RESOLUTION NO. 6457

A RESOLUTION CERTIFYING THE WATER SUPPLY ASSESSMENT AND VERIFICATION FOR THE EAST AREA 1 SPECIFIC PLAN FOR PROJECT NO. 2006-CDP-02.

The City Council of the City of Santa Paula does resolve as follows:

SECTION 1: The City Council finds and declares as follows:

A. On May 16, 2006, Limoneira Company ("Applicant") filed an application with the City for a General Plan Amendment, zone change, prezone/specific plan, and reorganization (annexation) for the East Area 1 ("EA1") Expansion Area. The Project consists of the following: 1,500 dwelling units, 150,000 square feet of light industrial, 285,000 square feet of commercial, 375,800 square feet of civic, 66.8 acres of parkland and greenways, 55 acres of Agricultural Preserve (proposed to be actively farmed) and 80 acres of natural open space (collectively, the "Project").

B. If approved, the Project would require a number of discretionary approvals including, without limitation, a General Plan Amendment for the East Area 1 Specific Plan ("EA1SP"); annexation of real property to the City's jurisdictional boundaries; adjustment of the City Urban Restriction Boundary ("CURB") in accordance with the Santa Paula General Plan; prezoning of property to a Specific Plan (East Area 1 Specific Plan, SP-3; "EA1SP"); adoption of a Development Agreement; and voter approval of certain General Plan Amendments. Such discretionary approvals are not part of this Resolution, but are part of the Project considered by the Final Environmental Impact Report ("FEIR") analysis.

C. The application was reviewed by City's Planning Department for, in part, for consistency with the General Plan and conformity with the Santa Paula Municipal Code ("SPMC").

D. On February 25, 2008 and February 26, 2008, the Planning Commission held joint public hearings with the City Council regarding the Project. This Resolution, and its findings, is adopted based upon the evidence set forth in the entire record including, without limitation, documentary and testimonial evidence; the staff report; and such additional information set forth in the administrative record that is too voluminous to reference.

SECTION 2: *Factual Findings and Conclusions*. Based on analysis contained in the Water Supply Assessment and Verification for the East Area 1 Specific Plan (dated February 2008), the entire record, and in accordance with Water Code § 10911(C), the City Council finds that projected water supplies are sufficient to satisfy the demands of the Project and existing and future planned uses. In partial support of this finding, the

City Council finds the following matters of note in the overall record:

A. The City of Santa Paula is identified as the public water supplier for the Project;

B. The City's Municipal water supplies are derived from groundwater contained within the Santa Paula Groundwater Basin which is recharged by Santa Clara River, Santa Paula Creek, and other local streams. The groundwater is pumped from City-operated water wells. A total of five (5) active wells located throughout the City (Wells 1-B, 11, 12, 13, and 14) are utilized and which can produce up to 10.6 million gallons per day. The City currently has access to 5,412 acre-feet per year (AFY) from the Santa Paula Groundwater Basin. Additional City municipal water supplies include a wheeling agreement with Farmers Irrigation Company to purchase 500 AFY from Santa Paula Creek. Therefore, the City's combined potential water supply is 5,912 AFY. These water supplies are treated before distribution via the City's water conditioning facilities (Well 12 Water Conditioning Facility and the Steckel Water Conditioning Facility).

C. Potable water supplies within the project site are derived from three on-site wells located within the south central portion of the project site. These wells draw from the Santa Paula and Fillmore Groundwater Basins, respectively and supply the domestic and agricultural needs of the project site. Currently, a total of 405 acres are under agricultural production with the remainder comprised of non-irrigated open space and urban uses (associated with ranch operations). The Applicant has a combined on-site groundwater allocation of 1,283.1 AFY from the Santa Paula Groundwater Basin and a total of 329 AFY from the Fillmore Groundwater Basin. Therefore, the combined groundwater sources available on-site from these basins is 1,612.1 AFY.

D. An analysis prepared by the City's Public Works Department and contained within the Water Supply Assessment and Verification for the East Area 1 Specific Plan (see Appendix Q of the DEIR) indicates that the proposed land uses would require from 1,744.4 AFY to 1,359.2 AFY of potable water. Of this total, between 866.0 AFY and 1,050.5 AFY is potable water demand and 308.7 AFY is non-potable water demand for irrigation of parks, athletic fields, and agricultural preserve. The City would supply the portions of the project overlying the respective groundwater basins with water from those basins. This will require between 854.0 AFY and 983.5 AFY of groundwater production from the Santa Paula Basin and between 320.7 AFY and 375.3 AFY of groundwater production from the Fillmore Basin. These supplies would be derived via five new on-site wells (two standby wells). Water supplied from these wells would be treated at the City's existing Steckel Conditioning Facility and distributed via the City existing distribution system and the project site.

E. Based upon the analysis contained within the Water Supply Assessment and Verification for the East Area 1 Specific Plan, the City of Santa Paula will have sufficient right to extract the necessary 1,744.4 AFY to 1,359.2 AFY from the

project site to serve the proposed East Area 1 Specific Plan, based on the parameters of the existing basin management program, the nature of the existing use programs implemented by the City, and the proposed transfer of sufficient quantities of groundwater rights to serve the proposed subdivision without decreasing availability of water supply for its existing customers. Therefore, the City will have sufficient water supplies to meet the anticipated demand during normal, single dry and multiple dry years.

F. In accordance with SPMC § 52.021, landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. The East Area 1 Specific Plan Area has an adjudicated groundwater right to produce from the Santa Paula Basin, and an overlying groundwater right to produce groundwater from the Fillmore Basin. Upon annexation, the Applicant must transfer a portion of these rights in sufficient quantity to meet all of the anticipated water demands of the project, all as set forth in the Development Agreement approved by Ordinance No. 1191 and the conditions of approval set forth in Ordinance No. 1190.

SECTION 3: *Environmental Review.* This Resolution incorporates by reference the findings, analysis, and recommendations set forth in City Council Resolution No. 6458 certifies the FEIR, make findings of fact, and adopt statements of overriding considerations for the for the overall East Area One Project proposed by the Applicant.

SECTION 4: *Actions.* The City Council certifies the Water Supply Assessment and Verification for the East Area 1 Specific Plan attached as Exhibit "A," and incorporated into this Resolution by reference.

SECTION 5: *Reliance on the Record.* Each and all of the findings and determinations in this Resolution are based on the competent and substantial evidence, both oral and written, contained in the entire record relating to the project. The findings and determinations constitute the independent findings and determinations of the City Council in all respects and are fully and completely supported by substantial evidence in the record as a whole.

SECTION 6: *Limitations.* The City Council's analysis and evaluation of the project is based on the best information currently available. It is inevitable that in evaluating a project that absolute and perfect knowledge of all possible aspects of the project will not exist. One of the major limitations on analysis of the project is the lack of knowledge of future events. In all instances, best efforts were made to form accurate assumptions.

SECTION 7: *Summaries of Information.* All summaries of information in the findings, which precede this section, are based on the substantial evidence in the record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact.

SECTION 8: This Resolution will remain effective until superseded by a subsequent

resolution.

SECTION 9:The Commission Secretary is directed to mail a copy of this Resolution to Applicant and Applicant's Representative and to any other person requesting a copy.

SECTION 10:This Resolution may be appealed within ten (10) calendar days after its adoption. All appeals must be in writing and filed with the City Clerk within this time period. Failure to file a timely written appeal will constitute a waiver of any right of appeal.

SECTION 11: This Resolution is advisory to the City Council and will take effect immediately upon adoption.

PASSED AND ADOPTED this ___ day of February, 2008.

_____
Robert S. Gonzales,
Mayor

ATTEST:

_____,
Josie Guzman Herrera,
City Clerk

APPROVED AS TO FORM:

_____
Karl H. Berger,
City Attorney

EXHIBIT A
REVISED DRAFT WATER SUPPLY ASSESSMENT AND VERIFICATION FOR THE EAST AREA 1 SPECIFIC PLAN

REVISED DRAFT

WATER SUPPLY ASSESSMENT

AND VERIFICATION

for the

EAST AREA 1

SPECIFIC PLAN PROJECT

February 2008

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EXECUTIVE SUMMARY

The purpose of this water supply assessment (WSA) and verification is to document the sufficiency of the local water supply to meet the demand associated with the land uses that would be permitted by the proposed East Area 1 Specific Plan. The East Area 1 Specific Plan addresses approximately 501 acres of land in unincorporated Ventura County east of the City of Santa Paula, and would permit a maximum of 1,500 residential units, 150,000 square feet of light industrial uses, 285,000 square feet of commercial uses, 375,800 square feet of civic/institutional uses, and various other land uses. Development of the project is assumed to begin in 2010 and be built in phases over a 10-year period with buildout in 2020. East Area 1 is identified as an urban expansion area in the City of Santa Paula General Plan. The City's General Plan requires the preparation and adoption of a Specific Plan for any identified expansion area prior to the City initiating annexation of the area to the City. Prior to considering the proposed Specific Plan for approval, the City is required to comply with the California Environmental Quality Act (CEQA). The City is currently preparing an Environmental Impact Report (EIR) to comply with CEQA.

The California Water Code (Sections 10910 through 10915) requires the preparation of a WSA by the public water system supplier that would provide water to the proposed project for all projects as defined in Section 10912 of the Water Code. This includes any mixed-use project including more than 500 dwelling units. The goal of a WSA is to provide information on the availability of water supplies to be included in EIRs.

The City of Santa Paula Public Works Department, Water Division, provides water service in the City of Santa Paula and would provide water service to the proposed project after annexation of the site to the City. Currently the Santa Paula Groundwater Basin (Santa Paula Basin) is the City's sole source of water supply. Rights to withdraw groundwater from the Santa Paula Basin have been adjudicated, and the Santa Paula Basin is managed in accordance with this adjudication to ensure a safe groundwater yield. In accordance with this adjudication, the primary owner of land in the East Area 1 Specific Plan Area, the Limoneira Company, has an allocation allowing a withdrawal of up to 3,173 acre-feet per year (AFY) and the owner of the remaining portion of the Specific Plan Area, the Newsom Family Trust, has an allocation allowing withdrawal of up to 138.1 AFY. Recent demand for water for the existing agricultural uses on the site has averaged approximately 816 AFY.

The eastern boundary of the Santa Paula Basin also demarcates the western boundary of the Fillmore Groundwater Basin (Fillmore Basin), which is generally located to the northeast of the Santa Paula Basin and "upstream" in relation to the Santa Clara River, which flows across both basins. This dividing basin boundary divides the East Area 1 Specific Plan property and runs roughly from the center of the site on

the north to the southern portion on the south. Roughly 184 acres or 37 percent of the eastern portion of the project site lies outside of the Santa Paula Basin, and instead overlies the Fillmore Basin. Water on the property has been historically supplied from on-site wells in accordance with the Santa Paula Basin Judgment. However, as discussed herein, the property is also entitled to overlying and/or appropriative groundwater rights from the Fillmore Basin. Groundwater for delivery in the City of Santa Paula must come solely from the Santa Paula Groundwater Basin. The Limoneira Company has historically averaged 329 acre-feet of per year of groundwater production from the Fillmore Basin for the seven-year period ending 2005. The Limoneira Company also produced approximately 800 acre-feet of groundwater annually from the Fillmore Basin for agricultural operations on other parcels overlying the Fillmore Basin. As part of the approval process for each phase of development within the East Area One project, the applicant will be required to show that the pumping out of the eastern portion of the Santa Paula Groundwater Basin has no adverse affect on the water levels within the western Fillmore Groundwater Basin or the Santa Paula Groundwater Basin. The City is required under California Water Code (Sections 10610 to 10656) to assess citywide water supply and demand over the next 20 years in 5-year increments in its Urban Water Management Plan. The City completed its most recent update in 2005. The 2005 update accomplishes water planning, including recycled water, over a 20-year period in 5-year increments; identifies and quantifies adequate water supplies for existing and future water demands in normal, dry, and multiple dry years; identifies actions to prepare for and implement during a catastrophic interruption of water supplies; and implements conservation and efficient use of urban water supplies. No decrease in availability of groundwater supplies is anticipated through the year 2030.

Conservative assumptions concerning future water demand are used in this WSA. The City's 2005 Urban Water Management Plan (UWMP) Update provides per capita, and specific use (commercial, industrial, and parks and recreation) demand rates for estimating future water demand. Additionally, the City's 2005 Potable Water Master Plan uses a demand rate of 163 gpd per capita. This WSA utilizes the 132 and 163 gallons per day (gpd) per capita rates provided in the UWMP and the Potable Water Master Plan.

The City has started the planning and design for a new Water Recycling Facility (WRF). The City WRF will produce recycled water that meets California Title 22 regulations. The capacity of the City WRF will be 3.2 million gallons per day (mgd), which equates to 3,584 AFY. Recycled water is anticipated to be available for irrigation of landscape areas in 2010 or upon completion of the distribution system.

In order to estimate water demand for the type and amount of land uses that would be permitted by the proposed Specific Plan, the water demand factors contained in the City's 2005 Urban Water Management Plan were used. Based on these factors, the annual average water demand for the proposed East Area 1

Specific Plan is between approximately 1,174.4 AFY and 1,359.2 AFY.[1] As part of new development water requirements, the City requires an additional 25% for safe yield. The values of demand for the development would then be 1468 and 1699 AFY. Of this total, between 866.0 AFY and 1050.5 AFY is potable water demand and 308.7 AFY is non-potable water demand for irrigation of parks, athletic fields, and agricultural preserves. .

The total demand for domestic and non-domestic purposes, between 1.174.7 AFY and 1.359.2AFY, would be greater than the amount of water currently used for agricultural purposes, 816 AFY, and less than the current allocation of groundwater available for this site, 1,283.1 AFY from the Santa Paula Basin plus the 329 AFY historically withdrawn from the Fillmore Basin (a total of 1,612.1 AFY). However, groundwater for delivery in the City of Santa Paula must come solely from the Santa Paula Groundwater Basin. The project does include an on-site recycled water distribution system, as described in the East Area 1 Recycled Water Master Plan. This will allow the project to use recycled water when the City extends a recycled water line to the site and the plant is producing sufficient recycled water to supply the site. The project does not require or need recycled water to ensure an adequate supply.

In accordance with the City of Santa Paula Municipal Code, landowners or developers are required to either provide water rights sufficient to serve the property or pay an equivalent in-lieu fee as a condition of project approval or when the property is annexed. The East Area 1 Specific Plan Area has an adjudicated groundwater right to produce from the Santa Paula Basin, and an overlying groundwater right to produce groundwater from the Fillmore Basin. Historically, 329 AFY has been withdrawn from the Fillmore Basin. Upon annexation, the applicants will transfer a portion of these rights in sufficient quantity to meet all of the anticipated water demands of the project (1699 AFY). Groundwater for delivery in the City of Santa Paula will come solely from the Santa Paula Groundwater Basin.

In summary, this Water Supply Assessment for the East Area 1 Specific Plan concludes that the City of Santa Paula's projected water supply for the next 20 years is adequate to meet the demand projected for the East Area 1 Specific Plan project, existing and planned future uses in the City in normal, single dry, and multiple dry years. Moreover, the water rights that the applicants will transfer to the City will satisfy the water demand for the East Area 1 Specific Plan.

Finally, in accordance with Senate Bill (SB) 221, this report verifies that sufficient water supply will exist to meet the City of Santa Paula's total water requirements during normal, singe-dry, and multiple-dry years within a 20-year project that will meet the projected demand associated with the proposed East

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1 The demand estimates uses a range for domestic demand of 132 galloons per day person and 163 gallons per day per person.

Area 1 Specific Plan, in addition to existing and planned future use, including, but not limited to, agricultural and industrial uses.

1.0 INTRODUCTION

The purpose of this water assessment is to document the sufficiency of the local water supply to meet the demand associated with the proposed land uses of the East Area 1 Specific Plan (Specific Plan). In order to adequately address the sufficiency of water supply sources for future developments and in an attempt to prevent major development projects from being approved without a water supply evaluation, the State of California passed into law Senate Bills 221 (Subdivision Act, California Government Code Section 66437.7 et seq.) and 610 (California Water Code Section 10910 et seq.).

In October 2001, the Governor of the State of California signed into law Senate Bill (SB) 610, which requires preparation of a WSA as part of the environmental review process for new development projects. A project is defined in the California Water Code as any proposed residential development having more than 500 dwelling units, or a public water system that has fewer than 5,000 connections with a proposed project that will account for a 10 percent or greater increase in the number of service connections.

In addition to adopting SB 610 in October 2001, the Governor of the State of California signed into law SB 221 in the same year. This law requires a city, county, or local agency to condition, as part of the tentative map process, preparation of a WSA documenting the availability of a water supply to serve a subdivision. Although the standards for compliance with SB 221 are essentially identical to those identified above for SB 610, this law uses a different set of requirements to determine the sufficiency of a water supply. SB 221 requires that the verification of a water supply take into consideration the following issues:

- water supply must be based on the historical record for at least 20 years;
- preparation of an urban water shortage contingency analysis;
- identify supply reduction for "specific water use sector" per water supplier's resolution, ordinance, or contract; and
- the amount of water that can be reasonably relied upon from specific projects is subject to the determinations of Government Code section 66473.7(d) et seq.

If there is a development agreement for the project for a subdivision consisting of 500 or more dwelling units, then the agreement is subject to SB 211. As part of the approval process, a development agreement will be implanted for the East Area 1 Specific Plan.

The East Area 1 Specific Plan encompasses approximately 501 acres of land in unincorporated Ventura County east of the City of Santa Paula. The proposed Specific Plan would permit the development of up to 1,500 residential units, 150,000 square feet of light industrial uses, 285,000 square feet of commercial uses, 375,800 square feet of civic/institutional uses, and various other land uses as specified in **Table 1,**

East Area 1 Specific Plan Proposed Land Use Summary. **Figure 1, East Area 1 Specific Plan Map,** illustrates the proposed land use plan. Development of the project is assumed to begin in 2010 and be built in phases over a 10-year period with buildout in 2020.[2]

Table 1
East Area 1 Specific Plan Proposed Land Use Summary

Planning Area	Land Use	Acreage	Light Industrial SF	Commercial SF	Civic/ Institutional SF	Dwelling Units
	Santa Paula Creek Neighborhood					
A	Residential	33.1				326
	Agricultural Preserve	14.3				
	Open Space: Park	5.1				
	Open Space – Roads, Medians	21.4				
	Subtotal	73.9				**326**
	Foothill Neighborhood					
B	Residential	66.4				359
	Open Space	79.4				
	Agricultural Preserve	40.7				
	Open Space -Parks, Greenways	11.4				
	Open Space- Roads, Medians	26.0				
	Subtotal	**223.9**				**359**
	Santa Paula Creek Civic District					
C	Civic: School	8.3			110,400	
	Civic: Shared Facilities	5.6			65,000	
	Civic: Community College	11.6			165,000	
	Open Space: Shared Athletic Fields	23.2				
	Open Space: Parks, Greenways	12.0				
	Open Space: Roads, Medians	13.1				
	Subtotal	**73.8**			**340,400**	
	Haun Creek Neighborhood					
D	Residential	28.0				745
	Commercial: Assisted Living	3.0		75,000		
	Commercial: Office/Retail	10.0		150,000		
	Civic: School	10.8			35,400	
	Open Space: Parks/Greenways	37.3				
	Open Space: Roads/Medians	21.0				
	Subtotal	**110.1**		**225,000**	**35,400**	**745**
	East Santa Paula Railroad District					
E	Work/Live	7.3				70
	Work: Light Industrial/Employment	7.3	150,000			
	Commercial: Office/Retail	2.4		60,000		
	Open Space – Roads, Medians	2.4				
	Subtotal	**19.4**	**150,000**	**60,000**		**70**
Total for East Area 1 Specific Plan Area		**501.1**	**150,000**	**285,000**	**375,800**	**1500**

Source: HDR Town Planning, East Area 1 Specific Plan, July 2007.

2 Project buildout is anticipated to be complete in 2020; however, for purposes of the water supply assessment and consistent with SB 610, buildout projection for water supply are for 20 years to the year 2030.

SOURCE: HDR Town Planning – April 2007, Impact Sciences, Inc. – April 2007

FIGURE **1**

East Area 1 Specific Plan Map

831-001•04/07

2.0 STATE WATER CODE REPORT REQUIREMENTS

2.1 WATER SUPPLY ASSESSMENT

California Water Code (Section 10910 et seq.) requires the preparation of a WSA for all projects meeting the definition of a project as stated in the Water Code. The goal of a WSA is to identify available water supplies that may be used to meet water demand for a project and to determine the adequacy of those supplies during critical periods, such as a drought.

2.2 URBAN WATER MANAGEMENT PLAN UPDATE

Section 10610 et seq. of the California Water Code, known as the Urban Water Management Planning Act, calls for creation and periodic update of Urban Water Management Plans (UWMP) by all urban water suppliers and sets forth the requirements for such plans, including definition of relevant terms.

