



### **COLAB SAN LUIS OBISPO COUNTY**

**WEEK OF AUGUST 2-8, 2015** 

## SAVE THURSDAY, AUGUST 13, 2015

FOR THE PLANNING COMMSSION'S CONTINUED HEARING ON THE MORATORIUM, AG OFFSET REQUIREMENTS, AND MORE

TIME TO BE DETERMINED BOARD OF SUPV. ACTION ON THESE ITEMS NOW LIKLEY TO OCCUR IN LATE AUG. OR EARLY SEPT.

## NO BOARD OF SUPERVISORS MEETING ON TUESDAY, AUGUST 4, 2015

# SUPPORT PG&E DIABLO PLANT RELICENSING WEDNESDAY, AUGUST 5, 2015

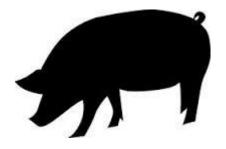
(SEE NOTICE AND DETAILS ON PAGE 7)

# SAVE THURSDAY, AUGUST 20, 2015 LAFCO HEARING ON PASO WATER MANAGEMENT AUTHORITY

(5:30 PM AT THE PASO ROBLES EVENTS CENTER –FAIR GROUNDS)

No Board of Supervisors Meeting On Tuesday, July 28, 2015 (Not Scheduled)

There was no meeting. It was not a fifth Tuesday, so the reason for the break is not clear. See the notes for August 4, 2015



below for what could actually be in play. Some Supervisors are heavily involved in various aspects of the Fair and may have created the schedule break on this account.

#### No Board of Supervisors Meeting On Tuesday, August 4, 2015 (Not Scheduled)

No meeting is scheduled. There was some community speculation at the Fair that the two-week hiatus had been deliberately planned to forestall any public comment on the so-called Water Conservation Plan (making the moratorium permanent) in the weeks leading up to the all-important August 11, 2015 meeting. The theory is that the Board water majority wanted to minimize discussion and community organizing. The entire schedule has now been changed. (See Planning Commission item below.)

Vacation Time Meeting Trifecta: Another theory is that the major water restrictions, continuation of the moratorium, the water offset controls, etc., are scheduled for mid and late August, a major vacation time, in the hope that the public will be away and/or distracted. Similarly, the first Local Agency Formation Commission (LAFCO) hearing on the proposed Paso Basin Water Management Authority is set for Thursday, August 20, 2015. Thus the



Board and the LAFCO have managed to concentrate two very complex and penetrating water issues into two consecutive weeks in mid-August, when citizens should be enjoying time away with their children in the mountains or at the seashore prior to the start of school. There will also need to be a hearing at the Board of Supervisors in this period for it to review and finalize the financing portion of its LAFCO application for the proposed AB 2453 Paso Basin Water Management Authority. Perfect! You have pre-paid reservations at the lodge on lake whatever and these guys will hold the crucial meetings concerning taking away your historic water rights and hitting you with new assessments or taxes while you are away building treasured memories with the children and grandchildren.

And the Board is oh so politically correctly pro-child and family.

#### Planning Commission Meeting of Thursday, July 30, 2015 (Completed)

**Item 5 - Water Conservation Program/General Plan and Land Use Ordinance Amendments.** After six hours of presentations and review, the Commission determined to continue the hearing to August 13, 2015 and to reserve August 27, 2015 in case further work is

necessary. In the meantime staff has been given a number of assignments to amend various clauses and to provide information on what actual data was used in the Paso Groundwater Basin Model to determine the amount of water used by grapes and other types of crops. This will require in turn that the Board of Supervisors' scheduled consideration of the so-called water conservation program on August 11, 2015 must be postponed to August 25, 2015 or even later, depending on the date of the final recommendation by the Commission. Final Board action could conceivably be in September. As result, and if the Board approves a program, it might not take effect until October. This means that there will be a gap between when the previously adopted so-called urgency ordinance sunsets by law on August 27, 2015 and the new program legally comes into effect. The impact of the gap is not expected to be significant substantively because there is already a six-month waiting list for well drillers on wells that have already been permitted. Whether there will be a rush to plant new crops is speculative. Season, market, availability of plants, and other factors all weigh into planting decisions. Similarly the Planning Department itself most likely will drag out the review process for a new home, winery building, or other facility until the new program takes effect.

