Agenda

San Miguel Groundwater Sustainability Agency

BOARD OF DIRECTORS

Raynette Gregory, President — Anthony Kalvans, Vice President
Ward Roney, Director — Crystal Lara, Director — Hector Palafox, Director

THURSDAY, April 28th, 2022
6:00 P.M. Opened Session
BOARD OF DIRECTORS MEETING AGENDA

SMCSD Boardroom
1150 Mission St.
San Miguel, CA 93451

Cell Phones: As a courtesy to others, please silence your cell phone or pager during the meeting and engage in conversations outside the Boardroom.

Americans with Disabilities Act: If you need special assistance to participate in this meeting, please contact the CSD Clerk at (805) 467-3388. Notification 48 hours in advance will enable the CSD to make reasonable arrangements to ensure accessibility to this meeting. Assisted listening devices are available for the hearing impaired.

Public Comment: Please complete a "Request to Speak" form located at the podium in the boardroom in order to address the Board of Directors on any agenda item. Comments are limited to three minutes, unless you have registered your organization with CSD Clerk prior to the meeting. If you wish to speak on an item not on the agenda, you may do so under "Oral Communications." Any member of the public may address the Board of Directors on items on the Consent Calendar. Please complete a "Request to Speak" form as noted above and mark which item number you wish to address.

Meeting Schedule: Regular Board of Director meetings are generally held in the SMCSD Boardroom on the fourth Thursday of each month at 7:00 P.M. Agendas are also posted at: www.sanmiguelcsd.org

Agendas: Agenda packets are available for public inspection 72 hours prior to the scheduled meeting at the Counter/ San Miguel CSD office located at 1150 Mission St., San Miguel, during normal business hours. Any agenda-related writings or documents provided to a majority of the Board of Directors after distribution of the agenda packet are available for public inspection at the same time at the counter/ San Miguel CSD office at 1150 Mission St., San Miguel, during normal business hours.

I. Call to Order: 6:00 PM

II. Pledge of Allegiance:

III. Roll Call: *Gregory___ Palafox___ Kalvans___ Roney___ Lara ___*

IV. Approval of GSA Meeting Agenda: M__S___ V____

V. ADJOURN TO CLOSED SESSION:

A. CLOSED SESSION AGENDA: None

VI. Call to Order for Regular Board Meeting/Report out of Closed Session: N/A

VII. Public Comment and Communications for items not on the Agenda:

Persons wishing to speak on a matter, not on the agenda may be heard at this time; however, no action will be taken until placed on a future agenda. Speakers are limited to three minutes. Please complete a "Request to Speak" form and place in basket provided.

VIII. Special Presentations/Public Hearings/Other: None

IX. Staff & Committee Reports – Receive & File:

1. Verbal report on Paso Basin Cooperative Committee meeting (last meeting 4/27/2022)

X. CONSENT CALENDAR:

1. **Approval of Board Meeting Minutes:**
   a. 03-24-2022 Draft Meeting Minutes

The items listed above are scheduled for consideration as a group and one vote. Any Director or a member of the public may request an item be withdrawn from the Consent Agenda to discuss or to change the recommended course of action. Unless an item is pulled for separate consideration by the Board, the following items are recommended for approval without further discussion.

XI. BOARD ACTION ITEMS:

1. **Review, discuss, receive and file the <u>amended</u> Final Draft sections of the Groundwater Sustainability Plan (GSP) for Basin 3-004.06 Salinas Valley Paso Robles Area.**

   Public Comments: (Hear public comments prior to Board Action) M____S___ V____

XII. BOARD COMMENT:

This section is intended as an opportunity for Board members to make brief announcements, request information from
staff, request future agenda item(s) and/or report on their own activities related to District business. No action is to be taken until an item is placed on a future agenda.

XIII. ADJOURNMENT TO NEXT GSA MEETING: TBD

ATTEST:

STATE OF CALIFORNIA)
COUNTY OF SAN LUIS OBISPO) ss.
COMMUNITY OF SAN MIGUEL)

I, Kelly Dodds, Director of Utilities of San Miguel Community Services District, hereby certify that I caused the posting of this agenda at the SMCSD office on April 19, 2022

Date: April 19, 2022

Raynette Gregory
President, Board of Directors

Kelly Dodds
Director of Utilities/ SMCSD staff representative for PBCC

SAN MIGUEL COMMUNITY SERVICES DISTRICT
BOARD OF DIRECTORS
GROUNDWATER SUSTAINABILITY AGENCY MEETING MINUTES

Thursday, March 24, 2022

MEETING HELD AT DISTRICT OFFICES
1150 MISSION STREET
SAN MIGUEL, CA 93451

I. Call to Order by Director Gregory: 6:00 PM

II. Pledge of Allegiance led by Director Roney.

III. Roll Call: Directors Present: Roney, Palafox, *Kalvans @ 6:03PM, Gregory*
Directors Absent: Lara

IV. Approval of GSA Meeting Agenda:
Motion by Director Roney to approve Meeting Agenda as presented.
Seconded by Director Gregory
Motion was approved by Voice Vote of 3 AYES 0 NOES 0 ABSENT 2 Vacancy.
Director Kalvans arrived at 6:03 P.M.

V. ADJOURN TO CLOSED SESSION

A. CLOSED SESSION AGENDA: None

VI. Call to Order for Regular Board Meeting/Report out of Closed Session: N/A

VII. Public Comment and Communications for items not on the Agenda:
Public: Greg Grewal Speaks

VIII. Special Presentations/Public Hearings/Other: None

IX. Staff & Committee Reports – Receive & File:

1. **Verbal report on Paso Basin Cooperative Committee meeting**

Presented by Kelly Dodds, Staff representative for SMCSD, Updating the Board of Directors on the Paso Basin Cooperative Committee meeting held on March 3rd 2022.
Board: None
Public: Greg Grewal Speaks
Board: Director Kalvans voiced that Mr. Grewal has been apart of the Groundwater since the Blue-Ribbon Committee. Discussion ensued.

X. CONSENT CALENDAR:

1. **Approval of Board Meeting Minutes:**
   a. 1-27-2022 Draft Meeting Minutes

2. **Receive and file Invoices for 3rd annual GSP Report:** (GSI)
   a. Invoice (SM_20220217) #3 GSP 3rd annual report share of cost $43.56
   b. Invoice (SM_20220315) #4 GSP 3rd annual report share of cost $217.86

3. **Receive and file Invoices for 3rd annual GSP audit:** (Todd Groundwater)
   a. Invoice (SM_20220126) #4 Correction Action Plan share of cost $219.41

Board Comment: None
Public Comment: None

Approved by Voice Vote of 4 AYES, 0 NOES, and 1 Absent. P/K/R/G

Motion by Director Roney to approve consent calendar as presented

Seconded by Director Kalvans

XI. BOARD ACTION ITEMS:

1. **Receive and file the Water Year 2021 GSP Annual Report for the Paso Robles Subbasin in and authorize the SLO County Director of Public Works, or designee, to submit the Annual Report to the DWR for the Paso Robles Subbasin.**
   Presented by Director of Utilities/Cooperative Committee Member for San Miguel C.S.D Kelly Dodds. Mr. Dodds explained that GSI Water Solutions have been awarded the project to prepare the 2021 GSP Annual Report.
   Board Comments: Director Kalvans asked about the report and discussion ensued, with Mr. Kalvans voicing those larger cities like Paso Robles manage their groundwater poorly and that effects the San Miguel District. Discussion on other GSA ensued.
   Public Comments: Greg Grewal Speaks

   Motion by Director Kalvans to Receive and file the Water Year 2021 GSP Annual Report for the Paso Robles Subbasin in and authorize the SLO County Director of Public Works, or designee, to submit the Annual Report to the DWR for the Paso Robles Subbasin.

Seconded by Director Roney.

Motion approved by a Vote of 4 AYES 0 NOES and 1 Absent.

XII. **BOARD COMMENT**: None

XIII. ADJOURNMENT TO NEXT GSA MEETING: approximately 6:31 P.M.

San Miguel Groundwater Sustainability Agency

Board of Directors
Staff Report

April 28th 2022 **AGENDA ITEM: XI-1**

SUBJECT: Review, Discuss, Receive and File the AMENDED Groundwater Sustainability Plan (GSP) sections For Basin 3-004.06 Salinas Valley Paso Robles Area and open public comment period.

RECOMMENDATION:

Review, Discuss, Receive and File the AMENDED Groundwater Sustainability Plan (GSP) sections For Basin 3-004.06 Salinas Valley Paso Robles Area.

BACKGROUND:

November 2019 the Board adopted resolution 2019-02 adopting the Final Groundwater Sustainability Plan (GSP) for this basin.

In 2021 the Department of Water Resources (DWR) provided a letter of deficiency to the County indicating that the GSP was deficient in two areas. Todd Groundwater was hired to make the necessary corrections to the GSP which have been made and approved by the Paso Basin Cooperative Committee (PBCC).

Changes were made to sections

- 4.7.2 HCM Groundwater Discharge (Hydrogeological Conceptual Model)
- 5.5 Groundwater Conditions ISW (Integrated Surface Water)
- 7.6 Monitoring Network-ISW Monitoring and Data Gaps
- 8.4 SMC-Chronic Lowering of Levels (Sustainable Management Criteria)
- 8.8 SMC-Depletion of ISW SMC

These changes have been reviewed by the public at the PBCC meetings as well as staff and DWR. The PBCC is confident that the revisions made satisfy the corrections from DWR.

The Original GSP sections have been amended to include the corrected information. This GSA needs to receive and file the amended GSP sections and will hold a hearing on June 23rd 2022 to adopt the full amended GSP and authorize the County of San Luis Obispo Director of Groundwater Sustainability or their designee to submit the amended GSP to DWR.

It is important that the Board members, District staff, and the public take the opportunity to review the DRAFT AMENDED GSP and provide comments, concerns and suggestions, prior to the hearing date of June 23rd 2022.

FUNDING:

No additional District funding is required in association with this item.

PREPARED BY: Kelly Dodds

Director of Utilities

4.7 Groundwater Recharge and Discharge Areas

4.7.2 Groundwater Discharge Areas Inside the Subbasin

Areas that have been identified in previous studies as potential historic natural groundwater discharge areas within the Plan area are shown on Figure 4-17 and include springs and seeps, groundwater discharge to surface water bodies, and ET by phreatophytes. Phreatophytes are plants with roots that tap into groundwater. The springs and seeps shown in the figure are a subset of the locations identified in the National Hydrology Dataset (NHD). Each of the NHD locations was examined on recent high-resolution (Google Earth©) aerial photographs to assess whether topography, soil color and vegetation at the site were consistent with the presence of groundwater discharge. In many cases they were not, and those locations were removed from the spring and seep data set[1]. Off-channel springs and seeps are almost all located in the foothills of the Santa Lucia and Temblor mountain ranges. Based on their elevations high above the main part of the Subbasin, the springs and seeps may represent discharge of groundwater from perched strata feeding the Paso Robles Formation Aquifer that is forced to the surface locally by subsurface stratigraphy or faults. No efforts were made to ground truth or physically verify the presence of these features and there is no evidence that pumping from the Paso Robles Formation Aquifer is affecting these areas.

Groundwater discharge to streams – primarily, the Salinas River and Estrella River – has not been mapped to date. Instead, areas of potential groundwater discharge to streams were tentatively identified using the conceptual groundwater flow model. Highlighted purple areas along streams on Figure 4-17 represent stream cells in the model where simulated average groundwater discharge to the stream reach is at least 10 AFY. In contrast to mapped springs and seeps, which are derived from groundwater in the Paso Robles Formation Aquifer, groundwater discharge to streams is derived from the Alluvial Aquifer. No efforts were made to ground truth or physically verify the presence of these features and there is no evidence that pumping from the Paso Robles Formation Aquifer is affecting these areas.

Phreatophytic vegetation along stream channels also functions as a discharge point for groundwater by removing water directly from the water table. The locations of this type of riparian vegetation are described in Section 5.5.

[1] Methodology for Identifying Groundwater Dependent Ecosystems (Reference Document)

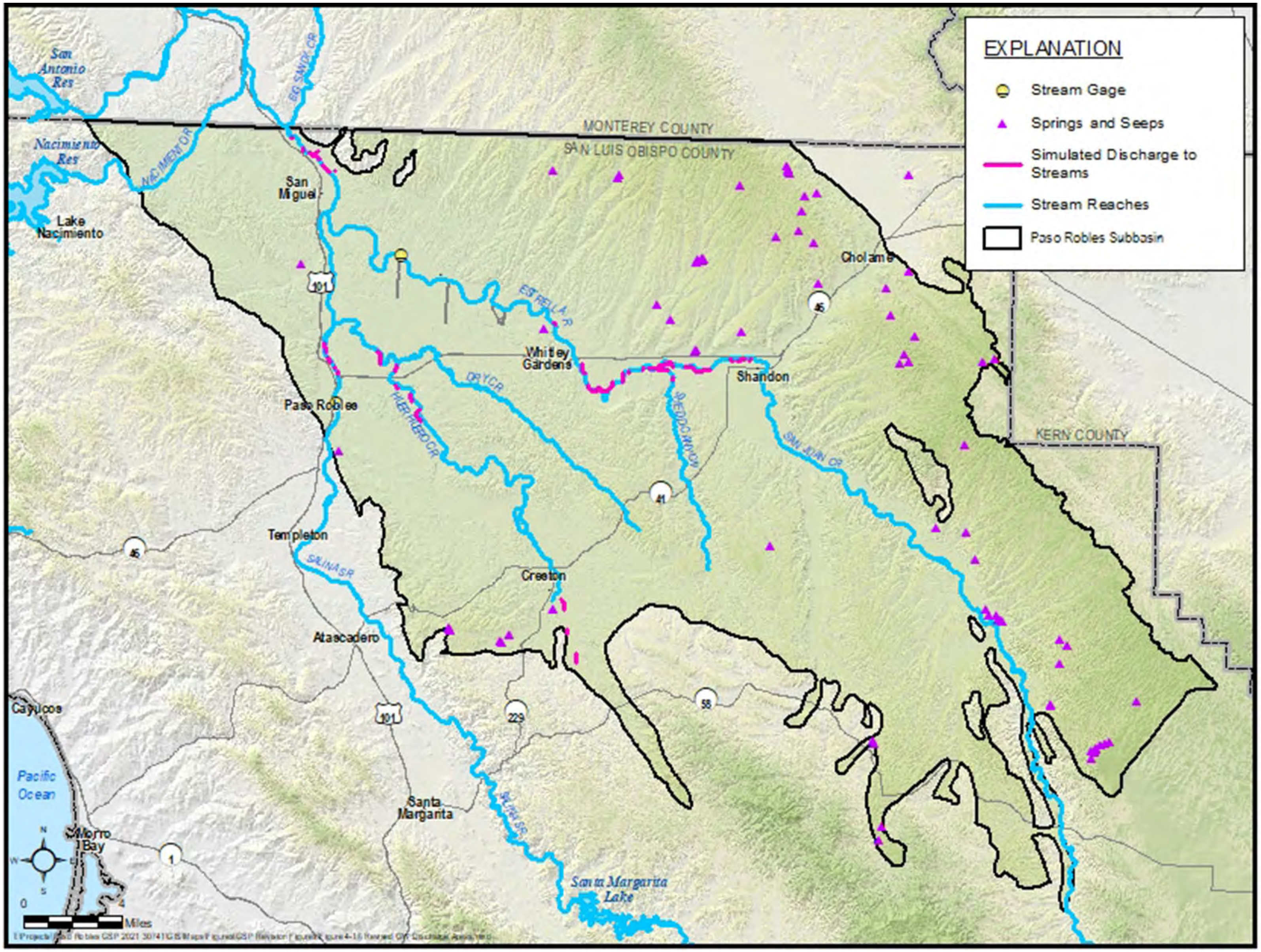

Figure Error! No text of specified style in document.-17. Potential Groundwater Discharge Areas

5.5 Interconnected Surface Water

SGMA regulations define interconnected surface water as “surface water that is hydraulically connected at any point by a continuous saturated zone to the underlying aquifer and the overlying surface water is not completely depleted” (§351 (o)). SGMA requires that GSPs evaluate “impacts on groundwater dependent ecosystems.” (Water Code §10727.4(l)). Groundwater dependent ecosystems (GDEs) are defined in the GSP regulations as “ecological communities or species that depend on groundwater emerging from aquifers or on groundwater occurring near the ground surface” (CCR § 351 (mm)). GDEs can be divided into two groups: plants and animals that depend on surface flow in streams (for example, fish, invertebrates, amphibians) and plants and animals that depend on a shallow water table accessible by plant roots (phreatophytic riparian vegetation and bird or other animal species that inhabit riparian vegetation). In this GSP, GDEs are discussed in the general category of interconnected surface water even though organisms in the second group strictly speaking rely only on a shallow water table, not surface flow in a stream.

