

Northern Cities Management Area Technical Group

August 26, 2013

Mr. Brian Pedrotti, Project Manager
County Planning and Building Department
976 Osos Street, Rm. 300
San Luis Obispo CA 93408-2040

**Subject: Laetitia Agricultural Cluster Subdivision – NOA for Revised
 Recirculated Draft EIR (Tract 2606)**

Dear Mr. Pedrotti:

The Northern Cities Management Area Technical Group (NCMA TG) appreciates the opportunity to comment on the proposed Laetitia Agricultural Cluster Subdivision (Project) Revised Recirculated Draft Environmental Impact Report (RRDEIR). The NCMA TG, which includes representatives from the Cities of Arroyo Grande, Grover Beach, Pismo Beach, and the Oceano Community Services District, was formed as a result of the Santa Maria Groundwater Basin (SMGB) Adjudication. A component of the Adjudication, the 2005 Stipulation, requires that NCMA TG prepare an Annual Report on the groundwater basin that documents monitoring results, quantifies changes in groundwater supplies and identifies any threats to groundwater supplies.

The NCMA TG understands that the Project includes 102 residential lots (1-acre each) and four open space lots and is to be located approximately two miles east of the NCMA boundary. Given the proximity of the proposed Project to the NCMA and the hydraulic connectivity of the Project's and the NCMA agencies' surface and groundwater sources, the NCMA TG respectfully submits the following comments regarding the RRDEIR.

Sustainability of Water Supply - The members of the NCMA TG are concerned that the yield of the local groundwater basin is insufficient to supply existing demands and that increased withdrawal will further impact local and regional groundwater supplies. Historical water level data for the four Laetitia irrigation wells (Figure 18, Geosyntec 2011) shows a long term decrease in groundwater levels, from 1980 to 2010. The proposed Project is anticipated to increase the demand and groundwater pumping on the Project site by 46.3 AFY, which could further lower groundwater levels.

The estimates of sustainable yield for the Project wells are based on pump tests and groundwater levels from the October 2009 to March 2011 time period (Pg 23, Geosyntec 2011). Rainfall amounts during this time period are documented to be 138% of average and thus may provide a false indicator of the amount of groundwater recharge and well yield. Additionally, Geosyntec's report states that "long term yields from water wells producing from bedrock aquifers, which may have linear fracture systems, commonly are substantially less than short-term yields".

The ability to maintain long-term sustainable pumping requires a balance between withdrawal and recharge. The RRDEIR does not include an analysis of the recharge component of the groundwater basin underlying the Project site. The Final EIR (FIER) should contain an analysis of the recharge potential for the Project site to provide verification that sufficient sustainable supply is available to meet the estimated demands of the existing vineyards and facilities and the proposed Project

SMGB Recharge – The Project site is located up-gradient from the NCMA and Nipomo Mesa Management Area (NMMA) of the SMGB. The SMGB relies on subsurface flow from the inland bedrock aquifers for recharge. The analysis performed for the RRDEIR estimates that approximately 27%, or 432 AFY, of the total groundwater influx (1,600 AFY) from the inland bedrock aquifers that recharges the SMGB travels across the project site. Pumping in excess of recharge within the Project site could decrease groundwater levels to the point that groundwater flow from the inland bedrock aquifers no longer recharges the SMGB.

Los Berros Creek Flow – Due to the apparent hydraulic connectivity between Well 11 and Los Berros Creek, the NCMA TG agrees with the proposed pumping schedule that restricts production from Well 11 from August to November to preserve base flow in the creek. However, the NCMA TG remains concerned that the increased pumping on the Project site will decrease the overall flow rate in Los Berros Creek, which provides critical recharge for the SMGB and environmental flows for Arroyo Grande Creek.

Each of the NCMA TG member agencies is also a participant in San Luis Obispo County Flood Control & Water Conservation District Zone 3 (Zone 3). Zone 3 is currently in the process of preparing and obtaining approval for a Habitat Conservation Plan (HCP) for the Lopez project. A key component of the HCP includes the development of a Downstream Release Program to provide sufficient flow and habitat for the endangered species in Arroyo Grande Creek. Development of a Downstream Release Program requires an understanding of the hydrology of Arroyo Grande Creek and each of the contributing tributaries. The FEIR should include an analysis of the impact of the Project on the flow in Los Berros Creek to enable the Zone 3 agencies to analyze the impact on Arroyo Grande Creek environmental flows and groundwater recharge.

Storm Water Runoff – Given the upstream/up-gradient location of the Project, relative to the NCMA portion of the SMGB, the NCMA TG is concerned about the potential impact of the proposed development on stormwater run-off and water quality.

Drainage and Flooding

The implementation of the Project will create additional impervious surfaces within the project site. The RRDEIR states that this change in land cover will increase the net peak run-off from a 10-yr storm by 4.4%, or approximately 125 cfs. This increase in storm flow will impact peak flows in Los Berros Creek and

subsequently Arroyo Grande Creek. Given the current flood risks in Arroyo Grande Creek, any increase in the peak flows in Los Berros Creek will increase the flood risk to Flood Zone 1/1A. The FEIR should further evaluate the impact of increased runoff from the project site on downstream hydraulic features.

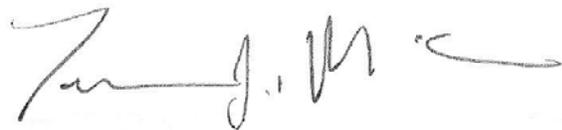
Water Quality

The increased amount of impervious surfaces will potentially result in increased runoff that will lead to additional sediment and pollutant transport to natural drainages. This increased pollutant loading could result in degradation of downstream water bodies. The FEIR should address the potential impact on downstream water quality due to increased runoff and should evaluate the potential for onsite stormwater capture as an appropriate mitigation measure. Onsite stormwater capture would reduce pollutant discharge to the natural drainage systems, reduce peak flows and improve groundwater recharge.

Previously Submitted Comments – Throughout this process, the NCMA member agencies have submitted comments on the previous drafts of the Project’s EIR. To ensure that all of the concerns of the NCMA agencies are addressed, the FEIR should include responses to all comments submitted on all of the drafts of the Project EIR.

The NCMA TG appreciates this opportunity to comment on the RRDEIR and would like to continue to be involved in any future project discussion. Please include the NCMA TG in any future communications regarding the Project and any other projects that may impact the water supply resources for the NCMA agencies.

Sincerely,



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City of Grover Beach



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Laetitia Agricultural Cluster Subdivision – Recirculated Revised Draft EIR (Tract 2606)
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Page 4

References:

Geosyntec Consultants. (2011). Review of Well Testing and Sustainable Yield Assessment – Potential Laetitia Agricultural Cluster Subdivision