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Water Supply

This section of the Draft EIR addresses the project's effects on water resources, including water demand and supply for the proposed project.

During the Draft EIR's NOP review period, some members of the public questioned the availability of water supply for the proposed project. The county's NOP and comment letters are included in Appendix B.

10.1 Environmental Setting

Water Supply Purveyor

Urban water supply is provided to the Las Palmas Ranch Specific Plan Area by the California Water Service Company (Cal Water). The project site is located within Cal Water's Indian Springs/Salinas Hills/Buena Vista service area. Cal Water has provided a "can and will serve" letter for the proposed project, which is included as Appendix E. Landscape irrigation on the project site associated with the proposed project would use reclaimed water from the Las Palmas Ranch Wastewater Treatment Facility, operated by California American Water. Reclaimed water pipe connections to the treatment facility are already located on the project site.

Cal Water has a total of 28 wells that supply its Salinas service area. The design production capacity of active operational wells is 27,880 gallons per minute (gpm), which is equivalent to 40 million gallons per day (mgd) or 44,843 acre-feet per year (AFY). Cal Water has three new wells being constructed and scheduled to become operational in 2017 and 2018. Well capacities range from 500 gallons per minute (gpm) to 2,000 gpm. It is assumed that the three new wells will have an average design capacity of 1,200 gpm for a total of 3,600 gpm or 5.18 mgd, which is equivalent to 5,812 AFY. Three additional wells are planned within the boundary of the West Area Specific Plan, a project currently being considered by the City of Salinas that is located in the north of Boronda Road Future Growth Area. The design capacity for each of these three wells is 1,200 gpm each. The first of these is scheduled to come online in 2020 (Cal Water 2015).

Recent and Existing Weather Conditions

According to the California Department of Water Resources, California is experiencing record wet conditions following five consecutive years of drought. In 2015, the state had

record low statewide mountain snowpack of only five percent of average. The three driest consecutive years of statewide precipitation in the historical record were in 2012-14. Water year 2017 (October 1, 2016-September 30, 2017) has surpassed the wettest year of record (1982-83) in the Sacramento River and San Joaquin River watersheds and is close to becoming the wettest year in the Tulare Basin (set in 1968-69). Mountain snowpack is already well above the April 1 seasonal averages throughout the Sierra Nevada, with the southern Sierra being more than 200 percent of average for the year to date.

California experiences the most extreme variability in yearly precipitation in the nation. The summary on California Precipitation by the Center for Western Weather and Water Extremes at the Scripps Institution explains how large storms (often atmospheric river storms) contribute to those extreme changes. Water year 2017 has been an active year for atmospheric river storms.

The potential for wide swings in precipitation from one year to the next shows why the state must be prepared for either flood or drought in any year. Although this year may be wet, dry conditions could return again next year. 2017 may be only a wet outlier in an otherwise dry extended period. Unfortunately, the scientific ability to determine if next year will be wet or dry (known as sub-seasonal to seasonal forecasting, or long-range weather forecasting) isn't yet capable of delivering reliable predictions (California Department of Water Resources 2017).

Groundwater Supply, Demand, and Basin Overdraft

There is no available data regarding how the 2016-2017 storms have affected the Salinas Valley Groundwater Basin (groundwater basin). The following discussion is based upon reports prepared prior to the 2016-2017 storms.

Groundwater is currently the dominant source of water supply for agricultural and municipal water demands in the Salinas Valley, as well as all of unincorporated Monterey County. Agricultural water use represents approximately 90 percent of all water used in the Salinas Valley (Brown & Caldwell 2016, pp. 2-4 – 2-5). Urban water supply to Salinas is currently derived exclusively from groundwater. There are no sources of imported water available to augment groundwater supplies within the district or within the groundwater basin. For this reason, the condition of groundwater resources from a supply and demand perspective is important in considering potential effects of increased water demand that would result from development of the proposed project. Due to the growth of urban development and agricultural activities over time, demand for groundwater has increased, resulting in impacts on groundwater availability and quality.

The project site is situated in the foothills at the north-western end of the Salinas Valley, a relatively narrow, elongated, fault down-dropped, sedimentary basin in the California

Central Coast Range. The uplifted mountainous boundary consists of older granitic, metamorphic and marine sedimentary rocks of the Salinian tectonic block. Beneath the valley, a thick sequence of Tertiary marine sedimentary rocks is overlain by late Tertiary to Recent non-marine sedimentary deposits of fluvial and alluvial fan origin. The uppermost 1,000 feet, or more, of this non-marine sequence contains the fresh ground-water basin that is utilized for various water supply purposes.