Interconnection with stream flow occurs when the water table is near the stream bed elevation, and interconnection with riparian vegetation occurs when the water table is within the root zone, which generally extends to about 25 feet below the ground surface. These two elevation thresholds have different frequencies and durations of occurrence. Along some stream reaches, the water table might reach the stream bed elevation only when there is surface inflow and associated percolation. This connection might be present only during storm runoff events or seasonally in winter. In contrast, the water table may remain within the root zone for months even while water levels are seasonally declining. If the reach is in an area of regional groundwater discharge, the water table can be in the root zone most or all of the time. Thus, the duration of interconnection of groundwater with the riparian root zone is much greater than the duration of interconnection with surface flow in the stream.

In the Paso Robles Subbasin, major streams all overlie alluvial deposits, and interconnection is with alluvial groundwater. The alluvial deposits are relatively thin, and in some parts of the Basin there are extensive clay layers between the alluvium and the deeper aquifers of the Paso Robles Formation, where most pumping occurs. Accordingly, potential effects of pumping on interconnected surface water are evaluated in two steps: the effects of Paso Robles Formation pumping on alluvial groundwater levels, and the effects of alluvial groundwater levels on vegetation and stream flow. Pumping from the Alluvial Aquifer in the Basin is rare and generally occurs to meet domestic and limited livestock water demands. Large scale irrigation pumping from the Alluvial Aquifer does not typically occur in the Basin.

A generalized conceptual model of interconnection between surface water and groundwater in the Paso Robles Subbasin was articulated in SWRCB Decision 1585, issued in 1982 (SWRCB, 1982). The decision regarded a group of applications for surface diversions from tributaries to the Salinas River between Salinas Dam and the Nacimiento River. By that date, the SWRCB had already determined that groundwater in alluvial deposits along the Salinas River was classified as underflow subject to the rules of surface water appropriation. The Decision described hydrogeologic conditions and recharge processes in the Paso Robles Groundwater Basin, stating that there are "silty clays of low permeability existing within the upper portion of the Paso Robles Formation beneath and adjacent to the Salinas River alluvium… [that] appear to be sufficiently thick and extensive to act as a barrier separating underflow in the river alluvium from groundwater that occurs in the underlying older water-bearing formations." The clays were noted to extend eastward to about the community of Estrella along the Estrella River and the community of Creston along Huer Huero Creek. Upstream of the clays, some percolation from the Estrella River and Huer Huero Creek may directly recharge the Paso Robles Formation.

This hydrogeological conceptual model suggests that groundwater pumping—the preponderance of which is from the Paso Robles Formation—could potentially lower alluvial groundwater levels and deplete stream flows upstream of the clay layers but have only a negligible effect on alluvial water levels and stream flows overlying the clay layers. An additional geographic variation in regional hydrology is that the western part of the watershed surrounding the Subbasin is much wetter than the eastern part. Average annual precipitation over the Coast Ranges along the western side of the watershed is about four times greater than precipitation along the eastern edge of the watershed. As a result, surface runoff into the Salinas River is substantially greater than surface runoff into the Estrella River. The combined effect of greater surface inflow and confining layers beneath the alluvium is to enable the Salinas River to maintain relatively steady groundwater levels in the Alluvial Aquifer that support the establishment and growth of riparian vegetation. Except during major droughts, river recharge has been able to outpace leakage across the confining layers, even after water levels in deep wells have declined. In contrast, some stream reaches in the eastern half of the Subbasin do not appear to be buffered from the effects of pumping. Over several decades, pumping has lowered groundwater levels in localized areas within the Paso Robles Formation Aquifer, which may have potentially depleted stream flow in the past and may have decreased the extent and health of riparian vegetation. Throughout the majority of the Basin, these conditions occurred prior to 2015, and subsequent pumping has not resulted in the depletion of stream flow. SGMA does not require that GDEs be restored to any condition that occurred prior to 2015.

The identification of interconnected stream reaches was based on a joint evaluation of multiple data sets related to interconnected surface water and GDEs, including precipitation, stream flow, groundwater levels, stream bed elevation, vegetation maps, aerial photographs of vegetation, satellite mapping of vegetation health, and results of groundwater modeling. A preponderance of evidence approach was used in delineating interconnected stream reaches, including subjective assessment of whether the frequency and duration of shallow water table conditions were sufficient to classify a reach as mostly or sometimes interconnected.

Many of the data used in the analysis pre-date 2015, which was the start of the SGMA management period. SGMA does not require that GDEs be restored to any condition that occurred prior to 2015. However, long-term data sets provide greater opportunity for differentiating the separate effects of variables that are often correlated. For example, precipitation, stream flow and groundwater levels are all potential sources of water for riparian vegetation, and all three are low during droughts. The extensive use of pre-2015 data in the analysis does not mean that this GSP intends to restore any conditions to a pre-2015 level.

Evaluation of the multiple data sets is summarized in subsections 5.5.1 through 5.5.4 below[1]. Subsection 5.5.5 presents the delineated interconnected stream reaches while Subsection 5.5.6 addresses groundwater dependent animals.

5.5.1 Groundwater Levels

Historical measurements of groundwater levels in wells can be used to identify where and to what extent Alluvial Aquifer water levels are different from Paso Robles Formation Aquifer water levels. The approach used to identify Alluvial Aquifer wells for this interconnected surface water analysis is not the same as the well-log based approach used for the groundwater elevation analysis in Section 5.1.1. The water-level database compiled for the GSP was screened to select wells with long periods of record located near streams. Thirty-one wells met these criteria. For the interconnected surface water analysis, the wells were classified as Alluvial Aquifer or Paso Robles Formation Aquifer based on the historical water level patterns. In Alluvial Aquifer wells, water levels remain relatively steady year after year at an elevation close to that of the nearby stream, and seasonal fluctuations are small. In wells completed in the Paso Robles Formation Aquifer, water levels exhibit seasonal fluctuations, have multiple-year trends in some areas of the Basin and are commonly substantially lower (rarely higher) than the nearby stream. **Figure 5-14** shows sample hydrographs illustrating the two characteristic patterns.

Three of the five wells with an alluvial water table pattern are along the Salinas River, which is consistent with the conceptual model for interconnected surface water with the associated Alluvial Aquifer. One is near the Estrella River near the town of Estrella (Jardine Road), which the conceptual model suggests is still within the region of extensive clay layers beneath the alluvium. The final well is next to San Juan Creek about 7 miles upstream of Shandon. Its hydrograph is not as strongly alluvial, but the water levels are close to the creek bed elevation

[1] Methodology for Identifying Groundwater Dependent Ecosystems (Reference Document)

and fairly steady. In either case, there is no evidence of surface water depletion as a consequence of pumping from the Paso Robles Formation Aquifer.

Two new pairs of monitoring wells installed in 2021 provided additional confirmation of the conceptual model (Cleath-Harris Geologists, 2021). One shallow-deep pair is next to the Salinas River at the 13th Street bridge. Water levels in both wells were within 3 feet of the riverbed elevation, indicating interconnection with surface water with the Alluvial Aquifer and a local absence of drawdown in the Paso Robles Formation Aquifer. The other pair was next to the Estrella River at Airport Road. These wells were constructed in 2021 as part of a Supplemental Environmental Project (SEP) which was implemented by the City of Paso Robles. This site is within the region where extensive shallow clay layers are thought to be present, and the water levels appear to confirm this. The shallower well was screened down to 40 feet below the ground surface and had a depth to water of 29.5 feet. The top of the screen in the second well was 160 feet deeper and its water level was 158 feet lower. This represents a vertical water-level gradient close to unity, which means the shallow aquifer is perched above the clay layers and there is an unsaturated zone between the shallow and deep aquifers.

It is recommended that pairs of shallow and deep monitoring wells be installed along the Estrella River upstream of Estrella and along San Juan Creek to provide a better understanding of the relationship between the Alluvial Aquifer and the underlying Paso Robles Formation Aquifer in these areas. Installation of additional monitoring wells is described in the monitoring discussion in Section 7.6.

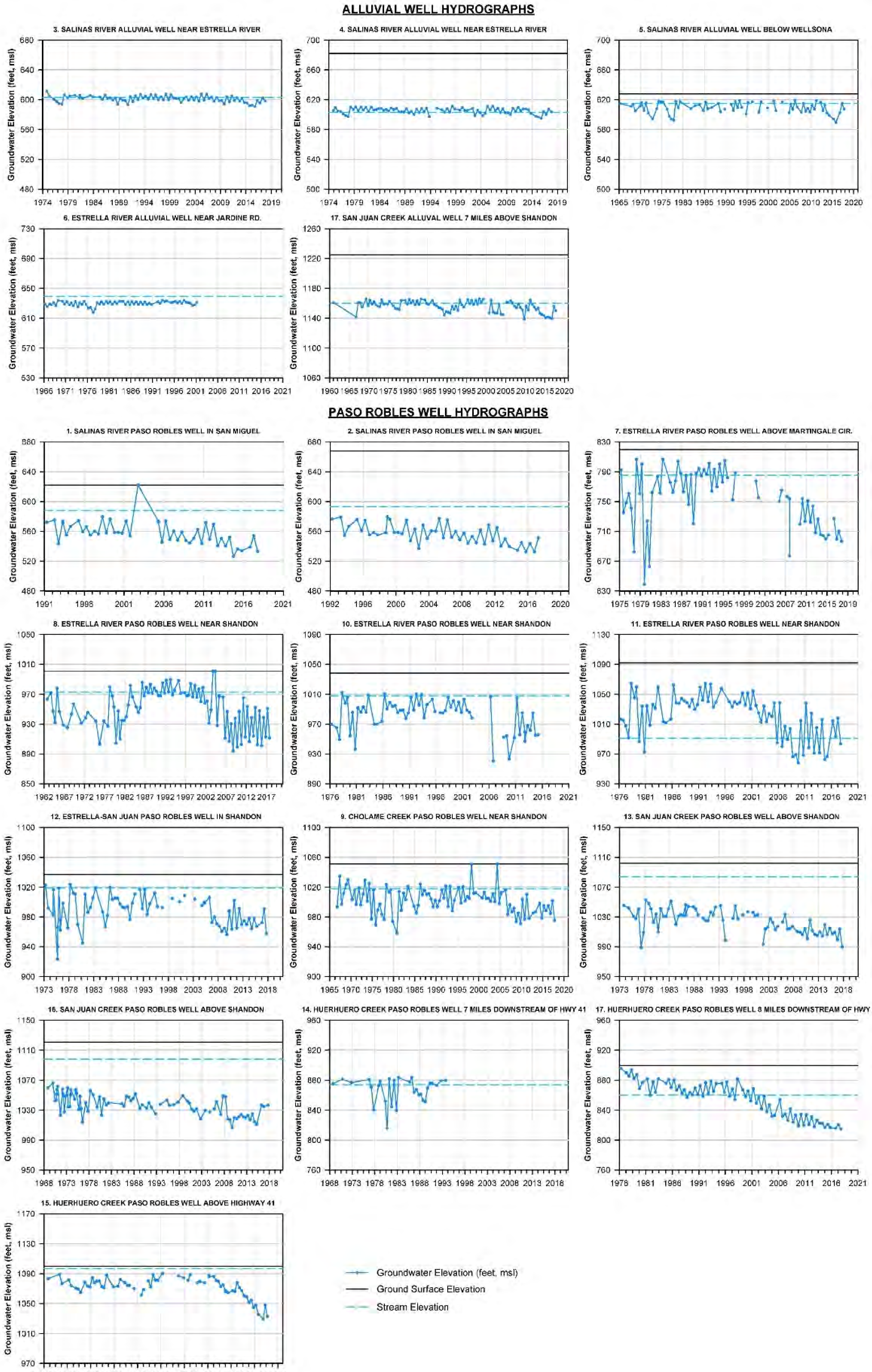

Figure 5-14. Alluvial and Paso Robles Well Hydrographs

5.5.2 Stream Flow

Differences between the low-flow regimes in the Salinas and Estrella Rivers are generally consistent with the hydrologic conceptual model and provide some evidence of flow depletion historically due to pumping along the Estrella River, although the flow record indicates that flow in the Estrella River are infrequent and typically only occur in response to seasonal wet weather conditions. Based on a review of the available stream flow records, any depletion of surface flow within the Estrella River occurred prior to 2015, and subsequent pumping has not resulted in the depletion of stream flow. SGMA does not require that GDEs be restored to any condition that occurred prior to 2015. The Salinas River gage is at Paso Robles, at the upstream edge of the Subbasin. Flows at that location do not reflect percolation or pumping effects within the Subbasin. The Estrella River gage is at Airport Road, downstream of the reaches potentially impacted by pumping. The gage was out of service from 1997-2015, but low-flow data for 2016-2018 was compared with data for 1955-1996.

Figure 5-15 shows flow-duration curves for both rivers for four three-year time intervals, roughly a decade apart from the 1960s to 2010s. Each curve displays all daily flows during a three-year period sorted from largest to smallest. The horizontal X axis shows the percentage of time each flow magnitude is exceeded. For perennial streams, the curves would extend across the entire width of the graph because flow exceeds zero 100 percent of the time. For seasonally intermittent streams, the curve bends down and crosses the X axis indicating the percentage of time flow is greater than zero. By plotting the vertical Y axis on a logarithmic scale, changes in low flows are visually expanded. If stream flow depletion is occurring, the effect is to curtail the duration of low flows (bend the curve downward) and shift the X axis intercept to the left.

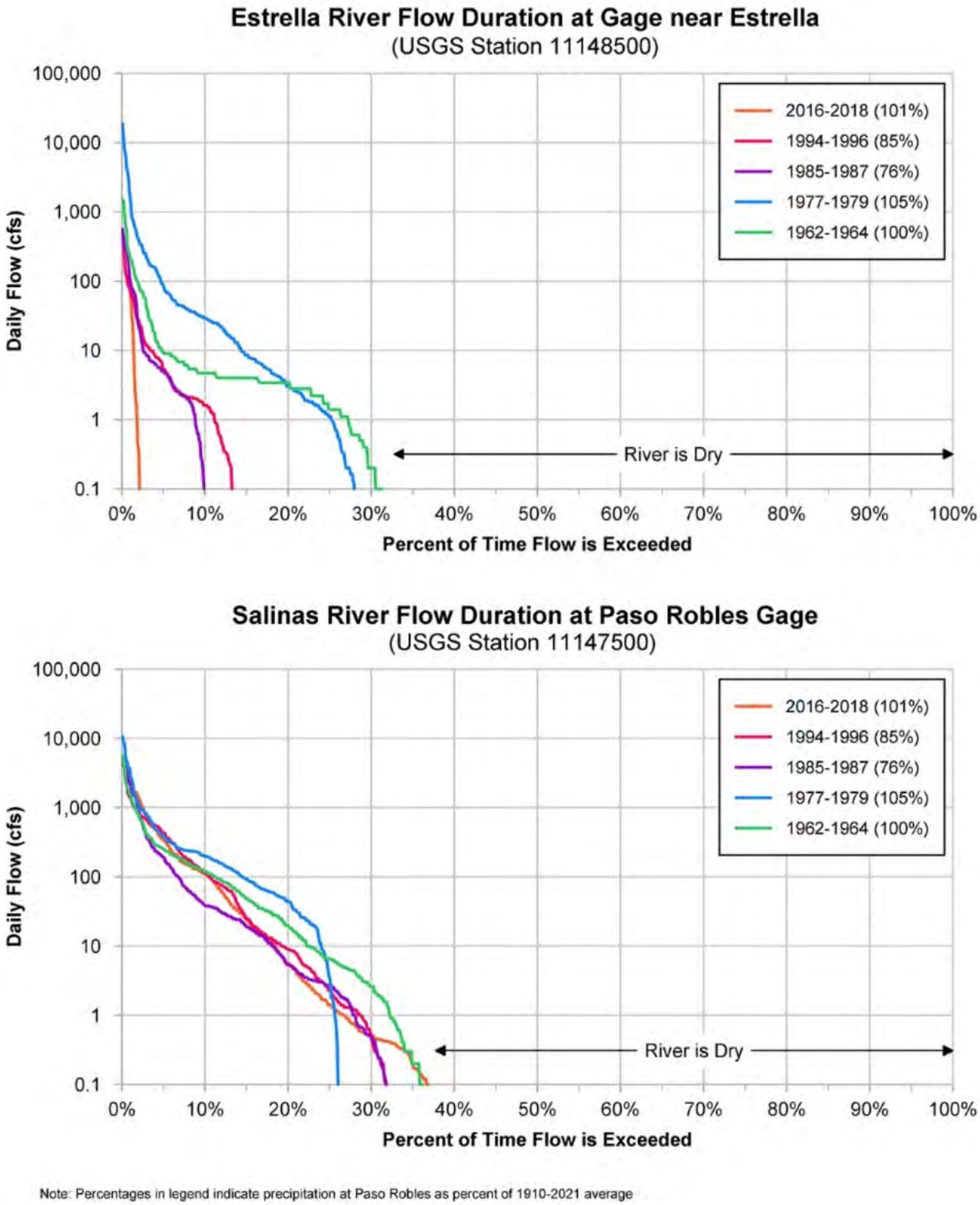

Figure 5-1. Flow-Duration Curves for Estrella and Salinas Rivers

As documented in **Figure 5-15**, low flows in the Estrella River have become progressively shorter in duration over the past five decades, indicated by the curves shifting progressively to the left. In contrast, the curves for the Salinas River have remained in a cluster, with no trend to the right or left. These curves suggest that flows upstream of the Estrella gage may have historically been interconnected with groundwater and subject to depletion by groundwater pumping and lowered groundwater levels. Based on a review of the available stream flow records, any depletion of surface flow within the Estrella River occurred prior to 2015, and subsequent pumping has not resulted in the depletion of stream flow. SGMA does not require that GDEs be restored to any condition that occurred prior to 2015.

