



North County Watch

Looking Out Today For Tomorrow



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Department of Water Resources

Mr. Rich Juricich

Via Email Rich.Juricich@WATER.CA.GOV

March 20, 2015

RE: Comments on BASIN BOUNDARIES requested at the March 13, 2015, NGO/DWR meeting

Dear Mr. Juricich,

Thank you for your invitation to comment on the issue of Basin Boundaries as pertains to the implementation of the Sustainable Groundwater Management Act.

We request that you give serious consideration to extending the authority of GSAs to important watersheds in basins, especially where it can be shown that the watershed is a significant vital attribute and contributor to a basin's sustainability and excluding the watershed will likely result in failure to balance a basin.

As an example, we offer the special characteristics of the Paso Robles basin. The recently published Paso Robles Groundwater Basin Update commissioned by the County of San Luis Obispo includes a comprehensive study of the "Subsurface Inflow Through Basin Boundary" (Section 3.3.3, Table 26)ⁱ. Although the County has prepared at least 3 thorough studies of basin capacity etc., the current study is by far the most in-depth look at inflow, outflow, and demand.

The safe annual yield for the basin is pegged at 89,000 af/y for the entire San Luis Obispo County portion of the basin. This includes what is commonly referred to as the Atascadero sub-basin. The current safe yield assessment of 89,000 af/y is a reduction in safe yield estimates which previous studies considered to range from 97,000-94,000 af/y.

The current study not only calculated outflow budgets much more precisely, it made an in-depth study of inflow. The results showed that 50% of the recharge to the basin comes from subsurface inflows from outside basin boundaries, i.e. from the watershed. Table 26 of the study, titled "Subsurface inflow through basin boundary average 1982-2010," shows that inflow from the watershed accounts for over 52,000 af/y of the total inflow of 101, 619 af/y. These numbers should speak for themselves as to the importance of including the watershed in the DWR basin boundary for the Paso Robles groundwater basin.

To reinforce the importance of protecting the watershed in addition to the basin, we offer the following local example. In August 2013 the County adopted an urgency ordinance to address declining well levels in the basin. The ordinance included the provision that any new well would be required to install a meter and report usage. In the weeks prior to the final adoption of the urgency ordinance, hundreds of permits for wells were applied for in order to avoid the metering/monitoring requirements. A PRA request showed that the 10,000-acre San Juan Ranch vineyard in the Shandon area pulled permits for 16 wells. San Juan Ranch had been recently acquired by the investment arm of Harvard University. The PRA showed that 7 of the wells were to be drilled within the Boundaries of the Paso basin, but the remaining 9 wells were drilled outside the basin, in the watershed that accounts for 50% of the recharge to the basin. It isn't hard to guess that the Ranch plans to circumvent GSA/GSP regulation by pumping from the 9 wells outside the Bulletin 118 basin boundaries. A GSP that does not include regulation of the Paso basin watershed will be meaningless if irrigated agriculture expands into watershed areas or pumps from watershed areas in order to avoid regulation. It will be impossible for the Paso basin to achieve safe yield.

Also, although the size and varied land uses over the Paso basin might suggest that multiple GSA/GSPs are an adequate approach to sustainability, we request that the entire basin be managed under one comprehensive GSA/GSP.

Although our comments here concentrate on specifics of the Paso Robles groundwater basin, we believe the circumstances of the basin have universal applicability. Thank you again for the invitation to comment and for considering our comments.

Sincerely,



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