

## **Summary of Comments on 2014-2016 Resource Summary Report by WRAC Ad Hoc Subcommittee and Members -Final, April 5, 2017**

The WRAC Ad Hoc Subcommittee is composed of Member Jim Garing (District 4), Member Debbie Peterson (City of Grover Beach), Member Greg Grewal (District 5), Member James Coalwell (Oceano CSD), Member Bill Garfinkel (District 2). Additional comments were provided by Member Sue Luft (Environmental-At-Large), Member Dennis Louck (District 1), Member David Chipping (Environmental-At-Large), Member George Kendall (SLO Farm Bureau), Member Eric Greening (Environmental at Large) and Member Linda Chipping (Coastal San Luis RCD) were also considered by the subcommittee and included.

Extensive comments were also provided by Atascadero Mutual Water Company, Oceano Community Services District, Templeton Community Services District, City of Paso Robles, Avila Valley Advisory Council, Cambria Community Services District and the Northern Cities Management Area Technical Group.

This compilation of comments attempts to consolidate and limit duplication. All individual and agency communications are appended at the end of this summary. These include agency submittals that may not have been previously transmitted to the county Planning Department.

### **General Comments**

Three comments concern strategies used in developing the water supply portion of RMS. Member Greening was concerned with the integration of the whole RMS process with the information being developed in connection with SGMA compliance. He stated "...at present, the RMS seems to be operating in a different universe than the data underlying the SGMA process. For example, information being developed in the Basin Characterization Study for the San Luis Obispo/Edna Basin will undoubtedly contribute to more precise RMS findings."

By example Member Greening noted that on p.16, regarding the LOS of the Santa Margarita Basin, A particular mis-alignment not mentioned by other commenters occurs in the Santa Margarita area. "The Santa Margarita section refers to something called the "Santa Margarita Basin" but the DWR-recognized boundary of the Atascadero Sub-basin includes most of the community of Santa Margarita and much of the adjacent Santa Margarita Ranch, particularly to the north. Is the Santa Margarita Basin separate from the Atascadero Sub-Basin, and, if so, where is it? How does it relate to the Atascadero Sub-Basin? Why is Santa Margarita left out of the discussion of the Atascadero Sub-Basin?".

Member D. Chipping notes that this report must be based on hydrological facts, and that seems to be derived from groundwater basins that have suppliers with access to data. However, the agricultural ponds issue currently under deliberation shows that, as a matter of concern, geographically diffuse well access to fractured bedrock resources should be addressed. While SGMA focuses on groundwater basins, LOS should address an analysis of the cumulative impact to wells on the west side of Templeton examined in view of the deficiencies revealed during the recent drought.

Member Garfinkel noted there may be a problem with the estimated future Forecast Demand as presented in the Groundwater Basins. This point is illustrated by his calculations provided in this document for 4 North Coast basins.

Both Member Peterson (Grover Beach City Council) and Member Eby (Nipomo CSD) requested that the Biennial Resource Summary Report presentation to the Board of Supervisors be postponed until the 2016 Annual Reports from the NCMA Technical Group and NMMA Technical Group are available for use data use in the report. The Annual Reports are expected to be available by the end of April.

### **Comments on specific parts of the document.**

#### **Page 3, Water System, Supply, Usage and Rates**

Member Luft and Member Grewal comment that for rural areas without water purveyors, the report needs to add discussion of existing Resource Capacity Studies that were used. If no RCS exists, need to explain source of data.

#### **Page 4, County Population Table I-1 Estimate of Present and Future County Population**

Member Peterson asks “Do future projections include Cal Poly’s intent to increase enrollment by 5,000?” and “Are the 1,300 new homes in Trilogy included in the figures.” A definition of the term “Population in Group Quarters” Unincorporated Areas is requested.

**Pages 6 and 8,** See Avila Valley Advisory Council comments

#### **Page 13**

Member Kendall questions the application of LOS III to the Santa Rosa basin, on the basis there being no supply problem in upper agricultural parts of the basin, and that future projections of agricultural use are unjustified. He states “There are two CASGEM observation wells in the middle (agricultural) part of Santa Rosa valley with water level records going back to 1958 for well 27S/08E-24J01 and back to 1989 for well 27S/08E-24J06. Both wells show a narrow annual range in water level (typically from 25 feet to 35 feet below ground level) with higher levels in the Spring and lower levels in the Fall and no long term overall decline. This same pattern is reported at other local wells in the agricultural area. Clearly, aquifer storage has not deteriorated or declined in the middle reaches of the Santa Rosa Valley. This is the part of the valley that has had perennial flow even during the drought years.”