Low flows and/or damp channel sediments visible in historical aerial photographs provide additional evidence of interconnection between surface water and groundwater. Along the Salinas River, flows as low as 5-8 cfs at the Paso Robles gage produced continuous surface flow all the way to the Nacimiento River, indicating negligible percolation due to a high water table. At other times, flow became discontinuous even when flow at the gage was considerably higher, probably indicating refilling of the Alluvial Aquifer after a period without surface flow.

Air photos indicate a potential for variable interconnection along the Estrella River upstream of the gage. Open water or ribbons of very damp soil along the channel were commonly present at various locations from about 4 miles upstream of Whitley Gardens to about 0.5 mile downstream of Whitley Gardens and along about a 1-mile reach near Martingale Circle (about 5 channel miles downstream of Whitley Gardens) prior to 2012. This reach is referred to in this analysis as the “middle reach” of the Estrella River. Since 2012, those apparent gaining conditions along the middle reach have not been visible in dry season air photos, possibly due to the 2012-2016 drought or to long-term declines in groundwater levels. No efforts were made to ground truth or physically verify the presence of these features and there is no evidence that pumping from the Paso Robles Formation Aquifer is affecting these areas, although it is recommended that additional investigations be undertaken to further characterize this area.

5.5.3 Riparian Vegetation

Vegetation patterns along streams can also be used to map potential interconnection of surface water and groundwater because growth is more vigorous where plant roots can reach the water table. There are limitations to this approach, however. First, some plant species are facultative phreatophytes, which means they will establish and grow with or without continuous access to the water table. A second limitation is that riparian vegetation in shallow water table areas is subject to mechanical removal by flood scour In spite of these limitations, broad patches of dense riparian vegetation stand out in aerial photographs and provide an indication of where the water table is shallow and interconnected with the root zone and possibly also the stream channel.

A source of vegetation mapping often used for preparing GSPs is the Natural Communities Commonly Associated with Groundwater (NCCAG) mapping provided in georeferenced digital formats on DWR's SGMA Data Portal. The NCCAG maps of potential riparian and wetland vegetation are statewide compilations of numerous local vegetation mapping studies, mostly from the early 2000s. However, a detailed comparison of vegetation and wetland polygons in the NCCAG maps with aerial photographs revealed that the accuracy of the NCCAG vegetation delineations is poor in the Subbasin[2].

For the purposes of the interconnected surface water analysis for this GSP, a new map of riparian and wetland vegetation was created by digitally outlining areas of visibly dense riparian trees or shrubs more than about 50 feet wide along river and creek channels based on May 2017 aerial photography. The photography represents non-drought conditions in a year close to the start of the SGMA management era (January 2015). For isolated wetlands, mapped polygons in the NCCAG data set were compared with the 2017 aerial photographs and retained as groundwater dependent wetlands if they exhibited open water or bright green herbaceous vegetation in the dry season and were natural features (as opposed to constructed stock ponds).

The resulting map of groundwater-dependent vegetation is shown in **Figure 5-16**. In-channel riparian and wetland vegetation is mapped as polygons accurately delineating the perimeter of the vegetation patch. Isolated wetlands are shown using symbols because many of them would otherwise be too small to see on a basin-scale map. The vegetation distribution is generally consistent with the conceptual model for interconnected surface water. Dense riparian vegetation is most abundant along the Salinas River, which has relatively large and persistent surface flows as well as consistently shallow depth to groundwater in the adjacent Alluvial Aquifer. These conditions also result in a relatively high abundance of in-channel wetlands. Riparian vegetation along the Estrella River is generally sparser but is more abundant along the middle reach than the upper and lower reaches. Patches of sparse and dense riparian vegetation and even potential wetlands are present along San Juan Creek at locations more than about 10 miles upstream of Shandon. No efforts were made to ground truth or physically verify the presence of these features and there is no evidence that pumping from the Paso Robles Formation Aquifer is affecting these areas.

[2] Methodology for Identifying Groundwater Dependent Ecosystems (Reference Document)

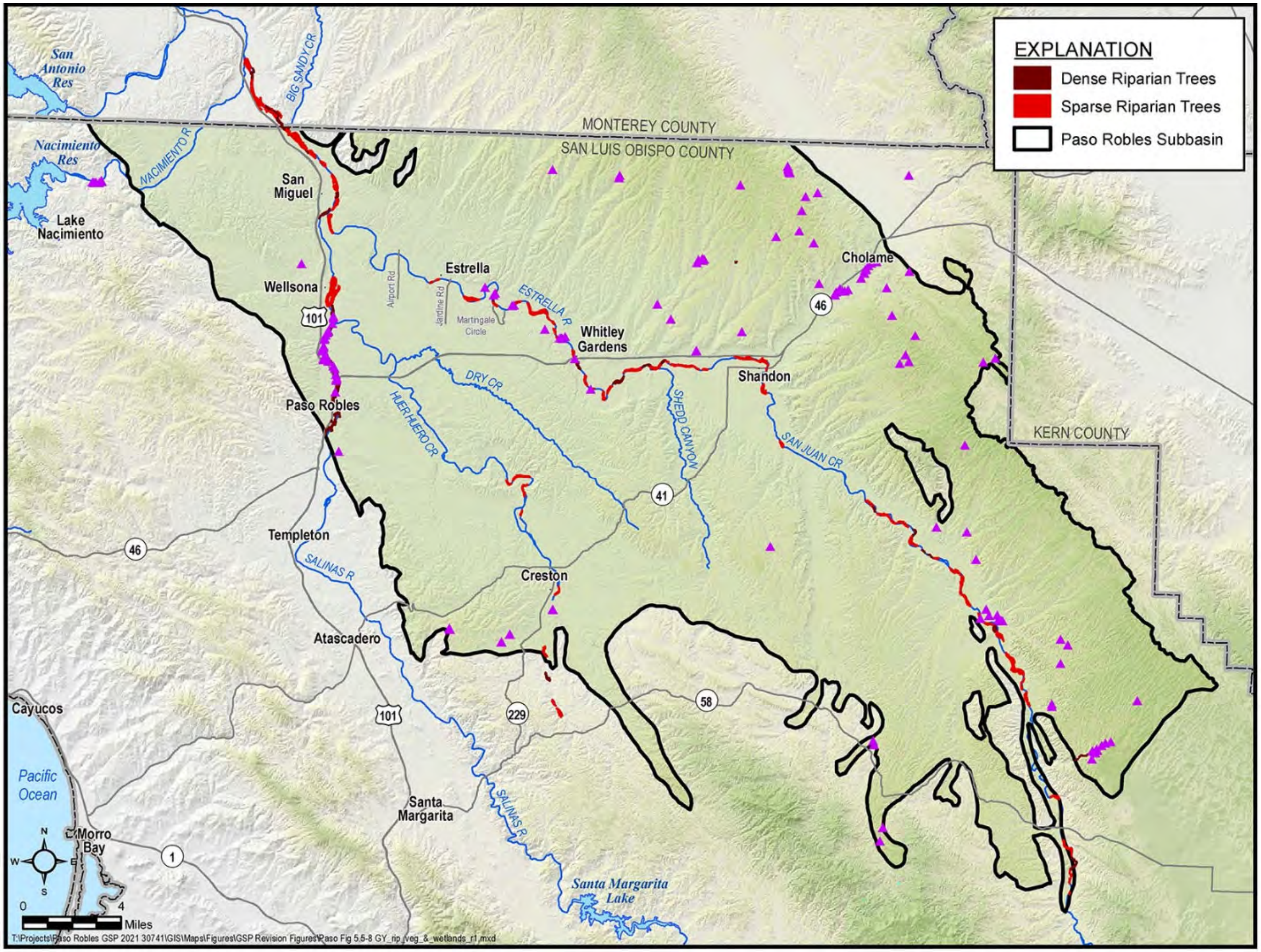

Figure 5-26. Groundwater-Dependent Vegetation in Paso Robles Subbasin

Riparian vegetation conditions in 2018 was compared with conditions in 1994 along the entire lengths of the Salinas River, Estrella River, Huer Huero Creek and San Juan Creek using aerial photographs. Both of those dates were 2-4 years after the end of a major drought, and the droughts were of similar intensity and duration. In other words, precipitation and stream flow conditions during the years immediately preceding the two photographs were similar, but groundwater levels were different. Between those two periods, there were cumulative water-level declines in Paso Robles Formation Aquifer wells of 25-70 feet in the eastern part of the Subbasin. Water levels in Alluvial Aquifer wells along the Salinas River remained stable until 2011, declined 12-18 feet during 2012-2016 and then recovered (see **Figure 5-14**). The density and extent of patches of riparian vegetation along the waterways in 2018 was visually classified as "more", "the same" or "less" than in 1994.

The results of the vegetation comparison are shown in **Figure 5-17**. Where there were differences along the Salinas River, they were all decreases in vegetation coverage. Review of additional photographs between 1994 and 2018 indicated that the decrease in vegetation occurred almost entirely during 2013-2017. This suggests that the relatively small and temporary declines in alluvial water levels during 2012-2016 were large enough to adversely impact vegetation. Along the Estrella River, vegetation coverage mostly declined near Shandon and along the downstream end toward the Salinas River, and the declines occurred over a longer period. Along the middle reach, however, vegetation coverage unexpectedly increased in a number of locations. This is the same river segment where gaining flow could be seen in aerial photographs up until 2012, indicating a near-surface water table. Although that river segment is thought to be east of the extensive near-surface clay layers in the Paso Robles Formation Aquifer, some aspect of hydrogeology and recharge appears to be sustaining a high water table in spite of large water-level declines in deeper wells in that region. No efforts were made to ground truth or physically verify the river geology in this area and additional investigations would be required to further characterize this area.

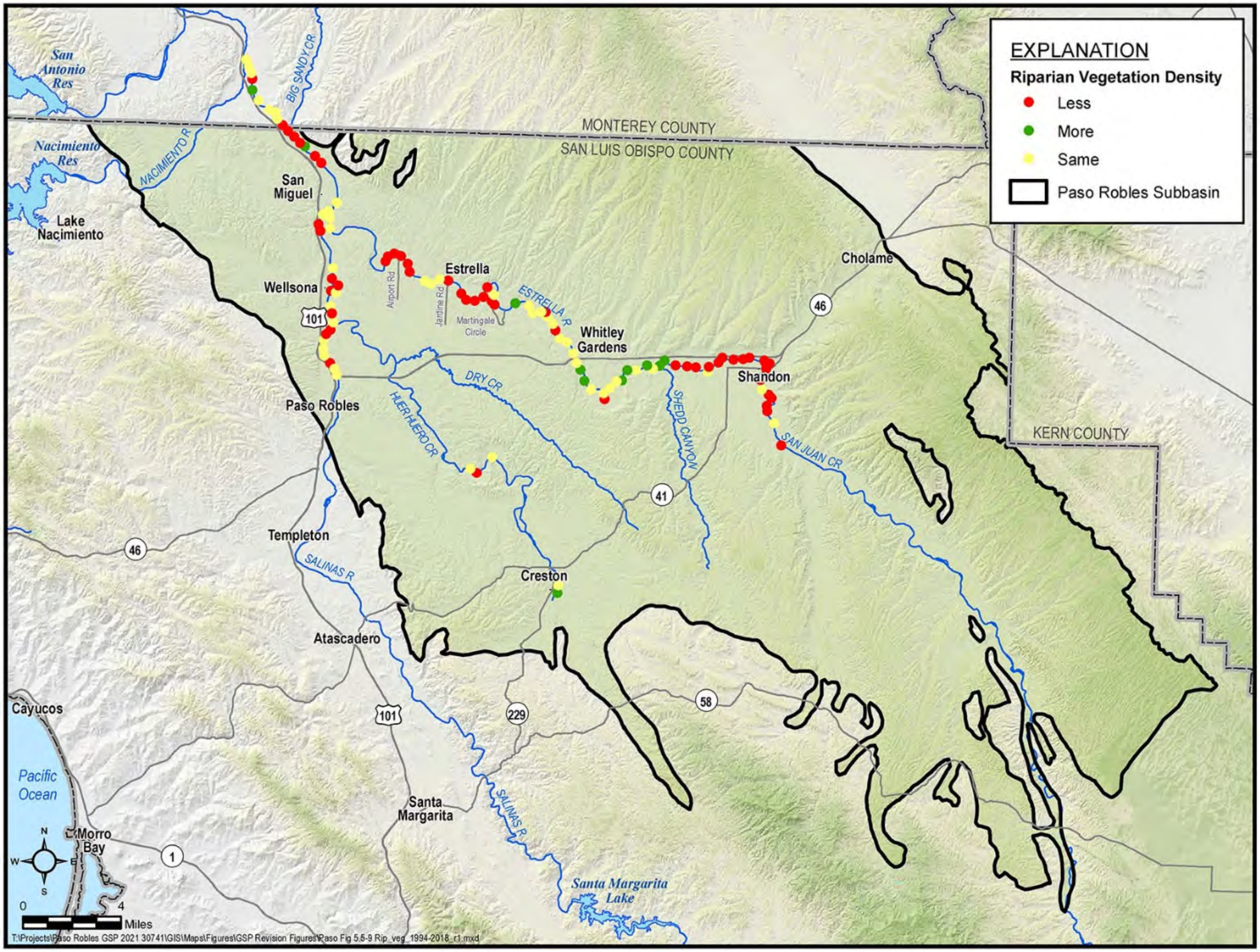

Figure 5-37. Density of Riparian Vegetation, Paso Robles Subbasin

Additional vegetation data were evaluated for indications of changes related to groundwater levels[3]. Briefly, high-resolution aerial photographs for 2013 and 2017 were inspected to identify four limited locations where riparian trees appear to have died during the recent drought. These locations generally occur where Paso Robles Formation Aquifer groundwater levels had been declining for a few decades or where Alluvial Aquifer groundwater levels declined by over 10 feet for a few years between 2013 and 2017.

An Enhanced Vegetation Index (EVI) trend analysis was performed for the sparse and dense riparian vegetation areas presented on Figure 5-16 for the purpose of identifying and evaluating trends in riparian vegetation health as an indicator of potential long-term trends in surface water-groundwater interactions within stream reaches. EVI data provide an indicator of healthy, well-watered vegetation. It is calculated from the proportions of visible and near-infrared sunlight reflected by vegetation. EVI values typically range from zero to over 0.7. Healthy, or well-watered, vegetation absorbs most of the visible light that hits it and reflects a large portion of near-infrared light, resulting in a high EVI value. Unhealthy, dry, or dormant vegetation reflects more visible light and less near-infrared light, leading to a lower EVI value.

