

1.0 MASTER RESPONSES

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MASTER RESPONSE NO. 1: TENTH STREET/CEMETERY ROAD–US 101 SOUTHBOUND ON-RAMP

Many of the commentors were concerned about the existing conditions on Cemetery Road and the project's contribution of traffic to this roadway, potentially exacerbating the conditions experienced along Cemetery Road. The specific issues of concern are as follows:

- To access United States Route 101 (US 101) southbound from Tenth Street, motorists travel southbound on Cemetery Road, which becomes the US 101 southbound on-ramp. Because of this configuration, many motorists mistakenly believe that Cemetery Road is one way and drive on the wrong side of the road.
- Many motorists exceed the speed limit on Cemetery Road, especially at the approach to the US 101 southbound freeway ramp.
- There is a school bus stop along Cemetery Road, and many drivers do not stop and/or swerve to avoid the school bus.
- Traffic control at the entrance to San Miguel Cemetery and at Nygren Road may be inadequate to handle trips added by the project.
- A new development that includes 40 dwelling units was recently approved and will contribute to traffic to Cemetery Road.
- Congestion on Cemetery Road could be significant, especially when there are memorial services at San Miguel Cemetery.
- A new ramp should be evaluated that considers an on-ramp directly from Tenth Street to southbound US 101.

The purpose of the Draft Environmental Impact Report (DEIR) Traffic and Circulation section and Traffic Impact Analysis (TIA) is to assess the impacts of the San Miguel Ranch project on the surrounding roadway network. Section 4.2.2 outlines the impact significance criteria used to evaluate off-site transportation facilities. In general, a significant project impact occurs when the traffic added to a facility causes the level of service (LOS) to deteriorate beyond a threshold adopted by the Lead Agency. According to the Highway Capacity Manual methodology used for roadway analysis in the DEIR, the capacity of Cemetery Road is approximately 3,200 vehicles per hour (vph) (i.e., 1,600 vph in each direction). In the existing condition, Cemetery Road carries fewer than 100 vph during the a.m. and p.m. peak hours. The project would add approximately 113 a.m. peak-hour trips and 104 p.m. peak-hour trips to Cemetery Road. Although the addition of project traffic is significant when compared to the existing volume on Cemetery Road, the total traffic volume would remain well below the capacity of the roadway, and the County's LOS threshold would not be exceeded. In the General Plan Buildout (2030) plus project condition, the traffic volume on Cemetery Road is forecast to be 274 trips in the a.m. peak hour and 267 trips in the p.m. peak hour. This forecast traffic volume would also be well below the capacity of the roadway. Cemetery Road is located outside the San Miguel Urban Reserve Line (URL) and has a LOS threshold of LOS C. The addition of project traffic to Cemetery Road would not cause the roadway to exceed the County's LOS threshold.

Many safety concerns along Cemetery Road are due to driver behavior and existing conditions on the roadway. A school bus that is stopped for the purpose of loading or unloading pupils should display either flashing red lights and/or a stop sign. According to the California Vehicle Code, drivers must

stop when these indicators are displayed. Speeding, driving on the wrong side of the roadway, and ignoring the flashing lights of stop signs on a school bus are issues appropriate for the County to address through increased signage and enforcement of traffic laws. It is not the responsibility of the proposed project to correct existing design deficiencies or address safety concerns due to driver behavior.

The DEIR analyzed the potential impact of the proposed project at the intersection of Cemetery Road/Tenth Street, on Cemetery Road between Tenth Street and Nygren Road, as well as on the US 101 southbound on-ramp. In all cases, these facilities operate at LOS B or better, which is well within the County's adopted threshold for operation of an intersection or roadway. The collision rate on Cemetery Road is below the County average. Cemetery Road is mostly straight, with a few gentle curves, and is relatively flat. There are no shoulders or turning lanes along Cemetery Road, which is rural in character. There are no obstructions to sight distance and no blind curves along Cemetery Road at Tenth Street, the San Miguel Cemetery, or Nygren Road to indicate a hazardous condition. It should be noted that these analyses were prepared for the a.m. and p.m. peak hours. Funerals would usually be held during the midday hours, when project traffic on Cemetery Road is even less than during the peak hours. As stated in the DEIR, the methodologies used in the traffic analysis for the proposed project are consistent with County Public Works Department and California Department of Transportation (Caltrans) methodologies. Additionally, the County Public Works Department reviewed the TIA and DEIR.