**A Crucial Issue:** As we pointed out in last week's Update, there is a major issue involving the numbers used to justify the need for the program in the first place.

The Water Use Calculation Problem: It turns out that a large technical-substantive problem has now been exposed. The calculations utilized to justify the need for the entire Water Conservation Program (basin overdraft) were based on incorrect water amounts needed for grape growing. The original calculation for the amount of water needed for grape production (as claimed in the Draft Environmental Impact Report (DEIR) was significantly higher than the actual amount required, as is now presented in the Final EIR. The amended finding shows that grapes use much less water than had been previously claimed.

Commissioner Campbell raised the issue at the beginning of the meeting and received an evasive and unresponsive answer from the staff. Subsequently and near the end of the meeting, he pressed the issue again and refused to be ignored and put off. The regular Planning Department staff and an official who has a joint assignment between the Planning Department and the Ag Commissioner's office attempted to blunt commissioner Campbell's questions.

Specifically, they attacked the new data as being inaccurate for purposes of computing the overall in- flow and out-flow of the basin water. They asserted that the new lower numbers are only appropriate for purposes of the proposed water conservation program itself, not the overall status of the basin. How does that "logic" work?

Campbell then asked the crucial question: What numbers were used to calculate the Updated Paso Basin Model, which asserts there is a growing overdraft and which were then used to justify the proposed Water Conservation Program in the first place?

It is expected that staff will return on August 13, 2015 with a rationale for why the new numbers are wrong. They indicated that they would have the Public Works staff and the consultant who prepared the new numbers at the Commission meeting on the 13<sup>th</sup> to repudiate the assertions of those who have raised the questions. For readers' convenience, Appendix 1 on page 9 at the end of this Update contains a portion of the analysis of this issue from last week. You can expect the full force and power of the County Board of Supervisors water majority, the staff, the County Counsel, and a plethora of agency water groupies to attack on this one. Have the affidavits ready.

**Background:** The purpose of this item was to complete the Commission's review of the proposed ordinance amendments and General Plan amendments, which collectively constitute the County's so-called **Water Conservation Plan**. The Commission's role is to review the various provisions proposed by staff, to make modifications, and then to determine if it will recommend the program to the Board of Supervisors. The overall purpose of the program is:

- 1. Making permanent the Paso Water and Development Moratorium.<sup>1</sup>
- 2. Creation of a Water Offset Program (Pay to Use Your Own Water).
- 3. Miscellaneous Restrictions on the Use of Water.

**Second Best Outcome:** The best possible outcome would have been for the Commission to reject the program and to so inform the Supervisors. The second best outcome would have been for the Commission to send the matter back to staff for analysis of a recently exposed error in the calculations of the current and potential overdraft of the basin, on which the whole program logically depends. This outcome did happen. Thanks to everyone who has worked so hard on this issue.

San Luis Obispo County Council of Governments (SLOCOG) Meeting of Wednesday, August 5, 2015, 8:30 AM (Scheduled)

Item B-4: Supplemental Funding, Polling Results (AKA Sales Tax Hike Poll Results). The poll shows that the voters will support neither a ½ nor a ½ cent sales tax increase for transportation. The key finding of the expert polling firm was:

A program of outreach to local leaders and a voter opinion poll reveal that there is not sufficient support to justify placing a measure before the voters. The results of the poll clearly indicate that transportation is not a current issue of top concern. Instead, prolonged state drought, along with worries about the economy and government debt occupies voters' minds.

<sup>&</sup>lt;sup>1</sup> The ordinance says that it will sunset when a sustainable water management plan is approved. Does anyone think the State will approve a plan that doesn't contain all the restrictions and regulations proposed to be adopted here?

