



Water Supply Assessment and Water Supply Verification for the Casitas Selma Mixed-Use Development Project

**Selma District
California Water Service**

**November 2024
EKI C40013.00**

Water Supply Assessment and Water Supply Verification

Casitas Selma Mixed-Use Development Project
Selma District, California Water Service

TABLE OF CONTENTS

1	INTRODUCTION.....	4
2	GENERAL REQUIREMENTS FOR THE PREPARATION OF A WATER SUPPLY ASSESSMENT AND WATER SUPPLY VERIFICATION	8
2.1	Applicability of Senate Bill 610 and 221 to the Proposed Project.....	8
2.2	Responsibility for Preparation of the Water Supply Assessment and Water Supply Verification.....	10
2.3	Components of a Water Supply Assessment and Water Supply Verification	11
3	PROJECT DESCRIPTION	13
4	PROJECT WATER DEMAND	15
4.1	Residential Water Use	15
4.2	Commercial Water Use.....	16
4.3	Community Landscaping Water Use.....	16
4.4	Distribution System Losses	17
4.5	Existing Current Water Demands on the Proposed Project Site	18
4.6	Total Project Water Demand	18
5	CAL WATER SELMA DISTRICT WATER DEMAND	22
5.1	Current and Historical Water Demand Within the District Service Area	22
5.2	District Water Demand Projections.....	23
5.3	Planned Development Projects within the District	23
5.4	Review of Proposed Project’s Inclusion in 2020 UWMP Growth Projections.....	24
5.5	Total Projected District Water Demand (Inclusive of the Proposed Project).....	24
6	CAL WATER SELMA DISTRICT WATER SUPPLY	27
6.1	Identification of Water Supply Rights.....	28
6.2	Groundwater Supply	29
6.2.1	<i>Subbasin Description.....</i>	<i>30</i>
6.2.2	<i>Groundwater Management.....</i>	<i>31</i>
6.2.3	<i>Groundwater Use.....</i>	<i>35</i>
6.2.4	<i>Analysis of Sufficiency of Groundwater Supply.....</i>	<i>35</i>
6.3	Total Projected Potable Supply in Normal, Single Dry, and Multiple Dry Years.....	37
7	COMPARISON OF SUPPLY AND DEMAND	44
8	CONCLUSIONS.....	48
9	REFERENCES.....	49

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Casitas Selma Mixed-Use Development Project

Selma District, California Water Service

TABLE OF CONTENTS (CONTINUED)

FIGURES

Figure 1	Selma District Service Area and Proposed Project Location
Figure 2	Proposed Project Location
Figure 3	Regional Setting and Groundwater Subbasins

TABLES

Table 1	Project Land Use Assumptions
Table 2	Summary of Estimated Annual Proposed Project Water Demand
Table 3	Estimated Annual Landscaping Water Use
Table 4	Historical Water Demand for the Selma District
Table 5	Projected Future Water Demand for the Selma District
Table 6	Historical Water Supply for the Selma District
Table 7	Historical and Projected Groundwater Pumping
Table 8	Projected Normal Year Water Supply and Demand for the Selma District
Table 9	Projected Single Dry Year Water Supply and Demand for the Selma District
Table 10	Projected Multiple Dry Year Water Supply and Demand for the Selma District

APPENDICES

Appendix A	Proposed Project Site Plans
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CALIFORNIA WATER SERVICE

Water Resource Sustainability Department 1720 North First Street
San Jose, CA 95112

November 5, 2024

Adan Garcia
Lance Kashian
255 E. River Park Circle
Suite 120
Fresno, CA 93720

Dear Mr. Garcia,

This letter serves as the California Water Service Company's (Cal Water) formal approval of the Water Supply Assessment (WSA) / Water Supply Verification (WSV) for the Casitas Selma Mixed-Use Development Project in Selma, California. This approval is contingent on the developer's compliance with any conditions set forth in the WSA/WSV by Cal Water.

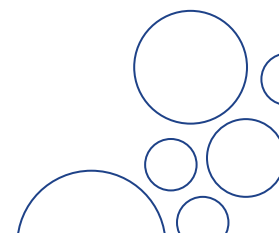
Authority for this approval is pursuant to Cal Water's "Resolution to Approve Water Supply Assessment and Related Documents for New Developments" dated October 27, 2021 (attached).

Should you have any questions, please contact Michael Bolzowski at mbolzowski@calwater.com or (408) 367-8338.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Jenkins", is written over a faint, larger blue outline of the same signature.

Ken Jenkins
Chief Water Resource Sustainability Officer



1 INTRODUCTION

Included herein is a Senate Bill (SB) 610-compliant water supply assessment (WSA) and SB 221-compliant water supply verification (WSV) in support of the proposed Casitas Selma Mixed-Use Development Project (Proposed Project). The Proposed Project comprises approximately 39 acres (ac) within Fresno County (County), California (**Figure 1**) and is located at 8601 East Floral Avenue outside the City of Selma (City; **Figure 2**). Per the project description provided by Lance Kashian (Project Proponent; Lance Kashian, 2024a), the Proposed Project consists of mixed-use development and includes a total of 600 multi-family residential (MFR) units with 29,000 square feet (sq ft) of clubhouse space, approximately 94,281 square feet of retail and food service uses and a 100-room hotel.

The Proposed Project is located within the City of Selma's (City's) sphere of influence (SOI) and is within the California Water Service (Cal Water) Selma District (District) service area; therefore, Cal Water will be the water service provider for the Proposed Project.

The information provided in this WSA/WSV is consistent with California Water Code (CWC) §10910-10912 requirements, California Government Code (CGC) §66473.7 requirements, California Business and Professions Code (CBPC) §11010 requirements, and the California Department of Water Resources' (DWR's) *Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001: To Assist Water Suppliers, Cities, and Counties in Integrating Water and Land Use Planning*, dated 8 October 2003. Relevant sections of the CWC, CBPC, and CGC are referenced throughout this document. The information presented in those respective sections, and the associated tables and figures, respond directly to CWC, CBPC, and CGC requirements.

The purpose of this WSA/WSV is to evaluate whether sufficient water supplies are available to meet all existing and planned future demands within the District service area, including demands associated with the Proposed Project, during normal, single dry, and multiple dry hydrologic years for a 20-year time horizon.¹ More specifically, this WSA/WSV includes:

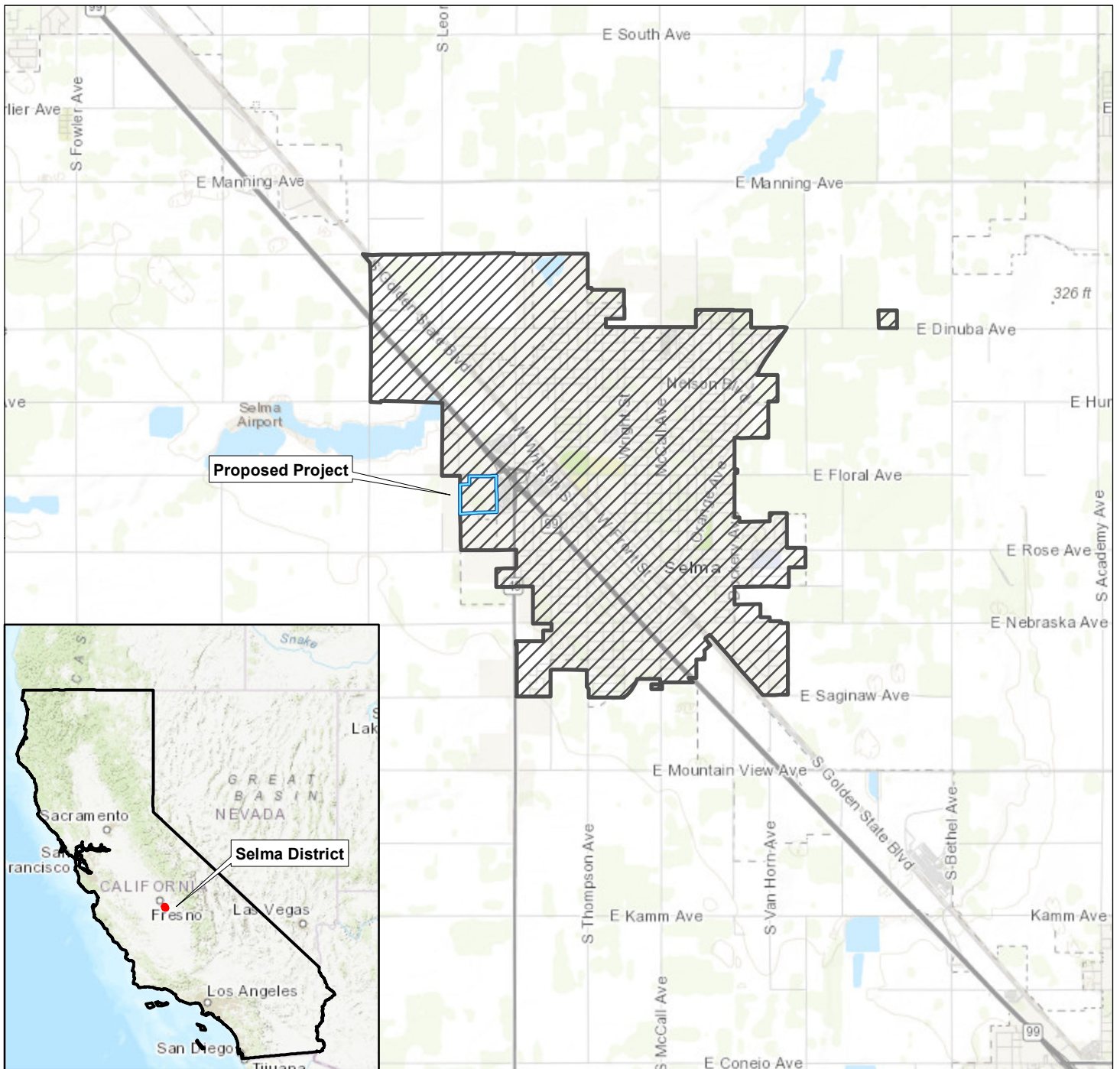
- A summary of the WSA/WSV requirements articulated in CWC §10910-10912 and CGC §66473.7 and a description of how they apply to the Proposed Project;
- A description and analysis of the current and projected future water demands of the Proposed Project through the year 2045;
- A description and analysis of the historical, current, and projected future water demands for the District service area through the year 2045;
- A summary of the availability of water supplies over a historical record of 20 years and proof of the availability of a sufficient future water supply;
- A description and analysis of the current and projected future water supplies for the District service area through the year 2045;

