

Shandon-San Juan Water District
Shandon-San Juan Groundwater Sustainability Agency

PO Box 150, 365 Truesdale Rd.

Shandon, CA 93465

www.ssjwd.org

805-239-0555



Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 Street, 24th Floor (958141)
P.O. Box 100
Sacramento, CA 95812-0100

Comments: East San Joaquin Ag Order A -2239(a) -(c)

November 16, 2017

Ms. Townsend and members of the Board,

I am writing on behalf of the Board of Directors of the Shandon-San Juan Groundwater Sustainability Agency (SSJ-GSA) and the Shandon-San Juan Water District. We share your concerns for our shared groundwater resource. We are fully committed to protecting that resource. To that end we have spent a great deal of time, money and effort to form a Water District which allowed us to form a GSA. We did this specifically so we could protect our groundwater resource. Both the groundwater quality and it's availability are critical to our ability to continue to farm. It is critical to our local economy, just as it its critical to the economy of the State of California. We are in the process of creating a Groundwater Sustainability Plan (GSP) acceptable to DWR to expressly describe exactly how we plan to protect our groundwater resource, including its quality. SSJ-GSA is part of a group of seven GSAs, including San Luis Obispo County, Salinas Valley Basin GSA and the City of Paso Robles working cooperatively together are creating a single GSP for the Paso Robles Groundwater Basin.

We are concerned about the potential over broad application of the East San Joaquin Ag Order to all areas of the State. In the Paso Robles Groundwater Basin the predominate irrigated crop is wine grapes. Irrigated agriculture in this Basin does not create the risk to groundwater as might potentially be seen from areas with high percentages of irrigated crops that demand more water, nutrients and pesticides than what is required for our predominant irrigated crop. We have a very high number of Sip Certified and Organic acres in our Shandon-San Juan GSA boundaries. The requirement to form, fund and participate in a third party group effort for extensive monitoring, reporting and self policing is unjustified in this Basin. This would potentially burden farmers with the need to duplicate ongoing efforts in our area that are now being strengthened, documented, reported and verified

under SGMA. The State Water Resources Control Board should demur to State Law and direct Regional Staff to support and adhere to the Sustainable Groundwater Management Act in groundwater basins actively managed under that Act. Our Central Coast Regional Water Quality Control Board should be a significant partner and resource to our GSAs as we create and later implement a GSP for our Basin.

Thank you for considering our comments.

Sincerely,



Willy Cunha
President of the Board of Directors
Shandon-San Juan Groundwater Sustainability Agency
Shandon-San Juan Water District
365 Truesdale Road, PO Box 150
Shandon, CA 93461
805-239-0555

Note: This message has been sent electronically and by post.