Voters feel they can afford a new tax, but they are not confident that tax revenues will be well spent. And, although they like many of the transportation ideas presented, the issue is simply not important enough for them to favorably consider a new tax. As a result, support for a countywide transportation measure has fallen from 2011 levels.

Significantly and as stated above, support for a tax increase actually decreased from the 2011 survey, when voters were still concerned about the impact of the recession.

The report exposes significant trust issues:

#### **Confidence**

Voters lack confidence that new tax money would be spent efficiently. In Figure 6, only 13 percent have a great deal of confidence, 40 percent some and 44 percent very little. Figure 6: If county voters approve increasing the sales tax, will you have a great deal, some or very little confidence the money will be spent efficiently?

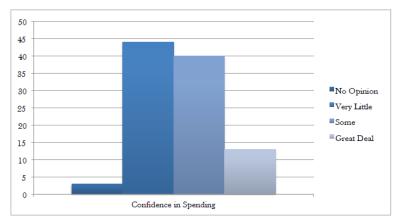


Figure 6: If county voters approve increasing the sales tax, will you have a great deal, some or very little confider the money will be spent efficiently?

**Just What We Have Been Saying For Years:** In talking about ways to change voter perceptions and ultimately achieving a more positive climate for a positive vote, the consultant states in part:

Voters' lack of confidence in government's use of tax dollars is best answered by performance and results. A concerted and well-documented focus on delivering effective road repairs in all jurisdictions should be a foundation goal and would help create a more positive environment if future extensions of these tax measures are needed.

That leads the focus to the County unincorporated areas, which do not yet benefit from the general sales tax revenue enhancements that city voters have approved. At the time the research was being conducted for this report, the County was considering whether existing budget resources could be redirected to road repairs. If that occurs then the same emphasis should be placed on aggressive, timely and well-documented progress.

Plastic bag bans; climate change plans; events restriction ordinances; increased single-family vacation rental regulations; mandatory acceptance of Federal Section 8 housing rental subsidies;

complex and costly water and development moratoria; failed homeless programs; endless multimillion dollar computer software upgrades (with no cost/benefit analysis); anti-oil, anti-mining, anti-industrial, anti-nuclear land use policies; insufficient land zoned for homes that people really want; political exploitation of the drought; relentless raises; added employees; attacks on Proposition 13; proposals to charge citizens a mileage fee; suffocating State and local environmental regulations (which in part make roads significantly more expensive than they should be); failure to properly examine and process annual budgets; proposed County takeover of the electrical distribution system; green energy subsidies and tax breaks ultimately paid for in people's utility bills; and many other costly and wasteful distractions fill the Board of Supervisors agenda and public policy cafeteria.

Is it any wonder that the poll showed a decline in an already low level of potential support for a tax increase?

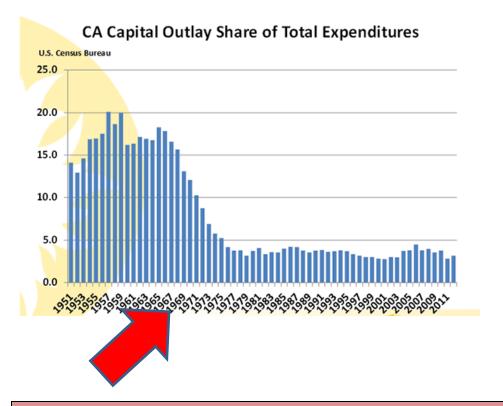
After all, just last December, the Board gave the County's 2600 employees a \$1,000 per person Christmas bonus, which had not been negotiated and for which the taxpayer/citizen received nothing. Voters should approve no tax increase whatsoever, even if they love the purpose to death, until the entire system is reformed.

**Reform Means This:** The governor, the legislature, every city council, every county board of supervisors, every special district, the UC Board Regents, the Board of CSU, and every school district board should join and demand a State Constitutional Amendment that would require every government entity in the State of California to appropriate 10% of all its combined gross annual revenue for the purposes of current maintenance and/or creation of new and replacement infrastructure each fiscal year. This 10% would be in addition to the current base year amount that each jurisdiction is expending for maintenance and infrastructure as of the effective date of the amendment. The requirement would be phased in over 5 years. The chart below illustrates the shift in strategic spending priorities that has taken place since 1968, when the State first allowed public employees to collectively bargain wages and benefits.<sup>2</sup>

Note: Proposition 13, which is often blamed, did not really take effect until 1979, the year in which the current dismal level of investment was already reached.