Under the definition given in Section 10617, an urban water supplier is an entity "providing water for municipal purposes either directly or indirectly to more than 3,000 customers or supplying more then 3,000 acre-feet of water annually." Water for this development will be supplied from groundwater wells dispersed around the project site, and possibly from future wells within the project boundaries; this system will connect to the City of Santa Paula's existing water system.

In 2006, the City of Santa Paula completed an UWMP update that included the portions of the East Area 1 Specific Plan located east of the City and north of Telegraph Road.[3] This UWMP did not discuss the specific development and activities contemplated by this Specific Plan, although it did discuss, in general terms, the nature and extent of the long-term water supply for the City for the East Area and included an estimated 1,107 dwelling units on approximately 491 acres. Much of this general discussion is cited and paraphrased in this WSA. The UWMP contains an analysis of the factors required by Government Code section 66437.7 (a)(2), and such factors apply to this WSA.

Accordingly, this WSA, in concert with the UWMP prepared by the City, includes all necessary data and analyses required by California Water Code section 10910 et seq. and by Government Code section 66437.7 et seq.

The City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, dated June 2006 is incorporated in total by reference in this WSA.

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3 City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-5, Potential Development and Estimated Future Water Demand.

3.0 WATER SUPPLY AND DISTRIBUTION

3.1 WATER SUPPLY

The City of Santa Paula currently has secured water rights from two sources: groundwater allocation from the Santa Paula Basin and a surface water wheeling agreement with the Canyon Irrigation Company. Surface water from Santa Paula Creek was a major source of potable water supply for the City's service area until wells were drilled into the Santa Paula Basin to augment the supply from Santa Paula Creek. Currently the Santa Paula Basin is the City's sole source of potable water supply.

The East Area 1 site overlies both the Santa Paula and Fillmore groundwater basins. The approximate boundary of the basin is shown in **Figure 2, Santa Paula and Fillmore Groundwater Basins Boundary Map,** and **Figure 3, Location of Santa Paula and Fillmore Groundwater Basins Boundary on East Area 1 Site.**

The City does not presently extract groundwater from the Fillmore Basin. However, roughly 37 percent of the East Area 1 Specific Plan is located outside of the Santa Paula Basin to the east within the Fillmore Basin. As discussed herein, the City will supply the East Area Specific Plan project with groundwater rights from the Santa Paula Basin. Groundwater for delivery in the City of Santa Paula must come solely from the Santa Paula Groundwater Basin. Both the Department of Water Resources (DWR) and United Water Conservation District (UWCD) regularly report on the hydrogeologic conditions within both basins, and a summary of reported groundwater conditions is provided herein.

DWR's most recent publication discussing the basins is the 2003 edition of Bulletin 118.[4] Bulletin 118 describes the Santa Paula and Fillmore Basins as subbasins of the larger Santa Clara River Valley Groundwater Basin. Other subbasins within the Santa Clara River Valley Groundwater Basin include the Piru, Mound, and Oxnard Subbasins. Each of the five subbasins is an alluvial basin recharged, in part, by the Santa Clara River.[5] For the sake of simplicity, and because the subbasins are subject to varying forms of management, this WSA refers to the Santa Paula and Fillmore Basins as basins rather than subbasins.

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4 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

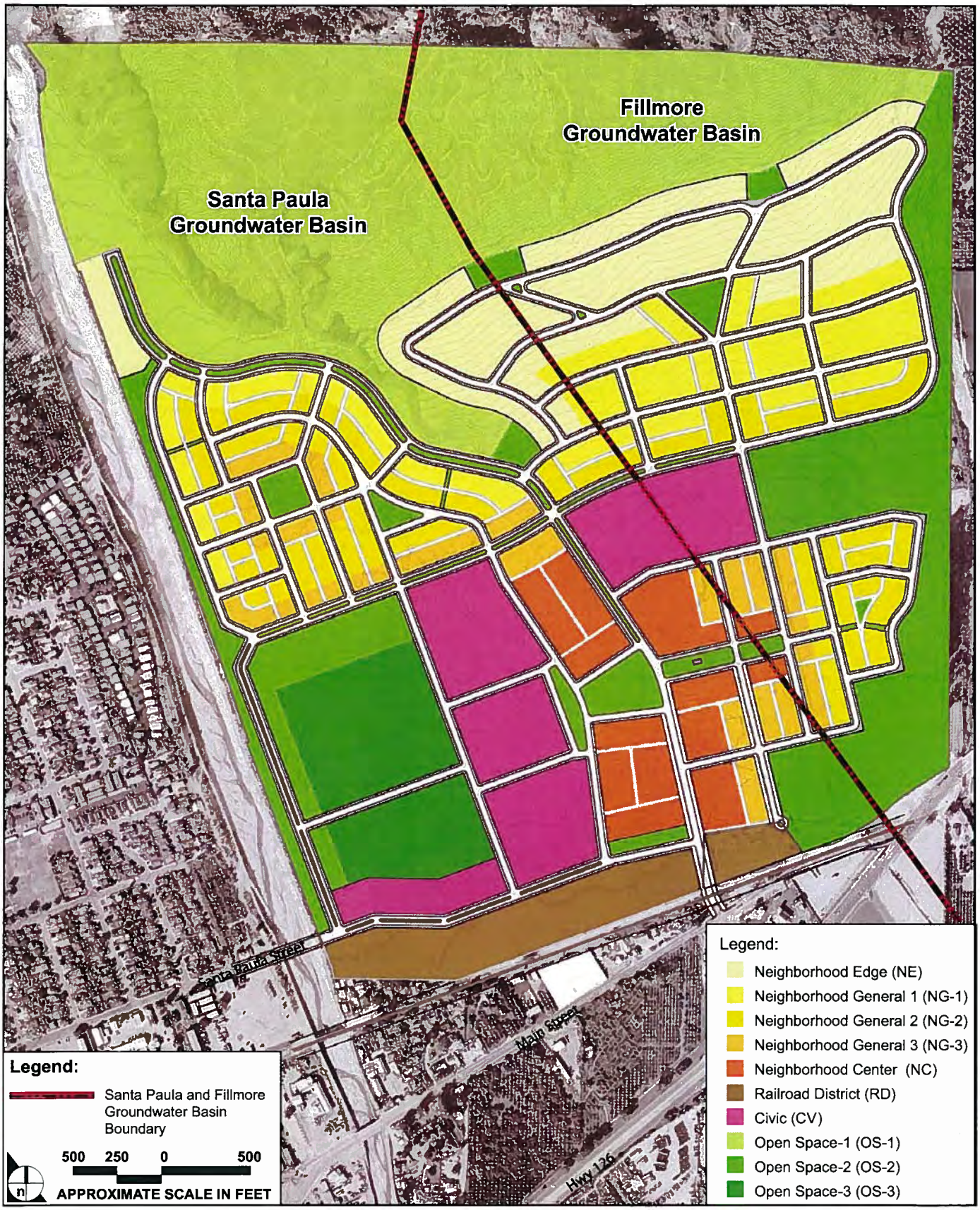
5 Ibid.

SOURCE: United Water Conservation District 2004

FIGURE 2

Santa Paula and Fillmore Groundwater Basins Boundary Map

831-001-09/07



SOURCE: United Water Conservation District – 2004

FIGURE 3

Location of Santa Paula and Fillmore Groundwater Basins Boundary on East Area 1 Site

831-001•09/07

3.1.1 Santa Paula Basin

The Santa Paula Basin underlies the City of Santa Paula and unincorporated areas to the southwest of the City within the Santa Clara River Valley. The basin is bounded by the impervious rocks of the Topatopa Mountains to the north, impervious rocks of Oak Ridge and South Mountain, the Oak Ridge fault, and Saticoy fault on the south.[6] The eastern edge of the basin is marked by a bedrock constriction, with the boundary placed at the position of maximum rising water.[7] The western boundary separates the Santa Paula basin from the Mound and Oxnard subbasins, with the western boundary placed where there is a distinct change in the slope of the water table.[8] Ground surface elevations range from 140 feet above sea level in the west to about 1,000 feet above sea level along the Santa Paula Creek drainage.[9] The Santa Clara River and Santa Paula Creek drain the valley westward toward the Pacific Ocean. Average annual precipitation ranges from 14 to 18 inches.[10]

The basin is recharged by percolation of surface flow from the Santa Clara River, Santa Paula Creek, and other minor tributary streams, as well as subsurface flow from the Fillmore Basin.[11] Some of the surface flow in the Santa Clara River originates as release from Lake Piru and contains natural runoff of precipitation and imported State Water Project water.[12] Percolation of precipitation and unused irrigation waters provide additional recharge. Groundwater in the Santa Paula Basin generally flows toward the southwest.[13]

Disagreement over the issue of safe yield of groundwater between the UWCD and other parties using water from the Santa Paula Basin, including the City of Santa Paula and the City of San Buenaventura (Ventura), led to the adjudication of groundwater rights within the Santa Paula Basin in 1996. A stipulated judgment was agreed to by the parties, and after review and approval by the Ventura County Superior Court, was entered as a final judgment (Judgment) to adjudicate groundwater rights within the basin. In summary, the Judgment adjudicates groundwater rights, regulates individual and collective pumping, provides for basin management through a Technical Advisory Committee (TAC), and reserves

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6 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

7 Ibid.

8 Ibid.

9 Ibid.

10 Ibid.

11 Ibid.

12 United Water Conservation District, Surface and Groundwater Conditions report, Water Year 2000 Supplement.

13 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

jurisdiction in the Superior Court to resolve future disputes and provide for supplementary orders as necessary. A copy of the Judgment is provided in **Appendix A**.

The Judgment allocates the use of groundwater in the Santa Paula Basin between the City of Ventura and the Santa Paula Basin Pumpers Association (SPBPA), which is a consortium of water users in the Santa Paula area, including the City and farming interests. UWCD is also a party to the Judgment. Although UWCD does not produce water from the Santa Paula Basin, the Basin is located within its boundaries and UWCD is authorized to engage in groundwater management and replenishment activities and to act to protect water supplies that are of common benefit to the lands and residents within UWCD.

Currently, the SPBPA possesses a collective groundwater right allocation of 27,500 AFY that it holds in trust for its membership. The Judgment further subdivides the collective 27,500 AFY allocation as sub-allocations to each of the SPBPA members and a few non-parties. The allocations and sub-allocations are summarized in **Table 2, Santa Paula Basin Water Allocations**.

Table 2
Santa Paula Basin Water Allocations

Water User	Allocation (AFY)[1]
Santa Paula Basin Pumpers Association	
City[2]	5,412
Canyon Irrigation Company	673
Farmers Irrigation Company	9,406
Limoneira	3,173
Alta Mutual Water Company	758
All Other SPBPA Users	8,078
Subtotal SPBPA	27,500
City of San Buenaventura	3,000
Unallocated Reserve	3,000

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-7.

[1] *All values rounded to nearest acre-foot (AF).*

[2] *City transferred 673 AFY to Canyon Irrigation Company in January 1998. Thus, the City's current allocation is 5,412 AFY.*

Pursuant to the terms of the Judgment, the City of Santa Paula has a sub-allocation of 6,085 AFY available for urban uses. However, the City transferred 673 AFY to Canyon Irrigation Company in January 1998. Thus, the City's current allocation is 5,412 AFY. This amount could be adjusted if the terms of the

Judgment are modified, or if the City acquires additional water rights from areas subject to development or from other users within the SPBPA.

Water on the project site used for irrigation has been historically supplied from on-site wells. Although all wells are listed in the Judgment as being within the Santa Paula Basin, one well overlies the Fillmore Basin and the others all overlie the Santa Paula Basin. Withdrawals from all of the wells have been accounted for under the Santa Paula Basin Judgment. Currently, the members of the SPBPA have a cumulative allocation to pump on average 27,500 AFY, of which Limoneira Company has an allocation of 3,173 AFY and the Newsom Family Trust an allocation of 138.1 AFY.[14]

The Judgment sets forth an "assumed initial yield" of the basin at 33,500 AFY, subject to modification if credible technical information demonstrates a need for a change.[15] The Judgment also set forth a seven-year study period to evaluate the appropriateness of the assumed initial basin yield of 33,500 AFY, which began on 1 January 1996. After the seven year study period, UCWD and the other member of the TAC collaborated to produce a study of the basin's groundwater conditions and the implications for the initial 33,500 AFY yield allocation.[16] The 2003 Annual Report reported that over the period 1997 to 2003, parties to the Judgment had cumulatively produced 42,111 AF less than their combined total allocation for this period.[17]

The estimated subsurface outflow was reported by DWR in Bulletin 118 to be 7,200 AFY. Average annual extraction were estimated to be 21,612 AFY in Bulletin 118,[18] The Yield Study found that an average annual pumping rate of approximately 26,000 AFY for the period from 1983 through 1995 was sustainable.[19] Furthermore, it is the opinion of the Santa Paula TAC that the yield of the basin is greater than the average annual production of 26,000 acre-feet.[20] The Yield Study also reported fluctuations in

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14 City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Appendix J, Stipulated Judgment for United Water Conservation District vs. City of San Buenaventura.

15 Ibid, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006.

16 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield*, prepared for Santa Paula Basin Technical Advisory Committee, July 2003.

17 United Water Conservation District, *Santa Paula Basin 2003 Annual Report*, November 2004.

18 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

19 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield*, prepared for Santa Paula Basin Technical Advisory Committee, July 2003.

20 Correspondence from Dana Wisehart, General Manager, United Water Conservation District, Comments on the Draft Environmental Impact Report No. SCH #2006071134; East Area 1 Specific Plan, dated January 4, 2008.

groundwater levels that correlated with precipitation trends.[21] However, the Yield Study also concluded that long-term observations suggested that he Basin was not in a state of overdraft.[22]

The Yield Study was submitted to the Superior Court by the TAC along with the 2002 Annual Report on the Basin.[23] Based on the study results, the, TAC recommended to the Court that the yield remain at 33,500 AFY. The Court accepted the recommendation, but ordered another report on the yield of the basin from the TAC in 2010.

Water Code section 10631 requires that this WSA (a) identify whether the DWR has determined, in the most recent official department bulletin, whether the Santa Paula Basin is presently in a state of overdraft or at risk of becoming overdrafted under current conditions; and (b) provide an analysis of the sufficiency of the Basin's groundwater supply to meet the projected water demands of the East Area 1 Specific Plan. DWR's most recent assessment of conditions in the Santa Paula Basin was issued as part of DWR's Bulletin 118, Update 2003, which does not state that any portion of the Santa Paula Basin is presently, or was previously, in a state of overdraft.[24] Bulletin 118 does, however, report as follows:

> *Hydrographs from the Santa Paula Subbasin show a range of up to 55 feet in water level elevation since 1975. The hydrographs show an annual cyclic rise and fall of water level of about 20 feet with longer-term variations apparently following precipitation cycles. The subbasin was at a low level in 1991 and 1992, then recovered by 1994 and has remained stable since then.*

In addition to the Yield Study's conclusion that the Santa Paula Basin is not in a state of overdraft, UWCD's most recent water table observations show that water levels within the Santa Paula Basin remain within the stable range reported within Bulletin 118 and the Yield Study.[25] Therefore, it does not appear that the Santa Paula Basin is in a state of overdraft or at risk of becoming overdrafted under current conditions.

As the forgoing discussion illustrates the Santa Paula Basin is comprehensively managed by the TAC, UWCD, and the reserved jurisdiction of the Court, as provided in the Judgment. The basin's water tables have stabilized and appear to be sufficient to support the allocation of groundwater rights set forth within the Judgment. Moreover, groundwater production rights are defined and limited as a collective

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21 Santa Paula Basins Expert Group, *Investigation of Santa Paula Basin Yield*, prepared for Santa Paula Basin Technical Advisory Committee, July 2003.

22 Ibid.

23 United Water Conservation District, *Santa Paula Basin 2002 Annual Report*, October 2003.

24 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

25 United Water Conservation District, UCWD website: http://www.unitedwater.org/groundwater/99160499_20061006_094638.pdf, accessed July 27, 2007.

whole and in relation to each of SPBPA's individual members. This confinement and definition of the groundwater rights existing within the Basin provides additional certainty for the long-term reliability of the groundwater supply from the Basin, including the Santa Paula Basin groundwater rights that will be used, in part, to supply the East Area 1 Specific Plan, as discussed herein. For these reasons, it is fair to conclude that the Santa Paula Basin's groundwater supply is sufficient to meet that portion of the East Area 1 Specific Plan's water supply needs that shall be satisfied by groundwater from the Santa Paula Basin.

3.1.2 Fillmore Basin

The Fillmore Basin is located northeast of the Santa Paula Basin. The two basins share a boundary (Santa Paula Basin eastern boundary and Fillmore Basin western boundary), which is characterized by bedrock restraints that cause groundwater levels to rise along the shared boundary.[26] The Fillmore Basin is bounded on the north by impervious rocks of the Topatopa Mountains and the San Cayetano fault and on the south by impervious rocks of Oak Ridge and the Oak Ridge fault. The eastern and western boundaries are marked by bedrock constrictions.[27] Ground surface elevations range from 280 feet above sea level in the west to about 1,000 feet above sea level along the north and south edges. DWR reports that the Fillmore Basin consist of Pleistocene to Holocene age alluvium that reach a maximum thickness of about 200 feet. DWR also reports that the San Pedro Formation underlying the alluvium extends as deep as 4,000 feet with an average water bearing thickness of 2,480 feet. It should be noted that UWCD has indicated that this may overstated as the production wells in the basin are less than 1,000 feet deep. One historic test well was 1,820 feet deep and it encountered poor water quality.[28] DWR estimates that the surface area of the basin is 24,224 acres;[29] however, UWCD believes that this has been overestimated by approximately 6,000 acres.[30] DWR reports that the Fillmore Basin has a specific yield of 12.2 percent;[31] UWCD is also of the opinion that the 12 percent specific yield estimated by DWR in Bulletin 118 is too optimistic and that a more reasonable estimate would be 10 percent or less.[32] The Santa Clara

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26 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

27 Ibid.

28 Correspondence from Dana Wisehart, General Manager, United Water Conservation District, Comments on the Draft Environmental Impact Report No. SCH #2006071134; East Area 1 Specific Plan, dated January 4, 2008.

29 Ibid.

30 Ibid.

31 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

32 Correspondence from Dana Wisehart, General Manager, United Water Conservation District, Comments on the Draft Environmental Impact Report No. SCH #2006071134; East Area 1 Specific Plan, dated January 4, 2008.

River and Sespe Creek drain the surface waters of the basin. Average annual precipitation ranges from 14 to 18 inches. [33]

A water budget has never been prepared for the Fillmore Basin, and there is limited technical hydrogeologic analysis for the Basin; the Fillmore Basin has not received the same level of technical attention because it has continued to demonstrate a rebound to full/near full conditions following wet years, suggesting that the basin is in a surplus condition. The most recent study is UWCD's Study for the *Piru and Fillmore Basins Annual Groundwater Conditions Report for the Water Year 2003*. While Bulletin 118 notes an update of January 2006 for the Fillmore Basin, it's sources date back to 2001 or later.[34]

The Piru and Fillmore basins are principally recharged from the Santa Clara River, Sespe Creek and minor tributary streams.[35] The Fillmore Basin also receives subsurface flow from the Piru Subbasin.[36] Some of the surface flow in the Santa Clara River originates as release from Lake Piru and contains natural runoff of precipitation and imported State Water Project water.[37] Flows within the Santa Clara River are fed by natural runoff and water releases from Lake Piru upstream from the Fillmore and Piru basins. Estimates of the recharge attributable to the Santa Clara River and Sespe Creek for the Piru and Fillmore Basins in 2003 were 20,520 acre-feet of water being released from Lake Piru for that year.[38] Percolation of precipitation and unused irrigation waters provide additional recharge. Groundwater in Fillmore Basin generally flows toward the southwest.[39] Other possible sources of groundwater recharge are the San Pedro outcrops in the foothills to the north of the basin. These sources of recharge may also be augmented by United Water Conservation District's (United) timed release of State Water Project Water from Lake Piru into the Santa Clara River for additional recharge; for 1997-98, the applied water recharge was estimated to be 19,125 AF.[40] It should e noted that UWCD that the estimate for recharge from agricultural return (50 percent of applied agricultural water) seems high.[41]

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33 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

34 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003, January 2006 Update for the Fillmore Basin.

35 Ibid.

36 Ibid.

37 Ibid.

38 Ibid.

39 Ibid.

40 Ibid.

41 Correspondence from Dana Wisehart, General Manager, United Water Conservation District, Comments on the Draft Environmental Impact Report No. SCH #2006071134; East Area 1 Specific Plan, dated January 4, 2008.