Cal Water extracts groundwater from two hydraulically connected sub-basins of the groundwater basin known as the Pressure Subarea and the East Side Subarea. Much of the water supply for the Salinas area is extracted from the Pressure Subarea. The Pressure Area is a region of gradually declining groundwater elevations and is characterized by three confined aquifer systems, overlain and separated by thick clay layers that act as aquicludes. These aquifers named for their relative depths are known as the "180-foot", the "400-foot", and "900-foot" aquifers. The groundwater level in the East Side Area is declining more rapidly than any other area in the groundwater basin. The East Side Area is comprised of unconfined, randomly scattered water bearing strata (Yarne & Associates 2016).

As described in Cal Water's 2015 Urban Water Management Plan (UWMP), the groundwater basin was in an overdraft condition at the time the UWMP was adopted. The state has designated the 180-foot and 400-foot aquifers as critically over-drafted. While the basin remains unadjudicated, the California Department of Water Resources has listed the groundwater basin as a high priority. The main concern of the overdraft is not water level, but rather seawater intrusion into these two aquifers. Seawater intrusion threatens the quality of water extracted from the aquifers.

The UWMP notes the annual non-drought overdraft of the groundwater basin is approximately 45,300 AFY. Because of the hydrologic continuity between the ocean and the aquifers of the Pressure Area, seawater has been intruding into these aquifers at a rate of approximately 28,800 AFY. During droughts, the annual overdraft can escalate to between 150,000 and 300,000 AFY per year.

Refined data on the imbalance of the groundwater basin can be found in the Brown & Caldwell's State of the Salinas River Groundwater Basin. That report investigates conditions in "Zone 2C" of the groundwater basin. Zone 2C is comprised of seven of the sub-basins within the groundwater basin. The report further focuses on the four water-producing subareas, including the Pressure Subarea and the East Side Subarea, that produce nearly all of the reported groundwater use within Zone 2C. The report states that the basin appears to be out of hydrologic balance. The average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The average annual change in storage was about 17,000 to 24,000 AFY, including seawater intrusion. Based on the continued large storage declines in the East Side and Pressure Subareas (and

resulting groundwater declines and seawater intrusion), the current distribution of groundwater extractions is not sustainable. Seawater intrusion can account for up to 18,000 AFY of the total storage loss of 24,000 AFY. It is stated that sustainable use of groundwater can only be achieved by aggressive and cooperative water resources planning to mitigate seawater intrusion and groundwater head declines (Brown & Caldwell 2015, p. ES-16). Brown & Caldwell note three possible options for reducing seawater intrusion impacts. These include: 1) reducing pumping in the Pressure and East Side subareas; 2) shifting pumping to areas farther away from the coast as long as it is shifted to areas far enough inland; and 3) shifting pumping from the 180-foot and 400-foot aquifers to the deep 900-foot aquifer. Regarding the latter, it is uncertain whether this is a viable option given lack of information about connectivity between the three aquifers and whether pumping in the 900-foot aquifer would lead to the onset of regional seawater intrusion (Brown & Caldwell 2015, pp. 6-3 – 6-4).

Intruding seawater has advanced into the 180-foot aquifer to within one mile of Cal Water's closest well. Cal Water has shifted production as much as possible out of the 180-foot and East Side aquifers and located it further south and more in the 400-foot aquifer of the Pressure area. Cal Water does not pump from the 900-foot aquifer. No change was observed in the location of the intrusion contours between the years 2011 and 2013, the most recent year for which analysis is available. It is possible that the first two years of the current drought did not have an apparent effect on the movement of the seawater intrusion front (Brown & Caldwell 2015, p. ES-13).

Current/Planned Water Projects to Reduce Groundwater Overdraft

Seawater intrusion into the Salinas Valley Groundwater Basin has been a problem for many years. A solution was identified as early as 1946 when the State of California proposed a three-part remedy:

- Construct several large reservoirs to capture excess storm flow on the upper reaches of the Salinas River and its tributaries;
- Recharge groundwater in the upper valley and Forebay sub-areas of the Salinas Valley with the captured runoff; and
- Extract portions of the augmented groundwater and transmit it via a conveyance system to the East Side and Pressure sub-areas of the basin so that the water users in this northern-most region of the valley can reduce their use of groundwater.