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<sup>&</sup>lt;sup>2</sup> In 1968, then-California Gov. Ronald Reagan signed the Meyers-Milias-Brown Act, establishing collective bargaining for California's municipal and county employees. But most of the other major collective bargaining laws came during Jerry Brown's two terms as governor, between 1975 and 1983. They include the Educational Employment Relations Act of 1976, establishing collective bargaining in California's public schools and community colleges; the Ralph C. Dills Act of 1978, establishing collective bargaining for state government employees; and the Higher Education Employer-Employee Relations Act of 1979, extending collective bargaining to the state university system. Reagan had been President of the Screen Actors Guild (SAG).



#### **Local Agency Formation Commission (LAFCO) (Not Scheduled)**

No LAFCO meeting was scheduled for July 2015. A huge LAFCO meeting is scheduled at the Paso Robles Event Center (Fair Grounds) for Thursday, August 20, 2015 at 5:30 PM. This will be the first hearing on the proposed AB 2453 Paso Basin Water Management Authority.

United States Nuclear Regulatory Commission (NRC) Wednesday, August 5, 2015 (Scheduled) 1:30 PM and 7:00 PM -----Take Your Pick

**Support PG&E's Diablo Power Plant license renewal.** The Plant is the County's largest private sector employer and single largest property taxpayer. In terms of payroll, purchases, direct economic impact, and indirect economic impact (multipliers), the Plant generates \$950 million dollars per year in SLO and northern Santa Barbara Counties.

The Plant has a strong safety record and recently passed its annual safety review by the NRC with no major or intermediate safety issues that need fixing. On any given day it generates 10% of all the electric power in California and 20% of all the electric power in PG&E's service area. Nuclear power is truly renewable and powers the stars. Failure to take advantage of renewable nuclear technology (as is used in most of the rest of the world) and the lack of storage for spent fuel is the result of Federal Government inaction and ideology.

**Situation:** On August 5, 2015, the Nuclear Regulatory Commission will be hosting two public meetings in San Luis Obispo to provide the public with opportunities to comment on

issues to be covered by an Environmental Impact Statement (EIS) report for Diablo Canyon Power Plant. During the two meetings, the NRC will present an overview of the environmental review process, will describe the process of review of the DCPP license renewal applications, and will receive public comment on the scope of the EIS report. Comments may be submitted in writing through August 31. All functions of Corporate Affairs are working with DCPP staff to prepare for the meeting and encourage meeting attendance.

**Background:** PG&E submitted its license renewal application for Diablo Canyon Power Plant (DCPP) on November 23, 2009, seeking to extend the licenses of Units 1&2 for an additional 20 years beyond the current expiration dates. In early 2010, the NRC conducted a public scoping process for an EIS. However, in May 2010, the NRC suspended its review of the application at PG&E's request. The NRC has decided to resume its review, re-open the scoping process, and proceed with developing the EIS, since the seismic research has been completed.

#### Where:

Courtyard by Marriott San Luis Obispo

1605 Calle Joaquin Road Wednesday, August 5 1:30-4:30PM 7:00- 10:00PM



NRC Seeks Public Comment on Environmental Issues for Diablo Canyon Nuclear Plant License Renewal

The Nuclear Regulatory Commission today announced its intention to develop and publish an environmental impact statement (EIS) for the proposed license renewal of the Diablo Canyon Nuclear Power Plant, Units 1 and 2, and is seeking public comment on issues to be covered by the report.

NRC staff will conduct two public meetings in San Luis Obispo on Aug. 5 to describe the EIS process and receive public comment on the scope of the report. Comments may also be submitted in writing through August 31.