The roadway volume analyzed does not include the recently proposed 40-unit residential development along Cemetery Road. The cumulative projects analyzed in the DEIR include those anticipated by the County at the time of the Notice of Preparation (NOP). The cumulative project list was also updated during preparation of the DEIR. The application for the subject project had not been filed during those times. Although the 40-unit residential development is not included, a conservative growth rate of 2 percent per year was applied to background traffic volumes to account for cumulative projects proposed after the date of the NOP. The proposed 40-unit residential project would generate approximately 41 peak-hour trips. If an additional 40 peak-hour trips were added to Cemetery Road, it would still operate below the County's LOS threshold of LOS C.

Comment O-3-3 notes that the County Public Works Department completed a traffic study to assess the feasibility of adding an on-ramp from Tenth Street to US 101. The County reportedly informed the San Miguel Community that the peak-hour traffic volume would not require a new on-ramp. This is consistent with the analysis of the US 101 southbound on-ramp that is presented on page 4.2-42 of the DEIR. This analysis concludes that although the ramp design is nonstandard, the future traffic volumes with the project are not significant enough to require improvements to the on-ramp.

The Cemetery Road/US 101 southbound on-ramp does not comply with current interchange design standards. However the proposed project would not result in a significant impact to this interchange per the results of the DEIR traffic analysis. This result demonstrates one of the drawbacks of a substantial change to a community governing General Plan through a site-specific analysis of a proposed development instead of a comprehensive review of the expansion of the community. A comprehensive update to the plans that define the Community of San Miguel and the surrounding area would address the opportunities and constraints associated with the expansion of San Miguel and would provide for a circulation plan update that could include planning for and implementation of a more standard freeway on-ramp configuration.

MASTER RESPONSE NO. 2: TRIP DISTRIBUTION

A number of commentors disagreed with the trip distribution assumption that project traffic would utilize the north and south entries equally (i.e., 50 percent utilize the north driveway and 50 percent utilize the south driveway). Because 75 percent of project traffic is destined south of the Community of San Miguel, the commentors believe that these vehicles would more likely travel to the south driveway, then utilize Tenth Street to access United States Route 101 (US 101). However, most of the lots on the project site are actually closer to the US 101 southbound on-ramp at Mission Street. Furthermore, the roadways providing access to this ramp will be new roadways that are fully improved and designed to County Standards, making this route more attractive. Project traffic utilizing the southern route to access US 101 would travel along Tenth Street, a two-lane rural road with no curb and gutter or lighting, and then along Cemetery Road, a facility many commentors believe is unsafe due to road design, driver behavior, and intersecting roadways and driveways. The north project driveway will provide a faster and more desirable route than the south driveway for project traffic accessing southbound US 101. For these reasons, the trip distribution assumptions used in the Draft Environmental Impact Report (DEIR) are justified.

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MASTER RESPONSE 3: SCHOOL DISTRICT IMPACTS

Commentors state that the proposed project would add a considerable number of new students to the San Miguel and Paso Robles Joint Unified School Districts, which are already at or over capacity. Therefore, implementation of the proposed project would cause significant impacts to both San Miguel and Paso Robles Joint Unified School Districts. Commentors further assert that while Mitigation Measure 4.12.2, School Facilities Fees, requiring the project applicant to pay school facility fees in accordance with California Education Code Section 17620, would be required, the required fees alone are not sufficient to reduce school district impacts to facility overcrowding to a level that is less than significant. In addition, the commentors assert that fees are not large enough to cover the costs associated with expanding school facilities.

The County of San Luis Obispo (County) understands that the current burden of the San Miguel and Paso Robles Joint Unified School Districts to provide school services (e.g., busing, classrooms/facilities, and instruction) exceeds existing school capacities and budgets. The County also understands that there can be a disconnect with the provision of fees to fund physical improvements needed to accommodate growth in student numbers and actual provision of physical improvements.

Senate Bill (SB) 50, however, limited the County's ability to mitigate for project-related impacts to schools (see discussion in DEIR, pp. 4.12-16–4.12-17). SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by Education Code Section 17620 or Government Code Sections 65970 (et seq.) may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. The mitigation fees authorized by SB 50 and designated in Section 17620 of the Education Code and Sections 65970, 65995 and 65996 of the Government Code are considered to be the exclusive method for considering and mitigating development impacts on school facilities.