See Cambria CSD comments.

**Page 14,** See Avila Valley Advisory Council comments

#### **Page 15**

Member Grewal asserts that LOS III for the Paso Basin only has problems in the Estrella area.

**Page 22**

See Cambria CSD comments

See Atascadero Mutual Water Company comments

See Avila Valley Advisory Council comments

**Page 24**

Member L. Chipping commented that the impact of the drought on the county would be better served if it was noted that on March 11, 2014, the Board of Supervisors adopted a resolution proclaiming a local emergency due to drought conditions in San Luis Obispo County. Rainfall and Reservoir Updates produced by the Public Works Department show that for the Water Years July 1, 2014–June 30, 2015 and July 1, 2015-June 30, 2016, precipitation totals were below average countywide. For years 2014-2016, the U. S. National Drought Monitor rated San Luis Obispo county drought conditions as D4- Exceptional Drought. This data can be found:

<http://agenda.slocounty.ca.gov/agenda/sanluisobispo/Proposal.html?select=6122>  
(June 21, 2016 monthly drought update provided to BoS, provided by Lisa Howe, Administrative office 781-5011)

**Page 25-26, Table II-2 Groundwater Basins**

Member Garing and Oceano CSD question the statement that there is no estimate available for safe yield in the Nipomo Mesa Management Area (NMMA). They state: "In 2002, The California Department of Water Resources published a report entitled "Water Resources Of The Arroyo Grande- Nipomo Mesa Area". At page ES-21 this report indicates that the dependable yield of the Nipomo Mesa portion of the basin is estimated to be between 4,800 and 6,000 AF. Compared to the actual production in 2015 of 15,249 AF this would seem to indicate that NMMA was pumping at least (6,000 - 15,249 = - 9,249) or 9,000 and as much as 10,200 AF more than the dependable yield.

A review of reports prepared by DWR, NCSO and NMMA over the 50-year period between 1965 and 2015 indicates that groundwater surface elevations under the Nipomo Mesa have been falling for half a century, an example being the area of the pumping depression, where the groundwater ridge between NCMA and NMMA stood 50 feet above sea level in 1995, but had fallen to sea level by 2015, with the deepest portion of the NMMA pumping depression at 13 feet below sea level.

Calculations that compare the amount of groundwater lost under NMMA over the last 50 years using the conclusion of about a 10,000 AFY overdraft in 2015 in No. 5 above, agree with calculations that use the volume of emptied aquifer in No. 6 above and indicate a cumulative groundwater deficit over the 50-year period of about 50,000 acre feet.

If the DWR (2002) dependable yield figures of 4,800 to 6,000 AFY for NMMA are accepted and then compared to Agricultural pumping of 7,337 AF reported in the NMMA 2015 annual report, it is apparent that there is NO surplus available for NMMA purveyors, since overlying land owners (agricultural pumpers) have senior rights to groundwater under

their land.

The conditions set forth above place the NMMA's groundwater supply at ever increasing risk from seawater intrusion, but also places the NCMA southwest agricultural area and eventually Pismo Beach and OCSD wells at risk to seawater intrusion in the near term and all NCMA purveyor wells at risk if the trend continues.”

**Page 25, Table II-2 Groundwater Basins**

Member Peterson requests that the Santa Maria Valley-Pismo Creek Valley Sub-basin, should include Sentinel Peak Resources LLC oil company in the Notes as a user. The Arroyo Grande Oil Field (without the 31 well expansion) produces 29,750 bpd (barrel =42 gallons) of water.

Member Peterson also comments that the Pismo Creek Valley Sub-Basin should be included in groundwater mapping projects very soon to gauge connectivity between Edna Valley Sub-basin and Northern Cities Management Area. Increased oil drilling activity is proposed to increase by 400 wells. Connectivity cross contamination caused by new drilling could negatively impact the Edna Valley and Santa Maria basins, serving 150,000 people from San Luis Obispo to Santa Maria. Note: Freeport McMoRan Inc. was the owner of the oil field .until the end of 2016, when it was sold to Sentinel Peak Resources LLC

See Avila Valley Advisory Council comments

**Page 26, Table II-2, Groundwater Basins**

Member Luft noted that Paso Robles Basin Safe Basin Yield (Perennial Yield) estimate was updated to 89,600 AFY in Final Model Update Report dated 1-13-15 (see page ES-9). See <http://slocountywater.org/site/Water%20Resources/Water%20Forum/Computer%20Modeling/index.htm>.