¹CWC specifies that a WSA/WSV must look at supplies and demand on a 20-year horizon (i.e., to 2044), but given the available data, this WSA/WSV looks beyond that to 2045.



- A description of reasonable foreseeable impacts of the Proposed Project on the availability of water resources for agricultural and industrial uses within the District's service area;
- A description of the extent to which the District or the project proponent has the right to extract additional groundwater as needed to supply the Proposed Project;
- A comparison of the water supplies and demands for the District service area, including the projected water demands associated with the Proposed Project; and
- A description of the District's 2020 Water Shortage Contingency Plan (WSCP) actions to be undertaken by the District in response to water supply shortages.

The information contained in this WSA/WSV is based primarily on the 2020 Urban Water Management Plan (2020 UWMP) prepared for the District, except where updated with relevant water demand and supply reliability and other information from sources including Cal Water, Groundwater Sustainability Agencies (GSAs), DWR, and others.

This WSA/WSV concludes that, based on the currently available information, sufficient water supply is available to the District to meet all future demands associated with current and planned development within the District service area, including those associated with the Proposed Project. It should be noted that the District will pump groundwater within the jurisdiction of the Central Kings Groundwater Sustainability Agency (CKGSA). While water use is consistent with the CKGSA Groundwater Sustainability Plan (GSP), the long-term impacts of the Sustainable Groundwater Management Act (SGMA) implementation are still uncertain, and pending decisions may have the potential to impact groundwater pumping.



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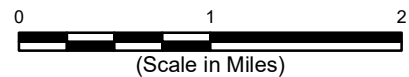
-  Proposed Project
-  Service Area Boundary

Notes

1. All locations are approximate.

Sources

1. Basemap provided by ESRI.



Selma District Service Area and Proposed Project Location

Casitas Selma Mixed-Use Development Project



Selma, CA
November 2024
C40013.00

Figure 1



Legend



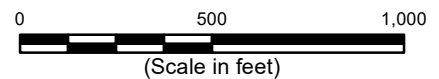
Proposed Project

Notes

1. All locations are approximate.

Sources

1. Basemap provided by ESRI.



Proposed Project Location

Casitas Selma Mixed-Use Development Project

Selma, CA
November 2024
C40013.00

eki environment
& water

Figure 2

2 GENERAL REQUIREMENTS FOR THE PREPARATION OF A WATER SUPPLY ASSESSMENT AND WATER SUPPLY VERIFICATION

The purpose of this section is to outline what types of projects require the preparation of a WSA/WSV, who is responsible for its preparation, and the necessary components of a WSA/WSV.

2.1 Applicability of Senate Bill 610 and 221 to the Proposed Project

☒ CWC § 10910

(a) Any city or county that determines that a project, as defined in Section 10912, is subject to the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) under Section 21080 of the Public Resources Code shall comply with this part.

☒ CWC § 10912

For the purposes of this part, the following terms have the following meanings:

(a) "Project" means any of the following:

- (1) A proposed residential development of more than 500 dwelling units.*
- (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.*
- (3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.*
- (4) A proposed hotel or motel, or both, having more than 500 rooms.*
- (5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.*
- (6) A mixed-use project that includes one or more of the projects specified in this subdivision.*
- (7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.*

(b) If a public water system has fewer than 5,000 service connections, then "project" means any proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public water system's existing service connections, or a mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential development that would represent an increase of 10 percent or more in the number of the public water system's existing service connections.

☒ CGC § 66473.7

(a) For the purposes of this section, the following definitions apply:

(1) "Subdivision" means a proposed residential development of more than 500 dwelling units, except that for a public water system that has fewer than 5,000 service connections, "subdivision" means any proposed residential development that would account for an increase of 10 percent or more in the number of the public water system's existing service connections.

(i) This section shall not apply to any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses, or housing projects that are exclusively for very low and low-income households.

☑ **CBPC § 11010**

(b)(6) A true statement of the provisions, if any, that have been made for public utilities in the proposed Subdivision, including water, electricity, gas, telephone, and sewerage facilities. For subdivided lands that were subject to the imposition of a condition pursuant to subdivision (b) of Section 66473.7 of the Government Code, the true statement of the provisions made for water shall be satisfied by submitting a copy of the written verification of the available water supply obtained pursuant to Section 66473.7 of the Government Code.

The Proposed Project consists of 600 dwelling units (Lance Kashian, 2024a) and therefore satisfies the definition of a “project” requiring a WSA pursuant to SB 610 (CWC §10910(a) and 10912(a)(1)), as well as a “subdivision”³ requiring a WSV pursuant to CGC §66473.7(a)(1). Furthermore, the Proposed Project does not meet the exemptions defined in CGC §66473.7(i) given that the existing Proposed Project site does not meet the definition of an “urbanized area”², it is not surrounded by properties developed for urban uses, nor is it or housing development exclusively for very low and low-income households.

² Per CGC – Health and Safety Code §53545.12(f), and “urbanized area” means an incorporated city or an urbanized area or urban cluster as defined by the United States Census Bureau. For unincorporated areas outside of an urban area or urban cluster, the area must be within a designated urban service area that is designated in the local general plan for urban development and is served by the public sewer and water systems.

2.2 Responsibility for Preparation of the Water Supply Assessment and Water Supply Verification

☒ CWC § 10910

(b) The city or county, at the time that it determines whether an environmental impact report, a negative declaration, or a mitigated negative declaration is required for any project subject to the California Environmental Quality Act pursuant to Section 21080.1 of the Public Resources Code, shall identify any water system that is, or may become as a result of supplying water to the project identified pursuant to this subdivision, a public water system, as defined in Section 10912, that may supply water for the project. If the city or county is not able to identify any public water system that may supply water for the project, the city or county shall prepare the water assessment required by this part after consulting with any entity serving domestic water supplies whose service area includes the project site, the local agency formation commission, and any public water system adjacent to the project site.

☒ CGC § 66473.7

(a)(3) "Public water system" means the water supplier that is, or may become as a result of servicing the subdivision included in a tentative map pursuant to subdivision (b), a public water system, as defined in Section 10912 of the Water Code, that may supply water for a subdivision.

(b)(1) The legislative body of a city or county or the advisory agency, to the extent that it is authorized by local ordinance to approve, conditionally approve, or disapprove the tentative map, shall include as a condition in any tentative map that includes a subdivision a requirement that a sufficient water supply shall be available. Proof of the availability of a sufficient water supply shall be requested by the subdivision applicant or local agency, at the discretion of the local agency, and shall be based on written verification from the applicable public water system within 90 days of a request.