Water levels in the Fillmore Basin vary cyclically according to seasonal changes in pumping and precipitation.[42] During the last 50 years, the groundwater levels have varied over a range of about 45 feet and during the last 30 years, a range of about 30 feet.[43] The Fillmore Subbasin recharges rapidly and fills to capacity in years of abundant precipitation. The most recent low water levels were observed at the end of 1992 following several years of below-average precipitation. Thereafter, water levels recovered by about 30 feet to reach recent historical high water tables in 1994.[44] Subsequently, water levels have remained within about 5 feet of historical high levels.[45] In October 1999, the subbasin was an estimated by DWR to be 95 percent full.[46] UWCD notes that the 1998 Water Year (October 1998 to September 1999) was the wettest year on record.[47] UWCD further disputes the accuracy of DWR's estimate of 7.33 million acre-feet in storage and DWR's estimate that the basin was 95 percent full.[48] UWCD notes that for all practical purposes, the Fillmore Basin was full and was only depleted by 6,000 acre-feet in October 1999.

The groundwater flow gradient in the Fillmore basin generally creates an east to west movement of groundwater through the alluvium. Groundwater that infiltrates from Sespe Creek generally flows towards the southwest.[49] In the San Pedro Formation, the movement of groundwater is southerly, changing to westerly near the axis of the syncline between the Fillmore and Piru Basins to the north. The basin is considered an unconfined groundwater basin.

The most recent published information on the Fillmore Basin is the 2003 *Annual Groundwater Conditions Report Water Year* completed to meet Assembly Bill (AB) 3030 requirements. For the period from 2002 to 2006, the pumpage from the Fillmore Basin has been slightly more than approximately 41,760 AFY.[50] The average pumpage was greater during the dry cycle from 1984 to 1991 than it was for the wet cycle from 1992 to 1998, which is understandable because much of the Basin water demand is for agricultural irrigation. Agriculture accounted for approximately 92 percent of this pumpage.

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42 United Water Conservation District, *Piru and Fillmore Basins Annual Groundwater Conditions Report Water Year 2003*, prepared for the AB 3030 Groundwater Management Council, December 2004.

43 Ibid.

44 United Water Conservation District, *Piru and Fillmore Basins Annual Groundwater Conditions Report Water Year 2003*, prepared for the AB 3030 Groundwater Management Council, December 2004.

45 Ibid.

46 California Department of Water Resources (DWR), *Bulletin 118 California's Groundwater*, Santa Clara River Basin, Fillmore Subbasin, January 20, 2006.

47 Correspondence from Dana Wisehart, General Manager, United Water Conservation District, Comments on the Draft Environmental Impact Report No. SCH #2006071134; East Area 1 Specific Plan, dated January 4, 2008.

48 Ibid.

49 United Water Conservation District, *Piru and Fillmore Basins Annual Groundwater Conditions Report Water Year 2003*, prepared for the AB 3030 Groundwater Management Council, December 2004.

50 Personal communication with Mr. Ken Turner, United Water Conservation District, August 3, 2007.

A historical record of the estimated groundwater storage capacity/depletion of the Fillmore basin is displayed in **Figure 4, Historical Fillmore Basin Groundwater Storage**. As this graph illustrates, the Fillmore Basin has been at or nearly full since the 1970s. The variability of storage over the past 40 years reflects changes in recharge from precipitation with declines in the Basin occurring during prolonged dry periods, as occurred in the late 1970s and early 1990s. However, the Basin has shown its ability to recover

from these and return to levels at or near capacity during wet periods. According to DWR, the Basin has approximately 7 million AF of water in storage.[51] Thus, although a basin water balance has not been performed by DWR or UWCD, the historical fluctuation of the basin's water tables and return to capacity following wet periods suggests that the basin is not in a state of overdraft or likely to enter a state of overdraft under current conditions. Moreover, the drawdown of basin water tables during dry periods provides UWCD with the opportunity to release additional SWP water for infiltration into the basin to recharge the available storage space.

Like the analysis above, relating to the Santa Paula Basin, Water Code section 10631 requires that this WSA (a) identify whether DWR has determined, in the most recent official department bulletin, whether the Fillmore Basin is presently in a state of overdraft or at risk of becoming overdrafted under current conditions; and (b) provide an analysis of the sufficiency of the Basin's groundwater supply to meet the projected water demands of the East Area 1 Specific Plan. DWR's most recent assessment of conditions in the Fillmore Basin was issued as part of DWR Bulletin 118, Update 2003.[52] Bulletin 118 does not state that any portion of the Fillmore Basin is presently, or was previously, in a state of overdraft.[53] Bulletin 118 does, however, state as follows:

Water levels in the Fillmore Subbasin vary cyclically according to seasonal changes in pumping and precipitation. During the last 50 years, the groundwater levels have varied over a range of about 45 feet and during the last 30 years, a range of about 30 feet (UWCD 1996, 1999b). Like the Piru Subbasin to the east, the Fillmore Subbasin recharges rapidly and fills to capacity in years of abundant precipitation. The most recent low water levels were observed at the end of 1992 and then water levels recovered about 30 feet to the historical high by 1994 (UWCD 1996, 1999b). Subsequently, water levels have remained within about five feet of historical high levels (UWCD 1996, 1999b). In October 1999, the subbasin was an estimated 95 percent full (Panaro 2000).

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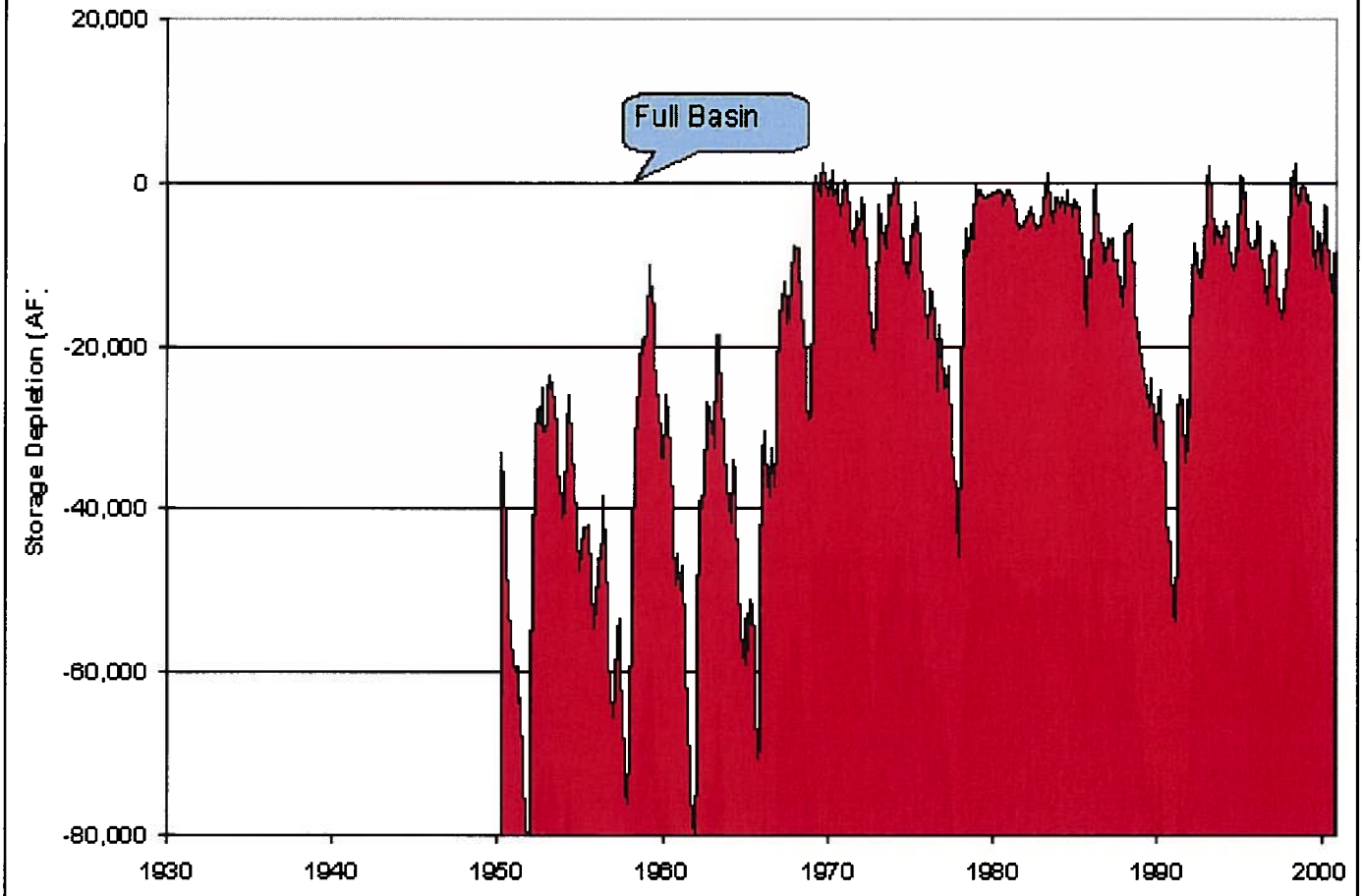
51 California Department of Water Resources (DWR), *Bulletin 118 California's Groundwater*, Santa Clara River Basin, Fillmore Subbasin, January 20, 2006. It should be noted that UWCD is of the opinion that the 7 million AF is too high for total basin storage.

52 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

53 Ibid.



SOURCE: United Water Conservation District – December 2004

FIGURE **4**

Historical Fillmore Basin Groundwater Storage

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UWCD's most recent water table observations for the Fillmore Basin show that water levels within the Fillmore Basin remain near historic highs. It is therefore fair to conclude that the Fillmore Basin is not in a state of overdraft, or at risk of becoming overdrafted under current conditions.54 Indeed, as evidenced by recent high water levels within the basin, the Fillmore Basin appears to be in a surplus condition. That is, there is likely more water recharging the basin than is being extracted or otherwise leaving the basin.

According to information provided by UWCD,[55] the total groundwater production for the Fillmore basin for the past five years was:

- 2002 – 45,915 AF
- 2003 – 41,453 AF
- 2004 – 42,538 AF
- 2005 – 38,226 AF
- 2006 – 40,672 AF

The top five pumpers in 2006 produced 18,364 AF from the Fillmore Basin in the following amounts of groundwater each:[56]

- 7,956 AF – (Fish Hatchery)
- 4,288 AF – (City of Fillmore)
- 2,609 AF – (Agricultural Mutual)
- 2,012 AF – (Agricultural Mutual)
- 1,499 AF – (Agricultural Mutual)

By virtue of the Limoneira Company's land ownership overlying the Fillmore Basin, they currently enjoy overlying groundwater rights, which allow them to extract groundwater from the Basin for reasonable uses upon their overlying property.[57] Overlying rights are senior in priority to appropriative rights (another type of right that allows for use of the groundwater off of the overlying property), and are correlative in priority with all other overlying rights held by other landowners overlying the Basin. It is important to acknowledge that overlying rights are not dependent upon historical use; that is, dormant overlying rights may be exercised at any time. Once exercised, the newly exercised overlying rights share the same priority as previously exercised overlying rights.

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54 United Water Conservation District, UCWD website: http://www.unitedwater.org/groundwater/99160499_20061006_094638.pdf, accessed July 27, 2007.

55 Correspondence (e-mail) from Ken Turner of United Water Conservation District to Frank Brommenshenkel on August 3, 2007.

56 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

57 *City of Barstow v. Mojave Water Agency* (2002) 23 Cal.4th 1224, 1240.

The Limoneira Company and the City as their successor, may also exercise appropriative rights from the Basin because the Basin has surplus water in excess of safe yield available for production.58 Thus, the City may rely on either overlying or appropriative rights in the Fillmore Basin to supply water to a portion of the East Area 1 Specific Plan.59 However, groundwater for delivery in the City of Santa Paula will come solely from the Santa Paula Groundwater Basin. The applicant will transfer Santa Paula Groundwater Basin pumping credits in sufficient quantity to cover the needs of the development including the 25%

3.2 WATER SERVICE AREA

The City is located approximately 17 miles inland from the Pacific Ocean in central Ventura County (**Figure 5, City of Santa Paula Location Map**). The City lies within the Santa Clara River Valley, approximately 12 miles east of the City of San Buenaventura and approximately 9 miles west of the City of Fillmore.

The City of Santa Paula is responsible for water supply and distribution within the City's service area (see **Figure 6, City of Santa Paula Water Service Area**). The proposed project is located outside of the City's corporate boundary but within an area identified in the General Pan for future expansion. A portion of the project site is currently located in the City's water service area, and the entire site would be located within the City's service area after annexation of the site to the City.

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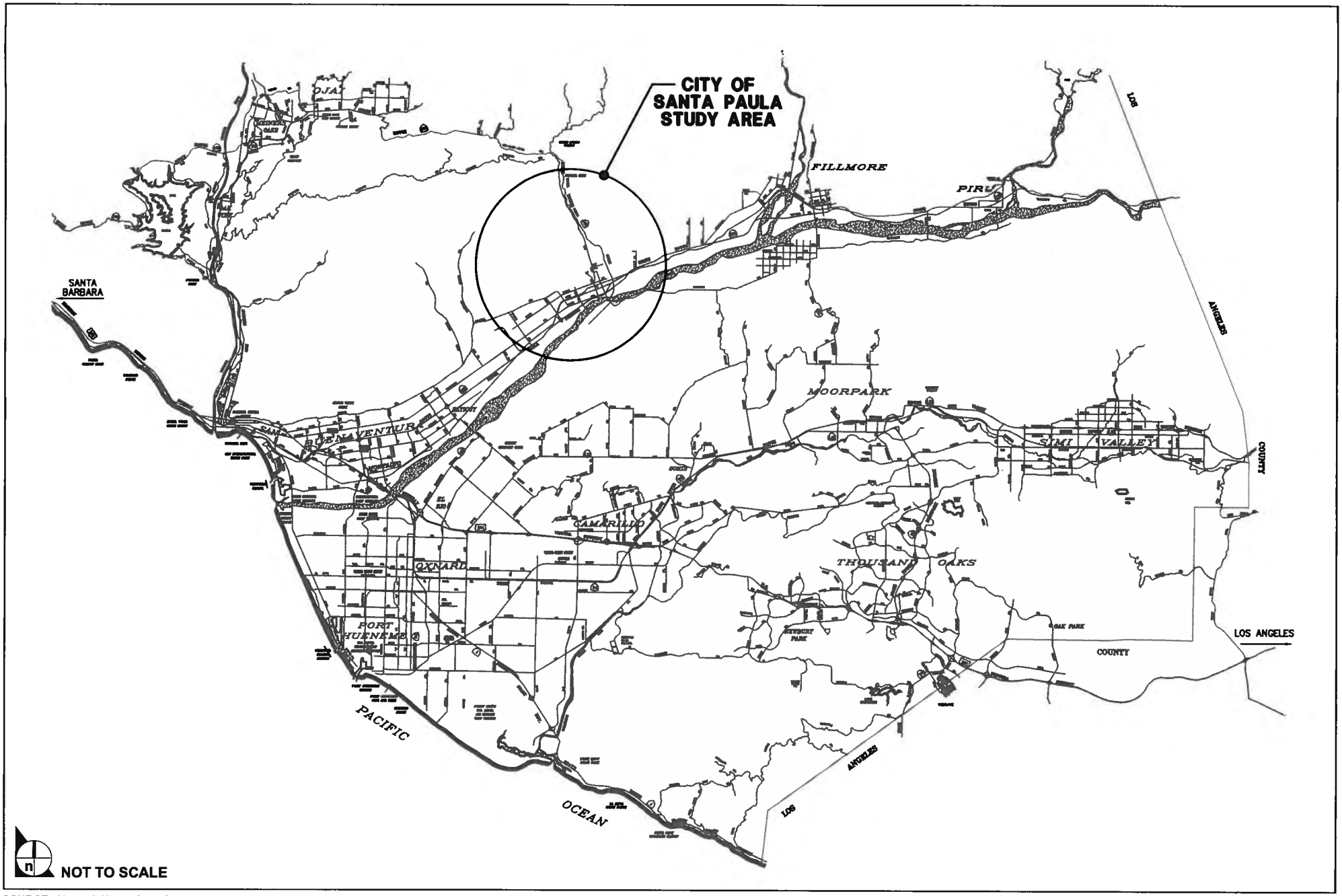
58 Ibid, appropriators have a legal right to extract surplus water.

59 Although a municipality is typically characterized as an appropriator when providing municipal water service (even when serving parcels overlying the groundwater supply), (*City of Pasadena v. City of Alhambra* (1949) 33 Cal.2d 908, 925; *Gould v. Stafford* (1891) 91 Cal. 146, 155; *Spring Valley Water Co. v. Alameda County* (1927) 88 Cal. App. 157, 168), overlying groundwater rights can be preserved and relied upon by the municipality to provide water service to overlying parcels where an agency relationship is established prior to the initiation of water service to provide that the municipality will act as agent of the overlying landowners to deliver water to them with reliance upon their overlying rights. *Hildreth v. Montecito Creek Water Co.* (1903) 139 Cal. 22, 29 [72 P. 395] (mutual water company becomes an agent...the water remaining the subject of individual ownership and private use as before); *City of Glendale v. Crescenta Mutual Water Co.* (1955) 135 Cal.App.2d 784, 801 [288 P.2d 105]; *Erwin v. Gage Canal Co.* (1964) 226 Cal.App.2d 189 [37 Cal. Rptr. 901] (mutual water company becomes an agent in producing and delivering landowners' water); see also *Orange County Water Dist. v. City of Colton* (1964) 226 Cal.App.2d 642, 648-649 [38 Cal. Rptr. 286] (court distinguished invalid transfer of water rights from a valid grant to an agent or trustee of the right to capture and distribute water to the overlying owners thereof). Thus, the City can preserve and rely upon the overlying rights currently held by the Limoneira Company and the Newsom Family Trust, by virtue of their land ownership, to serve portions of the East Area 1 Specific Plan. However, because the Fillmore Basin currently has surplus groundwater supplies, the City can also rely on appropriative rights for this service as well.



SOURCE: Kennedy/Jenks Consultants – December 2005

FIGURE **5**

City of Santa Paula Location Map

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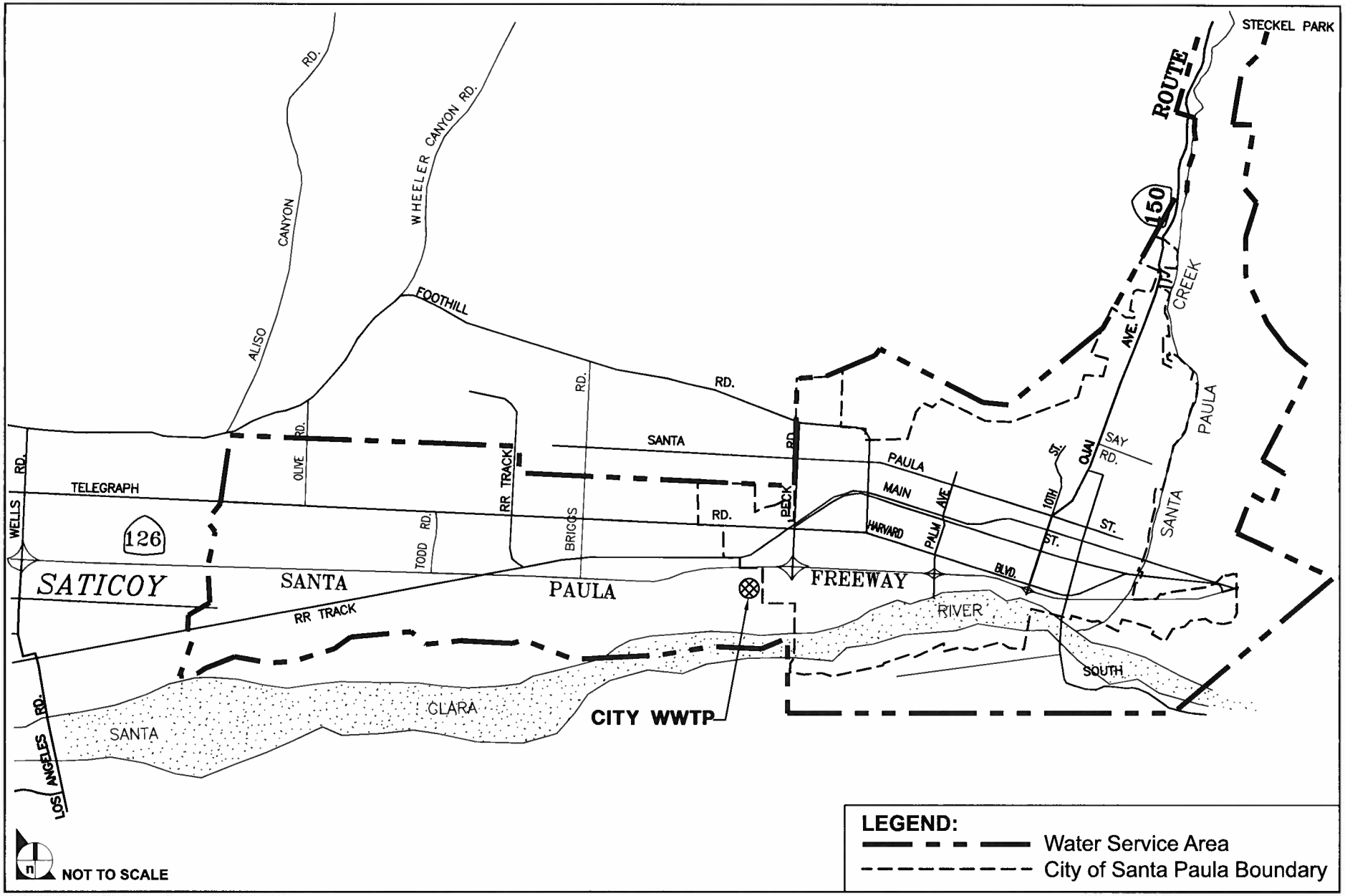

SOURCE: Kennedy/Jenks Consultants – December 2005

FIGURE 6

City of Santa Paula Water Service Area

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3.3 GROUNDWATER ALLOCATION TRANSFERS FROM DEVELOPED PROPERTIES

In accordance with City Municipal Code section 52.021 (Water Resource In-Lieu Fee Ordinance No. 1058), landowners or developers are required to transfer their groundwater rights to the City as a condition of project approval. The intent of the Ordinance is to ensure that new urban land users provide sufficient water resources for their needs without taxing existing users. If the associated water rights are not sufficient to serve the proposed development's anticipated water use (as determined by the City), or if the water rights are held by another entity who cannot or will not dedicate those rights to the City, the developer must purchase additional water rights and dedicate them to the City or pay a water resource in-lieu fee to the City. This ordinance applies to water rights within City limits as well as parcels outside City limits who must receive service from the City Water Enterprise.

