



Estrella-El Pomar-Creston Water District
Estrella-El Pomar-Creston GSA

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September 3, 2024

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John Hamon, Secretary, City of Paso Robles/GSA
Bruce Gibson, Treasurer, County of SLO/GSA
Dana Merrill, Estrella El-Pomar Creston WD/GSA

Willy Cunha, PBCC Staff Member, Shandon-San Juan WD/GSA
Joshua Reynolds, PBCC Staff Member, San Miguel CSD/GSA
Christopher Alakel, PBCC Staff Member, City of Paso Robles/GSA
Blaine Reely, PBCC Staff Member, County of SLO/GSA
Jerry Reaugh, PBCC Staff Member, Estrella-El Pomar-Creston WD/GSA

Dear PBCC Officers and Staff,

At the EPCWD/GSA Board Meeting on August 21st, the Board considered agenda item #6, "Consider action regarding the RFP for the Multibenefit Irrigated Land Repurposing (MILR) Program". A lively discussion ensued and as the discussion progressed it became clear that there was little understanding or uniformity of thought in regard to what the MILR Program is. Board members and the public seemed to have widely different ideas about the Program. Board members also related that discussion with members and others outside this meeting also demonstrated the lack of understanding of the MILR Program.

EPCWD/GSA understands that the MILR Program has the potential of being the centerpiece of Basin Management and possibly the most consequential Management Action to be taken by the PBCC.

The current RFP is timely as the PBCC is moving forward with implementation of programs and recommending Management Actions for the benefit of the Basin. The PBCC is also fortunate to have grant funding available which offers the PBCC an opportunity to engage outside professional expertise to help the PBCC craft a successful program. EPCWD/GSA supports moving forward with the RFP and developing an effective MILR Program.

However, the EPC Board Meeting discussion highlighted a concern that the RFP seems to outline a detailed and complex program. This seems incongruous with the nebulous understanding of the Program. The RFP introduces a new and novel concept of the Farming Unit and its associated farm plan. This approach has not been seen by the PBCC Committee or its staff nor the general public in the Basin. The RFP details Standard Operating Procedures (SOPs) and suggests a very complex 28 step process for the MILR Program. This sort of specificity might hinder the contractor in bringing their expertise to designing the MILR program.

EPCWD/GSA believes there should be a clear understanding of the MILR Program before the contractor designs the details of the Program.

Recognizing these concerns, the EPCWD/GSA Board voted unanimously that EPCWD/GSA would draft this letter to the PBCC Committee. EPCWD/GSA is asking that the County, in drafting the award letter to the successful bidder of the RFP, outline an upfront effort to clearly define the goals of the MILR Program, outline how the Program is supposed to work, define what is included in the Program, and describe how the goals will be achieved.

EPCWD/GSA recommends a three-step process at the beginning of the contract.

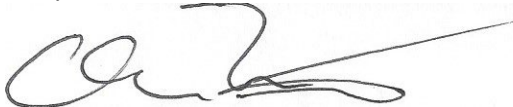
Three-Step Process:

- 1) EPCWD/GSA recommends that the PBCC Committee form a select ad hoc committee. During the early stages of the contract, the select committee would work closely with contractor staff to develop a clear and concise MILR Program overview document. During this process, the contractor can support the group by acting as facilitator and mentor to the group. Once achieved, the consensus document would move to Step 2.
- 2) The consensus document would then be presented to the PBCC and as a result, to the entire Basin community where it would be vetted and endorsed. EPCWD/GSA feels that consensus of the GSAs via the PBCC is important because of the potential influence of the MILR Program as a significant Management Action for the Basin.
- 3) With the consensus document approved by the PBCC, the contractor could proceed with designing the details of a MILR Program that corresponds to the consensus of the GSAs acting collectively through the PBCC.

EPCWD/GSA believes that this investment in bringing a consensus to this important program early in the program design process is essential. The MILR Program can have wide-reaching benefits to the Basin. The MILR Program is currently under consideration as the Rate Study process progresses. If we can build a common understanding of the Program and its benefits, we can start building the momentum needed when rates are put forward to voters in the Basin.

Thank you for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dana Merrill', written over a light blue horizontal line.

Dana M. Merrill
President