The first two parts of this solution have been constructed and are in operation. Nacimiento and San Antonio reservoirs were built and are operated by the Monterey County Water Resources Agency. The water that they capture is released in a controlled manner to recharge the aquifers in the upper and forebay areas through the natural riverbeds. The final part of the solution however, has not been implemented (Cal Water 2016).

A number of additional projects have been implemented, are currently being implemented, or are planned to reduce overdraft and reduce/halt seawater intrusion within the groundwater basin. Several of these are summarized below.

Castroville Seawater Intrusion Project. The Castroville Seawater Intrusion Project was completed in 1998. It generates recycled water for use by agricultural water users in the Castroville area during the irrigation season. By providing recycled water for agricultural use, the need for groundwater pumping to meet agricultural demand is significantly reduced. This in turn results in reduced intensity and rate of seawater intrusion.

Salinas Valley Water Project. The Monterey Regional Water Pollution Control Agency (MRWPCA) has utilized a collaborative effort with Salinas Valley interests to develop the Salinas Valley Water Project to address water resources management issues within the Salinas Valley. The project was approved in 2003. The Salinas Valley Water Project provides for the long-term management and protection of groundwater resources in the basin by meeting the following objectives: stopping seawater intrusion and providing adequate water supplies and flexibility to meet current and future (year 2030) needs. In addition, the project provides the surface water supply necessary to attain a hydrologically balanced groundwater basin in the Salinas Valley. The Salinas Valley Water Project includes Nacimiento Dam spillway modification and a rubber dam on the Salinas River near Marina, to allow diversion of river water for treatment and piping to nearby farms for irrigation. The project is also intended improve flood control and Nacimiento Dam safety, recharge the aquifers and improve river flow for migration of the federally designated threatened Steelhead trout. Construction of the Nacimiento spillway modifications was completed in 2009 and Salinas River diversion facility began its operation in April 2010 (http://www.mcwra.co.monterey.ca.us/salinas_valley_water_project_I/salinas_valley_water_project_I.php).

Salinas Valley Groundwater Project Phase II. A conceptual design for Phase II of the Salinas Valley Water Project has been developed by Monterey County Water Resources Agency (MCWRA). Under this plan additional winter flood flows would be diverted from the Salinas River. These diversions, up to 135,000 AFY, could be directly used by urban customers. A technical memorandum was completed in 2013. Phase II incorporates two surface water diversion points and will be accompanied by conveyance and delivery facilities. The project is not yet funded, so its implementation has not begun (Phone Conversation with Howard Franklin, Monterey County Water Resources Agency, December 7, 2016).

Pure Water Monterey Project. The Pure Water Monterey Groundwater Replenishment Project will serve northern Monterey County. The project will provide both purified recycled

water for recharge of the Seaside Groundwater Basin that serves as drinking water supply, and recycled water to augment the existing Castroville Seawater Intrusion Project's crop irrigation supply. The project is jointly sponsored by the MRWPCA and the Monterey Peninsula Water Management District, and also includes participation by the City of Salinas, the Marina Coast Water District, and the MCWRA.

The project includes collection of a variety of new source waters and conveyance of that water to the MRWPCA's regional wastewater treatment plant (regional plant) for treatment and recycling. New source waters include: 1) water from the City of Salinas agricultural wash water system; 2) storm water flows from the southern part of Salinas and the Lake El Estero facility in Monterey; 3) surface water and agricultural tile drain water that is captured in the Reclamation Ditch and Tembladero Slough; and 4) surface water and agricultural tile drain water that flows in the Blanco Drain. The project would enable California American Water Company to reduce its diversions from the Carmel River system by up to 3,500 acre-feet per year by injecting the same amount of purified recycled water into the Seaside Groundwater Basin. The project would also provide additional recycled water for agricultural irrigation in northern Salinas Valley through the Castroville Seawater Intrusion Project's agricultural irrigation system. It is anticipated that in normal and wet years approximately 4,500 to 4,750 acre-feet per year of additional recycled water supply could be created for agricultural irrigation purposes. In drought conditions, the project could provide up to 5,900 acre feet per year for crop irrigation (Denise Duffy & Associates 2016). It is this latter source of new agricultural water that would replace an equivalent volume that is now pumped from the groundwater basin and contributes to groundwater overdraft and seawater intrusion.