The City identified 1,925 AFY of potential groundwater allocations that could be transferred to the City from overlying landowners within the City General Plan boundary. One property includes a reserve of 110 AFY for agricultural uses. Thus, the maximum potential net groundwater transfer is 1,815 AFY. See **Table 3, Existing and Potential City Water Resources and Demand**, for a summary of existing and potential water resources. These transfers will occur in phases during the next 15 years as development occurs within the City. Transfers of allocations will need to be reported to the Technical Advisory Committee in accordance with the Judgment. The SPBPA will then transfer the applicable number of memberships (allocations) when transfers are between association members; a membership is equal to 1 AFY of groundwater allocation.

The City's current (2005) Urban Water Management Plan anticipates that the City will acquire through allocation transfers 454 AFY by 2010, 908 AFY by 2015, 1,362 AFY by 2020, and 1,815 AFY by 2025 through allocation transfers within the Santa Paula Basin as provided for in the Judgment.[60]

3.4 RECYCLED WATER

It has been the intent of the City to look for opportunities to increase the beneficial reuse of highly treated wastewater as part of a planned program of water reclamation and consistent with overall City water resources planning. Currently, recycled water is not currently available to the Santa Paula area.

The City has certified a FEIR for a new Water Recycling Facility (WRF), which will be constructed so that it can produce Title 22 water. Title 22 of the California Code of Regulations governs recycled water treatment in California. The treatment plant capacity identified in the EIR is 3.2 mgd, or 3,584 AFY.

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60 City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, p. 22.

Recycled water is anticipated to be available in 2010. The total anticipated recycled water demand for the City would be available for common area irrigation systems using recycled water. This includes Open Space areas and Common Area Irrigation areas as defined in the East Area 1 Specific Plan water demand. The recycled water demand could be fully met with recycled water from the new WRF (construction anticipated to be completed by late 2010) (**Table 4, Potential Recycled Water Demand 2005 to 2030**).

Table 3
Existing and Potential City Water Resources and Demand (AFY)

Supplies	2005	2010	2015	2020	2025	2030
Existing Supplies						
City Wells within the Santa Paula Basin[1]	5,412	5,412	5,412	5,412	5,412	5,412
Santa Paula Creek[2]	500	500	500	500	500	500
Subtotal	5,912	5,912	5,912	5,912	5,912	5,912
East Area 1 Supplies						
Santa Paula Basin	1145	1145.6	1145.6	1145.6	1145.6	1145.6
Subtotal	1,145	1,174.7	1,174.7	1,174.7	1,174.7	1,174.7
Total Existing Supplies	7,057	8,323.3	8,232.3	8,232.3	8,232.3	8,232.3
Potential Supplies						
Santa Paula Basin Groundwater Allocation Transfers[3]	0	0	260	520	780	780
Purchased Groundwater Allocations[4]	0	200	300	400	497	497
SWP[5]	0	0	0	220	220	220
Recycled Water[6]	0	400	800	1,200	1,622	1,622
Subtotal	0	600	1360	2,340	3,119	3,119
Total Potential Supplies	**8,202.6**	**9,4032.3**	**10,952.3**	**12,912.3**	**14.470.3**	**14,470.3**
Estimated Demand						
City of Santa Paula	5,102	5,961	6,819	7,678	8,536	8,971
East Area 1 Specific Plan site	1,145	1,145.6	1,145.6	1,145.6	1,145.6	1,145.6
Total Estimated Demand[7]	**6,247**	**7,106.6**	**7,964.6**	**8,823.6**	**9,681.6**	**10,116.6**
Difference (Supply – Demand)	**810**	**2,325.7**	**2,987.7**	**4,088.7**	**4.788.7**	**4.353.7**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-9. Modified to include Fillmore Basin and other allocations for Santa Paula Basin rights-holders supplies.
All values rounded to the nearest 1 AF.

1 *The Judgment allocates 6,085 AF to the City. The City transferred 673 AFY to Canyon Irrigation Company in January 1998. Thus, the City's current allocation is 5,412 AFY.*

2 *The City currently wheels the 500 AFY of surface water from Santa Paula Creek to Farmers Irrigation Company, which uses the surface water in lieu of pumped groundwater, and the City gains 500 AFY groundwater pumping credits in the Santa Paula Basin.*

3 *Total of 1,815 AFY allocation transfers achieved over 4 equal 5-year periods (approximately 454 AFY per 5-year period).*

4 *The City anticipates purchasing groundwater allocations. It is anticipated that approximately 200 AFY could be developed by 2010, 300 AFY by 2015, 400 AFY by 2020, and 497 by 2025.*

5 *The City has rights to 2,198 AFY. It is anticipated that approximately 220 AFY could be developed by 2020. However, actual delivery may be only 75 percent of water rights (DWR, 2002).*

6 *The City anticipates initiating a recycled water program by 2010. It is anticipated that approximately 400 AFY could be developed by 2010, 800 AFY by 2015, 1,200 AFY by 2020, and 1,622 by 2020.*

7 *2030 demand represent 2025 demand plus approximately 1 percent per year annual growth in demand.*

8 *It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.*

Additional recycled water demand may be generated by groundwater recharge, agricultural irrigation, and commercial/industrial recycled water use. The City has not yet prepared a recycled water master plan to evaluate potential users, demand, recharge feasibility, and economic feasibility within the City water service area. It is anticipated that the City would gradually develop a recycled water system to meet the objectives of identified recycled water demand.

Table 4
Potential Recycled Water Demand 2005 to 2030

Potential Use	2005 (AF)	2010 (AF)[1]	2015 (AF)[1]	2020 (AF)[1]	2025 (AF)[1]	2030 (AF)[1]
Landscape Irrigation[3]	0	400	800	1,200	1,622	1,622
Groundwater Recharge	0	[2]	[2]	[2]	[2]	[2]
Agricultural Irrigation	0	[2]	[2]	[2]	[2]	[2]
Other	0	[2]	[2]	[2]	[2]	[2]
Total	**0**	**400**	**800**	**1,200**	**1,622**	**1,622**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 4-3.

[1] *All values rounded to the nearest 1 AF.*

[2] *Undetermined.*

[3] *City of Santa Paula,SB610 Water Supply Assessment for the Fagan Canyon Development Project, prepared by RBF Consulting.*

3.5 SUPPLY SUMMARY

Implementation of these water supply programs is anticipated to provide the City with sufficient water supplies to meet future water demand. As shown in **Table 5, City of Santa Paula Water Supply and Demand at Buildout**, the potential water supplies available to the City exceed the estimated water demand at City buildout conditions.

3.6 NORMAL, SINGLE DRY, AND MULTIPLE DRY YEAR WATER SUPPLY

Currently, the entire potable water supply for the City is obtained by pumping from the Santa Paula Basin. The City has obtained additional groundwater pumping rights through a wheeling agreement with the Canyon Irrigation Company only if the water is available or diverted. The potential future water supplies include groundwater rights transfers to the City as new development occurs, City acquisition of potentially available groundwater allocations within the Santa Paula Basin, State Project Water, recycled water, and groundwater production from the Fillmore Basin.

The SPBPA and TAC monitor current and future groundwater pumping within the Santa Paula Basin. The City is not limited to its allocation in any single year, but may produce as much as seven times its annual average allocations over a seven-year period. There are no restrictions regarding pumping in single dry or multiple dry water years subject to court order. As discussed earlier, the Santa Paula Basin Yield Study did not recommend that restrictions be imposed on the amount of groundwater that can be pumped during dry periods. Therefore, groundwater pumping by the City is not anticipated to be

subject to any reductions in the dry year analysis. This conclusion is based on the results of the Santa Paula Basin Yield Study completed in July 2003, which analyzed two periods—1944 through 1998 and 1983 through 1995.

Table 5
City of Santa Paula Water Supply and Demand at Buildout

Supply (AFY)		
Existing Supplies		
City Wells within the Santa Paula Basin	5,412	5,412
Santa Paula Creek	500	500
Subtotal	**5,912**	**5,912**
Potential Future Supplies		
Santa Paula Basin Groundwater Allocation Transfers	780	780
Purchased Groundwater Allocations	497	497
State Project Water	220	220
Recycled Water	1,622	1,622
Santa Paula Basin East Area 1	[1] 1174.7	[1] 1358.8
Subtotal	**3,871.7[1]**	**4,055.8[1]**
Total Potential Water Supplies	**10,205.7**	**10,389.8**
Demand (AFY)		
City of Santa Paula	8,971	8,971
East Area 1	1,174.7[1]	1,359.2[1]
Total Estimated Water Demand	**10,145.6[1]**	**10,330.2[1]**
Difference (Supply — Demand)	**+60.1[1]**	**+59.6[1]**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-11 and Impact Sciences, 2007.

Notes:

1 *Projected water demand utilizes both 132 gpd per capita and 163 gpd per capita to illustrate a range of water demand based on both the City of Santa Paula UWMP(132 gpd rate) and the City of Santa Paula's Potable Water System Master Plan (163 gpd rate).*

2 *It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.*

Recycled water production will not be affected by single dry or multiple dry water years. Recycled water supply is directly related to wastewater generation, which is generally associated with indoor potable water use. Currently, there are no restrictions within the City regarding the use of potable water during dry periods. Additionally, the currently proposed uses of recycled water are restricted to non-potable irrigation that, if reduced during dry periods, would have little or no impact on the community. Therefore, it is not anticipated that the recycled water supply will be reduced during dry periods.

State Project Water dry year restrictions are not known due to the lack of specificity regarding how the water will be delivered. For the purposes of this analysis, it is assumed that State Project Water will be subject to dry year reductions similar to those reported in the State of California Department of Water Resources 2002 Delivery Reliability Report. A single dry year supply of State Project Water may be reduced by 80 percent and multiple dry years by 60 percent of the normal supply amount.

The City can also produce groundwater from the Fillmore Basin from wells that will be located on the East Area 1 Specific Plan property. The City can rely on overlying or appropriative rights associated with that portion of the property that overlies the Fillmore Basin, as discussed previously. Because the Fillmore Basin has surplus yield available for extraction, as evidenced by groundwater levels that are near historic highs, this groundwater supply will provide a reliable supply for the project.

Water supply scenarios are outlined for current and buildout conditions in **Table 6, Current Water Supply and Demand (2005)**, and **Table 7, Buildout Water Supply and Demand (2030)**, to illustrate the potential impacts to the City's sources of water supply during normal, single dry, and multiple dry years.

Table 6
Current Water Supply and Demand (2005)

	Normal Supply (AFY)	Single Dry Year (AFY)	Multiple Dry Years		
			Year 1 (2006) (AFY)	Year 2 (2007) (AFY)	Year 3 (2008) (AFY)
Supply					
Existing Supplies					
City wells within the Santa Paula Basin	5,412	5,412	5,412	5,412	5,412
Santa Paula Creek Surface Water	500	500	500	500	500
Subtotal	5,912	5,912	5,912	5,912	5,912
Potential Supplies					
Santa Paula Basin Groundwater Allocation Transfers	780	780	780	780	780
Purchased Groundwater Allocations	497	497	497	497	497
State Project Water	1,099[1]	211	422	422	422
Recycled Water	0	0	0	0	0
Santa Paula Basin East Area 1[2]	1145.3	1145.3	1145.3	1145.3	1145.3
Subtotal	3,521.3	2,633.3	2,844.3	2,844.3	2,844.3
Total Supply	**9,433.3**	**8,545.3**	**8,756.3**	**8,756.3**	**8,756.3**
Demand					
City of Santa Paula	5,102	5,102	5,102	5,102	5,102
East Area 1 Specific Plan[3]	1,174.7	1,174.7	1,174.7	1,174.7	1,174.7
Total Demand	**6,276.7**	**6,276.7**	**6,276.7**	**6,276.7**	**6,276.7**
Net Surplus	**3,156.6**	**2,268.6**	**2,479.6**	**2,479.6**	**2,479.6**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-9. Modified to include Fillmore Basin and other allocations for Santa Paula Basin rights-holders supplies.

[1] *The City of Santa Paula has designated rights to 2,198 AFY of State Project water by UWCD; this estimate provides for 50percent that total which is within the 67 percent allocation reduction implemented by recent court order.*

[2] *Not used.*

[3] *Potential demand for the East Area 1 Specific Plan utilize the projections at 132 gpd per capita as provided on Table 8.*

[4] *It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.*

The City will have sufficient water supplies to meet the anticipated demand during normal, single dry, and multiple dry years for the current and buildout scenarios, assuming the potential water supplies are secured by the City. This analysis underscores the importance of securing additional sources of water supply for the City and highlights the potential benefit of recycled water use for common area irrigation.

Table 7
Buildout Water Supply and Demand (2030)

	Normal Supply (AFY)	Single Dry Year (AFY)	Multiple Dry Years		
			Year 1 (AFY)	Year 2 (AFY)	Year 3 (AFY)
Supplies					
Existing Supplies					
Groundwater Allocation	5,412	5,412	5,412	5,412	5,412
Santa Paula Creek Surface Water	500	500	500	500	500
Subtotal	**5,912**	**5,912**	**5,912**	**5,912**	**5,912**
Other Potential Supplies					
Santa Paula Basin Groundwater Allocation Transfers	780	780	780	780	780
Purchased Groundwater Allocations	497	497	497	497	497
State Project Water	1,099[1]	211	422	422	422
Recycled Water	1,622	1,622	1,622	1,622	1,622
Santa Paula Basin East Area 1[2]	1174.7	1174.7	1174.7	1174.7	1174.7
Subtotal	**5,172.7**	**4,284.7**	**4,495.7**	**4,495.7**	**4,495.7**
Total Supply	**11,084.7**	**10,196.7**	**10,407.7**	**10,407.7**	**10,407.7**
Demand					
City of Santa Paula	8,971	8,971	8,971	8,971	8,971
East Area 1 Specific Plan[1]	1,174.7	1,174.7	1,174.7	1,174.7	1,174.7
Total Demand	**10,145.7**	**10,145.7**	**10,145.7**	**10,145.7**	**10,145.7**
Net Surplus	**939.0**	**51.0**	**262.0**	**262.0**	**262.0**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-9. Estimates for groundwater allocation transfers and purchased groundwater are based on the low estimates provided in the UWMP. Modified to include Fillmore Basin and other allocations for Santa Paula Basin rights-holders supplies.

[1] *The City of Santa Paula has designated rights to 2,198 AFY of State Project water by UWCD; this estimate provides for 50percent that total which is within the 67 percent allocation reduction implemented by recent court order.*

[2] *Potential supplies and demand for the East Area 1 Specific Plan utilize the projections at 132 gpd per capita as provided on Table 8.*

[3] *It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.*

3.7 WATER SUPPLY RELIABILITY

The Urban Water Management Planning Act requires urban water suppliers to assess water supply reliability and vulnerability to seasonal and climatic shortage. Reliability is a measure of a water service system's anticipated success in managing water shortages. This assessment must include a comparison of the total projected water demand with the supply available for the following conditions: (1) normal/average water year, (2) single dry water year, and (3) three consecutive dry years.

Costs of demand management or supply augmentation options to reduce the frequency and severity of shortages are now high enough that city planners must look more carefully at the costs of unreliability to make the best possible estimate of the net benefit of taking specific actions, hence the term "reliability planning." To plan for long-term water supply reliability, planners examine an increasingly wide array of supply augmentation and demand reduction options to determine the best courses of action for meeting water service needs. Such options are generally evaluated using the water service reliability planning approach. Reliability planning requires information about the following: (1) expected frequency and severity of shortages, (2) how additional water management measures are likely to affect the frequency and severity of shortages, and (3) how available contingency measures can reduce the impact of shortages when they occur.

In compliance with the Urban Water Management Planning Act, an assessment was developed to determine the City's water supply reliability. Results for the assessment for each of these three conditions are described below. In addition, the City is required to assess water supply and demand over the next 20 years in 5-year increments.

3.7.1 Current Assessment

The City's existing and potential water supplies and current and future water demand are summarized in **Table 3**. For 2005, the City had 7,057 AF of supply available via groundwater and surface water allocations. The 2005 UWMP Update assessment indicates that the City would have a net surplus of 810 AFY.[61] For the single dry year assessment, the City had 5,912 AF of supply available via groundwater and surface water allocations. This assessment indicates that the City would have a net surplus of 4,735.6 AFY when considering current City and East Area 1 demand, and East Area 1 supplies. The years 2006 to 2008 were used for the three consecutive dry years assessment. This assessment indicates that the City would have net surplus of 4,101.6 AFY in Year 1, 4,101.6 AFY in Year 2, and 4,101.6 AFY in Year 3. Thus, no deficit was observed during the assessment of current supplies and demand (per **Table 6**).

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61 City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, p. 12 and Table 3-5.

3.7.2 Assessments for Years 2010 to 2030

The City is required to assess water supply and demand over the next 20 years in 5-year increments. Conservative assumptions were utilized concerning future water demand. The City's 2005 UWMP Update provides these assessments and is incorporated by reference in this WSA.[62] This assessment assumed no demand reduction due to water conservation programs although these programs may yield significant demand savings. Conservative assumptions were also utilized concerning availability of future supplies. No decrease in availability of groundwater supplies is anticipated through the year 2030. Future supply programs (i.e., purchase/transfer of groundwater allocation credits, SWP water, recycled water) are anticipated to be developed starting in 2010, and fully developed by 2025, to address future demand. SWP water was estimated to include 20 percent of normal supply in the single dry year calculation and 40 percent of normal supply in each multiple year assessment. However, the City anticipates that groundwater will be the primary source of supply to meet future demand.

Results of 2010 Analysis

Year 2010 supplies and demand were used for the average/normal year and single dry year calculations. Years 2006 to 2010 supplies and demand were used for the multiple dry years calculations. Estimated supply surplus ranged from 866 AF for 2006 in the multiple dry year calculation to 1,006 AF for the single dry year calculation.

Results of 2015 Analysis

Year 2015 supplies and demand were used for the average/normal year and single dry year calculations. Years 2010 to 2015 supplies and demand were used for the multiple dry years calculations. Estimated supply surplus ranged from 1,025 AF for 2011 in the multiple dry year calculations to 1,101 AF for the single dry year calculation.

Results of 2020 Analysis

Year 2020 supplies and demand were used for the average/normal year and single dry year calculations. Years 2016 to 2020 supplies and demand were used for the multiple dry years calculations. Estimated supply surplus ranged from 1,164 AF for 2016 in the multiple dry year calculation to 1,353 AF for 2019 in the multiple dry year calculations.

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62 City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, pp. 26 to 28.

Results of 2025 Analysis

Year 2025 supplies and demand were used for the average/normal year and single dry year calculations. Years 2021 to 2025 supplies and demand were used for the multiple dry year calculations. Estimated supply surplus ranged from 1,307 AF for year 2021 in the multiple dry year calculation to 1,398 for 2025 in the multiple dry year calculation.

2026 to 2030 Analysis

Supplies and demand for the period of 2026 to 2030 can be extrapolated by projecting the future demand for the 2010 to 2025 period for this period. Estimated supply surplus ranged from 1,454 AF for year 2026 in the multiple dry year calculation to 1,528 for 2030 in the multiple dry year calculation.

4.0 WATER SHORTAGE CONTINGENCY PLAN

In accordance with the requirements of SB 221, the following section summarizes the City's plan to respond to water shortage emergencies so that water demands are met promptly and equitably.