The EVI analysis was processed in Climate Engine[4] using Landsat data from January 2009 through present. This analysis period is considered representative of recent hydrologic conditions as it begins and ends with similar hydrologic conditions and includes dry, wet, and average periods. The results of this study indicate that riparian vegetation health has generally remained stable over the analysis period suggesting that Alluvial Aquifer groundwater levels have remained a reliable water source within the rooting zone depth of the established riparian communities. Observed cyclical patterns of increasing and decreasing riparian vegetation health correlate strongly with water year type indicating that water levels in the Alluvial Aquifer operate independently from the long-term declining water levels induced by groundwater pumping in the underlying Paso Robles Formation Aquifer[5].

5.5.4 Simulated Groundwater-Surface Water Interconnection

Results of groundwater modeling provide additional clues regarding the location and timing of interconnected surface water. Stream cells where annual groundwater discharge into the stream averaged 10 AFY or more were shown on **Figure 4-17**. Those locations included the Salinas River above Huer Huero Creek and along a 3-mile reach below San Miguel. They also included the middle reach of the Estrella River. Those locations are consistent with the water

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[3] Methodology for Identifying Groundwater Dependent Ecosystems (Reference Document)
[4] Climate Engine (Huntington et al., 2017) is an online tool for cloud computing of climate and remote sensing data powered by Google Earth Engine (Gorelick et al., 2017) (https://app.climateengine.org/climateEngine)
[5] Paso Robles Basin Riparian Health Trend Analysis as an Indicator of SW-GW Interaction, GSI, (Reference Document)

level and vegetation data presented above. However, the model also had gaining stream reaches along Huer Huero Creek and parts of the upper reach of the Estrella River (from Shandon down to Shedd Canyon), where historical vegetation does not indicate the presence of shallow groundwater. This might indicate a bias in modeling results toward slightly high Alluvial Aquifer groundwater levels along those rivers. Conversely, the model did not simulate gaining flow where the San Juan Fault crosses San Juan Creek, where a perennial spring is located in the channel.

The locations of simulated gaining and losing reaches were also compared for 1998 and 2016, representing years with relatively high and low groundwater levels, respectively. The locations of simulated gaining reaches in 1998 closely matched the locations of simulated groundwater inflow shown in **Figure 4-17**. As expected, the lengths of the gaining reaches were much shorter in 2016 but still included part of the middle reach of the Estrella River near Whitley Gardens, where a dense patch of riparian vegetation is present.

5.5.5 Delineation of Interconnected Surface Water

Stream reaches where groundwater may potentially be interconnected with surface flow or the riparian vegetation root zone are shown in **Figure 5-18**. The delineation is based on an interpretation of the data and analyses described in the preceding sections. This involved some subjective assessments such as differentiating “dense” from “sparse” riparian vegetation or estimating how frequent and persistent interconnection may be designated “interconnected”. Along stream channels, two categories of interconnection were assigned: interconnection with surface water and interconnection with riparian vegetation. The former requires higher water levels and typically occurs less frequently or for shorter periods of time. The latter includes areas where the water table is less than about 25 feet below the stream bed most of the time. Empirically, this is the root zone depth associated with the presence of dense riparian vegetation. These considerations are discussed by stream reach below. No efforts were made to ground truth or physically verify the presence of actual interconnection and there is no evidence that pumping from the Paso Robles is affecting these areas.

The entire length of the Salinas River from Paso Robles to the confluence with the Nacimiento River was classified as interconnected with surface water and shallow groundwater in the Alluvial Aquifer. The presence of very stable water levels close to the riverbed elevation in all Alluvial Aquifer wells along that reach supports this designation, as does the presence of sparse to dense riparian vegetation along most of the reach. Even small inflows to the upper end of the reach commonly extend along the entire length of the reach, which also indicates that the water table is at or near the riverbed elevation along the entire length of the reach.

The Estrella River below Estrella (near Jardine Road) was classified as not interconnected. This classification reflects the very small amount of riparian vegetation along the entire reach throughout the analysis period (1989-2021). Although shallow clay layers are thought to be present in this area and the new shallow monitoring well at Airport Road confirms the presence of a water table 30 feet below the ground surface, this depth to water appears to be too great for vegetation to readily establish given the low frequency and duration of surface flow in the river.

The middle reach of the Estrella River, from Jardine Road up to Shedd Canyon contains alternating segments that appear to be not connected or are potentially connected to the vegetation root zone. These segments were classified primarily on the density of riparian vegetation. The only confirmation of groundwater levels is at a single well near the downstream end of the middle reach, where the depth to water was consistently about 10 feet below the riverbed. Emergent flow appeared to be present in some dry-season aerial photographs along a segment below Shedd Canyon, about 2.5 to 4 miles upstream of Highway 46. Open water or wet channel sediments appear to be present in some aerial photos in winter or spring but not during the dry season since about 2012. Thus, that segment was not classified as interconnected with surface water as of the start of the SGMA management period (2015).

The Estrella River from Shedd Canyon up to Shandon and the lowermost 10 miles of San Juan Creek were classified as not interconnected. Although sparse riparian vegetation is present in places, the depth to groundwater in Paso Robles Formation Aquifer wells has been declining for decades and now exceeds the rooting depth of riparian vegetation. The vegetation that remains probably consists of facultative phreatophytes or is vestigial mature vegetation that has managed to survive declining water levels. In any case, recruitment of new phreatophytic riparian vegetation is very unlikely under current conditions. Many of the data used in the analysis pre-date 2015, which was the start of the SGMA management period. SGMA does not require that GDEs be restored to any condition that occurred prior to 2015.

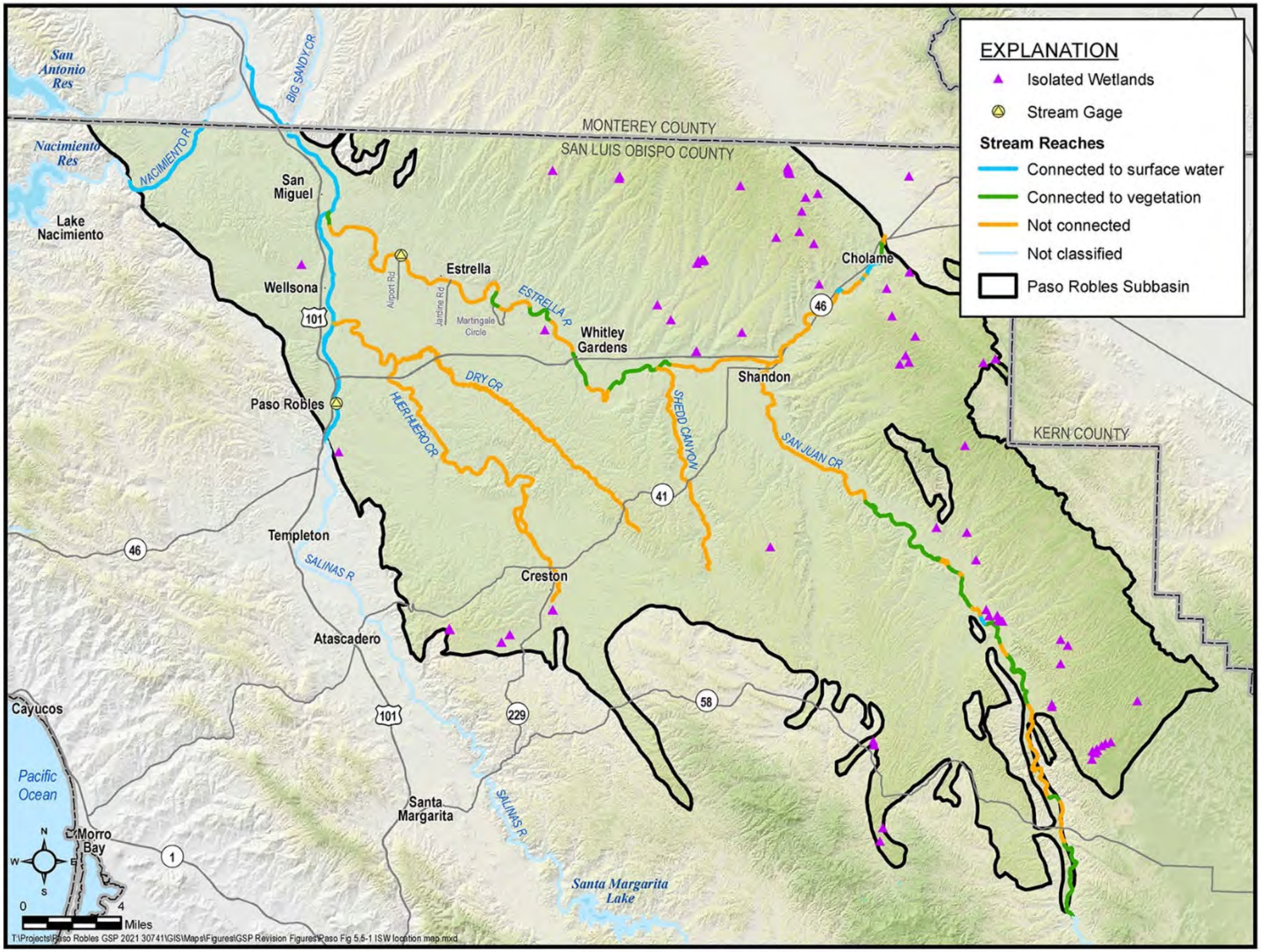

Figure 5-48. Locations of Interconnection Between Groundwater and Surface Water

Much of San Juan Creek more than 10 miles upstream of Shandon appears to be potentially interconnected to riparian vegetation based on the presence of sparse or dense vegetation along most of the reach. One short reach where the San Juan Fault crosses the creek was classified as interconnected to surface water because it usually has emerging groundwater along a low-flow channel bordered by wetland vegetation. The one well with water-level data along this reach has water levels that are usually within 10 feet of the creek bed elevation.

The lowermost 5 miles of Cholame Creek were delineated as not connected based on the absence of significant riparian vegetation and water levels in the sole monitoring well that average about 30 feet below the ground surface. Farther up the creek, however, is a reach several miles long that has open water or wetland vegetation in most historical aerial photographs. Shallow groundwater along that reach could be caused by faults that pass through the area (see Figure 4-4). For unknown reasons, the shallow water table and surface flow conditions have not caused the establishment of dense riparian vegetation.

Riparian vegetation is generally absent along Huer Huero Creek, Dry Creek and Shedd Canyon and is typically sparse where it is present. The depth to water in wells in those parts of the Subbasin is uniformly too deep to support riparian vegetation. Accordingly, those waterways were all classified as not connected to groundwater.

The reach of the Nacimiento River that traverses the northwest corner of the Subbasin was classified as interconnected to surface water because reservoir releases during the dry season are more than sufficient to sustain a high water table adjacent to the river. That reach is far from major pumping centers in the Paso Robles Subbasin and hence unlikely to be significantly depleted by pumping.

Isolated, off-channel wetlands shown on the interconnected surface water map (Figure 5-14) are the subset of the NCCAG wetlands where distinctly green vegetation was visible in dry season aerial photographs and the feature appeared to be a natural depression, not a constructed stockpond. These areas are not considered to be connected to groundwater and are not subject to depletion by pumping.

5.5.6 Groundwater Dependent Animals

Many fish and wildlife species use aquatic and riparian habitats that are supported by groundwater. For the purpose of this GSP, beneficial use for habitat is limited to native species present in the Subbasin as of 2015, when SGMA took effect. The focus was on species that are state or federally listed as threatened, endangered or of special concern. This implicitly assumes that non-listed species will probably also be sustained if hydrologic conditions are suitable for sustaining the rarer species.

The reference document entitled Methodology for Identifying Groundwater Dependent Ecosystems documents a review of several sources of habitat information. Those sources often disagreed regarding which species are present within the Paso Robles Subbasin. For GSP purposes, it was concluded that animals that depend on riparian vegetation will probably be in good condition if the vegetation is in good condition. The one listed aquatic species seasonally present in streams that cross the Subbasin is southern steelhead which migrates up and down the Salinas River in winter and spring. Analysis in the above-mentioned reference document shows that groundwater pumping does not materially impact passage opportunity for steelhead because passage is only possible during relatively high flows and pumping from the Paso Robles Formation Aquifer has little effect on Salinas River flows because of clay layers beneath the alluvium along the Salinas River.

7.6 Interconnected Surface Water Monitoring Network

Data presented in Section 5.5 indicate potential groundwater connection to surface water or to the riparian vegetation root zone at least some of the time along certain sections of the Salinas River, along the middle reach of the Estrella River (from Shedd Canyon to Martingale Circle) and along San Juan Creek upstream of Spring Creek. The potential connection along the Salinas River is between the surface water system and the adjacent Alluvial Aquifer. There is no evidence that the Salinas River surface water flows are connected to the underlying Paso Robles Formation Aquifer. The potential connection between the surface water system along the middle reach of the Estrella River (from Shedd Canyon to Martingale Circle) and along San Juan Creek upstream of Spring Creek, and the underlying Paso Robles Formation Aquifer is unknown but sufficient evidence exists that there could potentially be a connection, and therefore further investigation in these areas is recommended.

Seven existing wells already are monitored for water levels within 2,000 feet of those stream reaches and these have water-level patterns consistent with expected shallow water table conditions. Two of these are shown as blue squares in **Figure 7-5**. The locations of the others are not shown due to confidentiality restrictions, but they include three wells along the Salinas River between Wellsona and the Estrella River, one well next to the Estrella River near Jardine Road and one well next to San Juan Creek about 7 miles above Shandon. The City of Paso Robles' Supplemental Environmental Project (SEP) identified ten sites where multi-depth monitoring wells and stream gages would be useful for better characterizing interconnection of surface water and groundwater (Cleath-Harris Geologists, 2021). Those sites are shown as orange circles numbered 1 through 10 on the figure. Sites 1 and 9 have existing stream gages, and shallow and intermediate depth monitoring wells were installed nearby in spring 2021.

7.6.1 Interconnected Surface Water Monitoring Data Gaps

The existing shallow monitoring wells do not adequately cover the three stream reaches where interconnection of groundwater with surface water and/or the riparian vegetation root zone appears to occur some or most of the time. The presence of shallow clay layers and degree of separation between Alluvial Aquifer groundwater levels and Paso Robles Formation Aquifer pumping and water levels is poorly known in the eastern part of the Subbasin. Recommended locations for additional wells to verify and monitor interconnection are listed in **Table 7-6** and shown in **Figure 7-5** as green squares labeled A through H. Shallow and deep monitoring wells are needed at some of the locations to confirm any differences between Alluvial Aquifer and Paso Robles Formation Aquifer water levels. These locations are suggestions that would need to be refined based on practical considerations such as land ownership and adequate road access.

New stream gages have already been installed since the beginning of the GSP development process. This includes SEP sites 2, 4 and 10 on the Salinas River, Huer Huero Creek and Estrella River (see **Figure 7-5**) and a new gage installed by DWR on Cholame Creek at SEP site 8. Of the remaining SEP sites, a gage at site 7 would be the most useful.

