

Angela Ruberto

From: George Kendall
Sent: Wednesday, March 15, 2017 11:51 AM
To: Angela Ruberto; Ray Dienzo
Subject: Comments on RMS Update

To whom it concerns:

I am writing because I am concerned that the current draft RMS Update will continue to consider Santa Rosa Valley to be LOS 3 for water supply without adequate technical support. I have two main concerns. First, while the lower portion of the valley where the community of Cambria is located may have various water supply issues, the main agricultural portion of the valley has had no significant depletion of its aquifer. Second, the assumption in the RMS that agricultural water use in the valley will more than double over the next 20 years appears to be without support. As a 20 year resident of the valley and farmer and having spoken to other farmers and ranchers in the valley, we are highly skeptical that there is supporting evidence for this critical assumption

There are technical reasons for the differences between the middle agricultural part of Santa Rosa Valley and the lower municipal area. Much of the upper and middle reaches of Santa Rosa Creek have perennial flow, even through the drought. During the dry season the creek typically dries up at the base of the middle reach where the community services district operates a large water supply well. The creek is generally dry during the dry season from this area to the lagoon. The area of the municipal well is probably separated from the main agricultural area further upstream by faulting or other subsurface constrictions to groundwater flow.

The USGS published a study of the San Simeon and Santa Rosa valley aquifers in 1998 (Water Resources Investigations Report 98-4061). This report showed that these aquifers deplete gradually during the dry season then recover fully after only a few weeks of surface flow during the wet season. Santa Rosa Creek has had significant winter flow every year during the drought. In 2016 the creek flowed all the way to the lagoon until well into May. Local observers expect the creek to flow to the lagoon during all of 2017. The USGS report also documented significantly shallower water levels and different draw down patterns in the main agricultural area from those in the area of the municipal well and in the lower reaches.

There are two CASGEM observation wells in the middle (agricultural) part of Santa Rosa valley with water level records going back to 1958 for well 27S/08E-24J01 and back to 1989 for well 27S/08E-24J06. Both of these wells show a narrow annual range in water level (typically from 25 feet to 35 feet below ground level) with higher levels in the Spring and lower levels in the Fall and no long term overall decline. This same pattern is reported at other local wells in the agricultural area. Clearly, aquifer storage has not deteriorated or declined in the middle reaches of the Santa Rosa Valley. This is the part of the valley that has had perennial flow even during the drought years.

With regard to the assumed more than doubling of the agricultural water use over the next 20 years, local farmers are challenged to see the justification for this projection. Vegetable farming appears to be stable and has probably declined since the 1980s and 1990s. There has been only modest increases in orchard land. Several parcels have converted from vegetable land to dry farmed hay production. There is no large trend toward intensification of agriculture in the valley.

A designation of LOS 3 for water supply for Santa Rosa Valley could have significant implications for groundwater management and could lead to significant costs for farmers in the valley. Since there are technical

reasons implying a stable agricultural water supply in the aquifer and at least some questions by long term local farmers about projected future agricultural water use, I think the proposed designation of LOS 3 for water supply for at least the agricultural portion of Santa Rosa Valley should be reconsidered. Perhaps a resource capacity study should be performed prior to such a designation. The assumptions in the draft RMS Update do require more supporting evidence than is apparent.

Thank you for your consideration of the above comments.

Sincerely,
George Kendall