(2) If the public water system fails to deliver the written verification as required by this section, the local agency or any other interested party may seek a writ of mandamus to compel the public water system to comply.

(4) If the written verification is not provided by the public water system, notwithstanding the local agency or other interested party securing a writ of mandamus to compel compliance with this section, then the local agency may make a finding that sufficient water supplies are, or will be, available prior to completion of the subdivision that will satisfy the requirements of this section. This finding shall be made on the record and supported by substantial evidence.

(l) Nothing in this section shall preclude the legislative body of a city or county, or the designated advisory agency, at the request of the applicant, from making the determinations required in this section earlier than required pursuant to subdivision (b).

The Proposed Project is located within the Cal Water Selma District service area (**Figure 1**). Therefore, in accordance with CWC §10910(b) and CGC §66473.7(a)(3) and §66473.7(b)(1), Cal Water is the entity responsible for developing the WSA/WSV for the Proposed Project.

2.3 Components of a Water Supply Assessment and Water Supply Verification

☑ CWC § 10910

(c)(4) If the city or county is required to comply with this part pursuant to subdivision (b), the water supply assessment for the project shall include a discussion with regard to whether the total projected water supplies, determined to be available by the city or county for the project during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural and manufacturing uses.

☑ CWC § 10911

(b) The city or county shall include the water supply assessment provided pursuant to Section 10910, and any information provided pursuant to subdivision (a), in any environmental document prepared for the project pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code.

(c) The city or county may include in any environmental document an evaluation of any information included in that environmental document provided pursuant to subdivision (b). The city or county shall determine, based on the entire record, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses. If the city or county determines that water supplies will not be sufficient, the city or county shall include that determination in its findings for the project.

☑ CGC § 66473.7

(a)(2) "Sufficient water supply" means the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that will meet the projected demand associated with the proposed subdivision, in addition to existing and planned future uses, including, but not limited to, agricultural and industrial uses. In determining "sufficient water supply," all of the following factors shall be considered:

(A) The availability of water supplies over a historical record of at least 20 years.

(B) The applicability of an urban water shortage contingency analysis prepared pursuant to Section 10632 of the Water Code that includes actions to be undertaken by the public water system in response to water supply shortages.

(C) The reduction in water supply allocated to a specific water use sector pursuant to a resolution or ordinance adopted, or a contract entered into, by the public water system, as long as that resolution, ordinance, or contract does not conflict with Section 354 of the Water Code.

(D) The amount of water that the water supplier can reasonably rely on receiving from other water supply projects, such as conjunctive use, reclaimed water, water conservation, and water transfer, including programs identified under federal, state, and local water initiatives such as CALFED and Colorado River tentative agreements, to the extent that these water supplies meet the criteria of subdivision (d).

As listed above in CWC §10910(c)(4) and CGC §66473.7(a)(2), the primary purpose of a WSA/WSV is to evaluate whether sufficient water supply is available to meet all existing and future demands within the water supplier's service area and including those associated with the Proposed Project, during normal and dry hydrologic years for a 20-year time horizon.¹ Therefore, the following information is included in this WSA/WSV:

- A description and analysis of the current and projected future water demands of the Proposed Project through the year 2045;
- A description and analysis of the historical, current, and projected future water demands for the District service area through the year 2045;

- A summary of the availability of water supplies over a historical record of 20 years and proof of the availability of a sufficient future water supply;
- A description and analysis of the current and projected future water supplies for the District service area through the year 2045;
- A description of reasonable foreseeable impacts of the Proposed Project on the availability of water resources for agricultural and industrial uses within the District's service area;
- A description of the District's 2020 WSCP actions to be undertaken by the District in response to water supply shortages; and
- A comparison of the water supplies and demands for the District, including the projected water demands and supplies associated with the Proposed Project.

3 PROJECT DESCRIPTION

The Proposed Project is located on Assessor's Parcel Number (APN) 385-260-423 at the northwestern border of the City, west of South Highland Avenue and Highway 99, north of Stillman Street, and south of East Floral Avenue (**Figure 2**). The site plan for the Proposed Project can be found in **Appendix A**.

Per information provided by the Project Proponent, the combined project size is approximately 1,708,423 square feet (sq ft), or 39 ac divided into 10 parcels or lots. The specific retail land use associated with Lot 1 is not specified, but for the purposes of this WSA/WSV, it is assumed conservatively to be conference space. Lots 2, 3, 4, and 5 are planned for retail use, including fast food restaurants, shops, and small restaurants, and Lot 4 will include a hotel with 100 rooms. Lots 6, 7, 8, and 9 are planned for residential use and include a total of 600 dwelling units. Specifically, Lots 6 and 7 each include 150 dwelling units of market rate housing. Lot 8 includes 120 dwelling units of affordable senior housing, and Lot 9 includes 180 dwelling units of affordable family housing. The residential lots each include a clubhouse of 6,000 sq ft including a gym/fitness center, lobby, office space, and conference space, except for Lot 8, where the clubhouse will be 11,000 sq ft. Lastly, Lot 10 is a central lot which includes a landscaped central park of 3.6 acres (Lance Kashian, 2024b). The Proposed Project also includes an estimated 7,000 sq ft of water features (Lance Kashian, 2024c). Full buildout for the Proposed Project is assumed to be 2028, and the buildout schedule is provided in **Table 1** (Lance Kashian, 2024c).

The Proposed Project site has historically been a vacant commercial property (Cal Water, 2024b). Therefore, there is no historical water use at the site. The Proposed Project is located within the Cal Water Selma District service area and potable water service will be provided by Cal Water (**Figure 1**).

Table 1
Project Land Use Assumptions

Casitas Selma Mixed-Used Development Project, Selma District, California

Proposed Land Use	Total Land Use (a)	Land Use Units	Anticipated Buildout (b)				
			2025	2030	2035	2040	2045
Residential							
MFR (c)	600	du	0	600	600	600	600
Clubhouse	29,000	sq ft	0	29,000	29,000	29,000	29,000
Commercial							
Hotel	100	room	100	100	100	100	100
Fast Food/Small Restaurant (d)	17,099	sq ft	17,099	17,099	17,099	17,099	17,099
Shops	7,000	sq ft	7,000	7,000	7,000	7,000	7,000
Unspecified Retail (e)	70,182	sq ft	70,182	70,182	70,182	70,182	70,182
Community Landscaping							
Community Pools and Spas	7,000	sq ft	0	7,000	7,000	7,000	7,000
Irrigated Landscaped Area	3.6	ac	0	3.6	3.6	3.6	3.6

Abbreviations:

"ac" = acres

"sq ft" = square feet

"du" = dwelling units

"WSA" = Water Supply Assessment

"MFR" = multi-family residential

"WSV" = Water Supply Verification

Notes:

- (a) Land use square footages and number of dwelling units per References 1 and 2.
- (b) Buildout schedule and completion date of 2028 per References 1 and 2.
- (c) The MFR dwelling units will be built out in phases including 180 affordable family apartments by 2026, 120 affordable senior apartments by 2027, and 300 marketplace family apartments by 2028.
- (d) Total land use for fast food includes Lot 2, Lot 3, and a portion of Lot 5.
- (e) At the time of preparing the WSA/WSV, the specific retail use is unknown. It is conservatively assumed that this space will be conference space and will be built out by 2025.

References:

1. Lance Kashian, 2024b. Response to Request for Information, provided by Lance Kashian on 11 June 2024.
2. Lance Kashian, 2024c. Information provided by Lance Kashian on 28 June 2024.

4 PROJECT WATER DEMAND

The City and Fresno County have adopted green building standards and water efficient landscaping ordinances consistent with previous versions of the CALGreen building standards and the California Model Water Efficient Landscape Ordinance (MWELo). Landscaping will also be consistent with Assembly Bill (AB) 1572. As part of state requirements, all new developments must comply with these efficiency standards. As such, the Proposed Project is expected to include a number of water-efficient features, including, but not limited to:

- Use of low-flow lavatory faucets, kitchen faucets, toilets, and urinals in accordance with CALGreen Code; and
- Inclusion of low-water use landscaping and high-efficiency irrigation systems to minimize outdoor water use in accordance with MWELo.

As described below, the average annual water demand for the Proposed Project is estimated based on: (1) the Cal Water *WSA Water Factor Tool* developed based on 2016-2018 water use data for the District (Cal Water, 2019); (2) water demand factors from various sources; and (3) information provided by the Project Proponent in coordination with Cal Water (Lance Kashian, 2024a; 2024b; 2024c). Total water demands include water used by the Proposed Project for residential uses, commercial uses, landscaping, and water that is lost during distribution (i.e., “distribution system losses” or “unaccounted for water”).