4.1 INTRODUCTION

The City has several options for meeting future water demands, including increased deliveries of local groundwater, increased deliveries of imported water, evaluating recycled water, and supporting water demand management programs. This has allowed the City, to date, to meet demands in spite of the prior drought conditions. Water shortages can be triggered by a hydrologic limitation in supply (i.e., a prolonged period of below-normal precipitation and runoff), limitations or failure of supply and treatment infrastructure, or both. Hydrologic or drought limitations tend to develop and abate more slowly, whereas infrastructure failure tends to happen quickly and relatively unpredictably.

Drought periods going back to 1929 have caused pumping levels to decrease, however there never has been a necessity to implement mandatory restrictions of water use. More efficient use of water was encouraged during the 1976 to 1977 period. An even greater awareness of water conservation occurred during the 1987 to 1992 drought. This increased awareness resulted in more efficient use of water.

Additional supply reductions could be caused by regional power outage, terrorist activity, earthquake, tsunami or other significant meteorological event. The City prepared an Emergency Response Plan (2004) which provides details of emergency responses for numerous significant events that may affect the City's water system.

4.2 REDUCTIONS IN SANTA PAULA BASIN PRODUCTION REQUIRED BY THE STIPULATED JUDGMENT

According to the Judgment if it is found that the safe yield of the Santa Paula Basin is less than the total pumping allocations, then the pumping allocations shall be reduced. The Judgment specified that reductions in pumping will be required in the order of priority specified below:

- **Stage 1** – All uses in excess of the pumping allocations will be cut back to the approved allocations.
- **Stage 2** – Cumulative pumping allocation of the Santa Paula Basin Pumpers Association (SPBPA) will be reduced by 500 AF annually. This reduction will reflect reasonable conservation that can be achieved. The SPBPA will determine how a reduction in its cumulative allocation will be implemented.

- **Stage 3** – Pumping allocation of the City of San Buenaventura shall be reduced to 1,141 AF per year. This allocation reflects the City of San Buenaventura's historical maximum annual production prior to the Judgment.
- **Stage 4** – The remaining pumping allocations of all parties to the Judgment will be further reduced simultaneously. The SPBPA will reduce their total annual allocations by 2,000 AF. The City of San Buenaventura will reduce their total annual allocations by 500 AF.
- **Stage 5** – The City of San Buenaventura will cease pumping from the Santa Paula Basin.
- **Stage 6** – The remaining pumping allocations of the SPBPA will be reduced by the amount required to bring production into balance with the revised safe yield of the Santa Paula Basin.

4.3 MANDATORY PROHIBITIONS ON WATER WASTING

Water "waste" can be defined as any excessive, unnecessary or unwarranted use of water, including, but not limited to, any use that causes unnecessary runoff beyond the boundaries of any property as served by its meter and any failure to repair as soon as reasonably possible any leak or rupture in any water pipes, faucets, valves, plumbing fixtures, or other water service appliances.

4.3.2 County of Ventura

All cities and water purveyors within the County of Ventura were requested to adopt, by March 31, 1991, drought water conservation plans and regulations consistent with the use restrictions listed below. (Note: Each of the following restrictions has certain exemptions where appropriate.)

- Lawn watering and landscape irrigation with potable water is only permitted between the hours of 4 PM to 6 AM
- Irrigation with recycled water permitted on any day at any time
- Washing of buildings, facilities, equipment, autos, trucks, trailers, boats, airplane and other types of mobile equipment is prohibited
- Water shall not be used to wash down sidewalks, driveways, parking areas, tennis courts, patios, or other paved areas
- Water shall not be allowed to run off landscaped areas onto streets or sidewalks due to poorly maintained sprinklers or excessive watering
- Filling and refilling of pools and spas should only be permitted between the hours of 6 PM and 6 AM
- Using recycled water in ponds, fountains, artificial lakes should be encouraged
- Flushing of water mains will not be permitted

- Restaurants shall not serve water to their customers unless specifically requested
- Leaks should be repaired as soon as discovered and shall not be allowed to continue for more than 48 hours

4.3.3 City Ordinance

City Municipal Code (Section 52.038) states, "No person shall [un]lawfully or neglectfully waste water in any manner whatsoever. Continued wasting of water after mailing of [City] notice by registered mail to the customer of record at the mailing address of record by the [City] Director may result in discontinued water service." This Code is a beneficial tool to curb misuse and waste of potable water within the City. The provisions of the Code can be utilized during periods of normal water supply and supply deficiency. Violation of this Code is subject to City penalties.

4.4 PROPOSED WATER DEMAND REDUCTION PROGRAM

The City is establishing a water demand reduction program for worst-case planning purposes. The City is establishing a three-stage water demand reduction program. Stage 1 would impose a voluntary 15 percent water demand reduction goal, Stage 2 would impose an additional 15 percent mandatory reduction goal (total of 30 percent), and Stage 3 would impose an additional 20 percent mandatory reduction goal, for an overall reduction in water demand of 50 percent. Each stage would be implemented as needed based on actual or anticipated supply reductions. Proposed specific water demand reduction measures and triggering mechanisms for each stage are presented below.

4.4.1 Stage 1: 15 Percent Voluntary Reduction – Supply Watch

Stage 1 would be implemented when 5 to 15 percent reduction in water production capacity (or supplies) occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or other event. All restrictions during Stage 1 are voluntary. The goal for Stage 1 is 15 percent reduction in water demand. Measures to be implemented during this stage include but are not limited to the following:

- City to communicate to the customers through press releases, brochures, mail-outs, and/or water bills the need to voluntarily conserve water and the many ways possible to conserve without affecting their overall lifestyles.
- Water customers requested to voluntarily limit the irrigation of landscaped areas.
- Water customers requested to voluntary limit non-essential water use. Non-essential water used defined as:
  - Use of water to wash any motor vehicle, motorbike, airplane, or other vehicle.

- Use of water to wash down sidewalks, walkways, driveways, parking lots, tennis courts, or other hard-surfaced areas.
- Use of water to wash down buildings or structures for purposes other than immediate fire protection.
- Flushing gutters or permitting water to run or accumulate in any gutter or street.
- Use of water to fill, refill, or add to any outdoor or indoor swimming pools, or Jacuzzi-type pools.
- Use of water in a fountain or pond for aesthetic or scenic purposes except where necessary to support aquatic life.
- Failure to repair a controllable leak within a reasonable period after having been given notice directing the repair of such leak.

4.4.2 Stage 2: 30 Percent Mandatory Reduction – Supply Warning

Stage 2 would be implemented when a 15 to 30 percent reduction in water production capacity occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or other event. All restrictions in Stage 2 are mandatory. The goal for Stage 2 is 30 percent reduction in water demand. Measures to be implemented during this stage include but are not limited to the following:

- Continue to maintain Stage 1 measures; however, they become mandatory in Stage 2.
- City to mail information to water customers regarding the importance of significant water use reductions.
- Implement a 30 percent decrease in water allocation based on a yearly average for metered services. For those users who exceed their allocation, impose a 25 percent penalty for the excess volume. Charge an additional $25 "excess user" fee and install a flow restrictor for repeat offenders of excessive use.
- Enforce the non-essential water use discussed in Stage 1 and assess a $25 fee to offenders.
- Irrigation shall be by means of hand-held hoses, hand-held buckets, soaker hoses, or drip irrigation only. The use if hose-end sprinklers or permanently installed automatic sprinkler systems are prohibited at all times.
- Prohibit watering landscape between 10 AM to 4 PM.
- All restaurants are prohibited from serving water to patrons except upon request of the patron.
- Appoint a Water Conservation Coordinator. This can be an individual already working for the City with related duties.

4.4.3 Stage 3: 50 Percent Mandatory Reduction – Supply Emergency

Stage 3 would be implemented when a 30 to 50 percent reduction in water production capacity occurs or is anticipated. This reduction could be due to fire, earthquake, system failures, water quality contamination, or other event. The goal for this stage is 50 percent reduction in water demand. Measures to be implemented during this stage include but are not limited to the following:

- Perform an evaluation of Stage 2 water conservation measures and implement those not completed. Public Works Director to report to the City Council as appropriate.
- Implement a 50 percent decrease in water allocations for metered water services and charge a $50 "excess user" fee for repeat offenders.
- Prohibit watering landscape between 8 AM to 6 PM.
- All water use not required for health and safety is prohibited.

5.0 WATER DEMAND AND FACILITIES

5.1 WATER DEMAND

In order to estimate water demand for the Specific Plan, the generation rates provided in the City's 2005 Urban Water Management Plan (UWMP) were utilized. The 2005 UWMP provides estimates for future water demand related to potential development of 8,536 AFY.[63]

The 2005 UWMP provides rates for estimating future demand by per capita, commercial, industrial, parks and recreation, golf course, and schools. For the used proposed in the East Area 1 Specific Plan the following is provided:

5.1.1 Per Capita Demand[64]

The City conducted a study (City, 2005a) in 2004 that estimated per capita water demand based on sampling (data logging) actual current water demands for 12 residences for a period of two weeks in late summer. Conclusions of the analysis indicated that the estimated per capita water demand rate was 132 gpd per capita for existing residential customers. The study also concluded that future residential per capita demand will be 102 gpd per capita within the Fagan Canyon development. This reduced per capita water demand will result from the use of high efficiency clothes washing machines, ultra low-flow toilets, low-flow showerheads, and evapotranspiration sensor based irrigation controllers (City, 2005a). These water conservation measures will be required for all Fagan Canyon development projects, and will be considered by the City on a case by case basis for other new developments.

Concern has been expressed the future demand rates identified by the City of Santa Paula in the 2005 UWMP may underestimate actual future demand. Other UWMPs for Ventura County, such as the City of Ventura, located in a similar climate and slightly west of Santa Paula, has a per capita water use through 2004 of 0.18 AFY (or approximately 160 gpd).[65] Additionally, the City of Santa Paula Potable Water Master Plan uses 163 gpd for per capita estimates.[66]

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63 City of Santa Paula, Final Report, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-5, p. 13.

64 Ibid, p. 14.

65 City of San Buenaventura, Urban Water Management Plan, December 2005.

66 City of Santa Paula, Potable Water Master Plan, prepared by Boyle Engineering Corporation, October 2005.

5.1.2 Commercial Demand[67]

Average demand for commercial areas will be 15.10 gallons per square foot per year or 2.03 AFY per acre developed according to the City's General Plan (1998a). Anticipated future commercial developments include the potential for 37 AFY of additional water demand.

5.1.3 Parks and Recreation Demand[68]

Average demand rate is 2.22 AFY per acre according to the City's General Plan (City, 1998a). Anticipated future parks and recreation developments include the potential for 410 AFY of additional water demand.

5.1.4 Schools[69]

Average demand rate for the City's existing schools is 1.81 AFY per acre according to the City's General Plan (City, 1998a). Anticipated future schools include the potential for 56 AFY of additional water demand.

These demand rates were used to calculate the project water demand for the East Area 1 Specific Plan. For residential demand, the estimated future demand has been estimated using the 132 gpd noted in the 2005.[70]

The annual average water demand for the East Area 1 Specific Plan is estimated to be approximately 1,174.7 AFY (see **Table 8, Annual Average Water Demand at Buildout Using 132 gpd per Capita (2020)**).

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67 City of Santa Paula, Final Report, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-5, p. 13.

68 Ibid, Table 3-5, p. 14.

69 Ibid, p. 15.

70 Ibid, p. 14.

Table 8
Annual Average Water Demand at Buildout Using 132 gpd per Capita (2020)

Land Use	Total Units	Area (acres)	Demand Rates[1]	Annual Demand (AFY)	Demand from Santa Paula Basin (AFY)	Demand from Fillmore Basin (AFY)
Potable Water Consumption						
Residential[(2)]	**1500 units**					
Single Family Attached	266 units		132 gpd per person	147.5	95.9	51.6
Single Family Detached	607 units		132 gpd per person	314.1	133.0	181.1
Multifamily	627 units[4]		132 gpd per person	324.5	324.5	0.0
Light Industrial	**150,000 sq. ft.**		**2.49/sq. ft./yr**	**1.1**	**1.1**	**0.0**
Commercial	**285,000 sq. ft.[5]**		**15.10g/sq. ft./yr**	**13.2**	**13.2**	**0.0**
Civic/Institutional						
Elementary School		10.8	1.81 AFY per acre	19.5	8.7	10.8
High School		8.3	1.81 AFY per acre	15.0	15.0	0.0
Community College		11.6	1.81 AFY per acre	21.0	21.0	0.0
Civic Facilities		5.6	1,81 AFY	10.1	10.1	0.0
Subtotal Potable Water Demand				**866.0**	**622.5**	**243.5**
Other Water Consumption						
Shared Athletic Fields		23.2	2.22 AFY per acre	51.5	51.5	0.0
Open Space: Parks/Greenways		65.8	2.22 AFY per acre	146.1	114.5	31.6
Open Space: Agriculture Preserve						
Irrigated Orchards		55.0	2.02 AFY per acre[(3)]	111.1	65.5	45.6
Non-irrigated areas		79.4	No water use	0.0	0.0	0.0
Subtotal Other Water Consumption				**308.7**	**231.5**	**77.2**
Total Water Demand				**1,174.7**	**854.0**	**320.7**

Source: Impact Sciences, 2007.

[1] *Demand rates per 2005 Urban Water Master Plan, 2006 and utilize 132 gpd per person.*

[2] *Demand is estimated at 3.75 residents per dwelling for Single Family Attached units, and 3.50 residents per dwelling in both Single Family Detached and Multifamily units.*

[3] *Estimate of water demand for agricultural uses is based on actual use over last five years required to irrigated 336 acres of land under production (816.3 AFY/ 405 acres = 2.02 AFY per acre).*

[4] *The 627 multi-family units include 70 work/live units.*

[5] *The commercial uses include 100 assisted living units.*

5.2 WATER CONSERVATION MEASURES

The City of Santa Paula has implemented water conservation measures to ensure that customers use water efficiently and that negligent use will have appropriate consequences. Water conservation policies are described in the 2005 Urban Water Management Plan.

Below is a partial list of current adopted water conservation policies:

- Water survey programs for single-family residential and multi-family residential customers
- Metering with commodity rates for all new connections
- Large landscape conservation programs and incentives
- Conservation programs for commercial, industrial, and institutional accounts
- Wholesale agency assistance programs
- Conservation pricing

The combined effect of these policies places responsibility for water conservation on both the developer and the City. However, because the City has not yet adopted a water conservation program that currently applies throughout the City, water conservation savings have not been applied to demand estimates in this report.

The Fagan Canyon applicant conducted a study (in 2004 that estimated per capita water demand based on sampling (data logging) actual current water demands for 12 residences for a period of two weeks in late summer. [71] Conclusions of the analysis indicated that the estimated per capita water demand rate was 132 gpd for existing residential customers. The study also concluded that future residential per capita demand will be 102 gpd within the Fagan Canyon development. This reduced per capita water demand will result from the use of high-efficiency clothes-washing machines, ultra low-flow toilets, low-flow showerheads, and evapotranspiration sensor based irrigation controllers. These water conservation measures will be required for all Fagan Canyon development projects, and will be considered by the City on a case-by-case basis for other new developments.

To address concerns about which per capita demand rates should be used, an estimate using the 163 gpd per capita was completed. At this demand rate, the amount of water that the East Area 1 Specific Plan

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[71] City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, p. 14.

would need would be 1,359.2 AFY as shown in **Table 9, Annual Average Water Demand at Buildout Using 163 gpd per Capita (2020).**

Table 9
Annual Average Water Demand at Buildout Using 163 gpd per Capita (2020)

Land Use	Total Units	Area (acres)	Demand Rates	Annual Demand (AFY)	Demand from Santa Paula Basin (AFY)	Demand from Fillmore Basin (AFY)
Potable Water Consumption						
Residential[1]	**1500 units**					
Single Family Attached	266 units		163 gpd per person	182.1	118.4	63.7
Single Family Detached	607 units		163 gpd per person	387.8	164.2	223.6
Multifamily	627 units[4]		163 gpd per person	400.7	400.7	0.0
Light Industrial	**150,000 sq. ft.**		**2.49/sq. ft./yr**	**1.1**	**1.1**	**0.0**
Commercial	**285,000 sq. ft.**[5]		**15.10g/sq. ft./yr**	**13.2**	**13.2**	**0.0**
Civic/Institutional						
Elementary School		10.8	1.81 AFY per acre	19.5	8.7	10.8
High School		8.3	1.81 AFY per acre	15.0	15.0	0.0
Community College		11.6	1.81 AFY per acre	21.0	21.0	0.0
Civic Facilities		5.6	1,81 AFY	10.1	10.1	0.0
Subtotal Potable Water Demand				**1,050.5**	**752.4**	**298.1**
Other Water Consumption						
Shared Athletic Fields		23.2	2.22 AFY per acre	51.5	51.5	0.0
Open Space: Parks/Greenways		65.8	2.22 AFY per acre	146.1	114.5	31.6
Open Space: Agriculture Preserve						
Irrigated Orchards		55.0	2.02 AFY per acre[2]	111.1	65.5	45.6
Non-irrigated areas		79.4	No water use	0.0	0.0	0.0
Subtotal Other Water Consumption				**308.7**	**231.5**	**77.2**
Total Water Demand				**1,359.2**	**983.9**	**375.3**

Source: Impact Sciences, 2007.

[1] *Demand is estimated at 3.75 residents per dwelling for Single Family Attached units, and 3.50 residents per dwelling in both Single Family Detached and Multifamily units.*

[2] *Estimate of water demand for agricultural uses is based on actual use over last five years required to irrigated 336 acres of land under production (816.3 AFY/ 405 acres = 2.02 AFY per acre).*

[4] *The 627 multi-family units include 70 work/live units.*

[5] *The commercial uses include 100 assisted living units.*

6.0 EXISTING WATER USE

Approximately 405 acres of the East Area 1 Specific Plan site is under cultivation for a variety of crops, including avocado and lemon orchards.[72] Over the last six years, the water required to meet production needs has averaged 816.3 AFY; this has resulted in an annual average water demand of 2.02 AFY per acre. The balance of the Specific Plan site is upland areas and is not irrigated.

Water supply for irrigation on the project site has been historically supplied from on-site wells that overlie the Santa Paula and Fillmore Basins. The water table underlying the subject property is at a depth of approximately 20 to 40 feet.[73,74] The groundwater production has occurred at three on-site water wells as shown on **Figure 7, Well Locations**.

Well No. 4 (3N/21W-2R2) was drilled in 1968 and is located near the existing barn; well No. 6 (3N/21W-1N2), drilled in 1988, is located north of the farm structures. These wells supply water for both domestic consumption and agriculture irrigation uses. At the time each these wells were drilled, they were capable of 1,200 gpm and 2,500 gpm, respectively. Well No. 6 has withdrawn groundwater from the Fillmore basin and has averaged 329 AFY per year for the seven-year period ending 2005. [75] A third well (3N/21W-11AO1) is located on the Newsom Ranch property; the drilling of the well was completed on February 18, 1969, and it is an agricultural irrigation well.[76] Wells that serve residential structures are mandated by the County to conduct a performance test on the well to ensure enough water would be sourced to the residential structures. This particular well (3N/21W-11AO1) is an agricultural irrigation well; pumping capabilities for irrigation wells are not recorded by the County of Ventura. This well has averaged 122 AFY production for the past six years; Well No. 4 and the well on the Newsom property have withdrawn water from the Santa Paula Basin.[77]

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72 Impact Sciences, Agricultural Resources Study for the Proposed East Area 1 Specific Plan Project, Santa Paula, California, June 2007.

73 Leighton and Associates, Inc. Preliminary Geotechnical Investigation Report, Proposed Mixed Use Development, Limoneira – East Area 1, Santa Paula, California, Unincorporated Ventura County, California, January 23, 2007, p. 14.

74 Phase I Environmental Site Assessment and Limited Phase II Assessment, Limoneira and Newsom Ranches, Ventura County, California, January 18, 2007.

75 United Water Conservation District, 2005 Annual Basin Report - Fillmore Basin.

76 Telephone correspondence with Ms. Barbara Council, County of Ventura, Water Resources Division September 10, 2007.

77 Personnel communication from Frank Brommenschenkel to Joe Gibson dated February 14, 2007.

SOURCE: Well Location: Ventura County Public Works - January 2008, Settlement Boundary: Stipulated Judgement for Santa Paula Basin - March 1996

FIGURE 7

Well Locations

831-001-01/08

The Limoneira Company has a total allocation of groundwater rights within the Santa Paula Basin under the Judgment of 3,173 AFY and the Newsom Ranch has an allocation of 138.1 AFY. Approximately 1,145 AFY of the total 3,173 AFY for the Limoneira Company is available for use on the project site; all of the 138.1 AFY allocation for the Newsom family Trust is available per the judgment the Newsom Ranch property on site. Demand for the project site has averaged 816.3 AFY for a six year period 2000 through 2005 and ranged from a low of 732 AFY to a high of 942 AFY as shown in **Table 10, Historic Water Demand for East Area 1 Specific Plan Property**.

