Comments on Paso Robles Basin GSP 9/26/19

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The GSP process has a number of structural deficiencies which put agricultural landowners at a severe disadvantage that is disproportionate to their needs and use of groundwater. Economically viable agricultural is by necessity in the Paso Robles Basin "irrigated"; dryland agriculture cannot produce sufficient economic return. Irrigated lands can and often do generate significant income to owners, operators, cities and government entities. Pumping cutbacks will impact that income without sound strategies.

The GSP in process is to heavily dependent on cuts to agricultural pumpers and barely mentions projects for supplemental water. This despite the fact that property owners have paid to reserve rights to State Water for many years, have had rights to Lake Nacimiento water which to date has been allocated by the County to urban entities nearly exclusively and while other projects such as raising the San Luis Reservoir on the upper Salinas River have been mentioned, little in the way of progress has been made to actually take action to obtain its water. The newest positive development comes from private efforts by landowners interacting with the City of Paso Robles to utilize its recycled water, which may include blending with Nacimiento water that will further extend the supply as well as mitigate quality issues with the source if used as in lieu agricultural pumping. It has been frustrating to see no County Water Resources efforts to get projects going and even more frustrating to see some of our Boards of Supervisors actually seek to shut down efforts to form water districts, who have pledged funding as well, to take on the job.

At this point the GSP may be within months of being completed, subject to be approved by the four GSAs and submitted to the State. Whether it is sufficiently robust to be approved is anyone's guess at this point and the SGMA law is so new, there is no historical standard of actual approval. Reading through hundreds of pages it is clear that there is much work to do in future years even with approval. A few that come to mind :

1. Increase the number of observation and monitoring wells: A number of the wells listed are very shallow by today's standards and are unlikely to be viable and still being used a decade from now. Dedicated, smaller diameter wells used only for monitoring and not commercial pumping has been mentioned for years by County Water Resources, yet none to my knowledge have ever been drilled. Follow up on areas with data gap, many of us have worked to help sign up production wells that could contribute data without delay.

2. Subareas are poorly understood and undefined generally. Just where are the boundaries if it may be that pumping limits are to be imposed that are not equal across the entire basin?

3. Political decisions have impacted pumping. The original emergency ordinance dating back to 2012 introduced government action as a major force in the process. In the intervening years, times when the ordinance lapsed saw significant new irrigated lands developed by landowners

fearful that it was the last chance to do so. This essentially set aside supply and demand forces for irrigate crop development and made reacting to government policy the main motivator

4. The GSP has had no economic analysis component which would examine what our economy could pay for supplemental water and could help establish where the cost becomes simply higher than what economic return is generated. The economic impact extends far beyond the specific irrigators' interests as many other industries ranging from equipment sales to tourism to property and sales taxes will be impacted by pumping cutbacks. Cutbacks may have to be part of the resolution but their impact should be quantified economically.

5. The future must have more inclusion of those stakeholders left out of the process thus far. That includes most of the irrigated agricultural community. There was not one meeting held in the County GSA for the benefit of its landowners or irrigators. Other required meetings of the multiple GSAs and the comment period at the beginning of County supervisor meetings were judged adequate. This approach leaves out those impacted the most and calls into question how successful a GSP can be if the majority of the pumpers had no role in the process. It also leaves out significant expertise in water related matters that our world class agriculturists would bring to the table.

6. A word must be said about irrational fear of conspiracies by many in charge of the process. Ranging from fear of water export (which is banned by regulation and the GSP law itself in the Paso Robles Basin) has hurt chances for a positive, collaborative approach among stakeholders. This needs resolution beyond simply banishing a majority of agricultural pumpers from the process as has been done thus far. Encouraging "buy in" is what is needed, not expulsion from the process, for SGMA to be effective.

7. Creativity in solutions needs to be expanded. Incentivize short term and long term fallowing that allows individual landowners to utilize and mechanisms for their compensation for doing so. Utilize market forces so that low economic return discourages use while it encourages conservation and efficient use. Remove requirements to irrigate in order to maintain pumping rights which is still in effect as a regulation. If it costs more to irrigate a higher use crop, then let the farmer decide whether it is economically justified, do not ask more efficient water use crops to subsidize those that require more irrigation.

8. State Water Bulletins dating back to the early 1950's identified the likely need for supplemental water. In many respects, we actually have required less water that was projected in those years. Water use was projected to exceed 200,000 acre feet per year in the combined Paso Robles and Atascadero Basin and we have pumped less than half that annual total it appears. It is fortunate as it turned out but the fact that the area was projected to develop economically on many fronts led to forecasts of more water supply needs. It was not a surprise that water use increased.

Although I can go on listing deficiencies in the GSP and its process, the job remains to be done. If we have the cumulative will to succeed and work more collaboratively in the future, we can find a way to

balance our Basin. Hopefully a new start can be made in 2020 for more inclusion and collaboration. If not, it is hard to see how our SGMA effort will ultimately be successful.