Pacific Gas and Electric Co. (PG&E) submitted its license renewal application for Diablo Canyon on Nov. 23, 2009, seeking to extend the licenses for an additional 20 years beyond the current expiration dates of Nov. 2, 2024, for Unit 1 and Aug. 26, 2025, for Unit 2. The NRC conducted a public "scoping" process for an EIS in early 2010. However, in May 2010, the NRC suspended its review of the application at PG&E's request. The NRC staff has decided to resume its review and re-open the scoping process and proceed with developing the EIS.

The Aug. 5 public meetings will be held at the Courtyard by Marriott San Luis Obispo, 1605 Calle Joaquin Road. The first session will run from 1:30-4:30 p.m., and the second from 7-10 p.m. These meetings will be transcribed. NRC staff will also be available to meet informally with members of the public for an hour before each session. Please be advised that comments or information provided to the staff outside of the public meetings will not be included in the docket.

Written comments may be submitted over the federal government's rulemaking website, <a href="https://www.regulations.gov">www.regulations.gov</a>, using Docket ID NRC-2009-0552, or by mail to Cindy Bladey, Office of Administration, Mail Stop: OWFN-12 H08, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001

#### APPENDIX 1/WATER CALCULATIONS

1. The Draft EIR: The justification for the program was based on data that the Paso Basin is in overdraft because various users, including cities, rural residents, and agriculture are pumping more water from the basin than flows in from rain, stream flow, and sub-surface sources. Agriculture is the largest user, and currently the largest agricultural user is made up of grape growers. The original program design and the accompanying Draft Environmental Impact Report (DEIR) calculated that grapes require somewhere between 1.2 and 2.7 acre-feet per year of water (an acre-foot = 325,851)

gallons). The DEIR indicated that the mid-range was 1.7 acre-feet. This comports closely with overall data in the County's 2014 Paso Basin Computer Model Update, which indicates that over 30 years grapes used an average of 1.8 acre-feet per year. The data in the Model Update is a part of the basis for the entire program proposal.

The Final EIR: At some point and after the DEIR was circulated, various representatives of the wine industry and experts from the University of California pointed out that grapes in the Paso basin actually only use 1.2 acre-feet per year. Many growers indicate that they use less than 1 acre-foot per year. Accordingly, the County staff has changed the numbers in the Final Environmental Impact Report (FEIR).

Table 2-3 Crop-Specific Applied Water (af/ac/yr) by Crop and Water Planning Area

	Applied Water Ranges Salinas/Estrella WPA							
Сгор	Low	Medium	High					
Strawberries <sup>3</sup>	2.0	2.3	2.6					
Small Grains <sup>3</sup>	1.0	1.2	1.4					
Nursery	2.0	2.5	2.9					
Pasture <sup>2</sup>	4.2	4.8	5.5					
Vegetables <sup>1</sup>	1.6	1.9	2.2					
Vineyard	1.4	1.7	2.1					

Source: Table 2 of the Final Report on the Agricultural Water Offset Program, Paso Robles Groundwate Basin, October 2014.

Basin, October 2014.

1 Assumes two vegetable crops planted per acre per year.

2 Values for Deciduous crops and Pasture are modified from the values presented in the County's Master Water Report and are calculated based on original data used to prepare the County's Master Water Report.

3 Information obtained from Current Cost and Return Studies, UCCE, UC Davis (Small grains 2013 data, Strawberries 2011 data)

Table 2-3 Crop-Specific Applied Water (af/ac/yr) by Crop Type and Water Planning Area

	Applied Water Ranges Salinas/Estrella WPA							
Crop	Low	Medium	High					
Alfalfa	3.8	4.5	<del>5.2</del>					
Citrus	1.9	2.3	2.7					
Deciduous <sup>2</sup>	3.0	3.5	4.1					
Strawberries <sup>3</sup>	2.0	2.3	2.6					
Small Grains <sup>3</sup>	1.0	1.2	1.4					
Nursery	2.0	2.5	2.9					
Pasture <sup>2</sup>	4.2	4.8	5.5					
Vegetables <sup>1</sup>	1.6	1.9	2.2					
Vineyard	1.4	1. <del>7</del> 25	2.1					

Source: Table 29 of the Final Report on the Agricultural Water Offset Program, Paso Robles Groundwater Basin,

October 2014.