Member Grewal states “safe yield is a guess. Basin has not been quantified”

Atascadero Mutual Water Company (AMWC) comments “In its 2016 Bulletin 118 Interim Update, the California Department of Water Resources determined that the Rinconada Fault is a substantial barrier to the flow of percolating groundwater between Groundwater Basin 3.004.06, Salinas Valley, Paso Robles Area (“Paso Basin”), and Groundwater Basin 3.004.11, Salinas Valley, Atascadero Area. For the purposes of this report and to maintain clarity, consider revising Table II-2 by referring to the basin that serves Templeton and Atascadero as the “Atascadero Basin”.

See City of Paso Robles suggested changes.

See Atascadero Mutual Water Company comments

**Page 27**

Member Grewal states that SGMA “did not change any current water law. Overliers still have priority” and “When did county make claim that basin is critically overdrafted, basin

does not meet rule. (sic)”

**Page 30 Table II-3, Status of Self-Certification “Stress Test” of Water Purveyors**

Member D. Chipping noted with concern that not all water providers had reported “stress tests” which should be performed as determination of RMS Level.

See City of Paso Robles suggested changes.

**Page 33**

Member L. Chipping notes a discrepancy in the last paragraph, “The 2015 Report shows a decrease in the likelihood that more than 2,000,000(7) AF of Table A water will be delivered to SWP contractors statewide, compared with 79% in the 2013 Report.” and the footnote #7 amount of 2,550,000 AF. What is the quantity in the 2013 report that is 79%?

See Avila Valley Advisory Council comment.

**Page 34**

Member L. Chipping comments on Nacimiento Lake capacity. Over time, have the effects of sediment deposition and potential storage capacity loss been taken into consideration when determining actual allocations?

See City of Paso Robles suggested changes.

**Page 40, Water Supply**

The Nipomo Mesa Management Area Annual Report and Northern Cities Management Area Annual Report should be used and shown on this page as a source for water supply for the Santa Maria groundwater basin.

**Page 39,**

See City of Paso Robles suggested changes.

See Atascadero Mutual Water Company changes.

**Pages 39-46,** See Cambria CSD comments, revisions

**Page 42, Table II-10 San Simeon Area: Pico Creek Valley Groundwater Basin Existing and Forecasted Water Supply and Demand**

Member D. Chipping notes that the North Coast Area Plan states “*residential land use provisions in the Land Use Element, is 1,229 people. This assumes that public service constraints can be resolved, and the resource protection requirements of the LCP can be met by such development. The necessary water supply to support this population would be 160 acre-feet per year. Total build-out of both visitor-serving uses and residential growth will consequently create a substantial deficit over the allowed withdrawal of 140 acre-feet per year and the **safe yield of 130 acre-feet per year.** Safe Yield of 130AFY would be preferable to using 140 AFY.*

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Cambria Community Services District submitted an extensive rewrite of the section on the San Simeon Valley and Santa Rosa Valley Groundwater Basins, including

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Table II-11 Cambria Area: San Simeon Valley and Santa Rosa Valley Groundwater Basins Existing and Forecasted Water Supply and Demand. (THESE ARE ATTACHED)

From several comments: Member Garfinkel states “Based on an estimated Cambria population of 6,200 (Table II-1), the average water use per person calculates to be 59.4 gallons per person per day. Using the 59.4 gal/pp/day and the 15-year Forecast Demand of 909 AFY, the population would need to grow to 13,652 people, which is a population increase of 120.2%. The Forecast Demand of 909AFY should be revisited. The North Coast Area Plan estimates future population between 7,724 and 10,469 people. (see Buildout Reduction Program Report, May 16, 2006 (<http://www.cambriacsd.org/Library/PDFs/PROJECTS/Buildout%20Reduction/5.16.06%20Final%20Report.pdf>))

The “Other Surface Supplies” in (Table II-11) is purely speculative, and therefore should not be used in LOS calculations. Based on footnote 5, only the desalinization would seem to be a valid “other”.