Table 10
Historic Water Demand for East Area 1 Specific Plan Property

Location	Production (AFY) by Year						Six-Year Total (AF)	Six-Year Average (AFY)
	2000	2001	2002	2003	2004	2005		
Limoneira property	817	636	817	632	679	641	4222	703.7
Newsom Ranch	115	113	125	100	109	114	676	112.7
Total for East Area 1	932	749	942	732	788	755	4898	816.3

Source: Personnel communication from Frank Brommenschenkel to Joe Gibson dated February 13, 2007 and February 14, 2007.

7.0 PROJECT IMPACTS

7.1 PROJECT DEMAND ESTIMATES

The East Area 1 Specific Plan includes an approximately 501-acre development planned for the east side of the City of Santa Paula. This development will include a variety of residential uses, commercial uses, light industrial use, civic/institutional uses (i.e., schools, parks, and other recreational land uses), and open space. Development of the project is assumed to begin in 2010 and be built in phases over a 10-year period with buildout in 2020.

Table 11, Water Supply and Demand at Buildout (2020), lists specifics of water consumption for the Specific Plan after consideration is given to the use of recycled water from the wastewater treatment plant to meet the demand for non-potable water. As indicated, the total water demand for the Specific Plan ranges from approximately 1,174.7AFY to 1,359.2 AFY in average years.

Table 11
Water Supply and Demand at Buildout (2020)

Use and Demand	Anticipated Demand (Using 132 gpd per capita)	Anticipated Demand (Using 163 gpd per capita)
Specific Plan Water Demand		
Domestic Demand	866.0	1,050.6
Shared Athletic Fields	51.5	51.5
Open Space: Parks/Greenways	146.1	146.1
Agricultural Preserve	111.1	111.1
Total Demand Proposed Project	**1,174.7**	**1,359.2**
Existing Site Demand (Average for last five years)	816.3	816.3
Proposed Net Water Demand (Total Proposed less Existing Demand)	358.4	542.9
Recycled Water Available to Meet Non-potable Demand	308.7	308.7
Total Consumptive Use Change (Proposed Net less Recycled Demand)	**49.7**	**234.2**

Source: Impact Sciences, 2007.

The amount of non-potable water that could be used in the future from the City's proposed WRF to irrigate open areas on the Specific Plan site is approximately 308.7 AFY. Based on the anticipated demand evaluation shown in **Table 11**, the Specific Plan net consumptive use (potable water demand) with use of recycled water for open space and park irrigation would increase by 49.7 AFY to 234.2 AFY.

The project does not require or need recycled water to ensure an adequate water supply. The Limoneira Company and the Newsom Family Trust have sufficient Santa Paula Basin groundwater allocations under the Judgment available to transfer to the City, and overlying and/or appropriative rights to the Fillmore Basin, to adequately serve the project without the need for recycled water for non-potable water demands. However, as indicated in the City's UWMP, recycled water will increase the City's availability of supplies as well as increase the reliability of supplies.

It is understood that the City will need to develop a conveyance system (a recycled water system conveyance plan showing where recycled mains will be built) to provide recycled water to supply recycled water to the East Area 1 project. The project does not include any off-site water line improvements to connect the site to the plant to convey recycled water to the site (nor does it need to in order to provide adequate water supplies). The project does include, as described in the East Area 1 Recycled Water Master Plan, an on-site recycled water distribution system. This will allow the project to use recycled water when the City extends a recycled water line to the site and the plant is producing sufficient recycled water to supply the site.

In summary, the project does not need or assume recycled water will be provided by any certain date. Rather, the project allows for recycled water to be used when the City can provide it. The worst-case impact then is that potable water from the Santa Paula Basin will be used to satisfy the project's water demands. As discussed herein, there is sufficient groundwater supply available from these basins to supply the project's demands without the use of recycled water. Future recycled water deliveries to the Specific Plan site would free the potable water supplies for alternate uses.

7.2 NORMAL, SINGLE DRY, AND MULTIPLE DRY YEAR WATER SUPPLY

Currently, the entire potable water supply for the City is obtained by pumping from the Santa Paula Basin. The City has obtained additional groundwater pumping rights through a wheeling agreement with the Canyon Irrigation Company. Potential future water supplies include transfers of Santa Paula Basin groundwater rights to the City as new development occurs, City acquisition of potentially available groundwater allocations, State Project Water, and recycled water.

the potential sources of groundwater for the East Area 1 Specific Plan (the Santa Paula Basin) include substantial reserves of groundwater in storage. (See previous discussion.) Thus, so long as groundwater production does not exceed the long-term supply of recharge to the respective basins, these basins will remain a reliable source of water for the City and all of its demands, including the project, during normal, single dry, and multiple dry years.

Recycled water production will not be affected by single dry or multiple dry water years. Recycled water supply is directly related to wastewater generation, which is generally associated with indoor potable water use. Currently, there are no restrictions within the City regarding the use of potable water during dry periods. Additionally, the currently proposed uses of recycled water are restricted to non-potable irrigation uses that, if reduced during dry periods, would have little or no impact on the community. Therefore, it is not anticipated that the recycled water supply will be reduced during dry periods.

State Project Water dry year restrictions are not known due to the lack of specificity regarding how the water will be delivered. For the purposes of this analysis, it is assumed that State Project Water will be subject to dry year reductions similar to those reported in the State of California Department of Water Resources 2002 Delivery Reliability Report. A single dry year supply may be reduced by 80 percent and multiple dry years by 60 percent of the normal supply amount.

Water supply scenarios are outlined for current and buildout conditions in **Table 12, Current Water Supply and Demand (2005), Table 13, Buildout Water Supply and Demand Using 132 gpd per Capita (2030),** and **Table 14, Buildout Water Supply and Demand Using 163 gpd per Capita (2030),** to illustrate the potential impacts to the City's sources of water supply during normal, single dry, and multiple dry years.

The City will have sufficient water supplies to meet the anticipated demand during normal, single dry and multiple dry years.

Table 12
Current Water Supply and Demand (2005)

Water Source	Normal Supply (AFY)	Single Dry Year (AFY)	Multiple Dry Years		
			Year 1 (AFY)	Year 2 (AFY)	Year 3 (AFY)
Existing Supplies					
Santa Paula Basin Groundwater Allocation	5,412	5,412	5,412	5,412	5,412
Santa Paula Creek Surface Water	500	500	500	500	500
Limoneira and Newsom Family Trust Allocations	1,283.1	1,283.1	1,283.1	1,283.1	1,283.1
Fillmore Basin	329.0	329.0	329.0	329.0	329.0
Total Supply	**7,524.1**	**7,524.1**	**7,524.1**	**7,524.1**	**7,524.1**
Existing Demand					
City of Santa Paula	5,102	5,102	5,102	5,102	5,102
East Area 1 site	816.3	816.3	816.3	816.3	816.3
Total Demand	**5,918.3**	**5,918.3**	**5,918.3**	**5,918.3**	**5,918.3**
Net Surplus	**1,605.8**	**1,605.8**	**1,605.8**	**1,605.8**	**1,605.8**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-9. Modified to include Fillmore Basin and other allocations for Santa Paula Basin rights-holders supplies.
It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.

7.3 EAST AREA 1 SPECIFIC PLAN PROJECT WATER SUPPLY

7.3.1 Domestic Water

The City currently has secured rights to 5,912 AFY of groundwater. The annual average water pumped for use within the City service area for the last seven years is 5,102 AFY resulting in a current net surplus of 810 AFY of groundwater rights.[78] This net surplus is not sufficient to meet the estimated water demand from the Santa Paula Basin; the total project water demand estimated from the Santa Paula Basin is estimated to be between 853.6 AFY and 983.5 AFY. Additionally, the amount of water required from the Fillmore Basin is estimated at between 320.7 AFY and 375.3 AFY; it is anticipated that new City wells on the project site will produce between 320.7 AFY and 375.9 AFY to satisfy the project's demands. Sufficient recycled water supply is anticipated to be available to meet the estimated irrigation demand of the project.

The land associated with the project area has rights to 1,283.1 AFY of groundwater allocations a portion of which will be transferred to the City as part of the development process. In accordance with he City of Santa Paula Municipal Code Section 52.021(B), the project applicant will transfer adequate water supplies to meet the estimated water demand for the project.

78 City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, p. 12 and Table 3-5.

Table 13
Buildout Water Supply and Demand Using 132 gpd per Capita (2030)

Water Source	Normal Supply (AFY)	Single Dry Year (AFY)	Multiple Dry Years		
			Year 1 (AFY)	Year 2 (AFY)	(Year 3 (AFY)
					Existing Supplies
Santa Paula Basin Groundwater Allocation	5,412	5,412	5,412	5,412	5,412
Santa Paula Creek Surface Water	500	500	500	500	500
Limoneria and Newsom Family Trust Allocations	1,283.1	1,283.1	1,283.1	1,283.1	1,283.1
Total Existing Supplies	**7,195.1**	**7,195.1**	**7,195.1**	**7,195.1**	**7,195.1**
Potential Future Supplies[1]					
Santa Paula Basin Groundwater Allocation Transfers	774.7	774.7	774.7	774.7	774.7
Purchased Groundwater Allocations	200	200	200	200	200
State Project Water[2]	220	44	88	88	88
Recycled Water[3]	400	400	400	400	400
Total Future Supplies	**1,594.7**	**1,418.7**	**1,456.4**	**1,462.7**	**1,462.7**
Total Supply	**8,789.8**	**8,613.8**	**8,651.5**	**8,657.8**	**8,657.8**
Demand					
Current City Demand	5,961	5,961	5,961	5,961	5,961
East Area 1 Demand	1,174.7	1,174.7	1,174.7	1,174.7	1,174.7
Total Demand	**7,135.7**	**7,135.7**	**7,135.7**	**7,135.7**	**7,135.7**
Net Surplus	**1,654.1**	**1,478.1**	**1,515.8**	**1,522.2**	**1,522.2**

Source: City of Santa Paula, Urban Water Management Plan 2005 Update, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-9 and Impact Sciences, 2007.

Notes:

1 *Estimates for potential future water supplies are based on 2010 estimates from the UWMP. Modified to include Fillmore Basin and other allocations for Santa Paula Basin rights-holders supplies.*

2 *20 percent of normal supply in single dry year and 40 percent of normal supply in multiple dry years.*

3 *Equals estimated recycled water demand within the East Area 1 Specific Plan plus new development above current as specified in the General Plan.*

4 *It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.*

7.3.2 Recycled Water

The project does include, as described in the East Area 1 Recycled Water Master Plan, an on-site recycled water distribution system water to irrigate open space, greenbelt, and park areas. This will allow the project to use recycled water when the city extends a recycled water line to the site and the plant is producing sufficient recycled water to supply the site. The City will need to complete environmental review of the recycled water distribution conveyance system when it is designed and ready to build. As

shown in **Tables 8 and 9**, approximately 197.6 AFY of recycled water would be used to irrigate the shared athletic fields, open space, greenbelt, and park areas proposed. An additional 111.1 AFY of water will be used to maintain the agricultural preserve. This is a total of 308.7 AFY of recycled water. If recycled water were provided, the project would not require 231.1 AFY of water from the Santa Paula Basin or 77.2 AFY of water from the Fillmore Basin to meet irrigation needs.

Table 14
Buildout Water Supply and Demand Using 163 gpd per Captia (2030)

Water Source	Normal Supply (AFY)	Single Dry Year (AFY)	Multiple Dry Years		
			Year 1 (AFY)	Year 2 (AFY)	(Year 3 (AFY)
Existing Supplies					
Santa Paula Basin Groundwater Allocation	5,412	5,412	5,412	5,412	5,412
Santa Paula Creek Surface Water	500	500	500	500	500
Limoneria and Newsom Family Trust Allocations	1,283.1	1,283.1	1,283.1	1,283.1	1,283.1
Total Existing Supplies	**7,195.1**	**7,195.1**	**7,195.1**	**7,195.1**	**7,195.1**
Potential Future Supplies[1]					
Santa Paula Basin Groundwater Allocation Transfers	829.3	829.3	829.3	829.3	829.3
Purchased Groundwater Allocations	200	200	200	200	200
State Project Water[2]	220	44	88	88	88
Recycled Water[3]	400	400	400	400	400
Total Future Supplies	**1,649.3**	**1,473.3**	**1,517.3**	**1,517.3**	**1,517.3**
Total Supply	**8,844.4**	**8,668.4**	**8,712.4**	**8,712.4**	**8,712.4**
Current City Demand	5,102	5,102	5,102	5,102	5,102
East Area 1 Demand	1,359.2	1,359.2	1,359.2	1,359.2	1,359.2
Total Demand	**6,461.2**	**6,461.2**	**6,461.2**	**6,461.2**	**6,461.2**
Net Surplus	**2,383.2**	**2,207.2**	**2,251.2**	**2,251.2**	**2,251.2**

Source: Impact Sciences, 2007

Notes:

1 *Estimates for potential future water supplies are based on 2010 estimates from the UWMP. Modified to include other allocations for Santa Paula Basin rights-holders supplies.*

2 *20 percent of normal supply in single dry year and 40 percent of normal supply in multiple dry years.*

3 *Equals estimated recycled water demand within the East Area 1 Specific Plan plus new development above current as specified in the General Plan.*

4 *It is recognized that "Santa Paula Creek" is a seasonal water source that is based on rainfall and water diverted from Santa Paula Creek.*

It is understood that the City needs to develop a conveyance system (a recycled water system conveyance plan showing where recycled mains will be built) and build them to provide recycled water. The East Area 1 project does not include any off-site water line improvements to connect the site to the plant to convey recycled water to the site (nor does it need to in order to provide adequate water supplies).

7.3.3 Measures to Develop Water Supplies

As required by Section 10911 of the Water Code, the East Area 1 Specific Plan has completed plans to develop and distribute the water required to support the proposed project. Two water supply reports, the Domestic Water Technical Report[79] and Recycled Water Technical Report,[80] have been completed that outline the design for developing and delivering water to the proposed project. These reports describe the necessary improvements to develop the necessary infrastructure to meet the project's estimated water demand.

Estimated capital costs for completing the domestic water system are approximately $6.061 million and will be funded by the project applicant as part of the East Area 1 project.[81]

Ventura County requires all planned wells to be permitted to ensure the work is completed by a licensed drilling contractor, and to make sure an adequate surface seal is installed. The project would need to obtain well permits from the County of Ventura in accordance with County Well Ordinance No. 4184.[82] In Addition, the California Department of Health Services (DHS) will provide an amended operating permit that would include the new wells and would need to be coordinated with during the site selection process.

7.4 GROUNDWATER SUFFICIENCY

According to the UWMP, 100 percent of the City's water supply currently comes from groundwater from the Santa Paula Basin. A portion (between 853.6 AFY and 983.5 AFY) of the East Area 1 Specific Plan project's domestic water demand will be supplied from dedication of additional Santa Paula Basin groundwater production allocation from the Limoneira Company and the Newsom Family Trust to the City. .

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79 Huitt-Zollars, Inc., East Area 1 Domestic Water Technical Report, Santa Paula, California, April 2007.

80 Ibid., East Area 1 Recycled Water Technical Report, Santa Paula, California, April 2007.

81 Ibid., East Area 1 Specific Plan Comparison Cost estimates, June 27, 2007.

82 Ventura County Municipal Code, Division 4 – Public Health Chapter 8 – Water Article 1 – Groundwater Conservation, Ventura County Well Ordinance No. 4181, An Ordinance of the County of Ventura Repealing and Reenacting Ventura County Ordinance Code Section 4811 et seq. Relating to Groundwater Conservation.

The SPBPA and UWCD monitor groundwater pumping within the Santa Paula Basin. While there have been periodic declines in water levels within the Basin, members of the TAC agree that the Basin is not in an overdraft condition and additional yield appears to be feasible with additional pumping from the eastern end of the Basin. The Yield Study's findings also identified additional pumping from the eastern end of the Basin as a means of enhancing total Basin yield.

The City is not limited to its allocation in any single year, but may produce as much as seven times its annual average allocations over a seven-year period. There are no restrictions regarding pumping in single dry or multiple dry water years subject to court order. Groundwater pumping by the City from the Santa Paula Basin is not anticipated to be subject to any reductions in the dry year analysis. This conclusion is based on the results of the Santa Paula Basin Yield Study completed in July 2003, which analyzed two periods—1944 through 1998, and 1983 through 1995.

Groundwater produced from the Fillmore Basin will also be reliable during single dry or multiple dry water years. As discussed earlier, DWR's Bulletin 118 and UWCD's data reveal that the basin's water table remains near historic highs. Further, Bulletin 118 reports that as of 1999, the Ventura County Water Resources section estimated the Fillmore Basin was about 95 percent full with almost 7,000,000 acre-feet of water in storage within the Basin.[83] Thus, there appears to be ample groundwater supplies available within the Fillmore Basin to support the proposed production of groundwater for the portion of the project overlying the Fillmore Basin. Given the substantial groundwater in storage and the basin's high water table, the Fillmore Basin will support this production in single dry or multiple dry water years. The Fillmore Basin is also managed by an AB 3030 plan (*see* Water Code sections 10750 et seq.), which will help to ensure that cumulative demands upon the basin do not exhaust its long-term supply of groundwater.

The City of Santa Paula has been using the Santa Paula Basin as a source of water supply to serve its existing customers. The Limoneira Company and Newsom Family Trust have been using the Santa Paula and Fillmore Basins as a source of water for irrigation and domestic purposes in accordance with their overlying rights and allocation under the Santa Paula Basin Judgment.

The total demand for domestic and non-domestic purposes, between 1,174.7 AFY and 1,359.2 AFY, (1,468 AFY and 1,699 AFY with 25% safe yield) would be greater than the amount of water currently used for agricultural purposes, 816 AFY. However, the project's total demand of between 1,174.7 AFY and 1,359.2 AFY (1,468 AFY and 1,699 AFY) will be, less than the current allocation of groundwater available for this

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83 State of California, Resources Agency, Department of Water Resources, *California Groundwater*, Bulletin 118 Update 2003, October 2003.

site from the Santa Paula Basin (1,283.1 AFY), with the supplement of Santa Paula Groundwater basin water pumping transfer credits.

In accordance with City of Santa Paula Municipal Code, landowners or developers are required to transfer groundwater rights, or pay an in-lieu fee, to the City as a condition of project approval or when property annexed. The East Area 1 Specific Plan Area has a groundwater allocation of 1,283.1 AFY. Upon annexation, the applicants will transfer a portion of this allocation equal to the amount of groundwater needed to serve the project.

Based upon the forgoing analysis, the City of Santa Paula will have sufficient right to extract the necessary 1,174.7 AFY to 1,359.2 AFY (1,468 AFY to 1,699 AFY) from the project site to serve the proposed East Area 1 Specific Plan, based on the parameters of the existing basin management program, the nature of the existing use programs implemented by the City, and the proposed transfer of sufficient quantities of groundwater rights to serve the proposed subdivision without decreasing availability of water supply for its existing customers.

7.5 MITIGATION MEASURES

The following mitigation measures will be implemented:

- The East Area 1 Specific Plan shall require the use of water conservation measures to reduce water demand. These shall include the use of high-efficiency clothes-washing machines, ultra low-flow toilets, low-flow showerheads, and evapotranspiration sensor based irrigation controllers, and other such devices to reduce domestic water consumption.

- The East Area 1 Specific Plan, as a condition of approval, will implement a water use study and monitoring program to determine the actual per capita use for residential users. This water use study and monitoring program will be conducted over a period not more than one calendar year after the completion and occupancy of the Haun Creek Neighborhood (Planning Area "D" on Table 1). This study would include a survey of customer uses that would be available from customer billing records on a monthly basis.

7.6 CONCLUSIONS

Sufficient water supplies exist to support the proposed East Area 1 Specific Plan development based on the following facts:

- The City of Santa Paula has been identified as the public water supplier for the East Area 1 Specific Plan project.

- A portion of the estimated water demand for the East Area 1 Specific Plan project was included in the City of Santa Paula's 2005 UWMP.

- Limoneira Company and the Newsom Family Trust will transfer adequate groundwater rights to meet the proposed East Area 1 Specific Plan demand requirements from existing entitlements.
- The total estimated water demand for the City of Santa Paula and the East Area 1 Specific Plan project at buildout is between 10,145.6 and 10,330.2 AFY (see **Table 5**).
- The East Area 1 Specific Plan project is required to install water conservation measures.
- The East Area 1 Specific Plan will complete a water-use study and monitoring program to determine actual water use.
- The City has identified several potential water supply sources including:
  - Groundwater Allocation Transfers
  - Purchased Groundwater Allocations
  - State Project Water
  - Recycled Water
- The total water supply including existing and potential supply sources is estimated to be between 10,205.7 AFY and 10,389.8 AFY (see **Table 5**).
- Conclusions in the WSA are based on the results of the City's 2005 UWMP, Santa Paula Basin Yield Study completed in July 2003, which analyzed two time periods—1944 through 1998 and 1983 through 1995, DWR's Bulletin 118, 2003 Update, and UWCD's groundwater monitoring data.
- Adoption of a water conservation program by the City would provide additional water supply availability benefits, as would conversion of existing exterior irrigation to recycled water use.
- Existing water supply sources include groundwater from the Santa Paula and Fillmore Basins and a water wheeling agreement with the Canyon Irrigation Company.
- The 2003 Yield Study, DWR's Bulletin 118 (2003 Update), and UWCD's groundwater monitoring data indicate that Santa Paula Basin is not in overdraft.
- DWR's Bulletin 118 (2003 Update) and UWCD's groundwater monitoring data indicate that Fillmore Basin is not in overdraft.

