September 26, 2019

Paso Robles Groundwater Sub-basin Cooperative Committee San Luis Obispo County Paso Robles Groundwater Sub-basin GSA 1055 Montery Street San Luis Obispo, CA, 93408

Hello SLO County GSA

Re: Comments to the Paso Robles Groundwater Sub-basin GSP

On behalf of the Independent Grape Growers of the Paso Robles Area(IGGPRA), with almost 200 wine grape growers, wineries and business associates, I appreciate the opportunity to make some comments for the final version of the Paso Robles Groundwater Sub-basin GSP.

## Introduction

In 2001, IGGPRA was formed by a group of wine grape growers to help small to medium size vineyard owners understand how to plant and cultivate high quality grapes for sale to the wineries. At the time, there were about 60 wineries in the area, while there are now over 300. Today, the Association is dedicated to the advancement of superior grape growing in the Paso Robles Viticultural Area. Through our 8 Seminars per year, marketplace listing service and other critical services, we are able to provide our members with important grape growing methods, best practices and updates on how to most effectively use the water resources we have available.

IGGPRA is NOT a political organization and we do not entertain speakers with political affiliations or agendas. However, our wine grape growers and wineries will be strongly affected by any decisions made about the restrictions on groundwater use. WE ONLY ASK THAT THE AG COMMUNITY BE ADEQUATELY REPRESENTED IN ANY COMMITTEE MEETING AND DECISIONS. So far, that does not appear to be the case

With thousands of planted acres, our growers have a large stake in the economic impact of any decisions made.

## Comments on the GSP

- 1. With an approx.. 14,000 Acre feet per year of over draft, there is no clear picture of what the GSP plans to do about it. The Paso Robles Blended Water Project is an example of how a local community is trying to reduce the over draft, but with no involvement or support from the County.
- 2. There are other "real" projects that could be implemented in the area, but we have heard nothing from the GSP on proposed solutions. The County remains silent.
- 3. The County's so called "white area" accounts for 66% of agricultural pumping. This significant group of groundwater pumpers have many issues that need to be addressed

by the GSP. HOW WILL THESE ISSUES BE HEARD, IF THERE IS NO AG REPRESENTATION??!!

4. The GSP, so far, appears to be full of conjecture, concepts and very few concrete plans for sustainability. Every year, groundwater levels will continue to decline, so "pushing the ball down the road" is not going to solve the problem

## Suggested/Needed Actions

- A. First and foremost, there needs to be Agricultural representatives "at the table" of decision making. Ie. People who understand Ag, wine grape growing and the economic effects they have on the community
- B. The GSP must have specific and actionable plans for use of:
  - a. Available local water resources Nacimiento allocation, Blended Water Project
  - b. Accessing State Water Project resources to recharge the aquifer
  - c. Reasonable, economically viable, water conservation requirements
- C. Provide clear direction on how well water pumping will be monitored -- either by metering, crop type/acreage or formula.
- D. The GSP needs to have timeframes for each action that will be taken. Keeping water stakeholders in limbo for too long could well cause a major exodus from the area and affect the overall economy.

I trust my points of concern and suggestions have been clear. The Ag community just wants to be part of the GSP process and decision making. Adding our Voice will only help the GSA make more informed decisions and represent a broader part of the community.

Thank you for this opportunity to submit comments.

Best Regards Joe Irick President Independent Grape Growers of the Paso Robles Area A 501c3 non profit organization