Interlake Tunnel. Monterey County is currently in the process of developing the Interlake Tunnel Project which would connect Lake Naciemento and Lake San Antonio in southern Monterey County. The project is intended to move water between the two reservoirs to improve water storage and flood control.

Other Water Supply Projects. Cal Water's UWMP includes discussion of new water supply projects from which Cal Water may be able to obtain water supply that would reduce its need to pump groundwater from the groundwater basin. Chief among these are seawater desalination projects that are in the planning and review process. These include the Coastal Water Project in Marina and the DeepWater Desal project in Moss Landing. Other potential water sources include enhanced recycling and expanded surface water diversions from the Salinas River.

10.2 REGULATORY SETTING

State

Sustainable Groundwater Management Act

On September 16, 2014, Governor Brown signed into law Assembly Bill 1739, Senate Bill 1168, and Senate Bill 1319 (AB-1739, SB-1168, and SB-1319). This three-bill legislative package is known collectively as the Sustainable Groundwater Management Act. The act was amended in the later part of 2015 by Senate Bill 13, Senate Bill 226 and Assembly Bill 1390 to provide clarity to the original law and guidance on groundwater adjudications. This new legislation defines sustainable groundwater management as the "management and use of groundwater in a manner that can be maintained during the planning and implementation horizon without causing undesirable results". The legislation defines "undesirable results" to be any of the following effects caused by groundwater conditions occurring throughout the basin:

- Chronic lowering of groundwater levels indicating a significant and unreasonable depletion of supply;
- Significant and unreasonable reduction of groundwater storage;
- Significant and unreasonable seawater intrusion;
- Significant and unreasonable degraded water quality;
- Significant and unreasonable land subsidence; and
- Surface water depletions that have significant and unreasonable adverse impacts on beneficial uses of the surface water.

The legislation provides for financial and enforcement tools to carry out effective local sustainable groundwater management through formation of groundwater sustainability agencies consisting of local public agencies, water companies regulated by the California Public Utilities Commission, and mutual water companies. The legislation requires that groundwater sustainability agencies within high and medium priority basins under the California Statewide Groundwater Elevation Monitoring Program subject to critical conditions of overdraft prepare and submit a groundwater sustainability plan for the basin by January 31, 2020, and requires groundwater sustainability agencies in all other groundwater basins designated as high or medium priority basins to prepare and submit a groundwater sustainability plan by January 31, 2022. Following state approval, the basin would thereafter be managed under the groundwater sustainability plan. The legislation does not require adjudicated basins to develop groundwater sustainability plans, but they are required to report their water use.

The key intended outcomes and benefits of the Sustainable Groundwater Management Act are numerous, and include:

- Advancement in understanding and knowledge of the State's groundwater basins and their issues and challenges;
- Establishment of effective local governance to protect and manage groundwater basins;
- Management of regional water resources for regional self-sufficiency and drought resilience;
- Sustainable management of groundwater basins through the actions of Groundwater Sustainability Agencies, utilizing State assistance and intervention only when necessary;
- All groundwater basins in California are operated to maintain adequate protection to support the beneficial uses for the resource;
- Surface water and groundwater are managed as "a Single Resource" to sustain their interconnectivity, provide dry season base flow to interconnected streams, and support and promote long-term aquatic ecosystem health and vitality;
- A statewide framework for local groundwater management planning, including development of sustainable groundwater management best management practices and plans;
- Development of comprehensive and uniform water budgets, groundwater models, and engineering tools for effective management of groundwater basins;
- Improved coordination between land use and groundwater planning; and
- Enforcement actions as needed by the SWRCB to achieve region-by-region sustainable groundwater management in accordance with the 2014 legislation.

To assist in attaining the above outcomes, the California Department of Water Resources (DWR) will provide groundwater sustainability agencies with the technical and financial assistance necessary to sustainably manage their water resources. The benefits of these outcomes include:

- A reliable, safe and sustainable water supply to protect communities, farms, and the environment, and support a stable and growing economy; and
- Elimination of long-term groundwater overdraft, an increase in groundwater storage, avoidance or minimization of subsidence, enhancement of water flows in stream systems, and prevention of future groundwater quality degradation.