Subdivision (h) of Section 65995 of the Government Code prohibits an agency from denying or refusing to approve the planning, use, or development of real property on the basis of a developer's refusal to provide mitigation in amounts in excess of what is established by SB 50, and Government Code Section 65996 recites that the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation" for the purposes of the California Environmental Quality Act (CEQA) or for any other reason. A local agency may not deny approval of a legislative or adjudicative action under CEQA relating to real estate development on the basis of the inadequacy of school facilities.

Therefore, while the commentors' concerns are noted and will be made available to the decision-makers, State law requires the County to conclude that Mitigation Measure 4.12.2 constitutes full mitigation for school-related impacts and reduces them to a level that is less than significant.

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MASTER RESPONSE NO. 4: GROUNDWATER AVAILABILITY, RELIANCE ON HYDROGEOLOGIC DATA FROM 2004, APPLICATION OF THE GROUNDWATER MODEL, AND SENATE BILL 610

Several commentors questioned the results of the Water Resources Evaluation for the Draft Environmental Impact Report (DEIR), specifically raising issues of groundwater availability, reliance on hydrogeologic data from 2004 for the on-site water well, application of the groundwater model to increased water demand in nearby agricultural areas, and analysis of the project's water sufficiency in accordance with Senate Bill (SB) 610.

2004 On-Site Well Data

Relative to the use of data from the on-site well, reports by Cleath dating from 2004 provide adequate information about the depth, production ability, and water quality from the Paso Robles Formation aquifer that underlies the site. The data provided are considered adequate for the purposes of assessing well capacity and production characteristics. Criteria for assessing adequacy of the well data include the length (duration) of the pumping tests, quantity and quality of the collected data that was obtained and recorded throughout the pumping tests, controlled nature of the tests, consistency of data collection techniques and procedures, and adherence to standard industry practices for performance of such tests. Further indication of the credibility and adequacy of the data obtained from these tests is that the data are consistent with the results of other similar tests in the Paso Robles Basin area, which demonstrates a consistency of project-specific data with other local and regional groundwater well data. By conducting an 83-hour pumping test, Cleath (2004) determined that the North Well was capable of sustaining a pumping rate of at least 1,000 gallons per minute. Fugro reviewed the pump test data and concurred with the methodology used in the test and the results obtained relative to reliability of groundwater supply.

Application of Groundwater Model

As part of its development, the groundwater model includes historical groundwater levels in the San Miguel Community Service District (CSD) area and historical pumping in nearby wells under dry, normal, and wet climate conditions that are sufficient for numerically evaluating the pumping impacts of the North Well. Although investigated, the South Well is not being considered for use as a production well for the proposed development. Moreover, analysis of the sufficiency of groundwater supply for the proposed project was determined in accordance with SB 610 guidelines as advanced by the California Department of Water Resources. Normal, dry, and multiple dry year conditions of groundwater availability were evaluated over a 20-year planning horizon. The water supply sufficiency determination concluded that adequate groundwater supply is available for the proposed project without significantly impacting other groundwater users.

The hydrologic assessment used a calibrated model to evaluate the impacts on local groundwater levels and storage of additional pumping to meet the water demands of the proposed San Miguel Ranch development. Use of the numerical model as a tool to evaluate the potential impacts of the area is an excellent and appropriate application because a numerical groundwater flow model is a mathematical representation of a natural system. The input data for the numerical model mathematically describe the hydrogeological conceptual model and has the advantage that, once in a

mathematical format, the model has the capability to solve the mass balance and motion equations that govern groundwater flow to simulate groundwater elevations. In this format, the numerical model can produce a quantitative analysis of the groundwater entering and exiting the basin or study area, as well as the rate of groundwater flow through the basin. The model is also capable of calculating the combined interference effects of closely located wells or other features.

Model calibration is the process of testing the accuracy of the model results by comparing the model simulated groundwater elevations to measured groundwater data. During the calibration process, the aquifer properties are varied within an acceptable range until the closest fit of the simulated versus measured data is achieved. This comparison of observed versus simulated groundwater elevations is based on data from 180 water wells distributed throughout the Basin. The extensive calibration process was designed to better constrain the range of aquifer properties and conditions for the model, thereby reducing uncertainty in the results. For instance, a rigorous calibration was performed involving a statistical analysis to compare the difference or residual between measured and simulated groundwater elevations. The correlation coefficient for the data simulated by the Basin model is 0.996. Statistically, the correlation coefficient ranges from 0 to 1 and is a measure of the closeness of fit of the data to a 1 to 1 correlation. A correlation of 1 is a perfect correlation. The correlation coefficient of 0.996 indicates a very strong correlation between simulated and observed elevation data. This correlation is based on 4,290 measurements from 180 different basin wells.