Table 2 includes a summary of the water demand projections associated with the proposed land uses through buildout of the Proposed Project. As described in Section 3, anticipated full buildout for the Proposed Project is 2028 (Lance Kashian, 2024c).

4.1 Residential Water Use

The water use factor for the proposed MFR units was developed by Cal Water based on customer-level metered water use records for 2016 through 2018 for the District customers, referred to as the “*WSA Water Factor Tool*” (Cal Water, 2019). The *WSA Water Factor Tool* allows the user to select appropriate water use factors for a proposed development based on factors including the mean characteristics of the sample data (e.g., existing service area building stock), or to customize the water factors based on the expected characteristics of the proposed development.

Based on the *WSA Water Factor Tool*, the MFR units are estimated to use 187 gallons per day per dwelling unit (gpd/du). This water factor represents both indoor and outdoor water use. The clubhouse land use includes a gym/fitness center, lobby, office space, and/or conference space. For the purposes of this WSA/WSV, a water demand factor of 0.070 gpd/sq ft (equivalent to that of an event center/auditorium) is conservatively assumed for the clubhouse space (USEIA,

2012).³ Applying these water factors, the MFR and clubhouse components of the Proposed Project are expected to use approximately 126 AFY and 2.3 AFY, respectively, by 2045 as shown in **Table 2**. It should be noted that a portion of the water used for residential irrigation returns to the underlying Kings Subbasin (Subbasin) and thus is not a true demand on the groundwater supply. However, for purposes of this WSA/WSV, all water used for residential purposes is conservatively considered a demand.

4.2 Commercial Water Use

The projected water demand associated with the Proposed Project's commercial uses includes hotel, fast food/small restaurant, shops, and unspecified retail uses. The water demand factor for hotel use was developed by the City of Ventura as a part of the City of Ventura's Water Demand Factor Study (City of Ventura, 2020) and is estimated at 134 gallons per day per room (gpd/room). The water demand factors used for remaining commercial uses on site were developed by the U.S. Energy Information Administration 2012 Commercial Buildings Energy Consumption Survey. The factors are estimated as 0.068 gpd/sq ft for fast food/small restaurant use, 0.032 gpd/sq ft for shops, and 0.070 gpd/sq ft for unspecified retail use. Applying these water demand factors, the commercial component of the Proposed Project is expected to use approximately 22 AFY by 2045 as shown in **Table 2**.

4.3 Community Landscaping Water Use

The Proposed Project includes a 3.6 acre landscaped central park and an estimated 0.16 acres (7,000 sq ft) of community pools. The projected water demand for the landscaped area included as part of the Proposed Project was estimated based on the Maximum Applied Water Allowance (MAWA; DWR, 2015). The Model Water Efficient Landscape Ordinance (MWELO) requires that the annual landscape irrigation water use not exceed the MAWA (DWR, 2015). As shown below, the MAWA is calculated based on the regional reference evapotranspiration rate, an evaporation adjustment factor, the total landscaped area, and the area of "special landscaped area."⁴ Water use for the Proposed Project landscaping irrigation has been conservatively assumed to be equal to the MAWA, which is the upper limit of annual applied water for established landscaped areas. It is assumed that the landscaping will be considered non-residential landscaping.

³ The water demand factor of 0.070 gpd/sq ft associated with an event center/auditorium is greater than the water demand factors for the other stated clubhouse uses (i.e., gym, lobby, and office space). Since the areas for these uses within the clubhouse are unknown, this WSA/WSV conservatively assumes the water demand for an event center/auditorium.

⁴ Special Landscaped Area includes landscaping dedicated solely to edible plants, recreational areas, areas irrigated with recycled water, or water features using recycled water.

The MAWA is calculated using the following equation:

$$\text{MAWA} = \text{ETo} \times [(\text{ETAF} \times \text{LA}) + (1 - \text{ETAF}) \times \text{SLA}]$$

where:

ETo	=	The regional reference evapotranspiration rate
ETAF	=	Evapotranspiration Adjustment Factor
		For pools (SLAs) = 1.0
		For landscaped park = 0.45
LA	=	Total landscape area (including SLA)
SLA	=	Special Landscape Area

Based on the above methodology, the total annual water use for community landscaping is estimated to be 7.6 AFY at full buildout as shown in **Table 3** and encompasses all irrigated areas (excluding the distribution system losses discussed in Section 4.4). It should be noted that a portion of water used for outdoor irrigation purposes would return to the underlying Subbasin and thus would not be a true demand on the groundwater supply. However, for purposes of this WSA/WSV, all outdoor landscaping water use is conservatively considered a demand.

AB 1572 was signed into law in October 2023 and took effect in January 2024. This regulation prohibits the use of potable water for the irrigation of nonfunctional turf⁵ located on commercial, industrial, and institutional (CII) properties, other than a cemetery, and on properties of homeowners' associations, common interest developments,⁶ and community service organizations or similar entities. AB 1572, however, does not prohibit the use of potable water for irrigation of other types of landscaping, such drought-tolerant landscaping. It is important to note that MAWA already incorporates conservative measures that limit the total water use for landscape irrigation. Therefore, this WSA/WSV assumes that landscaping for the Proposed Project will be equal to the MAWA and comply with AB 1572.

4.4 Distribution System Losses

Water distribution systems experience a degree of water loss over the course of transmission from the source to the customer. Although distribution system losses from the newly-constructed portion of the system's infrastructure associated with the Proposed Project would be expected to be minimal, it is conservatively assumed that distribution system losses associated with delivering water for the Proposed Project will ultimately be consistent with the proportion of real and apparent water loss for the District's service area per the most recent (2022) water loss audit submitted to DWR (i.e., 2.6%; DWR, 2023b). It should be noted that while these real losses represent a demand on the system, water lost through the distribution system returns to the underlying Subbasin and thus is not a true demand on the groundwater supply.

⁵ Nonfunctional turf is defined as any turf that is not functional turf, and includes turf located within street rights-of-way and parking lots. Nonfunctional turf excludes recreational areas, or areas designated by a property owner or a governmental agency to accommodate human foot traffic for recreation, including, but not limited to, sports fields, golf courses, playgrounds, picnic grounds, or pet exercise areas.

⁶ A common interest development is defined as a community apartment project, a condominium project, a planned development, or a stock cooperative.

However, for purposes of this WSA/WSV, all water loss is conservatively considered a demand. **Table 2** shows the distribution system losses for the Proposed Project, estimated at a total of 4.2 AFY by 2045.

4.5 Existing Current Water Demands on the Proposed Project Site

The Proposed Project site has historically been vacant commercial property. There are no service accounts associated with the site, and therefore there is no historical water use (Cal Water, 2024b).

4.6 Total Project Water Demand

Based on the above methodologies and assumptions, the total annual water demand for the Proposed Project by 2045 is conservatively estimated to be 162 AFY, as shown in **Table 2**. Additionally, while not quantified herein, after consideration of return flows to groundwater, the actual demand on the supply system will be less than 162 AFY.

Table 2
Summary of Estimated Annual Proposed Project Water Demand
Casitas Selma Mixed-Used Development Project, Selma District, California

Proposed Land Use	Land Use at Full Buildout (a)	Land Use Units	Demand Factor (b)	Demand Factor Units	Total Water Demand (AFY) (c)				
					2025	2030	2035	2040	2045
Residential									
MFR	600	du	187	gpd/du	0	126	126	126	126
Clubhouse (d)	29,000	sq ft	0.070	gpd/sq ft	0	2.3	2.3	2.3	2.3
Commercial									
Hotel	100	room	134	gpd/room	15	15	15	15	15
Fast Food/Small Restaurant	17,099	sq ft	0.068	gpd/sq ft	1.3	1.3	1.3	1.3	1.3
Shops	7,000	sq ft	0.032	gpd/sq ft	0.25	0.25	0.25	0.25	0.25
Unspecified Retail (e)	70,182	sq ft	0.070	gpd/sq ft	5.5	5.5	5.5	5.5	5.5
Community Landscaping									
Community Pools & Spas	7,000	sq ft	(c)	--	0	0.69	0.69	0.69	0.69
Irrigated Landscape Area	155,324	sq ft	(c)	--	0	6.9	6.9	6.9	6.9
Distribution System Losses (f)	--	--	2.6%	--	0	4.2	4.2	4.2	4.2
Existing Site Demand (g)	--	--	--	--	0	0	0	0	0
Net Annual Water Demand (h)					23	162	162	162	162

Abbreviations:

"AFY" = acre-feet per year

"gpd" = gallons per day

"du" = dwelling unit

"MFR" = multi-family residential

"Proposed Project" = Casitas Selma Mixed-UseDevelopment Project

"sq ft" = square feet

Notes:

(a) Estimated total land use square footages and dwelling unit numbers per References 1 and 2.

