

6-11-15 California Coastal Commission, Suzanne Forster, Newport Beach resident. commenting on water supply demands for the proposed Newport Banning Ranch project.

The Newport Banning Ranch project's application was recently certified, raising questions about omissions in the application, some of which directly affect water supply. But there's only time for one of those questions today: Where is the water coming from?

California is now in the 4th year of the worst drought in 1200 years, based on studies by NASA and others.

According to the American Geophysical Union "... Central and Southern California (have) experienced some of the lowest water year precipitation totals in the observational climate record, the effects of which have been amplified by record high temperatures. Diminished snowpack, stream flows and reservoir levels have resulted in a convergence of reduced water supply with heightened demand that appears to be unique in modern California history."

The study also predicts that "future hot droughts, driven by increasing temperatures" will have a "substantial influence on future water resources supply in the western United States."

The most current document that deals with the Project's water supply is a 2010 Water Supply Assessment Report, WSAR for short. This report was done by the City of Newport Beach as part of its environmental review under CEQA. By law the report must evaluate the water supply for the Project over a 20-year period, which in this case is 2030. The report was based on a 2005 Urban Water Management Plan and it concluded there was sufficient water for the project.

However, a disclaimer in the last paragraph puts the entire report into question.

"It is acknowledged that uncertainties have come to light since the 2005 UWMP. However, record drought, climate change and environmental conditions are beyond the scope of this Assessment ... "

So, the report acknowledges that record drought conditions have not been taken into consideration in evaluating the Project's water supply.

The disclaimer also says updates from CNB, MWDOC and the Metropolitan Water District will address these issues. I checked for updates from all 3 agencies and found none. I also called the City and was told there were no plans to update the WSAR, despite it being virtually unusable for water supply analysis.

This raises another question. In the throes of record drought, with more of the same predicted, how can a Project as massive as NBR—we're talking about density higher than the **last five large Orange County coastal developments combined**. How can a project this big go forward with an unusable water supply assessment?

According to the Water Supply Assessment Report, the Project's water demands are estimated at 613.6 acre-feet a year, which is about 200 million gallons of water. (1 acre-foot = 325,581,000 gallons.)

On p20, the report states that the City receives all its groundwater from the Lower Santa Ana Basin. But, according to the OCWD's 2015 Groundwater Management Plan, the Santa Ana River basin is already seriously overdrafted. The river's base flow has declined from a high of 158,600 acre-feet in 1999 to a low of 64,900 acre-feet in 2014.

That's a loss of 93,700 acre-feet, or 60% of the water basin's water supply. That's a very steep decline.

Our other water resources are in trouble too. The snowpack, which supplies 1/3 of the state's water is expected to be at 6% of normal this year. 30 million people depend on the Colorado River for drinking water, but water deliveries from the basin dropped to their lowest in 2014. The State Water Project plans to deliver just 20% of contracted amounts to water agencies this year. (Source: CA Department of Water Resources)

Here's where the 2010 WSAR goes off track. It states on p22* that from 2007 to 2030, groundwater supplies will **increase** by 622 acre-feet and imported water supplies will nearly double. That's how they're able to say there's enough water for the Project. (*Table 7-2 Existing and Projected Supplies)

Today, in 2015, we know that there is significantly less groundwater to draw on. Allotments are going down, not up, as are imported water deliveries. The only thing going up is demand. Projected water demands for NB will increase over

1000 acre-feet by 2030.* That's over 326 million gallons. And that's despite all of new conservation and water use efficiency measures. (*WSAR, if numbers are accurate)

Another growing concern is the depletion of our groundwater around the country and the world. According to the U.S. Geological Survey, our global groundwater levels are now at historic lows. In California's central valley, they've pumped so much water out of the ground, the land is dropping by a foot a year in some areas. The earth is caving in. You have bridges sitting in water. The water's not rising. The bridges are sinking.

This raises the question of whether the water supply for the Project is consistent with the groundwater protections of the Coastal Act. **Section 30231 of the Coastal Act requires preventing the depletion of groundwater.** The Santa Ana basin has already been depleted by 60%. How much more are we going to take? How much more *can* we take before we risk a disaster like saltwater intrusion that could destroy the entire supply?

On May 12, the City voted to declare a Level Three Water Shortage, which comes with mandatory 25% water restrictions that could trigger fines and penalties.

So, now we're cutting our water usage by 25%. How much more will we have to cut to accommodate a project like NBR? And all the other projects that are going up? Orange County is in a development boom. We're 3rd in the nation for construction jobs. How much more water do we have to cut? 50%? More?

