say a DEFINITION of an undesirable result ¦? The word unanticipated should be deleted after extensive and before drought. Anticipated drought wouldnt be a potential cause of undesirable results? Section 8.6.1 ¦ in groundwater concentrations well above an established ¦ I think well above needs clarification. Section 8.6.2 Shouldnt criteria for constituents of concern be numbered 1 and 2, not 3 and 4? Why must a constituent of concern have already been above a level of concern? Doesnt this omit constituents that were previously present, but have since risen to a level of concern? Likewise with newly detected or newly declared constituents. Unacceptable levels or constituents that are identified in future should be included in this list.	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	
Robin Chapman (continued)	Additional Comments	Why are already-contaminated wells exempt from the current thresholds? Section 8.6.4.2 Groundwater recharge: Shouldnt this read active recharge with imported or ¦? Section 8.7.1 The last sentence in Land Subsidence should read Land subsidence is an inelastic ¦ Section 8.7.2.1 The margin of error is equivalent to one-half of the subsidence allowance. That doesnt instill a lot of confidence. Section 8.7.4.2 Couldnt continued pumping also be a potential cause of undesirable results? Section 9.1 ¦ to make new water supplies available ¦ There are no new water supplies. There is only as much water as there is. Expecting to receive water from out of the area reflects a lack of knowledge of the consequences to habitats deprived of their natural amounts of precipitation, stream flow, storage, etc. Section 9.2 There is a strong need for adequate information to justify area specific management actions. See comments on Sect. 8.1. Section 9.3.1.5 SMGA regulations require identification of data gaps and a plan for filling them. I have previously stated and currently maintain that there are too few wells enlisted in the monitoring program. I have never received an explanation why only wells with pedigrees are allowed in the program. Isnt there valuable information that could be gathered from wells whose dates of drilling are unknown, whose depth and perforations are not recorded? What have these things to do with monitoring well levels? Section 9.3.1.9 - Can public noticing in this and all other chapters please be changed to public notification?	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Robin Chapman (continued)	Additional Comments	Section 9.3.4 Voluntary fallowing I strongly support the creation of a Place Holder category for growers whom have had a hiatus in irrigation. It should be taken into account that the entire time such growers have suspended or reduced irrigation, they have been conserving groundwater. They should be rewarded, not punished. Historic land use and water rights should be duly considered. Section 9.4.1 Mandatory pumping limitations Rather than an across-the-board pumping reduction of 18%, I adamantly feel that groundwater extractors that planted thousands of acres of land that were previously never irrigated have exacerbated the groundwater situation and therefore should bear the brunt of any extraction decrease. It simply is not fair or right to strip growers with long-established irrigation rights of their means of livelihood. Therefore, perhaps a 20% decrease should be mandated for said properties, with re-evalution in two years. Section 9.5 Projects 1)Household and industrial waste dumps pollutants in the city waste water system that may make use of recycled water undesirable. 2)State water is completely allocated 3)Nacimiento water is completely allocated 4)The city of San Luis Obispo has the rights to more water than the dam currently holds. The city has already stated that it will not give up any of its current capacity to any other entity. The possibility of raising the level of the dam is, at best, remote. 5)Again, the pollutant issue 6)Diversions from any river, creek, stream, etc., requires DWR and CEQA approval Section 9.5.2.2 Pollutants, including salts and heavy metals, and their effects on targeted properties,must be assessed. How do landowners along Huer Huero Creek feel about this proposed discharge? Figure 9-2 Who owns the properties on which the proposed pipeline would pass? Are these owners compliant with this proposal?	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	
Robin Chapman (continued)	Additional Comments	How many growers would stand to benefit from this project? Who are they? Who would be required to pay for this pipeline and delivery system? Section 9.5.2.3 See comments under 9.5.2.2 Section 9.5.2.3.3 The information provided by only one monitoring well is entirely insufficient to base any action or project on. In particular, continued unsustainable groundwater level declines in monitoring well 25S/12E-16K05 will trigger implementation of this project. If it is known that a specific well is already pumping at an unsustainable rate, shut that well down. Dont put the onus on landowners and wells that have not demonstrated decline. It is completely unfair, unwarranted, and unprofessional to weight one location with ultimate decision-making status while all other data. If a data gap exists at such a location, then responsibility and diligence dictate that gaps be filled and analyzed before any action or project is considered. Funding for projects If pumping reductions are inadequate for achieving sustainability, funds raised by a water charge framework will be used to initiate projects throughout the Subbasin. Why should everyone have to pay into a fund that benefits only a few growers who most likely are the very extractors who hastened the current groundwater situation? This is welfare for the rich. Section 9.5.2.3.5 Costs can be covered by the bonding capacity¦ assumes that a public entity is willing to take on debt, and that voters are willing to approve that debt for the benefit of two or three water extractors. This is not holding unsustainable extractors accountable and is fobbing off their egregious water use on the community at large. Again, welfare for the rich at the expense of the entire populace.	