



# SHANDON-SAN JUAN WATER DISTRICT

## SHANDON-SAN JUAN GSA

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August 30, 2023

Corine Ellsworth, Foreperson  
San Luis Obispo County Grand Jury  
P.O. Box 4910  
San Luis Obispo, CA 93403

**RE: Subject: Report entitled “Can One Wet Year Wash Away the Paso Robles Basin’s Water Worries?”**

Dear Ms. Ellsworth:

The Grand Jury has instructed the Shandon-San Juan Water District (SSJWD) / Shandon San-Juan Groundwater Sustainability Agency (SSJGSA) to respond to the Grand Jury report Recommendation 6. The additional thoughts and comments that follow serve as the attachment to the SSJGSA’s response relative to the Grand Jury’s Findings and the Recommendations other than Recommendation 6. We want to be clear that we feel that the findings and recommendations are generally well described and appropriate. These comments are not intended to in any way diminish the results of your work.

On page 12 of the report there are two tables, one on historical agricultural production and the other on total crop values. There are several problems with this information. First, it would seem much more relevant to have a table tracking changes in water use in the Paso Robles Groundwater basin than either of those two subjects. Also, the data being county wide provides little insight into the specifics of the Paso Basin. We also question the acreage of field crops at 1.1 million acres. That almost certainly is wrong by a very large margin. We need to remain focused on water demand in the Paso Basin and wish that the Grand Jury had been provided with that information instead.

Another table on page 18 fails to even mention the applications for supplemental water filed by our District for water from the Nacimiento and Salinas Rivers. Those waters are specifically mentioned in the Groundwater Sustainability Plan and involved a great deal of engineering work and considerable financial outlay by our District and, if granted, could play a significant role in providing additional water to the Basin. The EPC Water District is also investigating the feasibility of using surplus State Water Project water for recharge. In 2023, under an Executive Order by the Governor, flood flows were diverted from local surface waters to lands overlying the Basin, creating a new one-time opportunity to supplement water. If the Governor’s order were extended and allowed those flood flows to be placed in storage reservoirs, more flood flow water could be conserved and later used in lieu of groundwater pumping.

While bringing up the reference to the two California Water Districts having already established “parcel fees” (page 22) may seem to be quibbling, our fees are based on acreage. Parcel taxes are a different type of charge and considered extremely unfair by many in the agricultural community.



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### FINDINGS:

- F1. We agree. The Basin is huge and not in crisis mode but is indeed unsustainable.
- F2. Agree
- F3. Agree and the SSJWD/SSJGSA has worked diligently with the other GSAs and the State of California to increase the number.
- F4. The PBCC does not have the authority to require access to groundwater pumping data, but the GSAs (including SSJGSA) do and are working through the PBCC to determine the best way to collect data and determine water demand within the Basin. The best way may be through imaging.
- F5. We do not agree. The Grand Jury study did not include all potential supplemental sources of water, which coupled with new conservation technology and implementation, could very well match the current deficit.
- F6. Currently the PBCC is not empowered to implement pumping restrictions. Because many avenues are being pursued to bring the Basin into balance, it is also premature to implement pumping restrictions.
- F7. We feel that the information is adequate but agree that the public needs greater outreach from all involved.
- F8. Agree.
- F9. Agree.
- F10. The County ordinance has been vital in preventing a run of new plantings and is a key policy decision to help protect the Basin. The GSAs will need to address inequities as the GSP is implemented.
- F11. Agree.

### RECOMMENDATIONS:

- R1. We agree that the monitoring network needs to be expanded expeditiously and we have been working for quite some time to secure more monitoring wells.
- R2. We agree that we need to employ the most accurate satellite data and are working diligently to implement that aspect of the recommendation. It is premature to adopt the proposed regulations when it is yet to be determined if that is the best approach.
- R3. We support implementation of the MILR Program, but it may never be appropriate to make it mandatory. There are other approaches to sustainability that may be more suitable to our situation.
- R4. We agree but believe the current MOA among the GSAs is working well through the PBCC. Formal regulations will follow the steps outlined in the GSP, including securing accurate information on water use, areas of greatest impact, areas best suited for recharge, projects to secure supplemental water, implantation of the MILR Program and other strategies.
- R5. Agree.
- R6. A specific response is on the form provided.
- R7. Agree.
- R8. It was originally intended that the implementation of the GSP would end the need for the ordinance, but that is for the Board of Supervisors to decide once the GSP is fully operational.
- R9. While we agree that establishing realistic and deliverable management actions are essential, the timing recommended is likely premature. Each of the five GSAs are responsible for making the basin sustainable and we want to assure you that we take that responsibility very seriously.



# SHANDON-SAN JUAN WATER DISTRICT SHANDON-SAN JUAN GSA

Thank you for your efforts to make a timely review of the Basin and as previously stated, we generally find your conclusions and recommendations appropriate.

Sincerely,

A handwritten signature in blue ink that reads 'Willy Cunha'. The signature is written in a cursive style with a horizontal line underneath the name.

Willy Cunha, President  
Shandon-San Juan Water District  
Shandon-San Juan Groundwater Sustainability Agency

DRAFT