Another method to check whether the model is calibrated and is numerically stable is to evaluate the differential in mass balance. Within the iterative technique of solving the analytical equations of the model, there is always a mass balance differential. This differential should be small, and by industry standards a differential of less than 1 percent is considered a good solution. The mass balance differential for the Paso Robles Basin model is 0.0014 percent. These values, and all the calibration standards applied to the model, indicate that the Paso Robles Basin model is a high-quality numerical model that is accurately simulating the flow of groundwater in the basin.

Once calibration of the model is achieved, the model is considered capable of simulating future conditions with reasonable accuracy. Input parameters can be set to simulate a wide range of potential future groundwater uses or hydrogeological scenarios. By modifying the input data, the model provides the capability of simulating a wide range of potential future conditions. The types of future conditions can include natural or climatic variations such as variation in rainfall over time in a drought scenario. Future groundwater practices can also be evaluated such as changes in the amount and distribution of groundwater pumpage, the addition of groundwater recharge programs, or evaluating the impacts of new development on groundwater conditions. A numerical model provides an excellent tool to estimate perennial yield through balancing the amount of water entering and exiting the basin and the rate of groundwater flow through the basin.

Conclusions of Water Resources Evaluation–Groundwater Availability

The Basin model was used in this evaluation as an investigative tool upon which all available data from the vicinity of San Miguel Ranch was added to the extensive database that makes up the analytical capability of the model. The revised, focused model evaluated not only the urban water demands of the development but also potential pumping from 27 wells located on the larger parcels in the development to be used to irrigate small farms (e.g., vineyards). Groundwater impacts were evaluated by the model for scenarios with a 27-year simulation period, which accounted for urban

build out in the San Miguel CSD, urban build out in the other major communities in the Paso Robles Groundwater Basin, rural domestic growth (rural residential development) based on County population growth estimates, and maximum reasonable agricultural water demand in the Basin (see further discussion below). In addition, the proposed project was evaluated by the groundwater model over a hydrologic period that included dry, normal, and wet climate conditions. This hydrologic period includes the extended drought from 1987 through 1991, which is generally considered to be the “standard” drought period across much of California. For the Paso Robles Groundwater Basin, the late 1980s represents the worst historical 2-year, 4-year, and 5-year drought.

The hydrogeologic assessment for the proposed development also evaluated three alternative scenarios involving urban build out, rural domestic growth estimates, and maximum reasonable agricultural water demand for the entire Paso Robles Groundwater Basin area. These scenarios included urban build out and rural domestic growth estimates not only of the San Miguel CSD (including the proposed San Miguel Ranch development and small farm irrigation demands), but urban build out of the other major communities in the Basin (i.e., Paso Robles, Templeton, and Atascadero). The source of groundwater for the San Miguel Ranch development would be the Paso Robles Formation. The Paso Robles Formation is the major source of semiconfined groundwater in the Paso Robles Groundwater Basin. The groundwater model also assumed “maximum reasonable agricultural water demands” using the County of San Luis Obispo Agricultural Commissioner’s Office projections, which included future crop types and irrigation practices. These future anticipated agricultural practices were considered in the analysis of groundwater cumulative impacts for a study area that included the project site as well as surrounding lands, including agricultural preserve properties which could reasonably be expected to be developed into vineyards. The study area defined in the DEIR for potential water impacts is the San Miguel CSD service area plus the Development project site area. This study area is appropriate for the analysis of the proposed project’s potential impacts because drawdown of groundwater for the proposed development would affect the Paso Robles Formation aquifer below the project site and in the immediate area of the site vicinity. Other portions of the Basin would not be affected by, nor would they in turn affect, the proposed project.

Historic groundwater levels have remained relatively stable in the vicinity of the proposed project, as have water levels in many parts of the Paso Robles Basin. During the same time period, water levels in some other parts of the Basin, most notably in the area along the Highway 46 corridor from the eastern edge of the City of Paso Robles to approximately the Whitley Gardens area, have shown recent dramatic declines. These illustrations of differing water level responses in different parts of the Basin demonstrate both the complexity of a large groundwater basin as well as the ability of the Basin to buffer various applied pumping stresses. The cause of the so-called “pumping depression” in the Estrella area is a result of a juxtaposition of several significant and competing stresses or pumping interests that are not experienced in other parts of the basin. This juxtaposition of competing interests for groundwater is one of the potential reasons that public agencies such as the City of Paso Robles is pursuing the Nacimiento Water Project that will allow the City to supplement its supplies while adding flexibility to its drought-year demands.