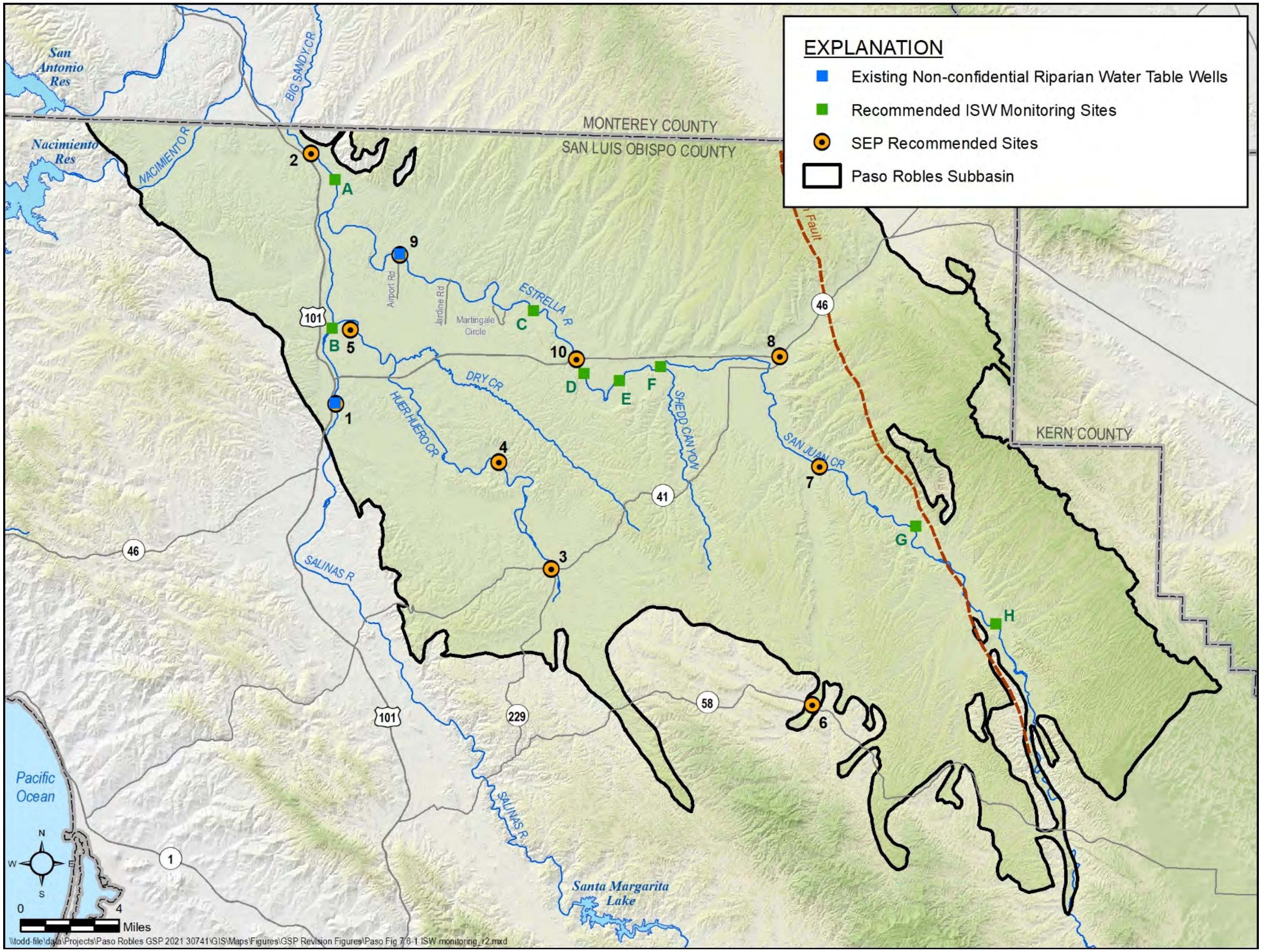

Figure 7-1. Interconnected Surface Water Monitoring Well Network

Table 7-1. Recommended Well Locations for Monitoring Interconnected Surface Water and GDEs

Map Label	Description
A	Salinas River in San Miguel, near existing Paso Robles Formation Aquifer monitoring well clusters. This site could replace or be shifted to SEP site 2. Only a shallow well is needed.
B	Salinas River near Wellsona. This fills a long reach with no data and is a location where surface flow is likely to become discontinuous before other reaches. Only a shallow well is needed.
C	Estrella River above Martingale Circle. This site is near an existing monitoring well near the river that shows a Paso Robles Formation Aquifer water-level pattern. Only a shallow well is needed.
D	Estrella River at Whitley Gardens. The suggested site is at the River Grove Drive bridge at the upstream edge of town. This site could replace or be shifted to SEP site 10. This site needs shallow and deep wells to confirm whether the alluvial water table is somewhat independent of underlying Paso Robles Formation Aquifer water levels.
E	Estrella River 3.3 channel miles upstream of Highway 46 (Whitley Gardens). There are no nearby existing wells to confirm the apparent presence of shallow water table conditions. This site needs shallow and deep wells to confirm whether the alluvial water table is somewhat independent of underlying Paso Robles Formation Aquifer water levels.
F	Estrella River near Shedd Canyon confluence. There are no nearby existing wells to confirm the apparent presence of shallow water table conditions. This site needs shallow and deep wells to confirm whether the alluvial water table is somewhat independent of underlying Paso Robles Formation Aquifer water levels.
G	San Juan Creek between existing monitoring well and San Juan Fault preferably near riparian vegetation. A shallow well is needed at this location to supplement the single existing well along this reach of San Juan Creek, which is reportedly 225 feet deep but has relatively stable water levels close to the creek bed elevation, like an Alluvial Aquifer well.
H	At this location, the San Juan Fault forces groundwater into the channel of San Juan Creek, creating a spring and a short reach of flowing water bordered by wetland vegetation. In lieu of a well, the length of the flowing reach and wetland area could be monitored to detect decreases in the flow of groundwater across the fault.

8 SUSTAINABLE MANAGEMENT CRITERIA

8.4 Chronic Lowering of Groundwater Levels Sustainable Management Criteria

This section is organized to first present the general concepts of the sustainable management criteria as developed in 2019. Responsive to the DWR Corrective Actions, this is supplemented by additional description of the undesirable results and additional explanation of the sustainability criteria with evaluation of the effects of the criteria on beneficial uses and users of groundwater.

8.4.1 Information and Methodology Used to Establish Measurable Objectives and Minimum Thresholds

The information used for establishing the chronic lowering of groundwater levels measurable objectives and minimum thresholds includes:

- Information about the public definition of significant and unreasonable conditions and preferred current and future groundwater elevations, gathered from the Sustainable Management Criteria survey and public outreach meetings.
- Historical groundwater elevation data from wells monitored by the County of San Luis Obispo
- Depths and locations from existing well records
- Maps of current and historical groundwater elevation data
- Results of modeling of various scenarios of future groundwater level conditions

Information and methods used to initially establish sustainable management criteria were supplemented using:

- The identified deficiencies and Corrective Actions defined by DWR in its June 3, 2021 letter reviewing the Paso Robles Area Subbasin – 2020 Groundwater Sustainability Plan and the January 21, 2022 “Incomplete” Determination of the 2020 Paso Robles Area Subbasin Groundwater Sustainability Plan (Appendix O)
- Evaluation of existing well records with information on construction and locations (as of 2021) relative to the Representative Monitoring Site (RMS) wells

- Evaluation of the effects of the sustainability criteria on beneficial uses and users of groundwater, especially existing domestic well records

8.4.2 Locally Defined Significant and Unreasonable Conditions

This section provides the descriptions, definitions, and evaluation that are the basis for establishing sustainability criteria in the next section.

- Description of significant and unreasonable conditions
- Potential causes of significant and unreasonable conditions
- Definition of significant and unreasonable conditions

8.4.2.1 Description of Significant and Unreasonable Conditions

As groundwater levels decline in a well, a sequence of increasingly severe conditions will occur. These include an increase in pumping costs and a decrease in pump output (in gallons per minute). With further declines, the pump may break suction, which means that the water level in the well has dropped to the level of the pump intake. This can be remedied by lowering the pump inside the well, which can cost thousands of dollars. Chronically declining water levels will eventually drop below the top of the well screen. This exposes the screen to air, which can produce two adverse effects. In the first, water entering the well at the top of the screen will cascade down the inside of the well, entraining air; this air entrainment can result in cavitation damage to pump. The other potential adverse effect is accelerated corrosion of the well screen. Corrosion can reduce the efficiency and capacity of a well and eventually creates a risk of well screen collapse, which would likely render the well unusable. If water levels decline below the well screen, water might not be able to flow into the well at the desired rate regardless of the capacity or depth setting of the pump. This might occur more frequently where the thickness of basin fill materials is relatively thin. While describing a progression of potential adverse effects, at some point the well no longer fulfills its water supply purpose and is deemed to have "gone dry." For the purposes of this discussion, a well going dry means that the entire well (to the reported total depth of the well) is unsaturated.

For purposes of setting the Measurable Objective and Minimum Threshold, significant and unreasonable conditions are defined in terms of an increased percentage of wells unable to sufficiently produce water. The rationale is based on four general assumptions summarized below, with more explanation in the following sections:

1. Accurate information on the location, elevation, use, status, and construction of most local supply wells is not readily available for detailed evaluation of the range of adverse effects. Analysis was initiated with the simple concept of the entire well depth

as “going dry” and then applied to the set of existing wells that have available information on location and construction.

2. Responsibility for wells in a SGMA managed groundwater basin is shared between GSAs that manage groundwater levels to protect against significant and unreasonable conditions and well owners who have responsibility for their respective wells.

3. During the recent drought, many wells within the Subbasin were reported to have been unable to sufficiently produce water. The California Department of Water Resources (DWR) *Household Water Supply Shortage Reporting System* (DWR 2021)[1] lists a total of 141 private household wells (i.e., domestic wells) that no longer sufficiently produce water as of the end of 2017, as shown on Figure 8-1.

4. Wells that are unable to sufficiently produce water prior to 2017 are assumed to have either been replaced by deeper wells or an alternative water supply source. 2017 is used as the end of this analysis period to be consistent with the water level measurable objectives defined below.

8.4.2.2 Potential Causes of Significant and Unreasonable Conditions

With respect to chronic groundwater level declines, the primary cause of significant and unreasonable conditions is a water budget imbalance with pumping in excess of recharge. At any given time and place, this could involve multiple factors including local hydrogeologic conditions, cumulative pumping, reduced natural recharge due to drought, or reduction of surface water supplies used in lieu of groundwater and associated reduction in groundwater recharge from return flows.

The groundwater level declines in turn cause adverse conditions (i.e., loss of yield) that not only vary across the Subbasin and through time, but also differ in magnitude from well to well depending on its location, construction, operation, and conditions. Accurate information on the location, elevation, status, and construction of most local supply wells is not readily available and therefore, detailed evaluation of the range of adverse effects is not possible.

Moreover, the significant and unreasonable conditions of a well losing yield, experiencing damage, or the inability to sufficiently produce water represent a complex interplay of causes and shared responsibility. Some of the potential causes are within the responsibility of the GSAs. Most notably, a GSA is responsible for groundwater basin management without causing significant and unreasonable conditions such as chronic groundwater level declines. SGMA also requires that a GSA address significant and unreasonable effects caused by groundwater conditions *throughout the basin.* This indicates that a GSA is not solely

[1] https://mydrywell.water.ca.gov/report/

responsible for local or well-specific problems and furthermore that responsibility is shared with a well owner. A reasonable expectation exists that a well owner would construct, maintain, and operate the well to provide its expected yield over the well's life span, including droughts, and with some anticipation that neighbors also might construct wells (consistent with land use and well permitting policies).

8.4.2.3 Definition of Significant and Unreasonable Conditions

As context, the Sustainability Goal for the Paso Robles Subbasin is to sustainably manage groundwater resources for the long-term community, financial, and environmental benefit of users while maintaining the unique cultural, community, and business aspects of the Subbasin. Significant and unreasonable groundwater levels were initially defined in 2019 as those that:

- Impact the ability of existing domestic wells of average depth to produce adequate water for domestic purposes.
- Cause significant financial burden to those who rely on the groundwater basin
- Interfere with other SGMA sustainability indicators.

These have been modified. First, the limitation of existing domestic wells to those of average depth has been modified to conceptually include all existing well records, with a focus on domestic well records. This focus recognizes the importance of domestic wells as a source of potable supply (often the sole source to one or more households) and assumes that these are more likely to be shallow and thus susceptible to undesirable results from groundwater level declines. Data limitations in identifying domestic wells and evaluating impacts are acknowledged throughout this section. Second, financial burdens are not evaluated as a groundwater sustainability issue but are more appropriately addressed as part of the analysis of projects and management actions and implementation plan. Third, the effects on other SGMA sustainability indicators are addressed in Section 8.4.5.5.

For purposes of this supplementary analysis in response to DWR Corrective Actions and to support the sustainability criteria in this GSP, significant and unreasonable groundwater levels are defined as follows.

1. A significant number of wells throughout the Subbasin unable to sufficiently produce water with the following considerations:
    - As noted above, "going dry" means that the entire well length (to the bottom of the well) is unsaturated.
    - It is acknowledged that groundwater level declines involve a continuum of potential impacts that are specific to a well.

- These include effects not noticed by the well owner and those that are noticed and reasonably handled by the well owner.
- This significance criteria relates to wells that unable to sufficiently produce water prior to 2017.
- The GSAs define a significant number of wells throughout the Subbasin as ten percent of all wells, as represented by wells with known location and construction information.

2. Chronic groundwater level declines that interfere with other SGMA sustainability indicators.

In that light, the definition of significant and unreasonable conditions would be the chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply equivalent to more than five percent of wells unable to sufficiently produce water. This is defined by groundwater conditions occurring throughout the Subbasin. Additional temporal and spatial components defining undesirable results are presented in Section 8.4.6.

8.4.3 Measurable Objectives

The measurable objectives for chronic lowering of groundwater levels represent target groundwater elevations that are established to achieve the sustainability goal by at least 2040. Measurable objectives are groundwater levels established at each RMS. Measurable objective groundwater levels are higher than minimum threshold groundwater levels. Measurable objectives provide operational flexibility above minimum threshold levels to ensure that the Subbasin can be managed sustainably over a reasonable range of climate and hydrologic variability. Measurable objectives may change after GSP adoption as new information and hydrologic data become available.

8.4.3.1 Methodology for Setting Measurable Objectives

Initial measurable objectives were established based on historical groundwater level data along with input and preferences on future groundwater levels from domestic groundwater users, agricultural interests, environmental interests, and other Subbasin stakeholders. The input and preferences were used to formulate a range of conceptual measurable objective scenarios. These scenarios were evaluated using the GSP model to project the effect on future Subbasin operation and to select measurable objectives for the GSP.

8.4.3.2 Paso Robles Formation Aquifer Measurable Objectives

Initial measurable objectives for each groundwater level RMS in the Paso Robles Formation Aquifer were set at the approximate 2017 average groundwater levels. The measurable objectives are depicted on hydrographs in Appendix H.

8.4.3.3 Alluvial Aquifer Measurable Objectives

Only one RMS could be established for the Alluvial Aquifer. This RMS is associated with a new monitoring well (well name 18MW-0191) installed by the City of Paso Robles in June 2018. A measurable objective was not established for this RMS because it does not have sufficient historical groundwater level data. Additional measurable objectives will be established for the Alluvial Aquifer early after GSP adoption when the RMS network is expanded by either locating new candidate monitoring wells, modifying confidentiality agreements at known wells so that groundwater level data can be used, or by installing new monitoring wells.

8.4.4 Minimum Thresholds

Section §354.28(c)(1) of the SGMA regulations states that *"The minimum threshold for chronic lowering of groundwater levels shall be the groundwater elevation indicating a depletion of supply at a given location that may lead to undesirable results."*

The Sustainable Management Criteria survey (Appendix G) provided general information on stakeholders' preferences for future groundwater levels. Initial minimum thresholds were developed based on the survey and public outreach results, hydrogeologic information including contours of 2017 groundwater levels and evaluation of historical groundwater level variability at the RMS, and information about well construction.

Average 2017 non-pumping groundwater levels have been selected as measurable objectives, and minimum thresholds are set below those levels. As stated in the Executive Summary section ES-7, a groundwater elevation minimum threshold for each monitoring well was set to an elevation 30 feet below the measurable objective. Analysis of historical groundwater elevation data suggested that 30 feet allows for reasonable operational flexibility that accounts for seasonal and anticipated climatic variations on groundwater elevation. Specific conditions such as well depths at each RMS were considered when establishing the groundwater level for the initial minimum threshold. Protecting a sustainable groundwater supply for existing wells was a guiding consideration. Minimum thresholds were selected to allow sufficient time for the GSAs to develop a broader and publicly accessible dataset that will give clear guidance to establish a reasonable justification for any potential management actions that would be triggered by exceedances of minimum thresholds.

As noted above, only one RMS could be established for the Alluvial Aquifer. This RMS is associated with a new monitoring well (well name 18MW-0191) installed by the City of Paso Robles in June 2018. A measurable objective was not established for this well; therefore, a minimum threshold is not established. A minimum threshold will be established after additional groundwater level data are available for the well. Additional minimum thresholds will be established for the Alluvial Aquifer early after GSP adoption when an expanded RMS network is developed.

