



SHANDON-SAN JUAN WATER DISTRICT

SHANDON-SAN JUAN GSA

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February 22, 2021

Chairman Jean-Pierre Wolff
Central Coast Regional Water Quality Board
895 Aerovista Place, Ste. 101
San Luis, Obispo, CA 93401-7906

**Subject: Comments on the Draft Ag Order 4.0
Inadequate Economic Analysis**

Dear Chairman Wolff and Members of the Board,

The Shandon-San Juan Groundwater Sustainability Agency (SSJ GSA) and Water District was created specifically to protect the groundwater and surface water resources of our area. All of us who live and work over the Paso Robles Groundwater Basin are highly reliant upon the annual precipitation that falls upon the Paso Basin and surrounding watersheds. Water that each year refills the Basin. SSJ GSA strongly supports the mission of the Central Coast Regional Water Quality Board and hope to see an effective, practical and achievable Ag Order 4.0 Final Draft that protects this water resource and that also recognizes and protects the many benefits that arise from the multiple uses of that water.

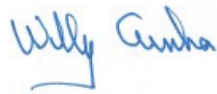
The Economic Analysis in the Ag Order 4.0 EIR is inadequate.

- a. The EIR does not measure or consider the economic impact from lost production due to the Order. The EIR mentions it in passing (p. 238) and in the Findings (p. 11 #27) it alludes to the importance of the economic impact.
 - i. The shortest perusal of the annual reports from the Ag Commissioners of the effected Counties will quickly demonstrated the economic importance of these irrigated crops to the well being of the local economies.
 - ii. Riparian setbacks are estimated to fallow over 4,000 acres in Findings Section 27, and those calculations seem to be an underestimate of the acres that could potentially be included by the current Order language.
 - iii. In high priority areas the requirements to "reestablish" riparian vegetation will be very expensive. The current ephemeral nature of the Ag Order's "Phases" places the whole area of Region 3 at risk of inclusion to the Order's most restrictive and punitive dictates. The current language allows the requirement to apply to many miles of "streams" and dry washes where vast stretches could be ordered "restored" to habitats that in many stretches and areas never supported riparian plants and animals. Much of these areas if planted with riparian species, the soils and available water would never be able to support them. The current Order allows the EO to expand riparian high priority areas to encompass the whole watershed.
- b. For vegetable growers, the hard limits and short timelines for nitrogen currently in the Order, will result in significant reductions in annual production that will definitely hurt the

entire economy of these coastal Counties. Potentially Billions of Dollars lost in economic impact.

- c. Staff acknowledges the comments and alternate plan submitted by the Agricultural interests but chose not to incorporate those ideas in the current version of Ag Order 4.0 with the flimsiest of rationalizations.
- d. The low bar set in the the EIR for analyzing economic impact is ludicrously low. "Increase costs for growers to such a degree that it would cause or result in growers going out of business, such that agricultural lands would be converted to non-agricultural uses". Further, the costs analyzed by Board Staff were the costs to comply with reporting, not the lost costs to production. The bookkeeping costs to comply were underestimated in the EIR but are not the most significant impact from this Order.
- e. In the face of the economic crises created by Covid 19 it is irresponsible for the Regional Board to unnecessarily further endanger the economies of the affected Counties. The current language and over punitive approach taken in Ag Order 4.0 is not necessary to address the ultimate goals of the Regional Board, compliance with recent court orders and the East San Joaquin Ag Order WQ 2018-0002 or to responsibly protect the resource. Two Cal Poly Agricultural Economists have done a study documenting the significant costs of SGMA compliance in the Paso Robles Basin that illustrate how far reaching these impacts will run
https://digitalcommons.calpoly.edu/cgi/viewcontent.cgi?article=1158&context=agb_fac

Thank you for considering the input of the Shandon-San Juan GSA.



Willy Cunha
President of the Board of Directors
Shandon-San Juan GSA