The Paso Robles Groundwater Basin Study (Fugro 2005) and all recent published studies have concluded that the Paso Robles Groundwater Basin is not in overdraft. Given the location of the proposed project away from the “pumping depression” located east of the City of Paso Robles, the proposed groundwater use and subsequent less-than-significant drawdown is not projected to cause a significant adverse impact, as further discussed below.

The Water Resources Evaluation and conclusions presented in the DEIR were prepared in accordance with standards and objectives of SB 610 for water supply analysis of a proposed project. Although the California Environmental Quality Act (CEQA) encourages Lead Agencies to develop thresholds of significance, thresholds must be adopted by ordinance, rule, or regulation, developed through a public review process, and supported by substantial evidence (CEQA Guidelines Section 15064.7). The majority of Lead Agencies do not formally adopt thresholds of significance in this way in order to allow for flexibility in evaluating the potential effects of projects pending the existing conditions of the affected project sites and study areas and the components specific to each project. The key to the analysis is whether the conclusions of potential significant effects or less than significant effects are based on substantial evidence. Per CEQA Guidelines Section 15064, the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting (CEQA Guidelines Section 15064 (b)).

The Water Resources Evaluation (WRE) presented conclusions regarding the significance of impacts related to groundwater supply using substantive data, including the Paso Robles Groundwater Basin Study and an extensive assessment of local hydrogeologic conditions that included an evaluation of existing wells in and around the Development project site, historical land use changes at the site, a review of historical groundwater level measurements in local wells, geologic cross-section of the site area, and results of a pump test at the North Well. The WRE accessed data on existing local water demands, land use, climate, hydrology, and hydrogeology from various public agencies. In addition, preparers of the WRE met with the San Miguel CSD to understand the CSD's use of groundwater to meet historic demands of the service area and to collect existing and historic production water well data.

The WRE assessed the proposed project drawdown through use of the numerical groundwater flow model of the Paso Robles Basin per the model output in light of historic groundwater fluctuations during drought conditions and the naturally induced recharge to groundwater storage from the Salinas River. Based on the substantial volume of data analyzed during the investigation and the three scenarios evaluated (including a worst-case scenario of reliance on only the on-site North Well), it was determined that a specific quantitative threshold of significance for the project site is not mandatory given allowance under CEQA for substantial evidence to drive conclusions of significance based on scientific and factual data.

As described in the WRE, the results of the simulated total pumping demands over the 27-year period of analysis (i.e., 7 years during development and 20 years after build out) indicate that the impacts of the project will not adversely impact local groundwater levels or cause unreasonable interference to nearby wells. Estimated long-term drawdown due to project pumping is expected to be less than 15 feet (ft) in areas surrounding the project. The 15 ft estimated drawdown is generally less than or equal to the seasonal and year-to-year fluctuations observed in historical groundwater levels in existing wells in the area.

In the absence of formally defined thresholds of significance, it is the professional opinion of Fugro that the less than 15 ft drawdown is not significant because (1) projected drawdown is not more than historic groundwater fluctuations that have occurred as a result of drought conditions and seasonal

changes in water levels, and (2) the decrease in groundwater storage is partially offset by naturally induced recharge from the Salinas River.

Transfer of Water Rights

Several comments were raised regarding the transfer of water rights if the North Well were to be transferred from the property owner (project applicant) to the San Miguel CSD.

The landowner of the Development project site currently has overlying rights to the water supply from the North Well, which would be transferred to the San Miguel CSD if the CSD were to accept the well into its water supply system. Thus, although new water rights or entitlements are not required, the nature of the rights to the use of the North Well would change with respect to the change in priority of use of the water from that of an overlying landowner right to an appropriative user (the CSD), which has a junior right. Comment L-2-11 theorizes that “once the Paso Robles Groundwater Basin reaches overdraft, the CSD’s use of the North Well is subject to enforced reduction in use to accommodate the prior rights of the overlying landowner’s uses.” There are numerous variables that must come into play and align before the CSD is forced to reduce its production capacity to accommodate the prior rights of overlying users. The large number of variables that must occur are sufficiently great that a worst-case scenario as described is likely fairly speculative. Some of these variables include:

- The Basin must be identified by the court as being in a state of overdraft.
- Both the overlying and appropriative users must be using significant volumes of groundwater.
- The overlying users must pursue legal action and remedies in a court of law and demonstrate to the court that the basin is in overdraft and that the action of the appropriative users is causing damage to the ability of the overlying users to pump water.
- Mitigation measures can be developed by the appropriative user to allow continued use of the resource by the overlying users, including:
 - Improvement of the pumping or delivery system of the overlying user
 - Increased distribution of the resource by the appropriative user to serve water to the overlying user.
 - Changing the time or location of the pumping of the resource by the appropriative user.
 - Implementation of water use reduction measures (water conservation).

Thus, the results of the analysis indicate that sufficient water supplies exist to supply the project as well as surrounding users without resulting in a significant impact. The concern regarding the change in water rights from overlying to appropriative represents a worst-case scenario beyond the reasonable worst-case scenario examined in the DEIR and includes a large number of assumptions that would be overly speculative.

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MASTER RESPONSE NO. 5: PROJECT WATER DEMAND AND METHODOLOGY USED IN THE WATER RESOURCES EVALUATION

Several commentors stated that the project water demand was underestimated, the methodology used was unclear, and the project demand did not include demand for the 27 larger parcels that could drill wells for agricultural irrigation.

Water Demand Estimates for Project Parcels. Project water demands and the methodology used were conducted by Wallace Group on behalf of the San Miguel CSD. The project water usage estimates utilized existing water consumption data for the San Miguel area, based on the 2002 Water Master Plan for San Miguel CSD. Wallace Group used 155 gallons per capita per day (gpcd) for the proposed project, and the Water Master Plan data include 139 gpcd for San Miguel. In addition, all new development within the proposed project would be constructed with water-efficient fixtures. The estimate is appropriately based on San Miguel area data, with a higher rate per person, thereby providing a conservative and reasonable estimate. Other areas within the Paso Robles Groundwater Basin have higher water consumption because of area-specific factors. Templeton, for example, has a high percentage of large lots (1 acre or more) that are on septic tanks. These larger lots consume more water compared to lots in San Miguel and other areas of the Basin.

Fugro reviewed the water demand estimates as to general accuracy and reasonableness for the types of land uses being considered. Fugro concurred that the project demand estimates were appropriate based on its professional knowledge of water usage in the Paso Robles Groundwater Basin (having authored the Paso Robles Groundwater Basin Report, 2005) and that of the San Miguel area specifically. As described below, Fugro prepared consumption estimates of the larger lots of the proposed project since those lots would have the ability to drill individual water wells and potentially have small farm uses. These estimates for agricultural uses (assumed vineyards) on these 27 large lots were added to the estimates provided by Wallace Group for the project to provide a complete estimate of potential water use of the proposed San Miguel Ranch development.

Water Demand Estimates for 27 Large Lots. Impacts of groundwater pumping from the 27 larger parcels for small-scale crop irrigation were explicitly evaluated in the hydrogeologic assessment (Water Resources Evaluation report) by use of the groundwater model. The estimated total annual pumping volume of 205 acre-feet per year was explicitly stated in the report in Section 5.2, Small Agricultural Farm Water Demands of the Water Resources Evaluation (WRE; Fugro 2008), and the semiannual pumping volumes for each year of the simulation period were listed in Table 5 of the WRE (Fugro 2008). The analysis of build-out water demand considered that only 27 parcels could construct individual wells as provided in the Project Description. The remaining parcels would be served through annexation to San Miguel CSD. Individual wells on the remaining project parcels would not be allowed. To be conservative, all 27 parcels that are proposed to have the legal ability to drill an individual well were considered to do so, planted to vineyards, which is the prevailing irrigated agriculture in the area, and most likely to be planted. It is possible, however, and indeed likely, that not all 27 parcels would drill individual wells and that not all available land would ultimately be planted to irrigated vineyards. Relative to the anticipated irrigation schedule for vineyards, reliance was placed on rainfall and crop consumptive use (i.e., applied irrigation water demand) available from the California Irrigation Management Information System (CIMIS).

Irrigation timing and amounts were appropriately linked to the CIMIS data for purposes of impact analysis (drawdown impacts) under a variety of seasonal rainfall and climatic conditions.