8.4.5 Evaluation of Effect on Existing Wells of Sustainability Criteria

This section focuses on the sustainability criteria for the Paso Robles Formation Aquifer. As noted in Sections 8.4.3.3 and 8.4.4, only one well was identified in 2019 to represent the Alluvial Aquifer and no sustainability criteria were defined. This 2021 evaluation includes:

- identification of existing well records with construction information relative to RMS wells
- presentation of measurable objectives at RMS and analysis of effects on existing well records
- presentation of minimum thresholds at RMS and analysis of effects on existing well records

8.4.5.1 Evaluation of Existing Wells with Construction Information

Figure 8-2 shows the locations of the Representative Monitoring Site (RMS) wells along with locations of existing supply well records in their vicinity. Each of the existing well records (shown on the map as a colored dot) has an assigned location and documented construction details from available sources.

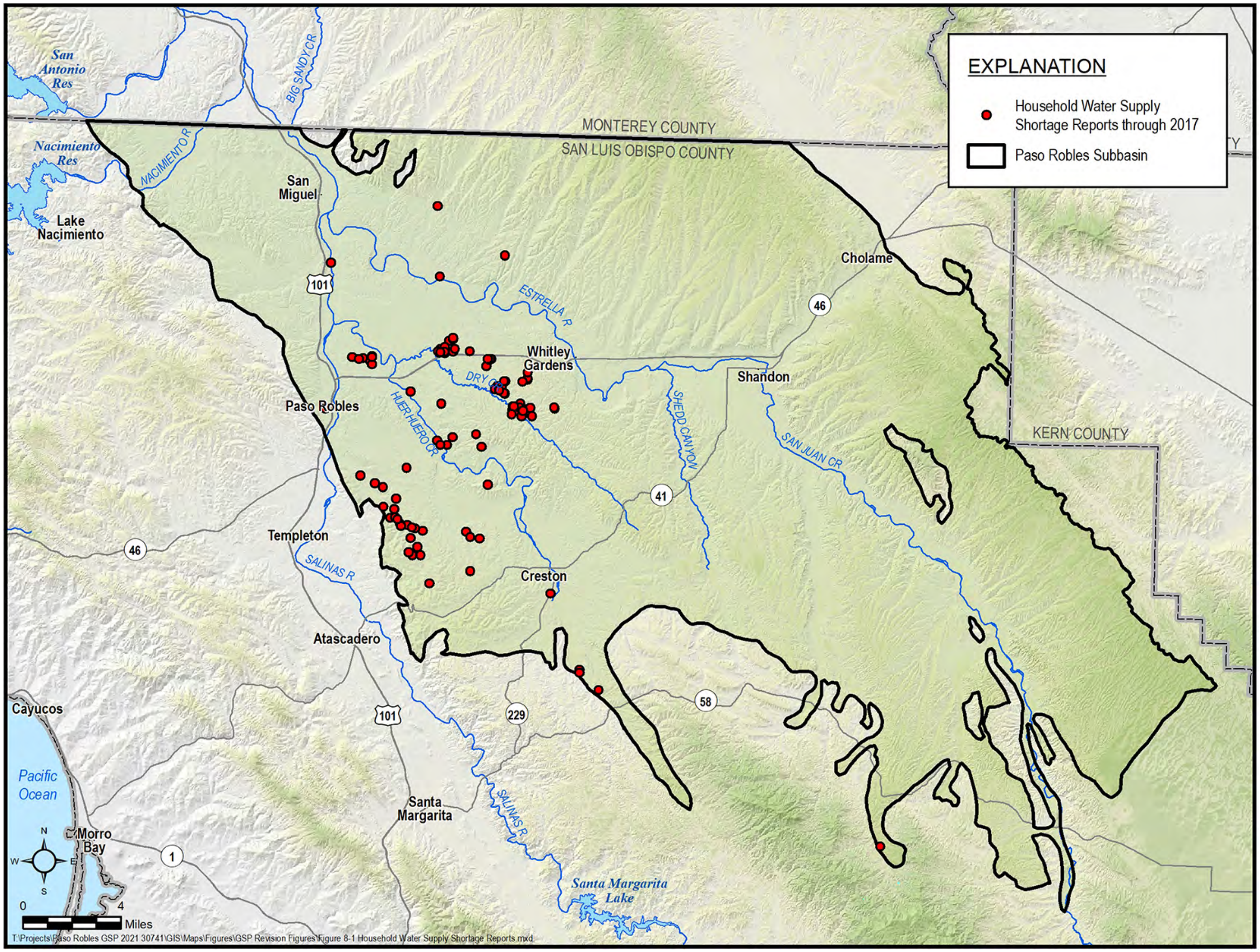

Figure 8-1. Household Water Supply Shortage Reports through 2017

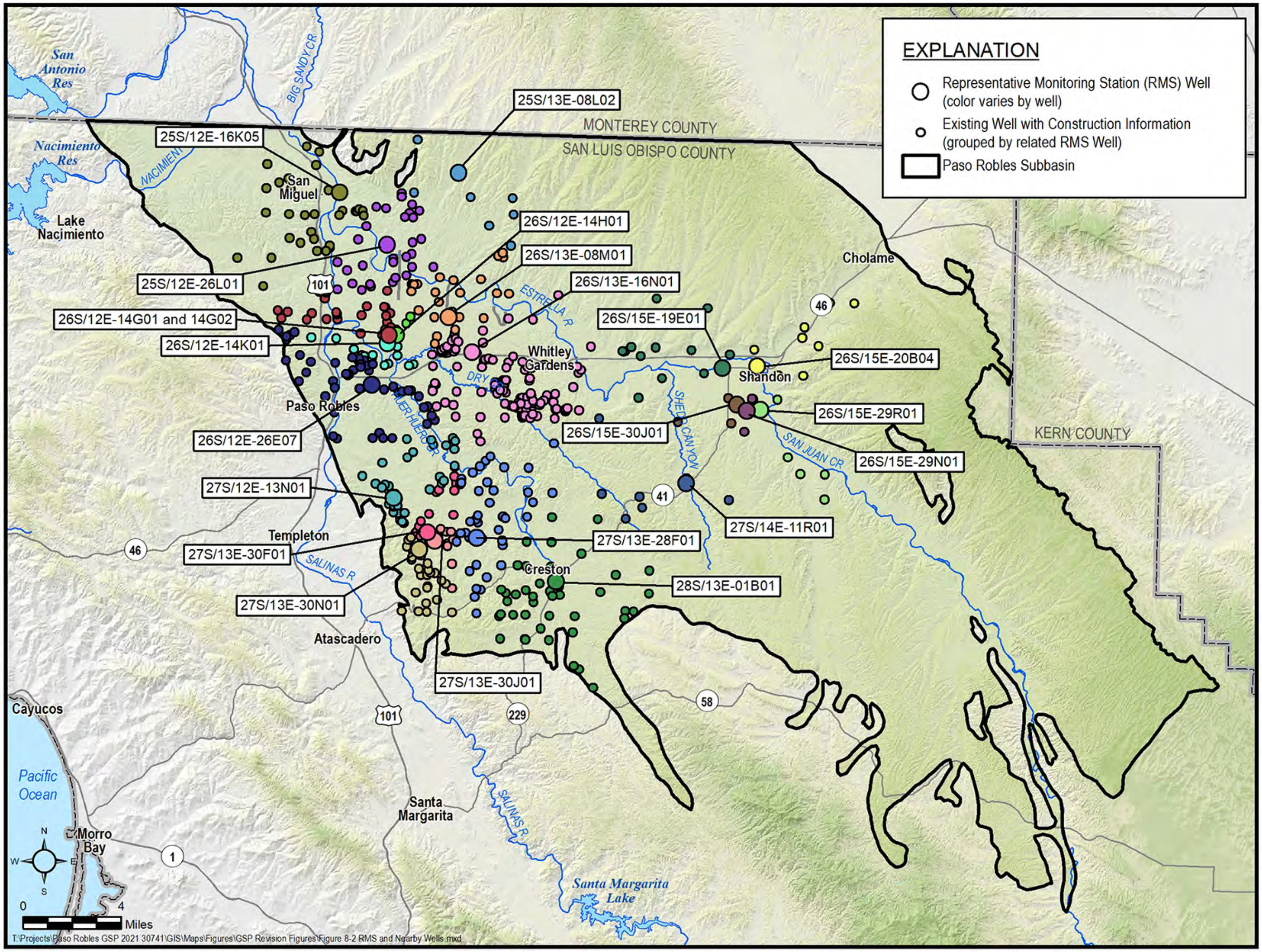

Figure 8-2. Representative Monitoring System (RMS) Wells and Existing Wells with Construction Information

Well locations and total depth information for existing wells in the Subbasin have been collected from three sources:

1. Records digitized as part of the Paso Robles Subbasin Data Management System (DMS)
2. Information from model development (GSSI 2016)
3. Records from DWR's Online System of Well Completion Reports (OSWCR, DWR 2021)

A total of 1,593 wells with total depth information was identified within these three datasets: 71 from the DMS, 193 from model development, and 1,329 from OSWCR. While these datasets include significant well location and construction information, they also have limitations. Specifically:

- These datasets are solely records of well construction. None of the three indicate which wells have been replaced or destroyed, which still exist, or which are actively used for water supply.
- None of these records include information on pumping equipment, so assessment of the effects of water level changes on pumping costs is not possible.
- Very few of these records include complete screen interval information, and total well depth is the most commonly available information relating to well construction. Accordingly, assessment of water levels in comparison to saturated screen length is not possible, but comparison to total well depth is.
- The wells in these datasets represent a long history of well construction and groundwater conditions in the Subbasin. Older wells were typically shallower, corresponding to higher water levels and the drilling technology and practices at the time. Older wells have not been removed from these datasets, even though old shallow wells are likely no longer viable.
- While OSWCR includes the most wells by far, accurate locations for most of the wells in the OSWCR dataset are unknown. Only 4.5 percent of the OSWCR sourced wells with total depth information in the Subbasin are located by address. The remaining wells from this data source have been given Public Land Survey System (PLSS) section centers as their location. This location inaccuracy limits how these data can be used:

- Groundwater surface elevation from subbasin-wide contours or numerical model simulations interpolated at the mapped locations will be incorrect because the elevations would be different at the actual well location(s).
- The hydrogeologic conditions and aquifer in which these wells are completed cannot be accurately assessed because the conditions may be different at the actual well location(s).
- Assessment of the impacts of historical or future groundwater conditions on these wells is limited by the inaccurate locations and should be assumed to be representative in the aggregate and not on an individual-well basis.

The data from these three sources were combined into a single geographically-enabled dataset for evaluation in comparison to water levels in the RMS wells. These existing well recorded locations were mapped and the RMS well closest to each existing well record was identified. The existing well records were then grouped according to the nearest RMS well.

For each of the 22 groupings of wells around the RMS wells, the total depth of the wells was then compiled for comparison to depth to groundwater measurement in the respective RMS well. This allows the enumeration of how many wells theoretically would have been unable to sufficiently produce water in historical and future periods.

Table 8-1 presents summary information for the 1,593 existing well records grouped by the nearest RMS well. As shown in Table 8-1, there is variability in the number and depths of existing wells nearest each RMS well. The number of nearby wells ranges from zero for RMS Well 26S/12E-14G02 (PASO-0017) to 310 for RMS Well 26S/13E-16N01 (PASO-0282). The shallowest well in this dataset is only 6 feet deep (nearest to RMS Well 26S/12E-26E07 (PASO-0124), while the deepest is 1,250 feet deep (nearest RMS Well 26S/13E-08M01 (PASO-0164). While there is a great deal of variability in the total depth of existing well records, the important observations from Table 8-1 are that:

1. The average depth of existing well records is over 400 feet, as shown by the weighted average at the bottom of the last column in the table.
2. The depth of the shallowest wells in the Subbasin varies widely with geography, as shown by the wide range of shallowest well total depths. However, the average depth of the shallowest wells in the Subbasin is only 76 feet, as indicated by the weighted average for the column showing the total depth of the shallowest wells.

These two statistics show that while most well records are for relatively deep wells, there have historically been shallow wells located in the Subbasin.

Table 8-1. RMS Wells and Nearby Existing Wells

RMS Well ID (alt ID)	Number of Nearby Wells	Total Depth of Shallowest Nearby Existing Well (feet)	Total Depth of Deepest Nearby Existing Well (feet)	Average Nearby Well Total Depth (feet)
25S/12E-16K05 (PASO-0345)	40	39	800	431
25S/12E-26L01 (PASO-0205)	92	70	890	377
25S/13E-08L02 (PASO-0195)	8	270	1,180	644
26S/12E-14G01 (PASO-0048)	99	30	870	362
26S/12E-14G02 (PASO-0017)	0	---	---	---
26S/12E-14H01 (PASO-0184)	11	100	1,090	585
26S/12E-14K01 (PASO-0238)	53	32	1,075	379
26S/12E-26E07 (PASO-0124)	174	6	1,004	347
26S/13E-08M01 (PASO-0164)	49	97	1,250	623
26S/13E-16N01 (PASO-0282)	310	120	1,220	610
26S/15E-19E01 (PASO-0073)	16	55	1,060	591
26S/15E-20B04 (PASO-0401)	36	39	475	304
26S/15E-29N01 (PASO-0226)	2	400	640	520
26S/15E-29R01 (PASO-0406)	23	210	867	419
26S/15E-30J01 (PASO-0393)	7	290	800	565
27S/12E-13N01 (PASO-0223)	62	92	980	442
27S/13E-28F01 (PASO-0243)	188	55	800	379
27S/13E-30F01 (PASO-0355)	55	104	810	398
27S/13E-30J01 (PASO-0423)	51	65	740	413
27S/13E-30N01 (PASO-0086)	111	100	660	348
27S/14E-11R01 (PASO-0392)	8	500	940	689
28S/13E-01B01 (PASO-0066)	198	62	750	381
Minimum:	0	6	475	304
Maximum:	310	500	1,250	689
Range:	310	494	775	385
Total / Weighted Average:	1,593	76	927	437

8.4.5.2 Effect of Paso Robles Formation Aquifer Measurable Objectives

Measurable objectives for groundwater level RMS wells in the Paso Robles Formation Aquifer are summarized in Table 8-22. Initial measurable objectives were set at the approximate 2017 average groundwater levels.

Assessment of the measurable objectives for the Paso Robles Formation Aquifer involved evaluation of the number of existing recorded wells that would have been unable to sufficiently produce water in 2017 when the measurable objective last occurred. The total depths of existing wells (with construction information) near the RMS wells were reviewed to identify which wells would be unable to sufficiently produce water in average 2017 conditions, as represented by the nearest RMS well. The number and percentage of wells near each RMS well that would have been unable to sufficiently produce water are indicated on Table 8-2. As shown, a total of 225 wells within the available well information dataset would have been unable to sufficiently produce water in average 2017 groundwater level conditions, equivalent to 14.1 percent of the wells with construction information. This is more than the 141 wells that were reported to have been unable to sufficiently produce water in the *Household Water Supply Shortage Reporting System* (DWR 2021). This likely reflects three characteristics or limitations of the available information. First, the dataset includes well construction records for very old wells that have either been destroyed or are no longer in use and thus would not be reported to DWR. Second, not all of the existing wells for which construction information is available are household water supply sources, and thus this analysis likely includes wells for other purposes (e.g., irrigation). Finally, not all wells that are unable to sufficiently produce water may have been reported to DWR.

Table 8-2. Chronic Lowering of Groundwater Levels Measurable Objectives for Paso Robles Formation Aquifer

RMS Well ID (alt ID)	Measurable Objective (feet NAVD88)	Number of Nearby Wells Dry at Measurable Objective	Percent of Nearby Wells Dry at Measurable Objective
25S/12E-16K05 (PASO-0345)	521	3	7.5%
25S/12E-26L01 (PASO-0205)	490	35	38.0%
25S/13E-08L02 (PASO-0195)	916	0	0.0%
26S/12E-14G01 (PASO-0048)	495	32	32.3%
26S/12E-14G02 (PASO-0017)	498	0	---
26S/12E-14H01 (PASO-0184)	505	2	18.2%
26S/12E-14K01 (PASO-0238)	483	17	32.1%
26S/12E-26E07 (PASO-0124)	648	38	21.8%
26S/13E-08M01 (PASO-0164)	613	4	8.2%
26S/13E-16N01 (PASO-0282)	588	4	1.3%
26S/15E-19E01 (PASO-0073)	929	1	6.3%
26S/15E-20B04 (PASO-0401)	967	1	2.8%
26S/15E-29N01 (PASO-0226)	993	0	0.0%
26S/15E-29R01 (PASO-0406)	986	0	0.0%
26S/15E-30J01 (PASO-0393)	959	0	0.0%
27S/12E-13N01 (PASO-0223)	716	10	16.1%
27S/13E-28F01 (PASO-0243)	894	19	10.1%
27S/13E-30F01 (PASO-0355)	766	16	29.1%
27S/13E-30J01 (PASO-0423)	806	12	23.5%
27S/13E-30N01 (PASO-0086)	810	31	27.9%
27S/14E-11R01 (PASO-0392)	1,028	0	0.0%
28S/13E-01B01 (PASO-0066)	1,040	0	0.0%
	Total:	225	14.1%

8.4.5.3 Effect of Paso Robles Formation Aquifer Minimum Thresholds

Minimum thresholds for groundwater level RMS wells in the Paso Robles Formation Aquifer are summarized on Table 8-33. Hydrographs for RMS wells with minimum thresholds are included in Appendix H. These minimum thresholds were selected to avoid the locally defined significant and unreasonable conditions.