And when we force all these cutbacks on residents and businesses, aren't we robbing Peter to pay Paul?

The Banning Ranch development is a massive project that's going to take hundreds of millions of gallons of water every year. We're in the throes of record drought with predictions of more to come. I've heard there is some possibility of an El Nino, but given that it will take 11 trillion gallons of water just to recover what we've lost since 2011*, even the Mother of all El Ninos won't fix that. (*NASA)

That's why I'm urging you to do whatever is necessary to ensure that the Project's water demands can be accurately estimated and reconciled with the future water supply, not just for the present, but dating to 2030, as required by law. **And**

please put all of your available resources into ensuring that our depleted groundwater sources are not being exploited, but instead are being protected and wisely used, as required by the Coastal Act. Thank you.

NOTES:

Cut: So, where *is* the water coming from? There's wastewater recycling, which is also affectionately called "toilet to tap." But it's limited to about 80 million gallons a day by the amount of available waste water. And it's not used for drinking.

The agencies are frantically working on solutions, such as expansion of extraction facilities, more water storage, groundwater recovery systems, various ways to recharge the basins and desal, which is not environmentally friendly and also very expensive.

It also says these conditions will be addressed in upcoming reports by three agencies: CNB, MWDOC and Metropolitan.

Cut: but all of this is limited by the fact that water is a finite resource. I think we forget that. It is our most *critical* finite resource. All life depends on it. (desal) (Should I mention finite resource?)

Cut: I found a Metropolitan 2010 Regional UWMP* and MWDOC 2013 Water Reliability Update that focused mainly on emergency measures. It did confirm on p37 that none of the climate change models in use at this time predict a wetter Southwest United States. Virtually all models indicate warmer and drier trends and longer periods of drought. *See Met Water Supply in notes. Use?

<http://www.mwdoc.com/cms2/ckfinder/files/files/FINAL%20DRAFT%20SOC%20Reliability%20Update%202012%20kws%2031213.pdf>

2010 Metropolitan Water District Regional Urban Water Quality Management Plan

http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP_2010.pdf

1.4 Current Conditions (see below & also see p 1-18 & 1-19, absolutely dismal on water supply!)

Current Challenges

Metropolitan continues to face ongoing water supply challenges. This section offers a brief discussion of Metropolitan's current challenges, current available resources, short-term supply outlook, and short-term actions to meet these challenges. The dry hydrology experienced during the last three years has resulted in diminished snowmelt and runoff levels and additional environmental restrictions were imposed on water imports from the San Francisco Bay/Sacramento-San Joaquin Delta (Bay Delta). By the end of 2009, mandatory

conservation was in place across much of Metropolitan's service area. The restrictions on water use, however, also generated a record demand for water-saving rebates and refocused efforts to increase development of local water resources.

Met RUWMP Water Supply p1-24

Metropolitan forecast shows that under a multi-dry year hydrology, Metropolitan could face depleted supply capability during the next three years. This places considerable emphasis on developing robust short-term actions that will increase supply reliability to Metropolitan service area.

(*OCWD 2015 Draft Water Management Plan, Table 10-3, Projected Total Water Demands (afy): Newport Beach 2015: 16,509. 2020: 17,001. 2025: 17492. 2030: 17983. 2035: 18,474")

//////The City of Newport Beach is its own water district and the Project's water will be drawn from its sources. The City is supplied with imported water from the State Water Project in Northern California and the Colorado River Project. The groundwater comes from four city-owned wells located in Fountain Valley.//////

A Level 4 shortage would require a moratorium on developments that don't have their own water supply.

((The 2015 reports on groundwater Plans for storage, but what good does more storage space do if there's no water to store, unless the problem is actually not enough storage for recovery?))

of what's happening w/imported water in 2030. If this doesn't compute, use the reduced deliveries in the comment letter?))

Every drop of it is being used for irrigation, preventing saltwater intrusion and recharging the aquifers.)

Newport Beach Municipal Code Chapter 14.16 (Water Conservation and Supply Level Regulation) Ordinance No. 2015-14, An Ordinance of the City Council of the City of Newport Beach, California, Amending Chapter 14.16 of the Newport Beach Municipal Code Pertaining to Water Conservation and Supply Level Regulation

Where would I find the wording of the Level 4 Water Supply Shortage regulation?

Demand is going up. Supply is going down. Every day we have more people, creating more demand. Every day we have less water.