As part of its responsibilities to implement the act, DWR has defined the 180-foot, the 400-foot, and the Paso Robles aquifers within the groundwater basin as high priority basins. Groundwater sustainability plans must be implemented for these aquifers by 2020. The other aquifers within the groundwater basin must have adopted plans by 2022 (Cal Water 2016).

In March 2017, the Salinas Valley Basin Groundwater Sustainability Agency was formed and is responsible for preparing groundwater sustainability plans. A groundwater sustainability plan is anticipated by January 31, 2022. The goal is to achieve sustainability 20 years after adoption of the plan (http://www.salinasgroundwater.org/).

California Green Building Standards Code

The Green Building Standards Code (CALGreen), which requires all new buildings in the state to be more energy efficient and environmentally responsible, took effect on January 1, 2011. These comprehensive regulations will achieve major reductions in greenhouse gas emissions, energy consumption and water use. Water use reductions are specified based on performance standards contained in the code that target indoor plumbing fixtures such as toilets, showerheads, faucets, etc., as well as outdoor water use through installation of irrigation controllers.

California Water Service Urban Water Management Plan

California's Urban Water Management Plan Act requires urban water suppliers to prepare an UWMP every five years and to file this plan with the DWR, the California State Library, and any city or county within which the supplier provides water supplies. All urban water suppliers, either publicly or privately owned, providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet annually are required to prepare an UWMP.

The UWMP is a foundational document and source of information about the Cal Water Salinas District's historical and projected water demands, water supplies, supply reliability and vulnerabilities, water shortage contingency planning, and demand management programs, including water conservation planning. Among other things, it is used as:

- A long-range planning document by Cal Water for water supply and system planning; and
- Source data on population, housing, water demands, water supplies, and capital improvement projects used in regional water resource management plans prepared by wholesale water suppliers and other regional planning authorities, general plans prepared by cities and counties, and statewide and broad regional water resource plans prepared by DWR, SWRCB, or other state agencies.

The Urban Water Management Plan Act was enacted in 1983. Over the years, it has been amended in response to water resource challenges and planning imperatives confronting California. A significant amendment was made in 2009 as a result of the governor's call for a statewide 20 percent reduction in urban water use by 2020. Colloquially known as 20x2020, the Water Conservation Act of 2009 (also referred to as SB X7-7) required urban retail water suppliers to establish water use targets for 2015 and 2020 that would result in statewide water savings of 20 percent by 2020. Beginning in 2016, urban retail water suppliers are

required to comply with the water conservation requirements in SB X7-7 in order to be eligible for state water grants or loans. Chapter 5 of the Cal Water's Salinas District UWMP contains the data and calculations used to determine compliance with these requirements (Cal Water 2016, pp. 11-12).

County

Monterey County General Plan

The Monterey County General Plan Land Use Element and Public Services Element provide the following goals, policies and objectives pertaining to water supply and distribution applicable to this project. Land Use Element goals LU-1 and LU-2 aim to concentrate development in areas where suitable access to services and facilities such as water and sewer.

Las Palmas Ranch Specific Plan

The following policies in the Las Palmas Ranch Specific Plan are applicable to water supply for the project site.

Policies

1. As the first priority, the entire development must be served by a public utility water company providing domestic and fire flow in accordance with the requirements of State and County health and fire agencies. If a public utility water company satisfactory to the County is no feasible, then an incorporated mutual water company may perform this function.
2. Availability of water meeting the requirements of Policy No. 1 shall be demonstrated as to each increment of development prior to filing of a final subdivision map or issuance of any building permit for that increment of development.
3. Plans and specifications for domestic and fire flow water supply shall be submitted to local and state environmental health agencies for approval.

10.3 THRESHOLDS OR STANDARDS OF SIGNIFICANCE

The CEQA Guidelines (Appendix G) indicates that a project may have a significant effect on the environment if it would:

- Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or

- Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; or
- Not have sufficient water supplies available to serve the project from existing entitlements and resources including groundwater, and would require new or expanded entitlements.

These are the issues evaluated in the impact analysis below.

10.4 ENVIRONMENTAL IMPACT ANALYSIS

Water Demand

The projected water use of the proposed project is provided in Table 10-1, River View at Las Palmas Water Demand Estimate.