Assumes two vegetable crops planted per acre per year.

2 Values for Deciduous crops and Pasture are modified from the values presented in the County's Master Water Report and are calculated based on original data used to prepare the County's Master Water Report.

3 Information obtained from Current Cost and Return Studies, UCCE, UC Davis (Small grains 2013 data, Strawberries 2011 data)

The Paso Robles Groundwater Basin Computer Model Report of 2014 Update/AKA the **Todd Report:** A significant problem is that the overall Basin Model, which provides the data for justifying the whole program, used an average of 1.8 acre-feet for grapes. On this basis it asserts that the Basin is currently in 2,473 acre-feet of overdraft per year, which would grow to 26,159 acre-feet per year if agriculture grew by 1% per year over the next 30 years. The Report states in this regard:

A Draft Final Report for the Paso Robles Groundwater Basin Computer Model Update, distributed for public review and comment on November 13, 2014, reported updated outcomes of the Paso Robles Groundwater Basin's perennial yield estimate and future year simulations based on "no-growth" and "growth" scenarios (San Luis Obispo County, January 2015). In summary, the period of 1982 to 2010 is representative of the historical average rainfall over the Paso Robles Groundwater Basin. The updated estimate for the perennial yield based on that period is 89,648 acre-feet per year (AFY). For the period of 1981 to 2011, outflows exceeded inflows to the Paso Robles Groundwater Basin by 2,473 AF on an average annual basis (i.e. more water left the Paso Robles Groundwater Basin than was replenished). Future year simulations project that the "no-growth" scenario projects would exceed inflows on an average annual basis over the thirty year period by 5,592 AFY. The "growth" scenario projects have projected outflows to exceed inflows on an average annual basis over the thirty year period by 20,900 26,159 AFY (Geoscience and ToddGroundwater, December 2014).

The table (from the Computer Model Update) on the next page below shows the derivation of the 1.8 acre-foot in the lower right hand corner (by the red arrow).