As with the measurable objectives, the number of existing wells that would be unable to sufficiently produce water at the minimum threshold was assessed. In this case, the assessment only included well records that would not have gone dry at the measurable objective. It is assumed that wells that would have been unable to sufficiently produce water in average 2017 groundwater conditions were either no longer active or were replaced with a deeper well or alternative water supply source. The number and percentage of additional wells near each RMS well that would be unable to sufficiently produce water at the minimum threshold are indicated on Table 8-3. A total of 62 additional wells, or 3.9 percent within the available well information dataset, would be unable to sufficiently produce water at the minimum threshold. This is less than the number of wells that were reported to have been unable to sufficiently produce water in the Household Water Supply Shortage Reporting System. The Household Water Supply Shortage Reporting System indicates that at least 95 wells, or 6 percent of wells, have been unable to sufficiently produce water since 2017. Some of these well issues have been resolved by lowering the pump or deepening the well. The number of wells unable to sufficiently produce water is expected to increase due to continued declining groundwater levels. Furthermore, current groundwater levels are above the minimum threshold except for one well, which will be the subject of further investigation. Therefore, the available data indicate that the minimum thresholds are protective of undesirable results as they relate to shallow domestic wells, defined as 10 percent of wells unable to sufficiently produce water after 2017.

Table 8-3: Chronic Lowering of Groundwater Levels Minimum Thresholds for Paso Robles Formation Aquifer

RMS Well ID (alt ID)	Minimum Threshold (feet NAVD88)	Number of Nearby Wells Dry at Minimum Threshold Not Dry at Measurable Objective	Percent of Nearby Wells Dry at Minimum Threshold Not Dry at Measurable Objective
25S/12E-16K05 (PASO-0345)	491	2	5.0%
25S/12E-26L01 (PASO-0205)	460	7	7.6%
25S/13E-08L02 (PASO-0195)	886	0	0.0%
26S/12E-14G01 (PASO-0048)	465	11	11.1%
26S/12E-14G02 (PASO-0017)	468	0	---
26S/12E-14H01 (PASO-0184)	475	0	0.0%
26S/12E-14K01 (PASO-0238)	453	3	5.7%
26S/12E-26E07 (PASO-0124)	618	4	2.3%
26S/13E-08M01 (PASO-0164)	583	0	0.0%
26S/13E-16N01 (PASO-0282)	558	1	0.3%
26S/15E-19E01 (PASO-0073)	899	0	0.0%
26S/15E-20B04 (PASO-0401)	937	0	0.0%
26S/15E-29N01 (PASO-0226)	963	0	0.0%
26S/15E-29R01 (PASO-0406)	956	0	0.0%
26S/15E-30J01 (PASO-0393)	929	0	0.0%
27S/12E-13N01 (PASO-0223)	686	3	4.8%
27S/13E-28F01 (PASO-0243)	864	4	2.1%
27S/13E-30F01 (PASO-0355)	736	4	7.3%
27S/13E-30J01 (PASO-0423)	776	4	7.8%
27S/13E-30N01 (PASO-0086)	780	15	13.5%
27S/14E-11R01 (PASO-0392)	998	0	0.0%
28S/13E-01B01 (PASO-0066)	1,010	4	2.0%
	Total:	62	3.9%

8.4.5.4 Minimum Thresholds Impact on Domestic Wells

The potential impacts of the minimum thresholds on domestic wells are included in the assessment presented above, while acknowledging that the available well information datasets do not necessarily differentiate which wells are domestic. The analysis indicates that no more than 3.9 percent of all wells in the Subbasin are susceptible to being unable to sufficiently produce water in the event that the minimum threshold is reached in all RMS wells simultaneously. However, the Household Water Supply Shortage Reporting System indicates that at least 95 wells, or 6 percent of wells, have been unable to sufficiently produce water since 2017. The methodologies used for the analysis, and methodologies used for forecasting occurrences of wells unable to sufficiently produce water, will be further refined during GSP implementation. As not all wells used in the analysis are for domestic supply, this indicates that a smaller number of domestic wells are susceptible to being unable to sufficiently produce water at the minimum threshold.

8.4.5.5 Relationship between Individual Minimum Thresholds and Relationship to Other Sustainability Indicators

Section 354.28 of the SGMA regulations requires that the description of all minimum thresholds include a discussion about the relationship between the minimum thresholds for each sustainability indicator. In the SMC BMP (DWR, 2017), DWR has clarified this requirement. First, the GSP must describe the relationship between each sustainability indicator's minimum threshold; in other words, describe why or how a water level minimum threshold set at a particular RMS is similar to or different to water level thresholds in nearby RMS. Second, the GSP must describe the relationship between the selected minimum threshold and minimum thresholds for other sustainability indicators; in other words, describe how a water level minimum threshold would not trigger an undesirable result for land subsidence, for example.

Groundwater elevation minimum thresholds are derived from the measurable objectives, which are average 2017 groundwater elevations. Because the measurable objectives represent a historical and realistic groundwater elevation map, the minimum thresholds derived from these objectives (i.e., 30 feet lower) likely do not conflict with each other.

Groundwater elevation minimum thresholds can influence other sustainability indicators.

- **Change in groundwater storage**. Changes in groundwater elevations reflect changes in the amount of groundwater in storage. Pumping at or less than the sustainable yield will maintain or raise average groundwater elevations in the Subbasin. The groundwater elevation minimum thresholds are set to maintain a constant elevation over an extended period of time, consistent with the practice of pumping at or less than the sustainable yield. Therefore, the groundwater elevation minimum thresholds will not result in long term significant or unreasonable change in groundwater storage.

- **Seawater intrusion**. This sustainability indicator is not applicable to this Subbasin.
- **Degraded water quality**. Protecting groundwater quality is critically important to all who depend upon the groundwater resource, particularly for drinking water and agricultural uses. Maintaining groundwater levels protects against degradation of water quality or exceeding regulatory limits for constituents of concern in supply wells due to actions proposed in the GSP. Water quality could be affected through two processes:
    1. Low groundwater elevations in an area could cause deeper, poor-quality groundwater to flow upward into existing supply wells. Groundwater elevation minimum thresholds are set below current levels, meaning upward flow of deep, poor-quality groundwater could occur in the future. Should groundwater quality degrade due to lower groundwater elevations, the groundwater elevation minimum thresholds will be raised to avoid this degradation.
    2. Changes in groundwater elevation due to actions implemented to achieve sustainability could change groundwater gradients, which could cause poor quality groundwater to flow towards supply wells that would not have otherwise been impacted. These groundwater gradients, however, are only dependent on differences between groundwater elevations, not on the groundwater elevations themselves. Therefore, the minimum threshold groundwater elevations do not directly lead to a significant and unreasonable degradation of groundwater quality in production wells.
- **Subsidence**. A significant and unreasonable condition for subsidence is permanent pumping induced subsidence that substantially interferes with surface land use. Subsidence is caused by dewatering and compaction of clay-rich sediments in response to lowering groundwater levels. Very small amounts of land surface elevation fluctuations have been reported across the Basin. The groundwater elevation minimum thresholds are set below existing groundwater elevations, which could induce additional subsidence that has not already started. Should new subsidence be observed due to lower groundwater elevations, the groundwater elevation minimum thresholds will be raised to avoid this subsidence.
- **Depletion of interconnected surface water**. The set of monitoring wells used to evaluate interconnected surface water includes some overlap with the set of RMS wells used for the groundwater level minimum threshold. Depending on the local relationship between Alluvial Aquifer water levels and Paso Robles Formation Aquifer water levels, the minimum threshold for interconnected surface water could be more constraining than the minimum threshold for groundwater elevations. The interconnected surface water minimum threshold (no more than 10 feet below the spring 2017 water level) is higher than the groundwater elevation minimum threshold (30 feet below the average 2017 water level), but the former applies only to Alluvial Aquifer wells. At locations along stream segments with riparian vegetation where the difference between Alluvial Aquifer

and Paso Robles Formation Aquifer water levels is less than 20 feet, the interconnected surface water minimum threshold would likely constrain water levels. The only locations where existing data indicates a potential connection between the surface water system and the underlying Paso Robles Formation Aquifer include the middle reach of the Estrella River (from Shedd Canyon to Martingale Circle) and along San Juan Creek upstream of Spring Creek. At these locations the connection between surface waters and the underlying Paso Robles Formation Aquifer is unknown but sufficient evidence exists that there could potentially be a connection, and therefore further investigation in these areas is recommended.

8.4.5.6 Effect of Minimum Thresholds on Neighboring Basins

One neighboring groundwater basin is required to develop a GSP: the Upper Valley Subbasin of the Salinas Valley Basin. Additionally, the adjoining Atascadero Subbasin is currently developing a GSP under SGMA. The anticipated effect of the groundwater elevation minimum thresholds on each of the two subbasins is addressed below.

Upper Valley Subbasin of the Salinas Valley Basin. The Upper Valley Subbasin is required to develop a GSP by 2022. The Upper Valley Subbasin is hydrogeologically downgradient of the Paso Robles Subbasin: groundwater generally flows from the Paso Robles Subbasin into the Upper Valley Subbasin. Lower groundwater levels in the Paso Robles Subbasin as a result of GSP actions could reduce the amount of groundwater flowing into the Upper Valley Subbasin, affecting that Subbasin’s ability to achieve sustainability. The groundwater elevation minimum thresholds are set at constant levels that are below current elevations; therefore, they could reduce groundwater flow into the adjacent Upper Valley Subbasin. If reduced groundwater flow is observed that impacts sustainability in the Upper Valley Subbasin of the Salinas Valley Basin, then minimum thresholds would be adjusted to avoid this impact.

The Paso Robles Subbasin GSAs have developed a cooperative working relationship with the Salinas Valley Basin GSA who will be developing the GSP for the Upper Valley Subbasin. The two GSAs will monitor and work together to ensure that minimum thresholds do not significantly affect each Subbasin’s ability to achieve sustainability.

Atascadero Subbasin. The Paso Robles Subbasin is hydrogeologically separated from the Atascadero Subbasin by the Rinconada Fault. The fault acts as a barrier to groundwater flow in the Paso Robles Formation Aquifer as presented in Chapter 4. While minimum thresholds are set at levels below current groundwater levels, these lower levels are not expected to impact sustainability in the Atascadero Subbasin due to the limited groundwater flow between the two Subbasins. The Paso Robles Subbasin GSAs have a cooperative working relationship with the Agencies managing the Atascadero Subbasin and will continue to work together to ensure that minimum thresholds do not significantly affect each Subbasin’s ability to achieve sustainability.

8.4.5.7 Effects on Beneficial Users and Land Uses

The groundwater elevation minimum thresholds may have several effects on beneficial users and land uses in the Subbasin.

Agricultural land uses and users. The groundwater elevation minimum thresholds limit lowering of groundwater levels in the Subbasin. In the absence of other mitigating measures this has the effect of potentially limiting the amount of groundwater pumping in the Subbasin. Limiting the amount of groundwater pumping will limit the amount and type of crops that can be grown in the Subbasin, which could result in a proportional reduction in the economic viability of some properties. The groundwater elevation minimum thresholds could therefore limit expansion of the Subbasin's agricultural economy. This could have various effects on beneficial users and land uses:

- There will be an economic impact to employees and suppliers of production products and materials. Many parts of the local economy rely on a vibrant agricultural industry, and they too will be hurt proportional to the losses imparted to agricultural businesses.
- Growth of city, county and state tax rolls could be slowed or reduced due to the limitations imposed on agricultural growth.

Urban land uses and users. The groundwater elevation minimum thresholds effectively limit the amount of groundwater pumping in the Subbasin. This may limit urban growth or result in urban areas obtaining alternative sources of water. This may result in higher water costs for municipal water users.

Domestic land uses and users. The groundwater elevation minimum thresholds protect most domestic wells. Therefore, the minimum thresholds will likely have an overall beneficial effect on existing domestic land uses by protecting the ability to pump from domestic wells. However, limited water in some of the shallowest domestic wells may require owners to drill deeper wells. Additionally, the groundwater elevation minimum thresholds may limit the increase of non-*de minimis* groundwater use in order to limit future declines in groundwater levels caused by more non *de minimis* domestic pumping. Policies allowing offsets of existing use to allow new construction or bringing in new sources of water can mitigate against this effect.

Ecological land uses and users. Historical reductions in the extent and density of riparian vegetation in certain stretches of rivers and creeks may have been associated with declines in groundwater levels. The additional 30 feet of water-level decline allowed by the water-level minimum threshold could cause further reduction in riparian vegetation in areas where the Alluvial Aquifer is in contact with the Paso Robles Formation Aquifer. Groundwater elevation minimum thresholds effectively protect the groundwater resource including those existing ecological habitats that rely upon it because they are set to avoid long term declines in groundwater levels in a short amount of time. The sustainability criteria for interconnected surface water (see Section 8.8) include minimum thresholds defined as groundwater levels that are in some locations higher than the groundwater elevation minimum thresholds.

8.4.5.8 Relevant Federal, State, or Local Standards

No Federal, State, or local standards exist for chronic lowering of groundwater elevations.

8.4.5.9 Method for Quantitative Measurement of Minimum Thresholds

Groundwater elevation minimum thresholds will be directly measured from existing or new monitoring wells. The groundwater level monitoring will be conducted in accordance with the monitoring plan outlined in Chapter 7. Furthermore, the groundwater level monitoring will meet the requirements of the technical and reporting standards included in the SGMA regulations.

As noted in Chapter 7, the current groundwater monitoring network in the Paso Robles Formation Aquifer currently only includes 24 wells. For the Alluvial Aquifer, only one RMS was established. The GSAs will expand the monitoring network in both aquifers during GSP implementation.

8.4.5.10 Interim Milestones

Initial interim milestones were developed for the 24 RMS established for the Paso Robles Formation Aquifer based on the results of modeling conducted to evaluate management actions and select measurable objectives (Chapter 9). Because measurable objectives have not been established at RMS for the Alluvial Aquifer, interim milestones cannot be developed. Interim milestones will be developed in the future (after GSP adoption) when the RMS network is expanded in the Alluvial Aquifer.

Conceptually, the following actions and groundwater conditions are expected to occur during implementation.

- Monitoring of Subbasin conditions using an expanded monitoring network and continuous monitoring devices will provide additional information to refine interim milestones

- Pumping cutbacks in some areas of the Subbasin will begin about five years after adoption of the GSP. During this five-year period, current groundwater levels trends would continue to be tracked by the RMS.

- After about 5 years, groundwater levels will begin trending toward measurable objectives as a result of management actions and possibly pumping cutbacks in some area of the Subbasin.

Error! Reference source not found. summarizes the interim milestones for the RMS in the Paso Robles Formation Aquifer.

