

September 24, 2019

TO: The Paso Basin Cooperative Committee

RE: Comments to be considered for the final draft of the PBCC

My family has been a landowner in the Paso Robles Groundwater Basin for over a decade. We have been closely following the development of the SGMA-directed Groundwater Sustainability Plan.

The irrigated agricultural community has been largely excluded from the process. The County GSA represents 66% of irrigated agriculture and the County GSA has completely failed its responsibility to seek agriculture's involvement in the GSP Process. The County failed to create any sort of ag advisory position in their GSP process. The County has not held a single outreach meeting with the Ag community. County officials have attended none of the EPC WD meetings and very few if any of the SSJ WD meetings. Also, the County has targeted and specifically excluded the EPC WD from participating directly in the GSP. Irrigated Ag needs a "seat at the table".

The GSP is a weak document that defers meaningful actions and decisions to the future. It's not clear how and when the GSP implementation process will begin and who will run it. There is no sense of urgency. Do we want the Subbasin continue to decline as we ponder what to do?

There is no clear management framework for how implementation decisions are going to be made. Who gets to vote? Who gets to veto? Who gets to cutback pumping?

Pumping cutbacks are coming but we don't know where, when, or how much. Predictable and stable rules are essential for farmers to plan and make informed decisions.

The GSP provides little direction on how users in the Subbasin are going to reduce groundwater pumping and/or pursue additional sources of new water. It seems that projects are left for folks other than our water authorities to do. Why have these agencies if they are unwilling to do anything?

There seems to be no urgency in pursuing and gathering the essential data necessary for informed decisions about basin management.

Best regards,

Anthony Riboli

- Riboli Family of San Antonio Winery

The GSP needs to have strong monitoring, reporting and enforcement regulations. Reporting of groundwater pumping should be measured by water meters, should be mandatory and should start immediately.

De minimis users are largely give a pass in the GSP. However, the GSP should address how to prevent unlimited growth of this class of pumpers and require this group to acquire their own sources of water.