**Page 47** See Cambria CSD red line markup page

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Table II-12 Cayucos Area: Cayucos Valley and Old Valley Groundwater Basins Existing and Forecasted Water Supply and Demand. Member Garfinkel states “Based on a Cayucos population of 6,052 (Table II-1), the average water used per person calculated to be 44.8 gallons per person per day (2015/16 Demand  $91.5+121.5+91=320$  AFY) Using the 44.8 gal/pp/day and the 15-year Forecast Demand (159+203+207) of 569 AFY, the population would need to grow to 11,328 people, an increase of 87.2%. The Forecast Demand should be reconsidered.

Member D. Chipping asks: “Where does the 555 AFY of “Other GW Resources” come from, the number seemingly chosen to bring agreement with 20-year demand? The bulk of the watershed is Franciscan mélangé, a very poor aquifer. Also, Footnote 2 can’t be found on the table itself. I can’t reconcile the numbers in the footnote with anything on the table. needs explanation.

**Page 58**

Table II-14 Avila Beach Area: There is no mention of the dependence on SLO treatment plant discharge to maintain flow, and hence recharge in the Avila Valley sub basin. If agriculture is getting its groundwater from the basins (970/0/uncertain) where are the 2,496 of other GW supplies located? Is the number contrived to match 3,466 30-year demand?) ag build-out demand ( $2,496 + 970 = 3,466$ )

**Page 59**, See Avila Valley Advisory Committee comments

**Page 60, Santa Maria Valley Groundwater Basin**

1<sup>st</sup> paragraph, last sentence: Is the 'Arroyo Grande Plain' referenced pertaining to the to the agricultural area south of lower Arroyo Grande Creek? It is historically called the Cienega Valley.

**Pages 60 through 66**

Member Garing (who served as District Engineer for the Nipomo CSD between 1993 and 2008), the Oceano Community Services District, and the Northern Cities Management Area (NCMA) Technical Group submitted lengthy comments in regards to the Oceano/Nipomo Area Water Supply and Systems section. Data presented in the draft RSR report differs from data provided by the annual reports produced by the Technical Groups of the Nipomo Mesa Management Area and Northern Cities Management Area. Their communications should be reviewed for a complete review of proposed changes, additions, deletions.

The Oceano CSD Board of Directors is requesting that the 2004 Resource Capacity Study (RCS) for Nipomo Mesa water supplies be updated. "Updating the 2004 RCS will provide the board of Supervisors with information and recommendations that will help ensure that land use policies and court approved groundwater stipulations are better coordinated, support long term sustainable water resource management, and promote healthy, livable and well governed communities."

Selected comments from Oceano CSD:

- *The adoption of the Low Reservoir Response Plan (LRRP) for the Lopez Project should be included as a drought response that has been implemented.*
- *Discussion of the Avila Beach and Avila Valley Water Supply and Systems (starting on page #56) should also identify that the LRRP is very important for some customers of San Luis Obispo County Service Area No. 12, who are entirely dependent on Lopez water supplies.*
- *The 2016 approval by the District of 750 acre feet of State Water drought buffer should be added. The "No recommended Level of Severity" for NCMA should clarify that it only pertains to the unincorporated area of the management area unless the County intends on addressing water resources for the cities within NCMA.*
- *The County should consider including an enhanced discussion on impacts that the drought had on agricultural and water dedicated for environmental needs to develop a more complete overview of NCMA water resources.*

An Oceano Community Services District letter dated February 8, 2012 and addressed to the Board of Supervisors stating there is no seawater intrusion in Oceano was submitted by WRAC meeting guest J. Tacker.

**Page 63, Table II-16 Santa Maria Groundwater Basin-NCMA Existing and Forecasted Water Supply and Demand**

Member D. Chipping asks why is just Oceano CSD here. Table II-15 shows other participants in groundwater allocation, with a total of 4,000 AFY. Footnote 7 seems to include the 4,000 AFY number (Footnote 7. *Safe yield of 9,500 AFY with subdivisions for*

*applied irrigation (5,300 AFY), subsurface outflow to the ocean (200 AFY), and urban use (4,000 AFY). The 2002 Groundwater Management Agreement safe yield allotment for urban use is broken down per the numbers shown.)*

Safe yield should refer to the safe extractable (5,300 +4,000 = 9,300 AFY) and should not include the 200 AFY that must be left in the ground. Where does the 4,000 AFY urban use fit on the chart? It is apparently the total allocated groundwater to all of NCMA, as shown in Table II-15, P.61).