Table 10-1 River View at Las Palmas Potable Water Demand Estimate[1, 2]

Casitas							
	Units	Kitchen Sink	Bath Sink	Toilet	Shower	Misc (Washer)	Totals
A	10	10	10	10	10	1	
B	12	12	24	24	24	12	
C	4	4	8	8	8	4	
Total Fixtures	26	26	42	42	42	17	
Fixture Unit Value		2	1	1.8			
Fixture Units		52	42	75.6	84	34	
Total Fixture Units							287.6
Water Demand (AFY)							2.876 AFY
Assisted Living							
Beds	Use Factor						Totals
52	0.085 AFY/Bed						4.42 AFY
Memory Care							
Beds	Use Factor						Totals
48	0.085 AFY/Bed						4.08 AFY
Total Project							11.376 AFY

SOURCE: EMC Planning Group 2017

NOTE:
[1] Monterey Peninsula Water Management District Fixture Unit Values for Residential Use and Commercial Use Factors have been used to determine project water demand.
[2] Landscaping on the project site would use recycled water.

The Las Palmas Ranch Specific Plan FEIR estimated total water demand for the Specific Plan area to be 922 AFY. When proposed, the specific plan included 1,578 housing units, which was evaluated in the specific plan EIR. However, the Board of Supervisors ultimately approved only 1,031 housing units, approximately sixty-five percent of the original number. Sixty-five percent of 922 AFY would result in a corresponding water demand of approximately 599 AFY.

California Water Service, the water purveyor for the specific plan area, has provided a "can and will serve" for the proposed project. Although California Water Service was not able to provide a current figure for actual water use in the specific plan area, California American Water Company, the wastewater treatment provider for the specific plan area, records wastewater flows from a period of January 2016 to February 2017as an average of 162,398 gpd (email communication with Mike Magretto, California American Water Company, March 13, 2017). This amount of wastewater flow, 162,398 gpd, equals approximately 182 AFY, less than half of the 599 AFY projected as water supply required and approved for the specific plan area. Common landscaped areas of the specific plan area utilize recycled water, but private residences use potable water for outdoor landscaping. However, water used for outdoor use is considered as a component of total water demand for a residence and therefore would not be considered additional water demand not already accounted for in totals. Therefore, it can be concluded that the proposed project and the entire Las Palmas Ranch development combined would use significantly less groundwater than projected in the original EIR. These numbers are presented in Table 10-2, Projected, Existing, and Proposed Las Palmas Ranch Water Use.

Table 10-2 Projected, Existing, and Proposed Las Palmas Ranch Water Use

	1982 EIR	Approved Specific Plan	Actual Water Use	Proposed Project Water Use	Total Water Use
Water Demand	922 AFY	599 AFY	182 AFY	11.376 AFY	193.376 AFY

SOURCES: 1982 Las Palmas Ranch EIR, 2017 California American Water Company, 2017 EMC Planning Group

The proposed project is subject to compliance with County of Monterey code requirements for water conservation. Furthermore, the project site has existing "purple pipe" infrastructure to use recycled water for all on-site landscaping, further reducing demand for domestic water on the site.

Construction or Expansion of New Water Facilities

Based on the "can and will serve" letter provided by California Water Service, the proposed project would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The "can and will serve" letter indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities. Although the proposed project would increase water demand on the project site, no new or expanded facilities, the construction of which could result in environmental impacts, would be required to meet that demand. No impacts would occur associated with construction of new water treatment, storage and distribution facilities.

Groundwater Impacts

As presented earlier in the groundwater setting of this section, the average annual groundwater extraction for the four noted subareas that compose Zone 2C was about 523,000 AFY from 1959 to 2013. The proposed project would add 11.376 acre feet per year, which is a 0.002 percent increase. This contribution to the cumulative existing impact is not considerable, and therefore, is a less-than-significant impact.

10.5 Impact Summary and Mitigation Measures

IMPACT **Increase Potable Water Demand for the Service Area by Approximately 11.376 AFY (Less than Significant)**

As identified in Table 10-1, River View at Las Palmas Water Demand Estimate, the proposed project would have an estimated potable water demand of 11.376 AFY. The "can and will serve" letter provided by California Water Service for the proposed project indicates the applicable water purveyor for the site is able to provide water supply for the proposed project based on its existing facilities. This would be a less-than-significant impact.

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