8.0 REFERENCES

City of Santa Paula, *Potable Water Master Plan*, prepared by Boyle Engineering Corporation, October 2005.

City of Santa Paula, *Urban Water Management Plan 2005 Update*, prepared by Kennedy/Jenks Consultants, June 2006, Table 3-5, Potential Development and Estimated Future Water Demand.

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City of San Buenaventura, *Urban Water Management Plan*, December 2005.

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9.0 REPORT PREPARATION

9.1 ORGANIZATIONS AND PERSONS CONSULTED

Impact Sciences, Inc.

Tony Locacciato, Managing Principal
Joe Gibson, Senior Associate
Chris Graham, Staff Environmental Planner

Frank B & Associates, Santa Paula, California

Frank Brommenschenkel, Groundwater Consultant

Hatch & Parent, Santa Barbara, California

Russ McGlothlin, Attorney

United Water Conservation District

Ken Turner

Ventura County Public Works

Glenn Luscombe

10.0 VERIFICATION

This Water Supply Assessment has been prepared by City of Santa Paula and its representative as of the date below. Based upon the analysis set forth within this Water Supply Assessment, the City verifies that there will be sufficient water supplies for the East Area 1 Specific Plan during all hydrologic conditions, including normal, single dry and multiple dry years, for more than 20 years into the future. The undersigned hereby represents that he or she has the authority on behalf of City of Santa Paula to execute and make effective this Verification.

City of Santa Paula by:

_____

Signature

_____

Name and Title

_____

APPENDIX A

Stipulated Judgment

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Special Counsel for City of San Buenaventura,
Defendant and Cross-Complainant

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF VENTURA

UNITED WATER CONSERVATION DISTRICT, Petitioner and Plaintiff, vs. CITY OF SAN BUENAVENTURA and DOES 1 through 1,000, Inclusive, Respondent and Defendant.	CASE NO. 115611 (Complaint filed April 9, 1991) JUDGMENT
LIMONEIRA COMPANY, ALTA MUTUAL WATER CO., et al., Intervenors	
CITY OF SAN BUENAVENTURA, Cross-Complainant, vs. LIMONEIRA COMPANY, ALTA MUTUAL WATER CO., et al., Cross-Defendants.	

RECITALS

(a) Complaint. On or about April 9, 1991, the United Water Conservation District (sometimes "District") filed its Petition for Writ of Mandate and Complaint against the City of San Buenaventura (sometimes "City"). The pleadings alleged a violation of the California Environmental Quality Act with respect to the proposed construction by the City of a new well or wells in the Santa Paula Basin (sometimes "Basin"), the expansion of an existing water conditioning facility, and increased extractions from the City's Saticoy wells. The Complaint further alleged that the Santa Paula Basin was in a condition of overdraft or threatened overdraft, and that the City's proposed production of water therefrom, together with the pumping of others from the Basin, would exceed the safe yield thereof. In its First Amended Petition for Writ of Mandate and Complaint, the District alleged on information and belief that there was no surplus or temporary surplus available in the Basin for appropriation by the City.

(b) Complaint in Intervention. By stipulation and order filed June 18, 1991, pumpers from the Santa Paula Basin were allowed to intervene. By stipulation and order filed February 20, 1996, plaintiffs in intervention were allowed to file a first amended complaint in intervention naming the following Santa Paula Basin pumpers as plaintiff intervenors: Limoneira Company, Alta Mutual Water Company, Inc., Aliso Vista Ranch, Associated Concrete Products, Inc., Farmers Irrigation Company, Inc., Hampton Canyon Ranch, Leavens Ranches, John McConica II, John McGrath & Sons,

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Nichols Associates, Petty & Petty, Robert L. Pinkerton & Sons, Rancho Attilio, Rancho Filoso, J. M. Sharp Company, Southern Pacific Milling, Thermal Belt Mutual Water Company, Inc., Walking Beam Ranches, We 5 Properties, Randall Axell as Trustee of the Dorothy E. Axell Trust, Basso Properties, Billiwhack Ranch, Frank R. Brucker as Trustee of the Frank R. Brucker Trust, Casa De Oro Ranch, Nola Clow as Trustee of the Monte Clow Estate, Gladys Daily Coffman, Paul R. and Irene Cummings & Sons, Flying-D Ranch, Evergreen Ranch AKA San Miguel Products, J. J. & H. H. Finch, Galbreaith Brothers, Inc., Gooding Ranch (John F. Gooding), Eva Gregory as Trustee of the Gregory Family Trust, Elizabeth Broome Grether, Ann B. Priske, John S. Broome Jr. as Trustee of the John S. Broome Jr. Trust, Hadley-Williams Partnership, Regents of the University of California, Headley Property Corporation, La Mesa Partnership #1, Fred Malzacher, John R. McConica et al., John R. McConica II et al., Alice C. Newsom as Trustee of the Newsom Family Trust, Nutwood Farms, Roger Orr as Trustee of the Orr Family Trust, Panamerican Seed, Pear Blossom Town & Country Market, Inc., Wesley Pinkerton Estate, W. B. Pinkerton Limited Partnership, W. J. Pinkerton Estate Ranch #1 & #2, R. F. Robertson as Trustee of the Robertson Family Trust, Santa Paula Basin Pumpers Association, City of Santa Paula, Saticoy Foods Corp., Frank Silva, John Shores Family Partnership, Shozi Brothers, Tri-Leaf Nursery (Bruce Arikawa), Tucker Ranch, William Wallace, James W. Williams III. Intervenors sought an adjudication of water rights in the Santa Paula Basin.

(c) Answers and Cross-Complaint. On or about September 27, 1991, the City of San Buenaventura answered the first amended pleadings of the District and the Complaint in Intervention, and filed a cross-complaint against Intervenors, alleging that the Santa Paula Basin was not then in a condition of overdraft, that surplus or temporary surplus water was available for appropriation, and seeking a declaration of water rights. Subsequently, answers were filed to the City's Cross-Complaint.

(d) Parties. The plaintiff United Water Conservation District is a public agency duly organized and operating under the provisions of Division 21 of the Water Code of the State of California, Sections 74000 through 76501. The defendant City of San Buenaventura is a charter city of the State of California, situated in the County of Ventura, California. Intervenors all pump water from the Santa Paula Basin and include individuals, trusts, partnerships, corporations, mutual water companies, and the City of Santa Paula, a general law city. Intervenors are all members of the Santa Paula Basin Pumpers Association (sometimes "Association" or "SPBPA"), and hereinafter are referred to under those names. The Association shall be included within the meaning of a "party" as used in this Judgment, and all motions on behalf of the Intervenors shall be made by and through the Association, unless an Intervenor makes a request to the Association to bring such a motion and the Association refuses, and provided that this provision shall not be used to involve the City or United in the internal affairs of the Association and its members.

(e) Settlement Negotiations. All of the parties have an interest in the Santa Paula Basin, and in the proper management and protection of both the quantity and quality of this important groundwater supply. The Basin is a significant water resource in the County of Ventura. Members of the Santa Paula Basin Pumpers Association and the City of San Buenaventura exercise rights to pump water from the Basin for reasonable and beneficial uses. The United Water Conservation District does not produce water from the Basin, but the Basin is located within its boundaries and the District is authorized to engage in groundwater management activities and to commence actions to protect the water supplies which are of common benefit to the lands within the District or its inhabitants. Recognizing the need to work together in order to achieve proper basin management and the protection of all uses against overdraft, the parties have joined in extensive technical studies and settlement negotiations. Much engineering, hydrologic and geologic data not previously known have been collected and analyzed by the United Water Conservation District, and verified by the parties. Included therein are estimates of recent pumping from the Basin. The results of these efforts provide the foundation for this Judgment, although all parties recognize that more data and knowledge based upon continued experience and studies are needed. Such data are included in the Engineering Appendix, and made a part hereof.

(f) Assumed Initial Yield. For a period of seven years commencing January 1, 1996, and until modified by the full agreement of the Technical Advisory Committee or by Court order,

the parties have agreed that the assumed initial yield of the Basin shall be considered to be 33,500 acre-feet annually, which corresponds to the maximum amount of recent pumping. This amount, however, does not necessarily represent the safe yield of the Basin on a long term basis. United believes that the additional monitoring and studies called for in Paragraph 4 will show that the safe yield of the Basin is less than this amount. The Association and the City do not necessarily agree with United in this regard. This Judgment represents the beginning of a program of basin management, including the regulation of pumping, which is aimed at meeting the reasonable water supply needs of the parties, including protection for historic users, without harm to the Basin. The Judgment is not a determination of water rights, but represents a complete physical solution under Article X, Section 2 of the California Constitution. All pre-existing water rights to groundwater within the Basin held or claimed by any party are hereby settled and defined in terms of the pumping allocations and obligations provided under this Judgment. The respective allocations for each party are expressly set forth in Paragraph 3, subject to modification as provided herein. Any rights to surface water held by the parties are not affected by this Judgment, including but not limited to those rights held by the City of Santa Paula which were the subject of Santa Paula Water Works, et al. v. Julia Peralta (1896) 113 Cal. 38.

DECREE

IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. Santa Paula Basin. The boundaries and other relevant features of the Santa Paula Basin are shown upon a map attached hereto as Exhibit "A" and made a part hereof. The Santa Paula Basin is a groundwater basin approximately ten miles in length extending from an area east of the City of Santa Paula to the Saticoy area on the west. The width of the Basin varies from 2 to 3.5 miles, and the surface area of the Basin contains approximately 13,000 acres. The Basin is traversed along its southerly boundary by the Santa Clara River which is a principal source of replenishment to the Basin. The Basin is also recharged by percolation from Santa Paula Creek and other minor tributaries, from subsurface inflow from the Fillmore Basin, from precipitation, and from return flows from applied water. The Basin contains two distinct aquifer systems. One consists of relatively shallow, unconfined alluvial deposits associated generally with the floodplain of the Santa Clara River. The other is comprised of deeper, confined aquifer systems within the San Pedro Formation. The deepest part of the Basin is approximately 4,000 feet, and approximately 4,900,000 acre-feet of water are contained in storage. Well depths of existing wells vary to a maximum depth of approximately 1000 feet. While there have been periodic declines in water levels within the Basin, the City and the SPBPA agree that the Basin is not currently in a state of overdraft. The groundwater within the Basin, and any extractions thereof, are subject to the Judgment. The parties will

operate the Basin and monitor groundwater extractions in conformance with the provisions of the Judgment so as to avoid overdraft and minimize potential adverse impacts. Within the meaning of this Judgment, the term Basin does not include surface water as it may exist from time to time in Santa Paula Creek or in the Santa Clara River.

2. Wells Pumping from Basin. The wells described on Exhibit "B," attached hereto and made a part hereof, are determined for purposes of this Judgment to be producing water from the Santa Paula Basin.

3. Pumping Allocations. For a period of seven years commencing January 1, 1996, the following pumping allocations shall apply:

(a) Members of the Santa Paula Basin Pumpers Association shall have a cumulative allocation to pump on average 27,500 acre-feet annually. Any person producing groundwater from the Basin and not a party to the Judgment is referred to herein as a nonparty. The 27,500 acre-feet annual allocation shall be held in trust by the Association for the benefit of the members of the Association and any nonparties, and it shall be distributed among the members of the Association and nonparties as follows:

SANTA PAULA GROUNDWATER BASIN

PARTY ALLOCATIONS

Party Name	Individual Party Allocations
Aliso Vista Ranch	1.8
Alta Mutual Water Company, Inc.	758.1
Associated Concrete Products, Inc.	5.8
Randall Axell as Trustee of the Dorothy E. Axell Trust	362.3
Basso Properties	43.4
Billiwhack Ranch	161.4
Frank R. Brucker as Trustee of the Frank R. Brucker Trust	121.8
Casa De Oro Ranch	99.3
Nola Clow as Trustee of the Monte Clow Estate	33.6
Gladys Daily Coffman	97.0
Paul R. and Irene Cummings & Sons	50.7
Flying-D Ranch	321.2
Evergreen Ranch AKA San Miguel Products	282.3
Farmers Irrigation Company, Inc.	9,406.4
J.J. & H.H. Finch	201.4
Galbreaith Brothers Inc.	78.4
Gooding Ranch (John F. Gooding)	101.8
Eva Gregory as Trustee of the Gregory Family Trust	50.7
Elizabeth Broome Grether, Ann B. Priske, John S. Broome Jr. as Trustee of the John S. Broome Jr. Trust	97.6
Hadley-Williams Partnership	129.2
Hampton Canyon Ranch	21.9

Party Name	Individual Party Allocations
Regents of the University of California	23.1
Headley Property Corporation	763.5
La Mesa Partnership #1	469.5
Leavens Ranches	297.0
Limoneira Company	3,173.1
Fred Malzacher	3.2
John McConica II	24.7
John R. McConica et al.	5.8
John R. McConica II et al.	70.8
John McGrath & Sons	101.9
Alice C. Newsom as Trustee of the Newsom Family Trust	138.1
Nichols Associates	46.7
Nutwood Farms	126.4
Roger Orr as Trustee of the Orr Family Trust	193.9
Panamerican Seed	410.3
Pear Blossom Town & Country Market, Inc.	33.1
Petty & Petty	116.0
Robert L. Pinkerton & Sons	62.1
Wesley Pinkerton Estate	61.9
W. B. Pinkerton Limited Partnership	39.1
W. J. Pinkerton Estate Ranch #1 & #2	291.2
Rancho Attilio	335.8
Rancho Filoso	119.6
R. F. Robertson as Trustee of the Robertson Family Trust	39.1

Party Name	Individual Party Allocations
City of Santa Paula	6,085.5
Saticoy Foods Corp.	134.0
Frank Silva	108.6
J. M. Sharp Company	167.3
John Shores Family Partnership	126.7
Shozi Brothers	66.2
Southern Pacific Milling	107.5
Thermal Belt Mutual Water Company, Inc.	497.3
Tri-Leaf Nursery (Bruce Arikawa)	8.8
Tucker Ranch	68.0
Walking Beam Ranches	13.0
William Wallace	2.9
We 5 Properties	9.8
James W. Williams III	27.6
Santa Paula Basin Pumpers Association as Trustee for the following Nonparties:	704.8
ABC Rhubarb Farms	31.1
Andrew Alsono	1.1
Patricia Conklin	2.7
Thomas Courtmarche	1.0
G. Dominguez	0.9
William Garman	2.0
Juanamaria Land Company	220.0
Albert Kimura	37.5
Tama Kimura	55.9
Madeline Lassich	1.1
Richard Ray	0.1

Party Name	Individual Party Allocations
Thomas H. Vint	4.9
Southern California Edison Co.	12.5
Ventura County, Jail Property	172.2
Ventura County, Parks Department	131.0
Ventura Unified School District	30.8
TOTALS:	27,500.0

The Association shall use its continuing best efforts to obtain the voluntary joinder of any nonparty to the Judgment. Any party may initiate legal proceedings to compel the joinder of any nonparty. The Technical Advisory Committee shall monitor and annually report the individual and cumulative groundwater production by all nonparties. Both the groundwater production of the Association and the groundwater production of the nonparties shall be attributed to the cumulative annual allocation available for the Association as set forth in Paragraph 3(c). In the event the combined pumping of the Association and the nonparties exceed the Association's allocation as provided in Paragraph 3(c), the Association shall be responsible for the over-production, and shall reduce its future groundwater production by an amount sufficient to offset the quantity of over-production by the nonparties. Under no circumstances shall the combined production by members of the Association and the nonparties exceed the Association's allocation

provided in Paragraph 3(c), subject to the provisions of Paragraph 5(b) and 5(d).

Water produced pursuant to this allocation shall be applied to reasonable and beneficial uses within the Basin, except for lands located outside of the Basin which are presently supplied with Basin water. Such lands are described in Exhibit "C," attached hereto and made a part hereof. No additional exports shall be allowed. Groundwater supplied to the customers of the City of Santa Paula is not an "export" within the meaning of the Judgment. To the extent that the City pumps water at the request of Alta Mutual Water Company for delivery to the Company's customers, such amounts of water shall be charged against the allocation attributable to Alta Mutual Water Company and not against the City's allocation. The City shall report annually to the Association the amount of all water delivered on behalf of the Alta Mutual Water Company.

(b) The City of San Buenaventura shall have an allocation to pump on average 3,000 acre-feet annually for distribution in its municipal water supply system, and for reasonable and beneficial uses by its customers. The City's present production is from a well known as Saticoy 2, and in the future its allocation may be pumped in whole or in part from an additional well proposed to be drilled, known as Saticoy 3, the proposed site of which is in the west end of the Basin approximately 1000 yards from Saticoy 2.

(c) The cumulative pumping allocation in Paragraph 3(a) and the City's allocation in Paragraph 3(b) shall be based on calendar years and shall be averaged over seven years commencing January 1, 1996. The parties are not limited to their respective allocations in any single year, but may produce seven times their average annual allocations over the seven-year period. Thereafter, and until modified by full agreement of the Technical Advisory Committee or Court order, the applicable seven year period shall be the immediately preceding seven calendar years. In the event reductions in allocations are required pursuant to Paragraph 6, the reductions shall be implemented prospectively so that any portion of a party's unused allocation accrued during the immediately preceding seven year period is not lost or forfeited. Pumping within these allocations may occur from present wells, from replacement wells, or from new wells.

(d) Upon review of the Technical Advisory Committee, the Association and the City may agree in writing to permit extractions from the Basin in addition to these pumping allocations, either in view of hydrologic conditions in the Basin, or to meet specific individual needs, or as part of a program to determine whether surplus water exists, and if so, to what extent.

(e) During the first seven year period commencing January 1, 1996, the difference between the total pumping allocations of the City and the Association, and the assumed yield for that period, namely, 3000 acre-feet annually, shall be

available to meet the needs of the City under a Class II emergency, pursuant to the requirements of Paragraph 7 hereof.

4. Basin Monitoring and Studies. A Technical Advisory Committee shall be formed with equal representation from the United Water Conservation District, the City of San Buenaventura, and the Santa Paula Basin Pumpers Association. Appointments to the Committee shall be in the discretion of the respective parties, but at least one representative of each party shall have technical qualifications appropriate to the tasks of the Committee. To the extent possible, the Technical Advisory Committee shall work by consensus. Disputes may be resolved on motion to the Court brought by any of the parties, or through independent arbitration, provided that an effort is first made to resolve the matter in accordance with the provisions of Paragraph 17(d). The Committee initially shall establish a program to monitor conditions in the Basin, including but not necessarily limited to verification of future pumping amounts, measurements of groundwater levels, estimates of inflow to and outflow from the Basin, increases and decreases in groundwater storage, and analyses of groundwater quality. In addition, the Committee shall undertake or cause to be made studies which may: assist in determining the amount of water which can be taken from the Basin without causing overdraft; assist in determining whether surplus or temporary surplus water exists, and if so, to what extent; identify additional replenishment sources for the Basin; develop programs for the conjunctive use and operation of the Basin; and provide such other information as may be useful in developing a management plan for operation of the Basin. The

Committee shall also consider and attempt to agree upon the safe yield of the Basin. The United Water Conservation District shall have the primary responsibility for collecting, collating and verifying the data required under the monitoring program, and shall present the results thereof in annual reports to the Technical Advisory Committee.

5. Future Pumping. At the end of the initial seven year period provided herein, any party, or the Technical Advisory Committee if it is in full agreement, may seek to have the Court review the assumed initial yield agreed to in Paragraph (f), and the pumping allocations provided in Paragraphs 3(a) and 3(b), and to determine the safe yield of the Basin. If no such review is sought, these pumping allocations shall remain in effect until further order of the Court.

(a) Any party or the Committee seeking such a review and determination shall file with the Court as part of its motion a written report including its recommendation and the data in support thereof. The report may recommend that the assumed initial yield of 33,500 acre-feet annually be adjusted either upward or downward, or otherwise modified. The Court shall conduct a hearing on the recommendation. The parties' Stipulation to use an assumed initial yield of 33,500 acre-feet annually for the first seven years shall have no bearing on any party's right to seek a safe yield determination that is either greater or less.

reductions in pumping shall be required in the following order of priority:

(a) Stage 1. All uses in excess of the pumping allocations provided in Paragraph 3(a) and 3(b) shall first be cut back.

(b) Stage 2. The cumulative pumping allocation of the Santa Paula Basin Pumpers Association shall be reduced by 500 acre-feet annually, such reduction reflecting reasonable conservation that can be achieved. The Association shall determine how any reduction in its cumulative allocation required under any Stage of Paragraph 6 shall be implemented.

(c) Stage 3. The pumping allocation of the City of San Buenaventura shall be reduced to 1141 acre-feet annually, such amount reflecting the City's annual historical maximum production prior to commencement of this action.

