



VITICULTURAL MANAGEMENT INC.

Paso Robles Groundwater Cooperative Committee

September 26, 2019

Dear Committee Members:

A great thank you is in order to the Paso Robles Subbasin representatives and other GSA's for the tremendous amount of work that has been put in to drafting the GSA. Creston Valley Vineyards has been a local SIP Certified grower in this community for over 20 years and active member in the Estrella-El Pomar-Creston Water District (EPC WD). As a SIP Certified vineyard, water conservation is of the utmost importance. Pumping reports are submitted annually and succession plans are made for future use. Along with the rest of the Agriculture community, we find it is the responsibility of all groundwater users in the basin to help eliminate the overdraft and ensure long-term groundwater sustainability. The purpose of this letter is to suggest possible improvements to the GSP that will increase its effectiveness, increase the likelihood that the Department of Water Resources will approve the GSP, and reduce the risk of a future groundwater adjudication. Thank you in advance for reading through the following comments and suggestions.

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.



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In closing, it is our hope here to help better develop the drafted GSP so that all parties involved may have appropriate representation. If there are any questions or points that need clarifying, we would be more than happy to continue this dialogue. All of your efforts are greatly appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Collins', with a long horizontal flourish extending to the right.

Carter Collins
General Manager
Creston Valley Vineyards



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Carter Collins
General Manager
Paso Robles Vineyards, Inc.



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General Manager
Collins Vineyard Inc.