Table 8-4: Chronic Lowering of Groundwater Levels Interim Milestones for Paso Robles Formation Aquifer

Well ID (alt ID)	Interim Milestones (feet NAVD88)		
	2025	2030	2035
25S/12E-16K05 (PASO-0345)	521	521	520
25S/12E-26L01 (PASO-0205)	499	496	492
25S/13E-08L02 (PASO-0195)	911	905	901
26S/12E-14G01 (PASO-0048)	526	532	534
26S/12E-14G02 (PASO-0017)	523	531	533
26S/12E-14H01 (PASO-0184)	513	521	524
26S/12E-14K01 (PASO-0238)	527	533	535
26S/12E-26E07 (PASO-0124)	644	644	645
26S/13E-08M01 (PASO-0164)	620	619	617
26S/13E-16N01 (PASO-0282)	595	594	593
26S/15E-19E01 (PASO-0073)	935	937	938
26S/15E-20B04 (PASO-0401)	972	976	978
26S/15E-29N01 (PASO-0226)	1,009	1,012	1,014
26S/15E-29R01 (PASO-0406)	997	1,001	1,003
26S/15E-30J01 (PASO-0393)	972	976	978
27S/12E-13N01 (PASO-0223)	711	710	709
27S/13E-28F01 (PASO-0243)	896	899	900
27S/13E-30F01 (PASO-0355)	770	768	765
27S/13E-30J01 (PASO-0423)	817	815	812
27S/13E-30N01 (PASO-0086)	804	799	794
27S/14E-11R01 (PASO-0392)	1,029	1,030	1,030
28S/13E-01B01 (PASO-0066)	1,052	1,055	1,055

Interim milestones may be revised during implementation as new data and understanding of the hydrogeologic conditions in the Subbasin become available.

8.4.6 Undesirable Results

8.4.6.1 Criteria for Defining Undesirable Results

The chronic lowering of groundwater elevation undesirable result is a quantitative combination of groundwater elevation minimum threshold exceedances. For chronic lowering of groundwater elevations, an exceedance is defined by the annual average (e.g., spring and fall) water level below the well's defined minimum threshold. For the Paso Robles Subbasin, the groundwater elevation undesirable result is:

Over the course of two years, no more than two exceedances for the groundwater elevation minimum thresholds within a 5-mile radius or within a defined area of the Basin for any single aquifer. A single monitoring well in exceedance for two consecutive years also represents an undesirable result for the area of the Basin represented by the monitoring well. Geographically isolated exceedances will require investigation to determine if local or Basin wide actions are required in response.

This compound definition of undesirable results provides flexibility in defining sustainability. Increasing the number of allowed minimum threshold exceedances provides more flexibility but may lead to significant and unreasonable conditions for a number of beneficial users. Reducing the number of allowed minimum threshold exceedances ensures strict adherence to minimum thresholds but reduces flexibility due to unanticipated hydrogeologic conditions. The undesirable result was set to balance the interests of beneficial users with the practical aspects of groundwater management under uncertainty.

Use of this definition of undesirable results in combination with the minimum threshold for groundwater elevation will avoid the significant and unreasonable conditions discussed above. Specifically, it will be impossible to cause a significant percentage of the wells in the Subbasin to be unable to sufficiently produce water because the undesirable result includes geographic and temporal components that prevent the entire Subbasin from reaching the minimum thresholds in the RMS wells simultaneously.

As the monitoring system is expanded, the number of exceedances allowed may be adjusted. One additional exceedance will be allowed for approximately every seven new monitoring wells. This was considered a reasonable number of exceedances given the hydrogeologic uncertainty of the Subbasin. Close monitoring of groundwater data over the following years will allow actual numbers to be refined based on observable data. Management of the Subbasin will adapt to specific conditions and to a growing understanding of basin conditions and processes to adopt appropriate responses. When additional data and a better understanding of hydrogeologic conditions are available in the future, the GSAs may adjust measurable objectives and minimum thresholds and adaptively manage sustainability actions to avoid undesirable results.

8.4.6.2 Potential Causes of Undesirable Results

Conditions that may lead to an undesirable result include the following:

- Localized pumping clusters. Even if regional pumping is maintained within the sustainable yield, clusters of high-capacity wells may cause excessive localized drawdowns that lead to undesirable results in specific areas.

- Expansion of *de-minimis* pumping. Individual *de-minimis* pumpers, individually, do not have a significant impact on Subbasin-wide groundwater elevations. However, many *de-minimis* pumpers are often clustered in specific residential areas. Pumping by these *de-minimis* users is not currently regulated under this GSP. Adding additional domestic *de-minimis* pumpers in specific areas may result in excessive localized drawdowns and undesirable results.
- Extensive drought and climate change. Minimum thresholds were established based on historical groundwater elevations and reasonable estimates of future groundwater elevations. Extensive droughts may lead to excessively low groundwater elevations and undesirable results.

8.4.6.3 Effects on Beneficial Users and Land Uses

The primary detrimental effect on beneficial users from allowing multiple exceedances occurs if more than one exceedance occurs in a small geographic area. Exceedances of the minimum thresholds for groundwater elevation are reasonable as long as the exceedances are spread out across the Subbasin. If the exceedances are clustered in a small area, it will indicate that significant and unreasonable effects are being born by a localized group of landowners.

8 SUSTAINABLE MANAGEMENT CRITERIA

8.8 Depletion of Interconnected Surface Water SMC

8.8.1 Locally Defined Significant and Unreasonable Conditions

The two manifestations of depletion of interconnected surface water are reduced surface flow in streams and a lowering of the water table next to streams. The potential effects of depletion on beneficial uses of surface water and groundwater in the Subbasin are:

- Reduction in Salinas River outflow that decreases groundwater recharge in the Salinas Valley,
- Reduction in the extent, density, and health of riparian vegetation and animal species that use riparian habitat, and
- Reduction in passage opportunity for steelhead trout.

Each of these issues was considered in setting sustainable management criteria for interconnected surface water. In the case of habitat uses, the basis for the SMCs relies on the quantitative evaluation of groundwater effects on habitat presented in GSP Section 5.5.

8.8.2 Minimum Thresholds

The minimum threshold for interconnected surface water is a decline in the alluvial water table elevation as measured at Alluvial Aquifer RMS wells in the spring measurement round along the Salinas River, middle reach of the Estrella River (from Shedd Canyon to Martingale Circle) or San Juan Creek upstream of Spring Creek that is 1) likely caused by groundwater pumping in the Paso Robles Formation Aquifer, 2) is more than 10 feet below the spring 2017 elevation, 3) persists for more than two consecutive years, and 4) occurs along more than 15 percent of the length of any of the three stream reaches. It is noted that the potential connection along the Salinas River is between the surface water system and the adjacent alluvial deposits. There is no evidence that the Salinas River surface water flows are connected to the underlying Paso Robles Formation Aquifer. The potential connection between the surface water system along the middle reach of the Estrella River (from Shedd Canyon to Martingale Circle) and along San Juan Creek upstream of Spring Creek, and the underlying Paso Robles Formation Aquifer is unknown but sufficient evidence exists that there could potentially be a connection, and therefore further investigation in these areas is recommended.

SGMA regulations specify that the minimum threshold for interconnected surface water shall be defined as “the rate or volume of surface water depletions caused by groundwater use that has adverse impacts on beneficial uses of the surface water and may lead to undesirable results” (Regulations §354.28(c)(6)). However, the regulations also allow the use of groundwater elevations as a reasonable proxy for the rate of flow depletion if such approach is “supported by adequate evidence” (Regulations §354.28(d)). In the Paso Robles Subbasin, depth to water is a reasonable proxy because the resource most likely to be impacted is phreatophytic riparian vegetation, which is sensitive to depth to water but not to the rate of percolation. Also, analysis of potentially impacted beneficial uses that do depend on the rate of stream flow—downstream water users and steelhead trout migration—indicates that the likely magnitude of impact is negligibly small. Finally, from a practical standpoint, induced percolation from streams is difficult to measure, particularly if it is a small percentage of total flow and varies substantially from reach to reach along a stream.

There presently are too few Alluvial Aquifer monitoring wells along the middle reach of the Estrella River and the upper reach of San Juan Creek to evaluate the minimum threshold. For the first five years of GSP implementation, the minimum threshold will be evaluated only for the Salinas River reach. New monitoring wells will be installed along the Estrella River and San Juan Creek during that period (see Section 7.6.1), allowing the minimum threshold to be applied to those reaches in subsequent implementation periods.

8.8.3 Measurable Objectives

Measurable objectives are specific, quantifiable goals for the maintenance or improvement of groundwater conditions. They represent a desirable condition with respect to interconnected surface water. With respect to riparian vegetation, the measurable objective is a five-year moving average of spring groundwater elevations in Alluvial Aquifer wells along the Salinas River, the middle reach of the Estrella River (from Shedd Canyon to Martingale Circle) and San Juan Creek upstream of Spring Creek that are no more than 5 feet below the spring 2017 groundwater elevations. This objective is expected to maintain the extent and density of riparian vegetation at the 2017 level. It would also maintain Salinas River outflow and steelhead passage opportunity at existing levels, at least as far as they are affected by depletion from groundwater pumping.

There presently are too few Alluvial Aquifer monitoring wells along the middle reach of the Estrella River and the upper reach of San Juan Creek to evaluate the measurable objective. For the first five years of GSP implementation, the measurable objective will be evaluated only for the Salinas River reach. New monitoring wells will be installed along the Estrella River and San Juan Creek during that period (see Section 7.6.1), allowing the measurable objective to be applied to those reaches in subsequent implementation periods.

8.8.4 Relationship of Minimum Threshold to Other Sustainability Indicators

8.8.4.1 Groundwater Elevations

The measurable objective and minimum threshold for interconnected surface water involve groundwater elevations in the Alluvial Aquifer. They do not conflict with the SMCs for Alluvial Aquifer groundwater elevations because those are not yet quantified (see Sections 8.4.3.3 and 8.4.4.2). The interconnected surface water SMCs could potentially be more restrictive than the SMCs for Paso Robles Formation Aquifer groundwater elevations if the latter would allow large declines in water table elevations along protected reaches of riparian vegetation. Specifically, the Paso Robles Formation Aquifer minimum threshold allows for 30 feet of additional water-level decline below the 2017 groundwater elevation.

8.8.4.2 Groundwater Storage

Groundwater storage is inherently connected to groundwater levels. Based on the logic presented above for groundwater elevation SMCs, the interconnected surface water SMCs could potentially constrain temporary or sustained reductions in groundwater storage in some locations that would otherwise be allowed by the groundwater storage minimum threshold, which is defined as groundwater elevations averaged over the entire Subbasin that are above the groundwater elevation minimum threshold (see Section 8.5.2).

8.8.4.3 Subsidence

Subsidence is not related to Alluvial Aquifer water levels because the Alluvial Aquifer is too thin and coarse-grained to experience significant compaction of clay layers due to 10 feet of water-level decline. Subsidence is a function of Paso Robles Formation Aquifer water levels, which are not directly involved in the interconnected surface water SMCs. To the extent that the interconnected surface water SMCs constrain the permissible amount of decline in Paso Robles Formation Aquifer water-levels, they decrease the risk of subsidence.

8.8.4.4 Water Quality

The interconnected surface water SMCs would not affect groundwater gradients and recharge rates, and they would not introduce contaminants or cause changes in aquifer geochemistry. Thus, they would not affect the water quality SMCs.

8.8.5 Effect of SMCs on Neighboring Basins

The mechanism by which the interconnected surface water SMCs could affect the Upper Valley Subbasin in the Salinas Valley (adjacent to and downstream of the Paso Robles Subbasin) would be by decreased groundwater recharge resulting from decreased flow in the

Salinas River. However, that effect would be negligibly small (see Section 8.9.7.1 under "Undesirable Results" below).

The interconnected surface water SMCs would not affect groundwater in the Atascadero Subbasin because any changes in Salinas River flow would not propagate upstream to that Subbasin. By maintaining GDEs in the Paso Robles Subbasin in good condition, the SMCs would support the regional maintenance of GDEs, especially animals that move up and down the river and riparian corridors.

8.8.6 Relationship of SMCs to Federal, State and Local Regulations

The only federal, state or local regulation that directly applies to stream flow gains and losses is the "live stream" requirement imposed by the State Water Resources Control Board in the water rights permit for operating Salinas Dam upstream of the Subbasin. However, that requirement reflects a concern that changes in surface flow might impact groundwater availability, not the opposite, which is the concern here.

The state and federal endangered species acts protect animal species listed as threatened or endangered against "take", which is to capture, harm, wound or kill the animal. Harm includes significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. The listed animals that appear to actually be present in the Subbasin and potentially vulnerable to depletion of interconnected surface water are steelhead trout and California red-legged frog. The SMCs for interconnected surface water are designed to sustain populations of GDE animals, including these listed species, at 2017 levels. This would avoid take.

8.8.7 Undesirable Results

Undesirable results are adverse effects on beneficial users and uses of water that reach a magnitude considered significant and unreasonable. This section defines undesirable results for surface water users, riparian vegetation and fish passage. Generally, undesirable results are defined in terms of the percent of all interconnected surface water reaches that exceed the minimum threshold.

8.8.7.1 Surface Water Users

Decreased groundwater discharge to the Salinas River would be significant and unreasonable if it prevented groundwater users in the Salinas Valley—where groundwater is primarily recharged by Salinas River percolation—from continuing their existing, economically viable agricultural or urban uses of land. This is not expected to occur because of the combined effects of the groundwater storage and interconnected surface water SMCs. A decrease in groundwater storage would be associated with lower groundwater elevations and decreased groundwater discharge to the Salinas River. The groundwater storage SMC allows for a reduction in storage to an amount associated with Paso Robles Formation Aquifer groundwater elevations 30 feet below 2017 groundwater elevations but does not allow further declines beyond that. Annual water budgets for 1981-2011 produced by the groundwater model show that groundwater discharge to the Salinas River is dominated by contributing flows from the alluvial deposits and clearly correlated with year type (it increases in wet years) but is not obviously correlated with changes in pumping and storage from the Paso Robles Formation Aquifer (see Figure 6-3), which are strongly correlated with each other (Figure 5-12). Average annual groundwater discharge to streams (7,400 AFY) equals about 1.5 percent of annual groundwater pumping downstream in the Salinas Valley. If pumping in the Paso Robles Subbasin were to change, its effect on groundwater discharge to the Salinas River would likely be small, and hence much less than 1.5 percent of downstream water use. This is because the connection along the Salinas River is between the surface water system and the adjacent alluvial deposits. There is no evidence that the Salinas River surface water flows are connected to the underlying Paso Robles Formation Aquifers. Furthermore, to achieve the groundwater level management objective it will be necessary to balance the Subbasin water budget, which means that groundwater pumping will not cause increased depletion of stream flow in the future. As stated in Section 6.5.1 "An overarching assumption is that any future increases in groundwater use within the Subbasin will be offset by equal reductions in groundwater use in other parts of the Subbasin, or in other words, groundwater use will remain neutral through implementation of the GSP." In any event, the interconnected surface water minimum threshold would tend to restrict rather than increase the amount of future storage depletion and thus be more protective of Salinas River outflow and downstream users.

8.8.7.2 Groundwater Dependent Vegetation

The qualitative undesirable result for riparian vegetation is mortality. The minimum threshold definition for interconnected surface water specifies a quantitative depth and duration of low water table conditions that are considered likely to cause riparian tree stress and potential mortality, based on observed limited mortality patterns during 2013 to 2017[1].

An exceedance of the minimum threshold at a single location would not necessarily be undesirable if riparian vegetation in other parts of the Subbasin remained in good condition. Regional ecological function would continue, and the locally impacted area would likely recover when the water table rises back to more normal elevations above the minimum threshold. However, widespread exceedance of the minimum threshold could impair regional ecological function and retard the recovery process. Accordingly, an undesirable result is

[1] Results of a riparian vegetation EVI trend analysis indicate that riparian vegetation health has generally remained stable over the long term from January 2009 through present (see Section 5.5.3).

when water levels along more than 15 percent of the length of any of the three stream reaches with abundant riparian vegetation exceed the minimum threshold (defined in Section 8.9.3) as a result of groundwater pumping in the Paso Robles Formation Aquifer. The three reaches are the Salinas River from Paso Robles to the Subbasin boundary below San Miguel, the middle reach of the Estrella River (Shedd Canyon to Martingale Circle), and San Juan Creek upstream of Spring Creek.

8.8.7.3 Groundwater Dependent Animals

Animals that depend on riparian vegetation are assumed to suffer population declines if the extent of riparian vegetation decreases and thus are implicitly covered by the SMCs and undesirable results for vegetation. The undesirable result for steelhead trout—which uses surface flow in the Salinas River for migration—is a long-term decrease in population as a result of flow depletion caused by groundwater pumping. As explained in section 5.5.10, groundwater pumping has little effect on passage opportunity. Because the SMCs for groundwater levels and storage preclude ongoing future increases in pumping or decreases in groundwater levels, undesirable results with respect to steelhead passage are not expected to occur.