(d) Stage 4. The remaining pumping allocations of the parties shall be further reduced simultaneously by the following amounts: 2000 acre-feet annually by the Santa Paula Basin Pumpers Association, and 500 acre-feet annually by the City of San Buenaventura.

(e) Stage 5. The City of San Buenaventura shall cease pumping from the Basin.

(b) If the Court finds that the safe yield of the Basin is greater than 30,500 acre-feet annually, or that temporary surplus may exist under certain conditions, the City of San Buenaventura and the Santa Paula Basin Pumping Association may both apply to increase their respective pumping allocations, and the Court relying upon established principles of water law shall determine how the additional water shall be allocated.

(c) If the Court finds that the safe yield of the Basin is less than the total pumping allocations provided in Paragraphs 3(a) and 3(b), then the pumping allocations of the parties shall be reduced in accordance with Paragraph 6, unless the Court finds that certain practical measures may be taken that will prevent harm to the Basin or to existing users.

(d) If either the Technical Advisory Committee or any party recommends a more flexible management plan for the operation of the Basin, the Court shall have authority after noticed hearing to modify the pumping allocations of the parties, provided that any such modifications will promote the more efficient use of the groundwater supply, will not result in overdraft or harm to existing users, and will not modify the priorities identified in Paragraph 6.

6. Overdraft. At the end of the seven-year period provided herein, and upon motion and hearing as provided in Paragraph 5(a), if the Court finds that the safe yield of the Basin is less than the total pumping allocations provided in Paragraphs 3(a) and 3(b),

(f) Stage 6. The remaining pumping allocation of the Santa Paula Basin Pumpers Association shall be reduced by whatever amount is required to bring production into balance with the safe yield of the Basin.

The timing of each reduction set forth above shall be determined by the Court, allowing sufficient time between stages to determine whether any further cutbacks are necessary. The Technical Advisory Committee shall attempt to develop a trigger perhaps based upon water levels, to determine when overdraft is deemed to commence and reductions in pumping are required. In the event the Technical Advisory Committee is unable to agree upon such a trigger, the issue of the commencement of overdraft, and required reductions in pumping, shall remain within the jurisdiction of the Court, to be decided upon motion of any party.

7. Emergency Pumping. Notwithstanding the provisions of Paragraphs 3(b), 5(c) and 6, and in addition to the amounts available thereunder, the City of San Buenaventura shall have the right, under the conditions hereinafter set forth, to pump water from the Basin during an emergency in order to reasonably supply public needs. Before this section applies, the City shall first meet its needs from any supplies that are reasonably available from City sources other than the Basin. The rights under this Paragraph shall apply only so long as an emergency exists.

(a) An emergency causing a water shortage may result from a sudden and unexpected occurrence such as fire, flood,

earthquake, contamination, systems failure, or extraordinary peak demand, hereinafter referred to as a Class I Emergency. An emergency may also result from a long-term drought situation affecting especially the City's surface water supplies, hereinafter referred to as a Class II Emergency.

(b) The City shall have the right to pump up to 300 acre-feet annually under a Class I Emergency provided that it gives prompt notice to the parties and the Technical Advisory Committee. Such notice shall include a description of the emergency, an explanation of the unavailability of other non-Basin supplies, the expected duration of the emergency, and an estimate of the amount of water required. Any party by motion may challenge the City's pumping under this emergency provision, and if successful, the amount of water pumped under the claim of emergency shall be charged against the City's pumping allocation. The City may pump more than 300 acre-feet annually under a Class I Emergency with the full approval of the Technical Advisory Committee or by order of Court. The City shall not be required to give more than 72 hours notice of any motion seeking Court approval for additional emergency pumping.

(c) The City shall be required to obtain full approval of the Technical Advisory Committee or the Court prior to any emergency pumping under a Class II Emergency. As a prerequisite to any such approval, the City must have in force drought conservation measures at least as stringent as those required in Resolution No. 90-16 adopted February 26, 1990 and in Ordinance No. 90-3 adopted

March 20, 1990, as amended. During the initial seven year period, the amount of water available for a Class II Emergency shall not exceed 3000 acre-feet annually as provided in Paragraph 3(e). Thereafter, there shall be no limit on the amount of water used for such Class II Emergency, provided: that the City render annual reports to the Court and parties concerning its past and projected use of emergency water; that the City mitigate all adverse impacts upon Intervenors, or any of them, caused by the City's emergency pumping; and provided that if the Intervenors or any of them should be required to reduce their respective individual pumping allotments in order to allow the City to pump emergency water under this Paragraph 7(c), the City shall pay the actual damages suffered by such Intervenors. Any such damages shall be determined by the Court under its continuing jurisdiction, and no claim under Government Code, Sections 900 et seq. shall be required.

8. Local Well Interference. The City's Saticoy 2 well is located in close proximity to two wells identified as 2N 22W 02 K02 and 2N 22W 02 K08 (Wittenberg-Livingston Inc.), and is about 400 feet away from Alta Mutual Water Co. Well No. 9, and about 2600 feet away from the Grether Well 35Q-02. The City's proposed Saticoy 3 well is proposed to be drilled in the same locality, and would be about 1800 feet away from the Grether Well. In the event that production from either or both of these City wells causes unreasonable interference with production from any of the wells herein identified, the City shall mitigate such impacts. Mitigation may include, but shall not be limited to, scheduling pumping so as to avoid interference, paying the cost of lowering

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the bowls in or deepening the affected wells, or producing water from City wells for use by the owners of such affected wells at costs the owners might otherwise have incurred. Any water produced from the Basin by the City for the benefit of such owners shall be charged against the cumulative pumping allocation of the Santa Paula Basin Pumpers Association. Nothing herein shall preclude any party from seeking relief against any other party for unreasonable well interference.

9. Regulating Pumping within the SPBPA. It shall be the responsibility of the Santa Paula Basin Pumpers Association to keep the total amount of water pumped by its members within the cumulative pumping allocation provided herein. In the event the Association fails to do so, the Court retains jurisdiction over the individual members as parties to this action, and shall issue such orders affecting the individual pumping of the parties as may be required. Successors in interest to any of the parties who are members of the Association shall be joined as parties to the action.

10. Transfers. Upon providing written notification to the Technical Advisory Committee, any party may transfer to any other party or person all or any part of its individual allocation provided in Paragraph 3(a), or as subsequently determined by the Court. Reasonable notice shall be given to the Committee prior to any proposed transfer of any such allocation apart from the land where the water has been used. Any such transfer shall be subject to all provisions of the Judgment, and any transferee not a party

to the action shall be required to join as a party in order for the transfer to be effective. Any transfer to the City of San Buenaventura shall reduce the allocation of the Santa Paula Basin Pumpers Association by the amount of the transfer.

11. Storage of Water. Nothing in this Judgment is intended to preclude the underground storage of water in the Basin provided:

(a) That the water to be stored is imported, or is reclaimed or native water that would otherwise waste to the ocean or would not replenish the Basin.

(b) That the storage program is approved in advance by the full agreement of the Technical Advisory Committee.

(c) That the storage program will not adversely impact the water quality of the Basin.

(d) That the storage program will not cause injury to any vested rights.

(e) That in the event the storage of water causes the Basin to spill, the first water lost to the Basin shall be deemed to be the stored water.

(f) That title may be retained to water stored underground pursuant to this Paragraph, and the stored water less

losses may be pumped in addition to the pumping allocations, provided no injury is caused to any Intervenor or party.

12. Forfeiture. It is in the interest of sound Basin management that no party be encouraged to take or use more water than is actually required. Failure to produce all of the water to which a party is entitled under this Judgment shall not, in and of itself, be deemed to constitute an abandonment or forfeiture of such party's right, either in whole or in part. Abandonment, forfeiture or extinction of any pumping allocation or right decreed herein shall occur only upon written election filed by the party, or upon motion filed by any party or the Technical Advisory Committee, and after hearing thereon. In either case, such loss of right shall be expressly confirmed by order of this Court.

13. Inter-Basin Litigation. In the event of future litigation between any party to this action and water users or water rights holders in basins contiguous or adjacent to the Basin, the parties hereto shall exercise good faith cooperation to preserve and protect their collective pumping allocations settled and determined under this Judgment.

14. Injunction. The parties and each of them, and their agents, successors and assigns, are enjoined from extracting any more water from the Santa Paula Basin than is permitted under this Judgment, and from otherwise violating the terms hereof.

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15. CEQA Dismissal. The causes of action brought by the United Water Conservation District alleging violations of the California Environmental Quality Act are hereby dismissed.

16. Costs and Attorney Fees. Each party shall bear its own costs and attorney fees.

17. Continuing Jurisdiction. Full jurisdiction, power and authority are retained and reserved by the Court for the purpose of enabling the Court, upon motion of any party and after hearing thereon:

(a) to make such further or supplemental orders or directions as may be necessary or appropriate for the interpretation, enforcement or carrying out of this Judgment;

(b) to determine any dispute between or among the parties concerning the Judgment; and

(c) to modify, amend or amplify any of the provisions of this Judgment whenever in the Court's opinion a substantial change in circumstances, or experience under the Judgment, or the results of new data and studies, justify or require such modification, including modification of the safe yield of the Basin and the pumping allocations, as provided in Paragraph 5.

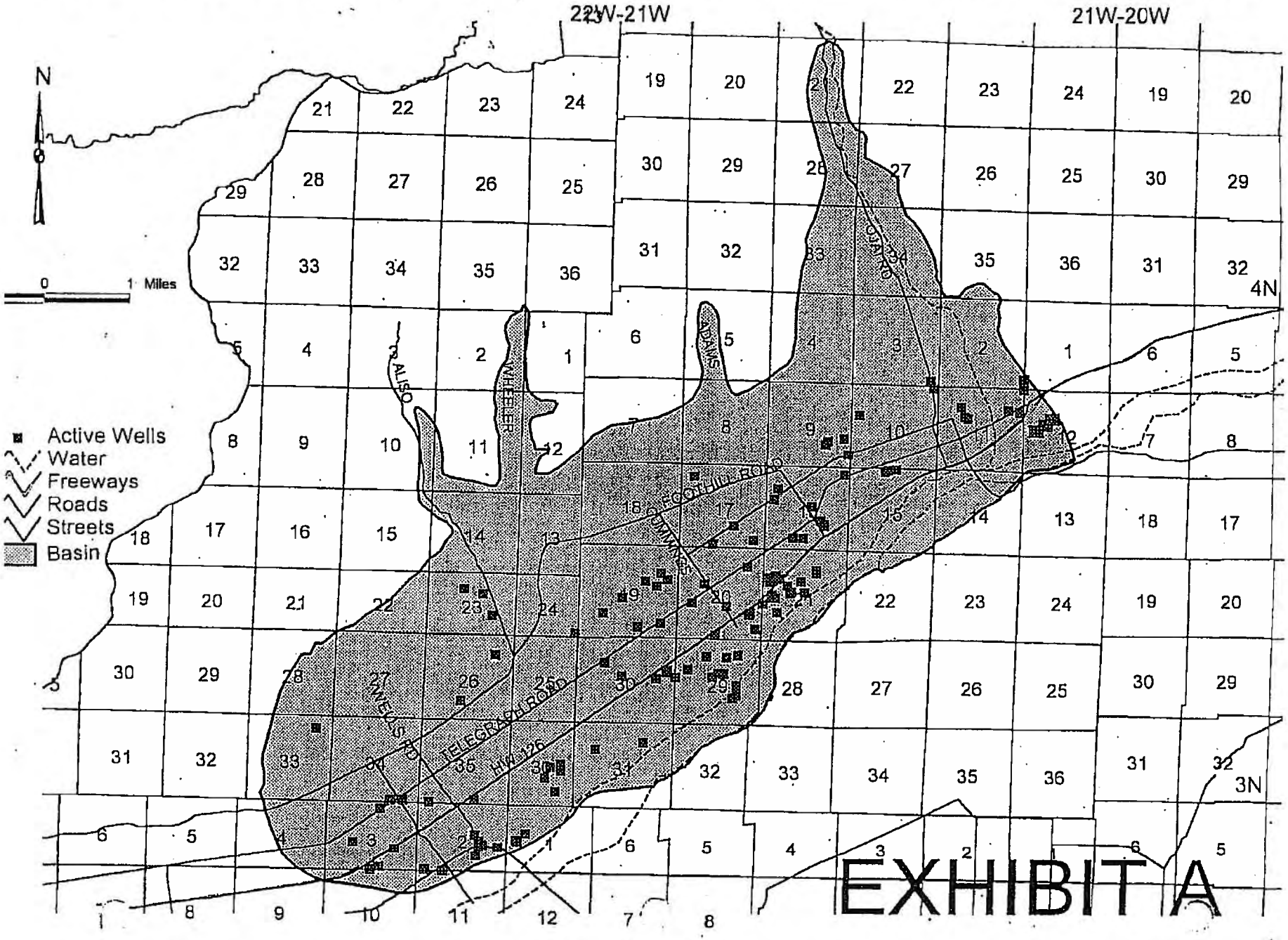
(d) Prior to any party or the Technical Advisory Committee filing a motion for judicial review or dispute resolution

under this Judgment, the party shall provide written notice of its intention, together with a brief summary of the basis for the request, to United, the City and the Association. Upon receipt of such request and within 30 days from the date of the notice, United, the City and the Association shall meet to attempt promptly to resolve the dispute without resort to judicial action. This provision shall not apply in the event of an emergency, either Class I or Class II.

DATED: MAR 7 - 1996, 1996.

JOHN J. HUNTER
Judge of the Superior Court

BOUNDARY OF SANTA PAULA GROUNDWATER BASIN SETTLEMENT



Santa Paula Groundwater Basin

WELLS AND OWNERS LIST

State Well No.	Name
03N/21W-16P01	ABC RHUBARB FARMS
03N/22W-23Q01	ALISO VISTA RANCH
03N/21W-21M01	ANDREW ALSONO
02N/22W-02K07	ALTA MUTUAL WATER COMPANY, INC.
03N/21W-29K01	ASSOCIATED CONCRETE PRODUCTS, INC.
03N/21W-16P02	DOROTHY E. AXELL TRUST
03N/21W-16P04	DOROTHY E. AXELL TRUST
03N/21W-09J01	BASSO PROPERTIES
03N/22W-23F02	BILLIWHACK RANCH
03N/21W-29F01	FRANK R. BRUCKER TRUST
03N/21W-20F01	CASA DE ORO RANCH
02N/22W-02K09	CITY OF SAN BUENAVENTURA
03N/21W-20A01	NOLA CLOW TRUST
03N/22W-35N01	GLADYS DAILY COFFMAN (c/o McAVOY)
03N/21W-21D02	PATRICIA CONKLIN
03N/21W-21G01	THOMAS COURTMARCHE
03N/21W-12E07	G. DOMINGUEZ
03N/21W-19R01	EVERGREEN RANCH
03N/21W-09R04	FARMERS IRRIGATION COMPANY, INC.
03N/21W-12E04	FARMERS IRRIGATION COMPANY, INC.
03N/21W-12E08	FARMERS IRRIGATION COMPANY, INC.
03N/21W-12F03	FARMERS IRRIGATION COMPANY, INC.
03N/21W-16K01	FARMERS IRRIGATION COMPANY, INC.
03N/21W-16K02	FARMERS IRRIGATION COMPANY, INC.
03N-21W-16K03	FARMERS IRRIGATION COMPANY, INC.

State Well No.	Name
03N/21W-19H06	FARMERS IRRIGATION COMPANY, INC.
03N/21W-19H07	FARMERS IRRIGATION COMPANY, INC.
03N/22W-34Q02	J.J. AND H.H. FINCH
03N/21W-10M01	FLYING "D" RANCH
03N/21W-17Q01	GALBREAITH/PINKERTON/ROBERTSON
02N/22W-02N04	WILLIAM GARMAN
03N/21W-09K02	GOODING RANCH
03N/21W-19L01	GREGORY/CUMMINGS
03N/22W-35Q02	ELIZABETH GRETHER
03N/21W-19A02	HAMPTON CANYON RANCH
03N/22W-36K02	HEADLEY PROPERTY CORPORATION
03N/22W-36R01	HEADLEY PROPERTY CORPORATION
02N/22W-03E01	JUANAMARIA LAND CO./HADLEY/WILLIAMS
03N/21W-11H03	ALBERT KIMURA
03N/21W-11H01	TAMA KIMURA
03N/21W-16E01	LA MESA PARTNERSHIP #1
03N/21W-17R01	LA MESA PARTNERSHIP #1
03N/21W-29B02	MADELINE LASSICH
02N/22W-03M03	LEAVENS RANCHES
03N/22W-24R01	LEAVENS RANCHES.
03N/21W-01N02	LIMONEIRA COMPANY
03N/21W-02P01 ✓	LIMONEIRA COMPANY
03N/21W-02Q01 ✓	LIMONEIRA COMPANY
03N/21W-02R02	LIMONEIRA COMPANY
03N/21W-19G02	LIMONEIRA COMPANY
03N/21W-30F01	LIMONEIRA COMPANY
03N/21W-30H04	LIMONEIRA COMPANY

State Well No.	Name
03N/21W-31B01	LIMONEIRA COMPANY
03N/21W-31E03	LIMONEIRA COMPANY
03N/21W-21G03	FRED MALZACHER
02N/22W-03Q02	JOHN McCONICA, II
03N/21W-21B01	JOHN McCONICA, II, ET AL.
03N/21W-21B03	JOHN McCONICA, II, ET AL.
02N/22W-02N01	JOHN R. McCONICA, ET AL.
03N/21W-20R02	JOHN McGRATH & SONS
03N/21W-21E05	JOHN McGRATH & SONS
03N/21W-21F03	JOHN McGRATH & SONS
03N/21W-21G02	JOHN McGRATH & SONS
03N/21W-11A01	NEWSOM FAMILY TRUST
03N/22W-36H01	NICHOLS ASSOCIATES
03N/22W-36H02	NICHOLS ASSOCIATES
03N/22W-36J01	NUTWOOD FARM
03N/22W-36J02	NUTWOOD FARM
03N/21W-20J03	ORR FAMILY TRUST
03N/21W-20K01	PANAMERICAN SEED
03N/21W-20M01	PANAMERICAN SEED
03N/21W-20P02	PANAMERICAN SEED
03N/21W-10E01	PEAR BLOSSOM TOWN & COUNTRY MARKET, INC.
03N/22W-36K04	PETTY & PETTY
03N/22W-36K05	PETTY & PETTY
03N/21W-17P02	ROBERT L. PINKERTON & SONS
03N/21W-21E01	WESLEY PINKERTON
03N/21W-16E02	W.J. PINKERTON ESTATE RANCH
03N/21W-29B03	W.J. PINKERTON ESTATE RANCH

State Well No.	Name
02N/22W-02K02	RANCHO ATTILIO
02N/22W-02K08	RANCHO ATTILIO
02N/22W-02Q01	RANCHO ATTILIO
03N/21W-09K03	RANCHO FILOSO
03N/22W026P01	RICHARD RAY
03N/22W-34R02	REGENTS OF UNIVERSITY OF CALIFORNIA
03N/21W-11D02	CITY OF SANTA PAULA
03N/21W-11E02	CITY OF SANTA PAULA #8 E03
03N/21W-11F03	CITY OF SANTA PAULA #9 F03
03N/21W-11J02	CITY OF SANTA PAULA
03N/21W-15C02	CITY OF SANTA PAULA
03N/21W-15C06	CITY OF SANTA PAULA
03N/21W-16A02	CITY OF SANTA PAULA
03N/21W-16G01	CITY OF SANTA PAULA
03N/21W-30H03	SATICOY FOODS CORP.
03N/21W-30H05	SATICOY FOODS CORP.
03N/21W-19M01	J.M. SHARP COMPANY
03N/21W-20J04	JOHN SHORES FAMILY PARTNERSHIP
02N/22W-03B01	SHOZI BROTHERS
02N/22W-01M03	FRANK SILVA
02N/22W-01M04	FRANK SILVA
03N/21W-29K02	SOUTHERN PACIFIC MILLING
03N/21W-29K03	SOUTHERN PACIFIC MILLING
03N/22W-27M02	SOUTHERN CALIFORNIA EDISON
03N/21W-15C04	THERMAL BELT MUTUAL WATER COMPANY
03N/21W-30E01	TRI-LEAF NURSERY
02N/22W-02E03	TUCKER RANCH

State Well No.	Name
02N/22W-03K02	TUCKER RANCH
03N/21W-29E01	VENTURA COUNTY JAIL
03N/21W-30H07	VENTURA COUNTY JAIL
02N/22W-02G01	VENTURA COUNTY PARKS
02N/22W-03P01	VENTURA UNIFIED SCHOOL DISTRICT
03N/21W-21E03	THOMAS H. VINT
03N/21W-19G03	WALKING BEAM RANCHES
03N/21W-21E02	WILLIAM WALLACE
02N/22W-02J03	WE 5 PROPERTIES
03N/22W-23G01	JAMES WILLIAMS