

DRAFT COMMENTS ON 2014-2016 RESOURCE SUMMARY REPORT

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First a general observation. It is understandable that this report must be based on data, and that seems to be derived from groundwater basins that have suppliers with access to data. However the ag ponds issue currently under deliberation shows that geographically diffuse well access to fractured bedrock resources should be addressed as a matter of concern. I would like to see an analysis of the cumulative impact to wells on the west side of Templeton examined in view of the deficiencies revealed during the recent drought. I have no idea if this could be accomplished in areas not covered by GWMA.

Table II-3, p.30

Failure to implement universal stress tests noted

Table II-10, p.42 San Simeon Area

Safe Yield is 130AFY, which would be preferable to using 140 AFY

*From NCAP... The theoretical buildout of San Simeon Acres, based on the maximum densities allowed by the residential land use provisions in the Land Use Element, is 1,229 people. This assumes that public service constraints can be resolved, and the resource protection requirements of the LCP can be met by such development. The necessary water supply to support this population would be 160 acre-feet per year. Total build-out of both visitor-serving uses and residential growth will consequently create a substantial deficit over the allowed withdrawal of 140 acre-feet per year and the **safe yield of 130 acre-feet per year.***

Table II-11, p.44 Cambria Area

The "Other Surface Supplies" is purely speculative, and therefore should not be used in LOS calculations. Based on footnote 5, only the desalinization would seem to be a valid "other".

Table II-12, p. 48 Cayucos Area

Where does the 555 afy of "Other GW Resources" come from, the number seemingly chosen to bring agreement with 20 year demand? The bulk of the watershed is Franciscan mélange, a very poor aquifer.

Footnote 2 can't be found on the table itself. I can't reconcile the numbers in the footnote with anything on the table .. needs explanation

Table II-14 p.58 Avila Beach Area

There is no mention of the dependence on SLO treatment plant discharge to maintain flow, and hence recharge in the Avila Valley sub basin.

If agriculture is getting its groundwater from the basins (970/0/uncertain) where are the 2,496 of other GW supplies located? Is the number contrived to match 3,466 30 year demand?) ag build-out demand (2,496 + 970 = 3,466)

Table II-16 p.63 NCMA

Why is just Oceano CSD here. Table II-15 shows other participants in groundwater allocation, with a total of 4,000 AFY. Footnote 7 seems to include the 4,000 AFY number

Footnote 7. *Safe yield of 9,500 AFY with subdivisions for applied irrigation (5,300 AFY), subsurface outflow to the ocean (200 AFY), and urban use (4,000 AFY). The 2002 Groundwater Management Agreement safe yield allotment for urban use is broken down per the numbers shown.*

Safe yield should refer to the safe extractables (5,300 +4,000 = 9,300 AFY) and should not include the 200 AFY that must be left in the ground. Where does the 4,000 AFY urban use fit on the chart? It is apparently the total allocated groundwater to all of NCMA, as shown in Table II-15 ,P.61).

Table II-16 p.66 NMMA

I concur with comments made by Jim Garing. The groundwater supply for agriculture includes 11,931 AFY of "Other GW Supplies". What is the connection of the San Luis Valley GW Basin to agricultural water use in the Nipomo Mesa Mgmt Area. (809 AFY). Garing's comments on the low ball estimate of NMMA overdraft numbers appear t be valid.

Table II-18 p.69 Santa Margarita Area

Why is the Hopkins study not considered valid enough to set the safe yield at 400-600 AFY? Instead the statement of uncertainty regarding safe yield seems to be avoidance of the necessity to declare serous concerns regarding LOS.

How is Santa Margarita Ranch demand of 1,621 AFY divided between urban and ag, and is this possibly repeating some of the 1,640 AFY of agricultural demand?

The groundwater supply for agriculture includes 1,762 AFY of "Other GW Supplies". The number seems to have been chosen to round up agricultural supply to 2,202 AFY, the 20 year demand, with no justification for the specificity of the number, particularly with potential conflicts between ag and urban demand in Santa Margarita. Use of a specific number such as 1,762 is stranger because Footnote 7 states "*It is uncertain which basins are used and the quantity of water pumped from each basin. Future studies should invest the resources to quantify the location of and use within each basin.*"

Why are the Rinconada and Pozo Basins included here when they are not connected by anything more than a highway.

Table II-19 p.75 Paso Robles Basin

Why is the sum of the 2015/2016 demand less than that used in the groundwater model (84,124.5 vs 93,100 AFY)?

The section on Future Year Simulations on p. 73 needs clarification. In “No-Growth” it is stated that outflow exceeds inflow by an annual 5,592 AFY, and under “Growth” by 20,900 AFY. However in the Paso Robles Groundwater Basin Computer Model Update Final Report to the San Luis Obispo County Board of Supervisors January 13, 2015, the average deficit was reported to be 2,400 AFY from 1981-2011.

The URL to Google Docs does not seem to work.

The SLO County General Plan LUE, 2014 Section 3.3, p.3-5 gives buildout populations for the Paso Robles GW Basin, and shows the Shandon-Carrizo Area as changing from 2,476 (yr 2000) to 53,691, and Salinas River Area from 61,906 (yr 2000) to 95,166. Are these numbers still valid, and, if do, are they the numbers used in calculation of future use.