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Robin Chapman (continued)	Additional Comments	Section 9.5.2.4 Project 3 This project has not been discussed or approved by the landowner, and benefits only one grower. I reiterate: NWP water is completely allotted There are too few monitoring wells to initiate action or projects The burden of finance should be distributed among only the beneficiaries of any such action or project Section 9.5.2.4.3 There are only three (3) monitoring wells that would trigger an expensive project that would benefit only a few individuals. Who owns wells 25S/12E-16K05, 25S/12E-26L01, and 25S/13E-08L02? Why should they be important enough to trigger a publicly funded project? Again, there is no unallocated NWP water. Sections 9.5.2.5; 9.5.2.6.3; 9.5.2.7; 9.5.2.7.3 Refer to previous comments beginning with Section 9.1 Section 9.6.2 improving should be changed to improve. Section 9.6.3 Export of water or water credits should be allowed only to contiguous or near-contiguous sites. Figure 10-1 What is JPA? Section 10.2 In paragraph 2, ¦. implementation ¦ between the four ¦ should read among the four.	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	
Robin Chapman (continued)	Additional Comments	Summation 1) Initial groundwater pumping limitations should fall on properties on which the irrigated crops were planted on previously non-irrigated land. 2) There are too few monitoring wells throughout the Subbasin to be representative of groundwater levels in any given area. 3) De minimus wells that are negatively affected by nearby extraction for the purpose of irrigating previously dry-farmed or never farmed land should have those negative effects mitigated by the causative extractors. 4) There needs to be a minimum of ten wells per area for the purposes of monitoring groundwater levels, extraction limits, and the initiation of projects. If necessary, change the criteria for inclusion in the monitoring program. Projects that benefit only a few growers should not be at the expense of the entire Subbasin	County of San Luis Obispo GSA	pasogcp.com	9/29/2019 2:55:00 PM	
Randy Record	Additional Comments	Good morning, My family and I have owned a wine grape vineyard in San Miguel since 2007. I have been actively involved in attempting to address the groundwater overdraft in the region. I am very concerned with the proposed Groundwater Sustainability Plan (GSP), particularly with the exclusion of irrigated agriculture. It is imperative that the Estrella-El Pomar-Creston Water District (EPA WD) be allowed to provide meaningful input and a voting position within the GSP. It is inconceivable that irrigated ag will be required to curtail groundwater pumping without the opportunity to provide input in the process and decision making. Thank you for your consideration and action.	County of San Luis Obispo GSA	pasogcp.com	9/28/2019 11:07:00 AM	
Patricia Wilmore	Additional Comments	The comments below are submitted on behalf of the Paso Robles Wine Country Alliance (PRWCA). *Please note: Although our offices are in the City of Paso Robles, our comments are made primarily on behalf of our members in the County of San Luis Obispo's Groundwater Sustainability Agency (GSA). Our organization is a 501 c 6 non-profit trade association of some 500 members representing winery, grower, hospitality and related businesses in Paso Robles Wine Country. Many of these members conduct business, growing grapes, making wine and/or providing hospitality, over the Paso Robles Groundwater Basin. While we have provided comments along the way as the draft chapters have been made available, we would like now to provide general comments about the process and its outcome. These comments include some concerns that we hope will be addressed as soon as possible within the first five year implementation period. Looking Back: 1. The irrigated agricultural community, most of whom are our members and who are the largest users over the basin, were not given an opportunity for focused stakeholder input. At the initial Information Meeting, 4/23/18, our Government Affairs Coordinator, Patricia Wilmore, requested that this be addressed. In a subsequent Cooperative Committee Meeting, 7/25/18, the request was made again. The Chair suggested this should be discussed; however, the County's GSA representative dismissed the idea out of hand. No specific outreach to the Ag community, the primary users, was done thereafter despite requests. 2. The document lacks specifics about how decisions will be made in the future. It's not clear how and when the GSP implementation process will begin and who will run it. It has been suggested that the task will fall to County Public Works staff. Do they have sufficient bandwidth to do so?	County of San Luis Obispo GSA	pasogcp.com	9/28/2019 10:39:00 AM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
		[illegible] suggested that the task will fall to County Public Works staff. Do they have sufficient bandwidth to do so? 3. This lack of detail results in a high level of uncertainty for business planning purposes for our members and others. 4. Best Management Practices (BMPs) are mentioned with few specifics BMPs can be very effective in reducing groundwater pumping. Our stakeholders were (and are) willing provide details on this but were not consulted. 5. We continue to be concerned about the rewrite of Chapter 9, Projects and Management Actions. This section says little about meaningful projects that could be pursued and does not emphasize project-development work that is already taking place. It does not state how the GSAs will promote viable development projects moving forward. Looking Ahead: 1. Provide for the active involvement of the Agricultural Community in the implementation of the GSP. 2. Explain how the GSAs will pursue the construction of water projects that can generate significant and usable water. 3. Clearly define the process by which groundwater pumping allocations will be determined. In conclusion, we appreciate the work that has gone into the GSP thus far and acknowledge the challenges that lie ahead. Our members are willing to be an active part of this process and hope for meaningful inclusion as we move forward.				
