



# 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  
Paso Groundwater Basin Deserves a Separate Designation**

Dear Chairman Wolff and Members of the Board,

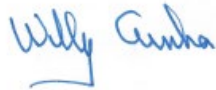
The Shandon-San Juan Groundwater Sustainability Agency (SSJ GSA) and Water District was created specifically to protect the groundwater and surface water resources of our area. All of us who live and work over the Paso Robles Groundwater Basin are highly reliant upon the annual precipitation that falls 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 Paso Groundwater Basin** actively managed under a single GSP by four active GSAs and dominated by wine grapes with small amounts of vegetable and tree crops **deserves a separate designation and less burdensome Regulation** under AG Order 4.0.

- a. 3<sup>rd</sup> Party groups working collaboratively with farmers, UC Researchers and Regional Board Staff would manage data collection, reporting and developing best management practices, but with less stringent requirements.
- b. Crop specific guidance and rules would be applied to all crops and those with higher N application needs would be required to comply with the more stringent regulations applicable in other growing areas.
- c. Ongoing testing and reporting of ground and surface waters is a critical component of GSP implementation and for compliance with our Regional Ag Order. This effort is open and public. These GSAs managing the Paso Robles Groundwater Basin and the Regional Board working through local 3<sup>rd</sup> Parties will continue to collect and make available in a local and publicly accessible fashion groundwater and surface water data including quality, extraction, and use.
- d. There are very real reasons why people and businesses want to keep their private data private. With the current level of compliance with Water Board objectives and the limits contained in the proposed Order it is more than justifiable to allow Paso Basin operations working under the auspices of a 3<sup>rd</sup> party to aggregate data for reporting purposes. Detailed site-specific data would be available if testing suggested a need to verify or disaggregate data and sources.

- e. Much of the Nitrogen in the groundwater in the Paso Basin is a legacy, an artifact of practices from the 1950's through the 1970's when much of the Paso Basin and the surrounding watershed was actively cultivated and fertilized.
- f. Measurements of preexisting legacy constituents in the groundwater should not be used to rate or grade current growing practices. More refined techniques to measure and understand the impacts of current agricultural inputs are needed.
- g. When an area such as the Paso Basin, does things right, it should be recognized and rewarded. Not punished. The Regional Board should be encouraging all their growing areas to take as much care.

Thank you very much,



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