(b) Water demand factors for MFR per Reference 3, hotel per Reference 4, and fast food/small restaurant and shops per Reference 5.

(c) Buildout schedule and completion date of 2028 per References 1 and 2.

(d) Clubhouse land use is inclusive of gym/fitness center, lobby, office space, and conference space. For the purposes of this WSA, it is conservatively assumed that all clubhouse land use is associated conference space, which has a demand factor of 0.070 gpd/sq ft per Reference 5.

(e) At the time of preparing the WSA, the specific retail use is unknown. It is conservatively assumed that this space will be conference space.

(f) Estimated distribution system water loss associated with delivery of water to the Proposed Project is based on a rate of 2.6% per Reference 6 and includes both real and apparent losses.

Table 2
Summary of Estimated Annual Proposed Project Water Demand

Casitas Selma Mixed-Used Development Project, Selma District, California

Notes Continued:

- (g) Per Reference 7, the Proposed Project site is currently vacant commercial property with no associated accounts. As such, the existing site demand is assumed to be 0 AFY.
- (h) Total may not sum due to rounding.

References:

1. Lance Kashian, 2024b. Response to Request for Information, provided by Lance Kashian on 11 June 2024.
2. Lance Kashian, 2024c. Information provided by Lance Kashian on 28 June 2024.
3. Cal Water, 2019. Cal Water WSA Water Factor Tool, developed by M.Cubed, dated 22 October 2019.
4. City of Ventura, 2020. Final Water Demand Factor Study, City of Ventura, prepared by Wood Rodgers, dated 8 April 2020.
5. US Energy Information Administration, 2012. Commercial Buildings Energy Consumption Survey: Water Consumption in Large Buildings Summary.
6. DWR, 2023b. California Water Service Water Audit Data Report for the Selma District, submitted 19 December 2023, accessed 2 July 2024 (https://wuedata.water.ca.gov/awwa_plans).
7. Cal Water, 2024b. Information provided by Cal Water on 17 July 2024.

Table 3
Estimated Annual Landscaping Water Use

Casitas Selma Mixed-Used Development Project, Selma District, California

Landscaping Land Use	[A] Area of Land Use at Full Buildout (ac) (a)	[B] Annual Reference Evapotranspiration Rate (in) (b)	[C] Evapotranspiration Adjustment Factor (ETAF) (c)	[D] MAWA (AFY) $D = A * B * C$ (d)	Estimated Water Use (AFY)				
					2025	2030	2035	2040	2045
Community Pools & Spas	0.16	51.6	1.0	0.69	0	0.69	0.69	0.69	0.69
Irrigated Landscaped Area	3.6	51.6	0.45	6.9	0	6.9	6.9	6.9	6.9
Estimated Total Outdoor Water Use (AFY)					0	7.6	7.6	7.6	7.6

Abbreviations:

"ac" = acre

"AFY" = acre-feet per year

"ETAF" = Evapotranspiration Adjustment Factor

"in" = inches

"MAWA" = Maximum Applied Water Allowance

Notes:

- (a) Land use square footages per Reference 1 and 2.
- (b) The annual reference evapotranspiration rate for the nearby Kingsburg area is 51.6 inches, per Reference 3.
- (c) The ETAF is assumed to be 0.45 for non-residential areas per Reference 4 and 1.0 for water features per Reference 5.
- (d) The MAWA calculations are described in Reference 5.

References:

1. Lance Kashian, 2024b. Response to Request for Information, provided by Lance Kashian on 11 June 2024.
2. Lance Kashian, 2024c. Information provided by Lance Kashian on 28 June 2024.
3. DWR, 2012. California Irrigation Management Information System Reference Evapotranspiration Zones, January 2012.
4. DWR, 2020. California Code of Regulations, Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance, 29 September 2020.
5. DWR, 2021. Draft Model Water Efficient Landscape Ordinance Guidebook, dated 2021.

5 CAL WATER SELMA DISTRICT WATER DEMAND

☒ CWC § 10910

(c)(1) The city or county, at the time it makes the determination required under Section 21080.1 of the Public Resources Code, shall request each public water system identified pursuant to subdivision (b) to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted urban water management plan adopted pursuant to Part 2.6 (commencing with Section 10610).

(2) If the projected water demand associated with the proposed project was accounted for in the most recently adopted urban water management plan, the public water system may incorporate the requested information from the urban water management plan in preparing the elements of the assessment required to comply with subdivisions (d), (e), (f), and (g).

(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.

Consistent with the UWMP Act (CWC §10610-10656), the 2020 UWMP presents estimates of projected future water demand for the entire District service area in five-year increments, between the years 2025 and 2045 (Cal Water, 2021). As discussed further below, the 2020 UWMP demand projections account for: (1) demands for the existing service area and accounts, (2) projected growth based on population and employment estimates, and (3) all anticipated new development based on information then available to Cal Water.

As discussed in Section 5.4 below, the Proposed Project's demands are not considered to be within the projected growth anticipated by the 2020 UWMP. Total water demands for the Proposed Project are therefore considered additive to the District's projected demands.

5.1 Current and Historical Water Demand Within the District Service Area

Historical water demand within the District from 2000 through 2023 is summarized in **Table 4**. Based on average water use from 2019 to 2023, the majority of the water demand within the District is from the single family residential (SFR) sector, which represented 65% of the demand. The remainder of the demand was split between commercial (12% of overall demand), non-revenue water (8.2% of overall demand), MFR (8.1% of overall demand), institutional (6.2% of overall demand), industrial (1.0% of overall demand), and other (0.31% of overall demand) (Cal Water, 2024b).

Water use from 2000 to 2008 remained fairly consistent, at an average of approximately 6,773 AFY. A decrease in water use occurred from 2008 to 2011, which generally corresponds with the 2007 to 2009 drought and the economic downturn. Then, a significant drop in water demand occurred from 2014 through 2016, and 2022 through 2023, corresponding with the

droughts and mandatory state-wide water use restrictions and water conservation targets. Total water demand within the District was 3,711 AFY in 2023 (Cal Water, 2024a).

5.2 District Water Demand Projections

The 2020 UWMP water demand projections account for growth within the District service area through 2045. The 2020 UWMP projects population and associated water demands based on historical rates of service area growth plus known future development to be served by the District.

The 2020 UWMP demand projections for the District are presented in **Table 5** in five-year increments through 2045. It is estimated that the total annual water demand for the District will be approximately 4,800 AFY in 2045.

5.3 Planned Development Projects within the District

In addition to the Proposed Project, Cal Water has identified a number of additional development projects within the District:

- TT 6019 – A 301-unit SFR subdivision, located on the north side of East Dinuba Avenue between south Shaft Avenue and Thompson Avenue.
- Singh Apartments and Commercial (NEQ Nebraska and Highland Development) – A 144-unit MFR development and two commercial developments on approximately 16 acres located at the northeast corner of Highland Avenue and Nebraska Avenue.
- Josan Development (SWQ Nebraska and Highland Development) – A mixed-use development including approximately 200 dwelling units, a hotel, and various commercial retail, eating, and auto sales establishment located at the southeastern corner of the Nebraska and Highland Avenue intersection.
- Caliber Collision Selma – The construction of a Regional Commercial Center at the northwest corner of the SR 43 and Rose Avenue, which would include approximately 42,149 sq ft of retail commercial uses consisting of a sit-down restaurant, and combined retail and drive-thru dining services and a mini mart/gas station.
- Amberwood (Tract 6244) – A 55 acres development of 270 SFR parcels with 2 outlots in the southern portion of the Amberwood Specific Plan on the northeast corner of E. Floral Avenue and Dockery Avenue.
- Canales – A 153-unit SFR development on 55 acres and three commercial lots.
- Selma Crossings – The development of approximately 3.5 million sq ft of commercial retail, office and residential uses on approximately 288 acres located on the northwest, southwest, and northeast quadrants of the intersection of Mountain View and Highway 99.
- Selma Grove – A regional shopping center consisting of about 94 acres and approximately 973,100 sq ft of retail uses located north of Floral Avenue and west of Highway 99.

- Dinuba & McCall Gas station – A 5,000 sq ft mini-mart with a 1,000 sq ft quick service restaurant, and eight gas pump facility (16 fueling stations).