## **Pages 63 - 65**

Member Garing and Oceano Community Services District questions NMMA data.

- *The NMMA Calendar Year 2015 report (pgs. 42 & 43) indicates: (a) "In Fall of 2015 the divide between the pumping depression and Coastal wells directly to the west is largely absent creating a groundwater gradient that is landward from the coast.", and (b) The condition increases the risk of seawater intrusion. It is "downhill" from the ocean to inland groundwater elevations.*
- *In 2002, The California Department of Water Resources published a report entitled "Water Resources Of The Arroyo Grande- Nipomo Mesa Area". At page ES-21 this report indicates that the dependable yield of the Nipomo Mesa portion of the basin is estimated to be between 4,800 and 6,000 AF. Compared to the actual production in 2015 of 15,249 AF this would seem to indicate that NMMA was pumping at least (6,000 - 15,249 = - 9,249) or 9,000 and as much as 10,200 AF more than the dependable yield.*
- *A review of reports prepared by DWR, NCSD and NMMA over the 50 year period between 1965 and 2015 indicates that groundwater surface elevations under the Nipomo Mesa have been falling for half a century, an example being the area of the pumping depression, where the groundwater ridge between NCMA and NMMA stood 50 feet above sea level in 1995, but had fallen to sea level by 2015, with the deepest portion of the NMMA pumping depression at 13 feet below sea level Calculations which compare the amount of groundwater lost under NMMA over the last 50 years using the conclusion of about a 10,000 AFY overdraft in 2015 in No. 5. above, agree with calculations which use the volume of emptied aquifer in No. 6. above and indicate a cumulative groundwater deficit over the 50-year period of about 50,000 acre feet.*
- *If the DWR (2002) dependable yield figures of 4,800 to 6,000 AFY for NMMA are accepted and then compared to Agricultural pumping of 7,337 AF reported in the NMMA 2015 annual report, it is apparent that there is NO surplus available for NMMA purveyors, since overlying land owners (agricultural pumpers) have senior rights to groundwater under their land.*
- *The conditions set forth in 1.- 8. above place the NMMA's groundwater supply at ever increasing risk from seawater intrusion, but also places the NCMA southwest agricultural area and eventually Pismo Beach and OCSD wells at risk to seawater intrusion in the near term and all NCMA purveyor wells at risk if the trend continues.*
- *No mention is made of some of the important provisions in the June 30, 2005 Stipulation, which was the settlement agreement which adjudicated the basin through terms in the settlement:*
- *While the draft mentions the requirement for NCSD to bring in 2,500 AFY, there is no mention of the requirement to bring in water for, or to assess a charge sufficient to pay to bring in water for, all new development on the Mesa that occurred after January 1, 2005. NCSD has been charging approximately \$14,000 per DU in this regard, which NCSD has used to help pay for the importation of 2,500 AFY (the Nipomo Supplemental Water Project), but has so far had insufficient funding to complete that project.*
- *Because of lack of funding, the Nipomo supplemental water Project is so far bringing in less than*



*1,000 AFY and that flow just began about a year ago, at 650 AFY.*

- *Because of the requirement to bring in water for all new development occurring after January 1, 2005, the Nipomo Supplemental Water Project must bring in significantly MORE than 2,500 AFY. The two water supply requirements in the Stipulation are cumulative. NCSD itself is planning on 3,000 AFY to account for the added development within NCSD since January 1, 2005. Unknown additional water will be required for the same reason for the likes of Rural, Golden State and other purveyors on the Mesa. Their requirements should be defined in the draft.*

**Page 66 Table II-17 Santa Maria Valley Groundwater Basin - Nipomo Mesa Management Area Existing and Forecasted Water Supply and Demand**

Member Garing questions the Agricultural Demand reported as 3,800-4,300 AFY. The 2015 Nipomo Mesa Management Area (NMMA) Annual Report, page 23, indicates agricultural production for that year as 7,337 AFY.

Members Garing and D. Chipping question the source for the Other GW Supplies for Agriculture of 11,931 AFY, and may not exist.