Estimated Annual Agricultural Irrigation Demand and Applied Water Rates B

Water	Annual Precip <sup>1</sup> (inches)	Alfalfa		Citrus		Deciduous		Nursery		Pasture		Vegetable		Vineyard	
Year		Irrigation Demand	Applied Water												
1981	12.4	3.2	5.1			3.0	4.7	1.8	2.9	3.4	5.4	2.7	4.3	1.3	2.3
1982	16.3	2.9	4.7			2.8	4.4	1.6	2.5	3.1	4.9	2.7	4.2	1.3	2.2
1983	28.9	2.9	4.6			2.7	4.2	1.5	2.3	3.0	4.8	2.7	4.2	1.2	2.1
1984	7.3	3.5	5.5			3.1	4.9	1.9	3.0	3.6	5.7	2.8	4.4	1.5	2.6
1985	9.6	3.3	5.2			3.0	4.8	1.7	2.8	3.4	5.5	2.7	4.3	1.4	2.3
1986	20.5	3.2	4.9			2.9	4.4	1.7	2.6	3.4	5.2	2.7	4.1	1.1	1.9
1987	8.4	3.4	5.2			3.1	4.5	1.9	2.9	3.5	5.5	2.7	4.2	1.4	2.2
1988	12.7	3.2	4.9			2.9	4.2	1.7	2.5	3.4	5.2	2.7	4.2	1.2	2.0
1989	9.1	3.3	5.1			3.0	4.5	1.8	2.8	3.5	5.4	2.6	4.1	1.4	2.3
1990	7.3	3.3	5.1			3.0	4.4	1.9	2.8	3.5	5.3	2.7	4.1	1.6	2.6
1991	12.8	3.2	4.8			3.0	4.2	1.8	2.8	3.4	5.1	2.7	4.1	1.4	2.0
1992	12.5	3.3	4.9			3.1	4.3	1.8	2.7	3.5	5.3	2.8	4.1	1.3	1.9
1993	23.3	3.2	4.7			3.0	4.1	1.7	2.5	3.4	5.1	2.7	4.1	1.1	1.7
1994	11.3	3.2	4.7			2.9	4.1	1.5	2.3	3.4	5.1	2.6	3.9	1.3	1.9
1995	31.4	3.2	4.7			2.9	4.1	1.6	2.3	3.3	5.0	2.7	4.0	1.0	1.5
1996	15.3	3.3	4.6			3.0	4.0	1.7	2.4	3.4	4.9	2.7	3.9	1.3	1.8
1997	17.6	3.5	4.8			3.2	4.2	1.9	2.7	3.7	5.3	2.8	3.9	1.2	1.7
1998	26.8	3.0	4.2			2.7	3.6	1.4	1.9	3.1	4.5	2.6	3.6	1.0	1.4
1999	9.4	3.4	4.8			3.0	3.9	1.5	2.1	3.4	4.8	2.7	3.8	1.4	1.9
2000	13.2	3.3	4.7	1.6	2.2	3.0	4.0	1.7	2.3	3.5	4.9	2.8	3.8	1.3	1.7
2001	15.4	3.3	4.8	1.7	2.3	3.1	4.0	1.7	2.4	3.6	5.1	2.8	3.8	1.2	1.6
2002	8.3	3.4	4.9	1.8	2.4	3.1	4.1	1.7	2.3	3.6	5.1	2.7	3.8	1.2	1.7
2003	13.8	3.1	4.5	1.6	2.0	2.9	3.7	1.5	2.0	3.3	4.7	2.7	3.5	1.1	1.4
2004	9.5	3.4	4.9	1.9	2.5	3.2	4.1	1.8	2.3	3.7	5.3	2.8	3.6	1.3	1.6
2005	33.2	2.8	4.0	1.5	1.9	2.6	3.4	1.5	1.9	2.9	4.2	2.5	3.3	0.9	1.2
2006	18.3	2.9	4.2	1.6	2.1	2.8	3.6	1.6	2.1	3.0	4.3	2.7	3.6	1.0	1.4
2007	6.6	3.5	5.1	2.0	2.6	3.2	4.1	1.9	2.5	3.6	5.1	2.7	3.5	1.4	1.9
2008	13.8	3.6	5.1	2.1	2.7	3.3	4.2	2.0	2.5	3.8	5.4	2.8	3.5	1.2	1.6
2009	9.1	3.7	5.3	2.1	2.6	3.4	4.3	1.9	2.5	3.8	5.4	2.8	3.6	1.3	1.7
2010	21.0	3.0	4.2	1.6	2.0	2.7	3.5	1.6	2.0	3.2	4.6	2.6	3.4	1.0	1.3
2011	22.0	2.8	4.0	1.5	1.9	2.6	3.4	1.4	1.8	3.0	4.2	2.4	3.0	0.8	1.1

otive use and applied water rates reflect the combined RDI and non-RDI rate (

The Entire Program Needs to be Corrected: The table to the right shows the potential acre-feet of use under different assumptions. Note that the difference between 1.7 acre-feet and 1 acre-foot yields an overall 26,250 positive, which would more than extinguish the current projected 2,473 acre-foot deficit.

The Planning Commission needs to stop this whole process and have staff redo the assumptions and eliminate the contradictions on which the proposed draconian program rests.

#### Vineyard Acres Paso Basin ~ 37,500

$$37,500 \times 1.7AF = 63,750AF$$

$$37,500 \times 1.25 \text{AF} = 46,875 \text{AF}$$

$$37,500 \times 1.0 AF = 37,500 AF$$

$$37{,}500 \ge 0.8 \text{AF} = 33{,}000 \text{AF}$$

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$$1.7AF - 1.25AF = .45AF$$

= 16,875AF per acre annually

$$1.7AF - 1.0AF = .7AF$$

= 26,250AF per acre annually

$$1.7AF - .8AF = .9AF$$

= 30,750AF per acre annually