The projects listed above are not explicitly mentioned in the District’s 2020 UWMP. Additionally, the project statuses and estimated water demands are unknown at this time. Therefore, for the purposes of this WSA/WSV, these projects are not considered in the projected demand growth analysis for the District.

In addition to the projects listed above, Cal Water has identified two development projects that are moving forward and have estimated water demands: (1) the Nagra Estates project, including ten SFR dwelling units and a park, and (2) the Valley View project, including 37 SFR dwelling units. Nagra Estates has not yet been built out, while Valley View came online in 2022 and has completed 34 of the 37 planned SFR dwelling units.

Per the District’s 2020 UWMP, the number of SFR service connections in the District’s service area are projected to increase by approximately 26% between 2020 and 2045 (Cal Water, 2021a, 2021b). This corresponds to an estimated net increase of 1,500 service connections and a net increase of 706 AFY of demand in the SFR sector within the District. When considering the average water demand of Valley View (17 AFY) and the estimated demand for Nagra Estates (5 AFY), the combined demand of the two known developments would account for 3% of the projected net SFR growth for the District (Cal Water, 2024c). Therefore, while the two developments are not explicitly included in the 2020 UWMP water demand growth projections, their demands are considered to be within the projected growth anticipated by the 2020 UWMP. Total water demands for the District are therefore inclusive of the demands associated with the Nagra Estates and Valley View projects.

5.4 Review of Proposed Project’s Inclusion in 2020 UWMP Growth Projections

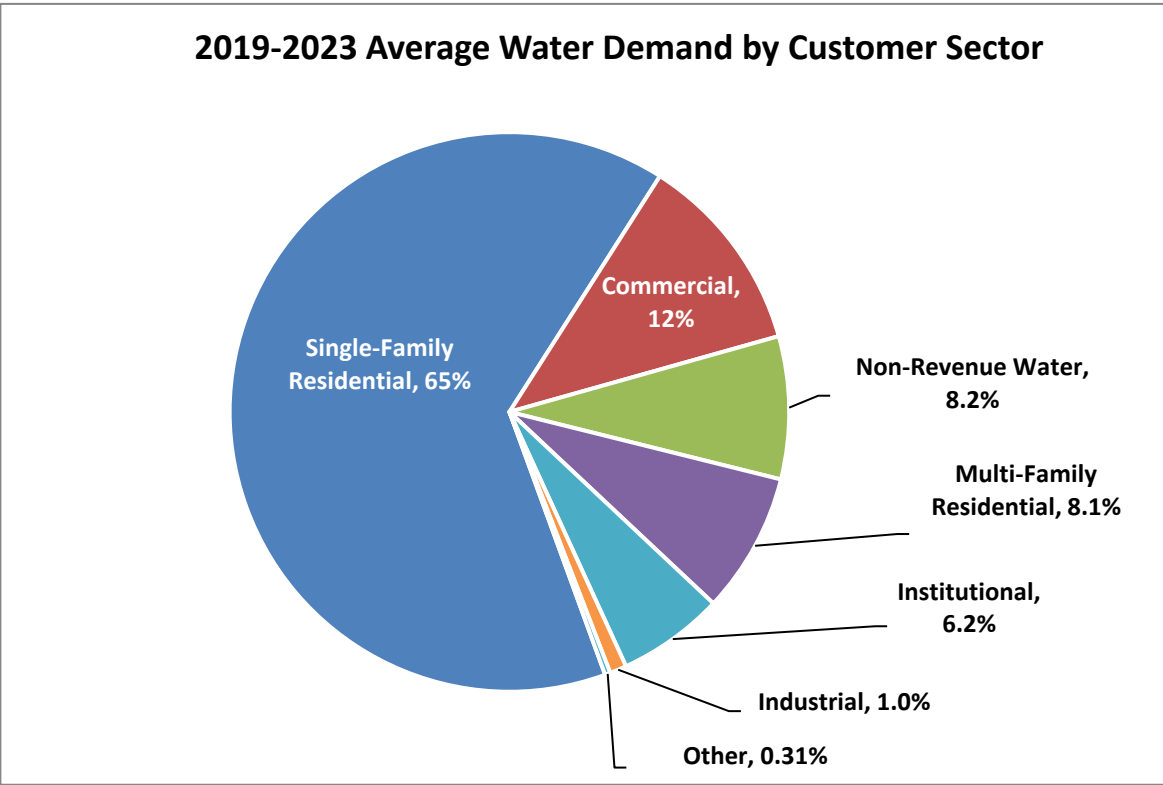
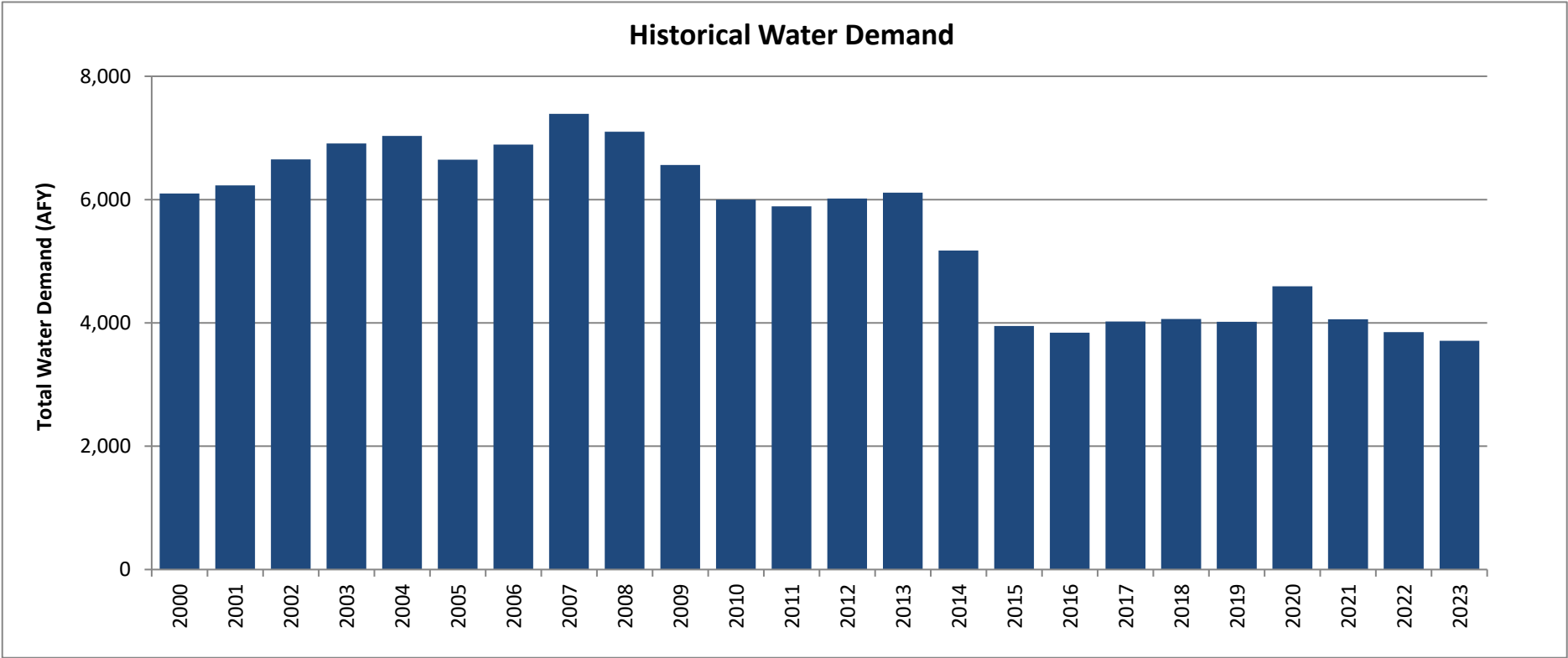
The 2020 UWMP assumed a decrease in MFR service connections and demands (Cal Water, 2021b). Because the total water demand associated with the Proposed Project is higher than what was accounted for in the District 2020 UWMP projections, it is conservatively assumed that the Proposed Project is not explicitly included in these projections. Consequently, the demands associated with the Proposed Project are assumed to be additive to District’s overall demands.

5.5 Total Projected District Water Demand (Inclusive of the Proposed Project)

Table 5 shows the projected water demands for the District inclusive of the additive demands associated with the Proposed Project. As shown, the Proposed Project will increase the District’s demand by 23 AFY in 2025 and by 162 AFY in 2045.