Member D. Chipping asks what is the connection of the San Luis Valley GW Basin to the Nipomo Mesa Management Area, that it can supply 809 AFY Agricultural Supply water in the NMMA?

**Page 69 Table II-18 Santa Margarita Area**

Member D. Chipping asks “Why is the Hopkins study not considered valid enough to set the safe yield at 400- 600 AFY? Instead the statement of uncertainty regarding safe yield seems to be avoidance of the necessity to declare serious concerns regarding LOS.”

“How is Santa Margarita Ranch demand of 1,621 AFY divided between urban and agriculture, and is this possibly repeating some of the 1,640 AFY of agricultural demand?”

“The groundwater supply for agriculture includes 1,762 AFY of “Other GW Supplies”. The number seems to have been chosen to round up agricultural supply to 2,202 AFY, the 20-year demand, with no justification for the specificity of the number, particularly with potential conflicts between agriculture and urban demand in Santa Margarita. Use of a specific number such as 1,762 is stranger because Footnote 7 states “*It is uncertain which basins are used and the quantity of water pumped from each basin. Future studies should invest the resources to quantify the location of and use within each basin.*”

Why are the Rinconada and Pozo Basins included here when they are not connected by anything more than a highway?

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Member Luft stated the report needs to add that the Level of Severity III for the Paso Robles Groundwater Basin, excluding the Atascadero Sub-Basin, was certified by the Board of Supervisors on February 1, 2011.

Also, need to add that water conservation requirements for discretionary land use permit applications and land divisions and general plan amendments within the rural portions of the Paso Basin, outside of the Atascadero Sub-basin, were adopted by the Board of Supervisors on September 25, 2012.

Member Grewal draws attention to the 2005 PRIOR Agreement that asserted that the Paso Robles Basin was not in overdraft.

**Page 73, 4<sup>th</sup> bullet**

Member Luft, noted that the discussion regarding the Computer Model Update needs to be revised to reflect the latest work effort by the County. The appropriate report is Refinement of the Paso Robles Groundwater Basin Model and Results of the Supplemental Water Supply Options Predictive Analysis – Final, dated 12-8-16. This report provides the updated change in groundwater storage as a deficit of 3,184 acre-ft averaged over 1981 to 2011 (See Table 1). The report also provides an updated groundwater budget from 2012-2040. The change in groundwater storage during this period is predicted to be 32,844 acre-ft in deficit on average. See

<http://slocountywater.org/site/Water%20Resources/Water%20Forum/Computer%20Modeling/index.htm>.

Member Chipping noted the section on Future Year Simulations needs clarification. In “No-Growth” it is stated that outflow exceeds inflow by an annual 5,592 AFY, and under “Growth” by 20,900 AFY. However, in the Paso Robles Groundwater Basin Computer Model Update Final Report to the San Luis Obispo County Board of Supervisors January 13, 2015, the average deficit was reported to be 2,400 AFY from 1981-2011.

Mr. Grewal questions the ‘Updated Perennial Yield for the Basin’ based on estimation of irrigation requirements for grapes being 1 AFY and not 1.7 AFY. He cites “Mark Battney Report”

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Member Luft noted the following.

2<sup>nd</sup> bullet: This was a step towards compliance with SGMA but did not initiate compliance.

3<sup>rd</sup> bullet: Only two of the measures failed – the formation and the funding,

4<sup>th</sup> bullet: Statement is incorrect - the County did not provide notification to DWR that they would not serve as the GSA.

5<sup>th</sup> bullet: The Computer Model Update is complete. See page 73 note above.

Last paragraph, the first sentence is incorrect and should be deleted.

Member Grewal asks “Who sent notice to SWRB, county won’t do their job”, presumably in reference to the fourth bulleted item.

**Page 75, Table II-19 Paso Robles Groundwater Basin Existing and forecasted Water Supply and Demand**

Member Luft notes that the data in this table should be revised to align with recent Computer Model Update data and results. What is the source of the 2012 agriculture and rural data? What is "SWRCB WPA 14"?

Member Chipping asks "Why is the sum of the 2015/2016 demand less than that used in the groundwater model (84,124.5 vs 93,100 AFY)?"

