PASO BASIN ADVISORY COMMITTEE

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Paso Robles Wine Country Alliance

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SLO County Cattlemen's Association

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SLO County Farm Bureau

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Upper Salinas – Las Tablas RCD

AT-LARGE

Dana Merrill
Viticulture Agriculturalist At-Large

Bill Spencer
Non-Viticulture Irrigated Crop Agriculturalist At-Large

Sue Harvey
Environmental At-Large

Sue Luft
Rural Resident At-Large

Claudia Engel
Rural Resident At-Large

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George Tracy
Rural Resident At-Large

Randy Diffenbaugh
Rural Resident At-Large District 1

Greg Grewal
Rural Resident At-Large District 5

Larry Werner
Undesignated At Large

February 20, 2015

Honorable Debbie Arnold
Chairperson, Board of Supervisors
County of San Luis Obispo
1050 Monterey Street
San Luis Obispo, CA 93408

Subject: Support for Continuing with the Agricultural Water Conservation Offset Program Ordinance Process

Dear Chairperson Arnold,

At the February 19, 2015, Paso Basin Advisory Committee (PBAC) meeting, the PBAC voted 20 – 2 (with one abstention and one absent) to request that the Board of Supervisors continue with the process of adopting an interim ordinance that would stand until such time a management body is established over the Paso Robles Groundwater Basin, direct staff to vet the draft ordinance with the PBAC and to approve the ordinance prior to the expiration of the Urgency Ordinance.

Sincerely,

John Neil
Chairperson, Paso Basin Advisory Committee

cc: San Luis Obispo County Board of Supervisors, All Districts

WRAC Ad Hoc Subcommittee to Review Agricultural portions of Countywide Water Conservation Program

Subcommittee members

Mike Broadhurst (Chair of subcommittee), George Kendall, Lowell Zelinski, Sue Luft

Documents reviewed by subcommittee

Countywide Water Conservation Program Draft Supplemental Environmental Impact Report (supplemental to EIR for COSE)

Revisions to Title 22 regarding crop production

Revisions to Title 8 regarding wineries

Revisions to Agriculture Element and Conservation and Open Space Element (COSE)

Comments on each document

Title 22 - General

How is the offset program enforced (monitoring, penalties for non-compliance, etc.)?

Offset credits should be available for a limited duration if desired by the landowners. This might make the cost of the credits more affordable to small farmers.

Title 22, Chapter 22.06.040

Figure XX should show the Paso Robles Groundwater Basin as delineated in DWR Bulletin 118, excluding the Atascadero sub-basin. A footnote should be provided stating "Paso Robles Groundwater Basin as identified and defined in Bulletin 118 or as modified pursuant to Water Code Section 10722 et seq, excluding the Atascadero sub-basin as delineated by the Rinconada fault." Similar language is used in the draft ordinance regulating the exportation of groundwater.

Title 22, Chapter 22.30.204, Table 1

This table would be clearer if the term "crop water use" was used instead of "crop production".

Title 22, Chapter 22.30.204, Table 1

The restriction that the receiving site cannot be within the area of severe decline makes sense. However, this will have an impact on the ability to use the offset program. Also, the area of severe decline (which well level decline contour) needs to be defined.

Title 22, Chapter 22.30.204. G.2.

This provision is not enforceable since a landowner cannot be mandated to continue in crop production, particularly if the economics do not support the operation.

Title 22, Chapter 22.30.204. G.3.

This statement seems unnecessary since a Williamson Act contract must be complied with whether the site is involved in the offset program or not.

Title 22, Chapter 22.30.204. G.5.

Add "as listed in Table 2" at the end of the sentence.

Title 22, Chapter 22.30.204. G.6., regarding landowner agreements

Are there standardized landowner agreements to simplify the process, particularly for small farmers?

Title 22, Chapter 22.30.204. G.7.

Do deed restrictions end when ordinance sunsets?

Title 22, Chapter 22.30.204. G.8.

Flowmeters should be installed on wells at both the sending and receiving sites. Reports of water use should be turned into the County on an annual basis. County staff should review this data to ensure compliance with this program.

Title 22, Chapter 22.30.204, Table 2

This table differs from Table 2-3 in the Draft SEIR. However, the vineyard applied water value in Table 2 may be a more appropriate number than the value in Table 2-3.

Title 8, Chapter 8.69, Section 8.69.110

Since the Agricultural Offset Program applies only in the Paso Robles Groundwater Basin, the agricultural processing uses - wineries should also only apply in the Paso Robles Groundwater Basin. Discussions should be held with industry representatives to determine appropriate best management practices which would provide meaningful reductions in water use.

Revisions to COSE, Page 10.7, Policy WR 1.7 Agricultural operations

Since the proposed requirements Agricultural Offset Program applies only in the Paso Robles Groundwater Basin, this policy should be applicable only to the Paso Robles Groundwater Basin.

Countywide Water Conservation Program Draft SEIR

Executive Summary, Project Description

Although the "exceptional drought" has exasperated the problem, well levels have been in decline in the three listed groundwater basins for many years. The first sentence should be removed.

2.0 Project Description, 2.2 Background

Although the "exceptional drought" has exasperated the problem, well levels have been in decline in the three listed groundwater basins for many years. The first sentence should be removed.

3.0 Environmental Setting, 3.2 Program Area Setting

These three groundwater basins were certified as LOS III long before the current drought. The discussion of drought should either be removed or moved to later in this section.

3.0 Environmental Setting, 3.2 Program Area Setting, 3.2.1 Paso Robles Groundwater Basin

Last sentence of this section. The outflows are projected to exceed inflows by 26,159 AFY (see page ES-10 of http://www.slocountywater.org/site/Water%20Resources/Water%20Forum/Computer%20Modeling/pdf/Final%20Executive%20Summary.pdf).