Table 4
Historical Water Demand for the Selma District
Casitas Selma Mixed-Used Development Project, Selma District, California

	Selma District Historical Annual Water Demand (AFY) (a)																							
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total Water Demand	6,099	6,228	6,652	6,912	7,032	6,648	6,893	7,391	7,100	6,563	6,000	5,891	6,019	6,113	5,173	3,952	3,839	4,021	4,063	4,017	4,592	4,060	3,852	3,711



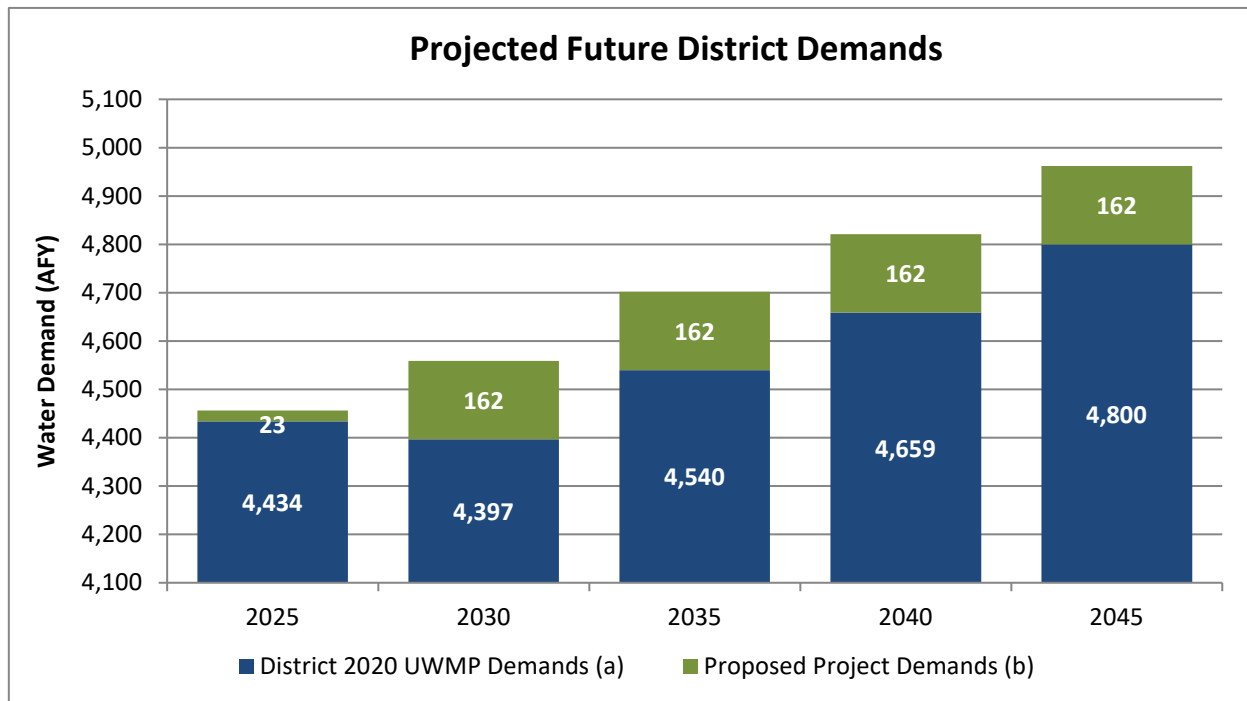
Abbreviations:
"AFY" = acre-feet per year

Notes:
(a) Historical water demands from 2000 through 2023 are based on production numbers per Reference 1.

References:
1. Cal Water, 2024a. Historical Demand and Production Data provided by Cal Water on 9 May 2024.

Table 5
Projected Future Water Demand for the Selma District
Casitas Selma Mixed-Used Development Project, Selma District, California

Water Demand	Projected Annual Water Demand (AFY)				
	2025	2030	2035	2040	2045
District 2020 UWMP Demands (a)	4,434	4,397	4,540	4,659	4,800
Proposed Project Demands (b)	23	162	162	162	162
Total District Demands (Inclusive of Additive Proposed Project Demands)	4,457	4,559	4,702	4,821	4,962



Abbreviations:

"AFY" = acre-feet per year

"District" = California Water Service, Selma District

"DWR" = California Department of Water Resources

"Proposed Project" = Casitas Selma Mixed-Use Development Project

"UWMP" = Urban Water Management Plan

"WSA" = Water Supply Assessment

"WSV" = Water Supply Verification

Notes:

(a) Water demand projections for the District were updated in 2021 and are presented from DWR Table 4-2, per Reference 1.

(b) As discussed in Section 5 of the WSA/WSV, the Proposed Project demands are not included within the 2020 UWMP and are therefore considered additive to District demands.

References:

1. Cal Water, 2021b. 2020 Urban Water Management Plan, Selma District, prepared by California Water Service, dated June 2021.

6 CAL WATER SELMA DISTRICT WATER SUPPLY

☒ **CGC § 66473.7**

(c) The applicable public water system's written verification of its ability or inability to provide a sufficient water supply that will meet the projected demand associated with the proposed subdivision as required by subdivision (b) shall be supported by substantial evidence. The substantial evidence may include, but is not limited to, any of the following:

(1) The public water system's most recently adopted urban water management plan adopted pursuant to Part 2.6 (commencing with Section 10610) of Division 6 of the Water Code.

(2) A water supply assessment that was completed pursuant to Part 2.10 (commencing with Section 10910) of Division 6 of the Water Code.

(3) A groundwater sustainability plan adopted or alternative approved pursuant to Part 2.74 (commencing with Section 10720) of Division 6 of the Water Code.

(4) Other information relating to the sufficiency of the water supply that contains analytical information that is substantially similar to the assessment required by Section 10635 of the Water Code.

This section identifies the water supplies for the District and discusses the vulnerability of the various supplies to drought and other factors affecting water supply reliability. Unless otherwise noted, the source of the information included in this section is the District's 2020 UWMP. The District relies entirely on groundwater pumped from the Kings Subbasin of the San Joaquin Valley Basin.

6.1 Identification of Water Supply Rights

☑ CWC § 10910

(d)(1) The assessment required by this section shall include an identification of any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed project, and a description of the quantities of water received in prior years by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), under the existing water supply entitlements, water rights, or water service contracts.

☑ CGC § 66473.7

(d) When the written verification pursuant to subdivision (b) relies on projected water supplies that are not currently available to the public water system, to provide a sufficient water supply to the subdivision, the written verification as to those projected water supplies shall be based on all of the following elements, to the extent each is applicable:

(1) Written contracts or other proof of valid rights to the identified water supply that identify the terms and conditions under which the water will be available to serve the proposed subdivision.

(2) Copies of a capital outlay program for financing the delivery of a sufficient water supply that has been adopted by the applicable governing body.

(3) Securing of applicable federal, state, and local permits for construction of necessary infrastructure associated with supplying a sufficient water supply.

(4) Any necessary regulatory approvals that are required in order to be able to convey or deliver a sufficient water supply to the subdivision.

(g) The written verification prepared under this section shall also include a description, to the extent that data is reasonably available based on published records maintained by federal and state agencies, and public records of local agencies, of the reasonably foreseeable impacts of the proposed subdivision on the availability of water resources for agricultural and industrial uses within the public water system's service area that are not currently receiving water from the public water system but are utilizing the same sources of water. To the extent that those reasonably foreseeable impacts have previously been evaluated in a document prepared pursuant to the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) or the National Environmental Policy Act (Public Law 91-190) for the proposed subdivision, the public water system may utilize that information in preparing the written verification.

Pursuant to CWC §10910(d)(1), CGC §66473.7(d), and CGC §66473.7(g), a WSA/WSV is required to include identification of all water supply entitlements, water rights, and water service contracts relevant to the identified water supply for the Proposed Project. The District meets its demand solely through groundwater. In accordance with these requirements, this WSA/WSV includes a summary of Cal Water's groundwater supply in the District service area. Given that the supply source described herein is currently available to the District, the elements described in CGC §66473.7(d) are not included in this WSA/WSV.

6.2 Groundwater Supply

☒ CWC § 10910

(f) If a water supply for a proposed project includes groundwater, the following additional information shall be included in the water supply assessment:

(1) A review of any information contained in the urban water management plan relevant to the identified water supply for the proposed project.

(2)(A) A description of any groundwater basin or basins from which the proposed project will be supplied.

(B) For those basins for which a court or the board has adjudicated the rights to pump groundwater, a copy of the order or decree adopted by the court or the board and a description of the amount of groundwater the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), has the legal right to pump under the order or decree.