Laurie Gage	Additional Comments	TO: The Paso Basin Cooperative Committee RE: Comments to be considered for the final draft of the PBCC As a landowner in the Paso Robles Groundwater Basin and having been involved with water issues in the Basin since 2013, I have been following the development of the SGMA-directed Groundwater Sustainability Plan with interest and some concerns. My Groundwater Sustainability Agency is the San Luis Obispo County Flood Control District and I have been disappointed by the degree to which my GSA has not developed a serious outreach program to all overliers to engage them in serious conversation about the Plan. Apart from some very sparsely noticed and attended early meetings, there has been no visible effort on the part of the County to let the people they represent in the process know about what is going on. I speak with many people on a daily basis who have NO idea that there is anything happening in the Basin at all, let alone be concerned about and have the opportunity to provide input. The County has put the Paso Basin Cooperative Committee meetings up as the resource for landowners to engage in the process, and that is well and good, as long as a landowner even knows about the Plan and the PBCC to begin with. But due to the lack of outreach by the GSA, many sit in ignorance yet will feel the effects of the Plan for years to come. Additionally, the Plan to date is fairly vague not in the concepts of sustainability, but in the details on how achieving sustainability will take place. The implementation of the Plan is the proverbial can getting kicked down the road, and the responsibility will fall to a consortium of the GSAs. If my GSAs actions, or lack thereof, to date are any example, then I fear that there will be more can kicking with no effort to obtain supplemental water through recycled and Nacimiento water, aquifer recharge or other projects. The only solution then that I expect to be offered by my GSA is that of cutbacks across the board and while I am not an irrigator, I fear what impacts across-the-board cutbacks may have on not just the agricultural irrigators, but all the collateral industries and services that intertwine with the agricultural industry: fuel providers, equipment operators, ag employment services, mechanics and so on, filtering on down to the impacts on the businesses and services that support those impacted in the first tier. Currently, the only GSA with an agricultural voice represents only a portion of the agricultural use in the Basin, yet irrigated agriculture accounts for something close to 90% of the pumping in the Basin. I would like to see a voice for irrigated agriculture included in the implementation group as an equal participant with the existing four GSA members. Without that input, irrigated agriculture may not have the opportunity to help formulate consistent policies and approaches to reaching sustainability that allow for reasonable constraints which then allow for business planning and protect the complex economic structure that currently benefits all in the Basin, while working towards the protection sustainability offers us all. I feel that my GSA has not fully represented my interests in developing the current Plan due to their lack of serious intent to reach ALL the landowners they represent and gather them in for their input. Our Basin is a complex combination of irrigated agriculture, dryland farming, ranching, and residential interests, and a few active and loud voices have steered our GSAs approach to the Plan and have had no compensating voice of the rest of the people in our GSAs area because our GSA has made a very scanty effort to include us all. Thank you. Laurie Gage	County of San Luis Obispo GSA	pasogcp.com	9/27/2019 3:30:00 PM	

Public Comments received through 9/29/2019
to be considered while compiling the Draft GSP for the Paso Basin

Name	Chapter & Section	Comment	GSA	Comment Source	Date/Time	Attachment(s)
Debra Dommen	Additional Comments	First, Id like to thank the San Luis Obispo Board of Supervisors for their efforts in drafting the Groundwater Sustainability Plan (GSP). We farm over 1,000 acres of vineyard in San Luis Obispo County and take our responsibility for water conservation seriously. Over the past year we have tracked a 15.8% improvement in water efficiency, and this is just one year. We acknowledge and support that it is the responsibility of all groundwater users in the basin to work together to eliminate the overdraft of water and establish long term sustainability. To that end, the GSP absolutely must involve the agricultural community in the implementation of the plan. This has not been accomplished to date. We recognize that groundwater pumping allocations will come, however it is imperative that the process by which these allocations are determined be clearly outlined in the GSP. As above, it is important that there be a meaningful dialog with the agricultural community and that we have input into the process of determining those allocations. It is essential that the GSP provide an effective monitoring and enforcement program. The draft GSP states that non-dinimis must use a water measuring method satisfactory to the GSAs but does not comment on enforcement. Metering need to be required to ensure accurate monitoring and violations must be enforced. Thank you for taking our comments into consideration and we look forward to being part of the dialog.	County of San Luis Obispo GSA	pasogcp.com	9/27/2019 15:30	
Joe Plummer	Additional Comments	I am concerned that the aquifer, itself, may be mis-represented by the well data and aquifer levels developed from same. For a number of years, I have asked that my irrigation well data from my well (drilled in 2006) be included in the model. County have regularly measured water levels since 2012 have seen very little decline in water table, even though this well sets in the area shown by model in the "-40 to -60 ft decline" zone.	County of San Luis Obispo GSA	pasogcp.com	9/25/2019 2:10:00 PM	