



Planning Commission

Alex Villicana, 1st District

Michael Multari, 2nd District

Kristina Simpson-Spearman, 3rd District

Philip Henry, III, 4th District

Don Campbell, 5th District

MEMORANDUM

DATE: October 27, 2022
TO: Board of Supervisors, County of San Luis Obispo
FROM: Planning Commission, County of San Luis Obispo
SUBJECT: PBLUMA Planting Ordinance – Planning Commission Recommendation

The Planning Commission recommends the Board of Supervisors not adopt the proposed planting ordinance or proposed General Plan Amendments and instead extend the existing offset ordinance until January 1, 2028 or until a milestone tied to the sustainable management criteria of the Groundwater Sustainability Plan is achieved. This recommendation is based on the following reasons:

- The existing Paso Basin is currently in serious overdraft and not sustainable and the planting ordinance would exacerbate the existing overdraft.
- The proposed planting ordinance is opposed by the agricultural community and resource agencies.
- While the objectives of the Planting Ordinance are worthy, the proposed planting ordinance doesn't achieve them. The Groundwater Sustainability Plan, which has been prepared and submitted to the State, is the more equitable and appropriate means to achieve sustainability and equitable distribution of groundwater resources.
- Since the Board directed Staff to develop the planting ordinance, the County has hired a Groundwater Sustainability Director and received a \$7.6M grant funding to implement the Groundwater Sustainability Plan.
- The benefits of the proposed planting ordinance do not outweigh the significant unavoidable impacts identified in the Environmental Impact Report.

- The proposed planting ordinance could make it more difficult for smaller agriculturalists, rural residents, and other groundwater users if the groundwater supply is further stressed by the 25 AFY exemption.
- The proposed planting ordinance and Environmental Impact Report mitigation measures impose financial burdens, are inflexible, and are economically onerous for agricultural operations.
- Increased groundwater extractions facilitated by the proposed planting ordinance risk the State Water Resources Control Board taking over the Groundwater Sustainability Plan process if sustainability is not achieved.
- The proposed planting ordinance does not support a healthy and competitive agricultural industry because it creates an unfair burden on PBLUMA agricultural operations, compared to rest of the county and the State.
- The proposed planting ordinance reduces the flexibility needed to achieve efficient agricultural operations.