The SLO County General Plan LUE, 2014 Section 3.3, p.3-5 gives build out populations for the Paso Robles GW Basin, and shows the Shandon-Carrizo Area as changing from 2,476 (yr 2000) to 53,691, and Salinas River Area from 61,906 (yr 2000) to 95,166. Are these numbers still valid, and, if do, are they the numbers used in the calculation of future use?

Member Louck addressed the 2015/2016 Demand (AFY) for the City of Paso Robles at 3,569 AFY. He was under the impression that city annual water usage was in the vicinity of 6,000 AFY. As the City expands in population, the forecast demand for water in 15, 20 and 30 or more years was listed at 13,400 AFY. Considering that the population of Paso Robles is currently around 30,000 and their maximum population or build out is estimated to be approx. 45,000, the total demand would be 5,353 AFY not 13,400 AFY. Due to this disparity, Member Louck reviewed the City of Paso Robles 2015 Urban Water Management Plan, final report July 2016 prepared by Todd Groundwater Management. That report, in their chart ES-2, reflected demand expectations of 7,089 AFY in 2020 and the chart projected a total demand of 9,519 AFY at total build out in 2045 or later. This is considerably less, 3,881 AFY less, than the forecasted amount in Table II-19.

The Supply Section states that the Nacimiento Project would supply 6,488 AFY. The City of Paso Robles had contracted for roughly that amount but their treatment plant could only treat somewhere in the vicinity of 1100 AFY. The City of Paso Robles 2015 Urban Water Management Plan, char ES-2, indicated a supply of 1,120 AFY through 2040 with an increase to 2,017 in 2045 or later. Further in the report, Table 6-9 provided some insight as to why the 6,488 AFY was used. That amount, 6,488 is the contract amount and is listed under the Total Right or Safe Yield (optional). The 1,120 AFY amount is listed as the Reasonably Available Volume and is used in their (City of Paso Robles) calculation for future water demand. What is clear is that the County and the City of Paso Robles have interpreted these two numbers differently. This is confusing and hopefully can be clarified.

Member Louck notes that the City of Paso Robles 2015 Urban Water Management Plan was finalized in July 2016. According to page 6, a notice of intention to adopt the plan was sent to 13 Coordinating Agencies and the plan itself was available for review on the Paso Robles City website. They received no comments on the draft plan (with the exception of General Public comments). This seems odd in view that the City of Paso Robles overlies the basin and is a large user of water resources. Since July 2016 has any Coordinating Agency commented on the Urban Water Management Plan?

**Pages 76 and 78,** See Atascadero Mutual Water Company comments

**Pages 73 thru 78,** See City of Paso Robles comments

**Page 77**

Mr. Grewal states “Atascadero sub basin has basin modified all water meets to be removed from Paso basin. Where is any info on Salinas dam water this is part of north co water (sic)

**Page 83**, See Avila Valley Advisory Council comments

**Pages 83 and 85**, See Cambria CSD comments

**Page 86, Paso Robles Groundwater Basin**

Member Luft noted that

1. should state “LOS III for the Basin per the Feb. 2011 Resource Capacity Study”., and
2. should state “Continue to support efforts to implement SGMA”.

See City of Paso Robles comments

**Page 134**, See Avila Valley Advisory Council comments

**Page 180, VIII. Appendix**

Two important documents not listed that should be referenced are:

NMMA Technical Group. Nipomo Mesa Management Area, 8<sup>th</sup> Annual Report, Calendar Year 2015, Submitted May 2016  
<http://ncsd.ca.gov/resources/reports-by-subject/#nmma>

Northern Cities Management Area Technical Group. Northern Cities Management Area 2015 Annual Monitoring Report, April 27, 2016  
<http://pismo beach.org/DocumentCenter/View/42377>

**Pages 185 and 186**, See Cambria comments.

**Appendix I - WRAC Subcommittee and Additional Members’ Individual Comments**

- Bill Garfinkel
- Jim Garing
- Greg Grewal
- Debbie Peterson
- David Chipping
- Linda Chipping
- Eric Greening
- George Kendall
- Dennis Louck
- Sue Luft

**Appendix II – Agencies’ Comments Provided to WRAC**

- Atascadero Mutual Water Company

- Avila Valley Advisory Council
- Cambria Community Services District
- Northern Cities Management Area Technical Group
- Oceano Community Services District
- Paso Robles, City of
- Templeton Community Services District