(C) For a basin that has not been adjudicated that is a basin designated as high- or medium-priority pursuant to Section 10722.4, information regarding the following:

(i) Whether the department has identified the basin as being subject to critical conditions of overdraft pursuant to Section 12924.

(ii) If a groundwater sustainability agency has adopted a groundwater sustainability plan or has an approved alternative, a copy of that alternative or plan.

(D) For a basin that has not been adjudicated that is a basin designated as low- or very low priority pursuant to Section 10722.4, information as to whether the department has identified the basin or basins as overdrafted or has projected that the basin will become overdrafted if present management conditions continue, in the most current bulletin of the department that characterizes the condition of the groundwater basin, and a detailed description by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), of the efforts being undertaken in the basin or basins to eliminate the long-term overdraft condition.

(3) A detailed description and analysis of the amount and location of groundwater pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), for the past five years from any groundwater basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

(4) A detailed description and analysis of the amount and location of groundwater that is projected to be pumped by the public water system, or the city or county if either is required to comply with this part pursuant to subdivision (b), from any basin from which the proposed project will be supplied. The description and analysis shall be based on information that is reasonably available, including, but not limited to, historic use records.

(5) An analysis of the sufficiency of the groundwater from the basin or basins from which the proposed project will be supplied to meet the projected water demand associated with the proposed project. A water supply assessment shall not be required to include the information required by this paragraph if the public water system determines, as part of the review required by paragraph (1), that the sufficiency of groundwater necessary to meet the initial and projected water demand associated with the project was addressed in the description and analysis required by paragraph (4) of subdivision (b) of Section 10631.

☑ **CGC § 66473.7**

(a)(2)(E) If a proposed subdivision relies in whole or in part on groundwater, the following factors:

(i) For a basin for which a court or the State Water Resources Control Board has adjudicated the rights to pump groundwater, the order or decree adopted by the court or the State Water Resources Control Board.

(ii) For a basin that has not been adjudicated, as follows:

(I) For a basin designated as high- or medium-priority pursuant to Section 10722.4 of the Water Code, the most recently adopted or revised adopted groundwater sustainability plan or approved alternative. If there is no adopted groundwater sustainability plan or approved alternative, information as to whether the Department of Water Resources has identified the basin or basins as overdrafted or has projected that the basin will become overdrafted if present management conditions continue.

(II) For a basin designated as low- or very low priority pursuant to Section 10722.4 of the Water Code, information as to whether the Department of Water Resources has identified the basin or basins as overdrafted or has projected that the basin will become overdrafted if present management conditions continue.

(g) The written verification prepared under this section shall also include a description, to the extent that data is reasonably available based on published records maintained by federal and state agencies, and public records of local agencies, of the reasonably foreseeable impacts of the proposed subdivision on the availability of water resources for agricultural and industrial uses within the public water system's service area that are not currently receiving water from the public water system but are utilizing the same sources of water. To the extent that those reasonably foreseeable impacts have previously been evaluated in a document prepared pursuant to the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code) or the National Environmental Policy Act (Public Law 91-190) for the proposed subdivision, the public water system may utilize that information in preparing the written verification.

(h) Where a water supply for a proposed subdivision includes groundwater, the public water system serving the proposed subdivision shall evaluate, based on substantial evidence, the extent to which it or the landowner has the right to extract the additional groundwater needed to supply the proposed subdivision. Nothing in this subdivision is intended to modify state law with regard to groundwater rights.

As shown on **Figure 3**, the District overlies and pumps water from a single water source, the Kings Subbasin of the San Joaquin Valley Groundwater Basin (DWR Basin No. 5-022.08). Additional details regarding the Subbasin description, groundwater management, and historical groundwater use are included below.

6.2.1 Subbasin Description

The Subbasin covers approximately 981,325 acres (1,533 square miles) and is bounded on the north by the San Joaquin River and on the east by the contact of the alluvium with the nonsedimentary, metavolcanics, and granite rocks of the Sierra Nevada foothills. The southern and western Subbasin boundaries follow multiple features including the Kings River, the Tulare/Kings County line, and the Westlands Water District boundary (DWR, 2018).

The Subbasin is not adjudicated. In its evaluation of California groundwater basins under the Sustainable Groundwater Management Act (SGMA), DWR determined that the Subbasin is in a condition of critical overdraft (DWR, 2019). The Subbasin is further designated as a high priority basin under DWR's 2019 Phase 2 Basin Prioritization. Under this prioritization process, basins are ranked on eight components, and if a basin is assigned more than 21 total points, it is defined as

“high priority.” The main factors driving the Subbasin’s designation include irrigated acreage per square mile (5 out of 5 possible points), groundwater reliance (5 out of 5 possible points), population growth (4 out of 5 possible points), total well density (4 out of 5 possible points), and documented impacts including declining groundwater levels and subsidence (4 out of 5 possible points). However, because the Subbasin is critically overdrafted, the Subbasin is assigned 40 priority points, which is the maximum total points under DWR’s ranking system.

6.2.2 Groundwater Management

6.2.2.1 Non-SGMA Groundwater Management Program

Prior to the passage of SGMA, water agencies in the Subbasin cooperated in water supply and groundwater management efforts. In 2001, four agencies, the Consolidated Irrigation District (CID), Kings River Conservation District, Alta Irrigation District, and Fresno Irrigation District, formed a Basin Advisory Panel, and signed a Memorandum of Understanding defining a cooperative effort to manage existing supplies and obtain new supplies. Recognizing the need for wider stakeholder participation, the Upper Kings Water Forum (Forum), a group of 24 agencies with interest in the Basin, was formed in 2004. The Forum completed the Kings Basin Integrated Regional Water Management Plan (IRWMP) that identified and defined different water management scenarios and evaluated alternatives to determine the most economical and best use of the water resources of the region. In 2009, the Forum became a more formal organization governed by a Joint Powers Agreement (JPA) known as the Kings Basin Water Authority (Kings Basin Water Authority, 2018).

The most recent update to the Kings Basin IRWMP was adopted in October 2018. The five regional goals identified by the Kings Basin Water Authority and stated in the IRWMP include: (1) halt the current overdraft and provide for sustainable management of surface and groundwater, (2) increase water supply reliability, enhance operational flexibility, and reduce system constraints, (3) improve and protect water quality, (4) provide additional flood protection, and (5) protect and enhance aquatic ecosystems and wildlife habitat. These regional goals were used to inform measurable objectives and potential project proposals to accomplish the goals of the region. The GSPs (discussed below) supersede the IRWMP as the groundwater management plan for the Subbasin.

In January 2014, Cal Water and the City jointly filed an application with the California Public Utilities Commission (CPUC) to apply groundwater surcharges to customers in the Selma District. The Office of Ratepayer Advocates, the City, and Cal Water reached a settlement of all issues that would apply groundwater surcharges (i.e., to collect approximately \$0.5 million per year over eight years) for remittance to the City. The CPUC approved the settlement in March 2015. Beginning in April 2015, the groundwater surcharge was listed as a separate line item on customers' bills. The surcharges were designated for use by the City and the CID for groundwater recharge projects in the Upper Kings River Basin.

6.2.2.2 SGMA Groundwater Management

In 2014, the California State Legislature enacted SGMA with subsequent amendments in 2015. Among other things, SGMA requires the formation of GSAs and the development and implementation of GSPs for groundwater basins that are designated by DWR as medium or high priority. As a high priority, critically overdrafted, and non-adjudicated basin, the Subbasin is subject to the requirements of SGMA, including the requirement to be covered by one or more GSAs and to prepare and submit to DWR one or more GSPs.

Pursuant to these SGMA requirements, seven GSAs were formed to collectively assume responsibility for sustainable groundwater management of the Subbasin. The seven GSAs within the Subbasin include: the CKGSA, North Fork Kings GSA, South Kings GSA, McMullin Area GSA, Kings River East GSA, North Kings GSA, and James GSA. The Selma District falls within the jurisdiction of the CKGSA, which covers an area of 141,452 acres in the east-central portion of the Subbasin, including the entirety of the CID, the City, the community of Caruthers, the Selma-Kingsburg-Fowler sanitation district, and a number of smaller communities and properties.

In 2020, the GSAs coordinated to prepare seven GSPs within the Subbasin (i.e., CKGSA GSP, James GSA GSP, Kings River GSA GSP, McMullin Area GSA GSP, North Fork Kings GSA GSP, and South Fork Kings GSA GSP), but certain technical efforts (e.g., development of the Kings Basin Water Budget) were cooperatively developed through a Coordination Agreement. The District falls within the jurisdiction of the CKGSA GSP.

All of the Subbasin's GSPs were submitted to DWR in January 2020. In January 2022, DWR announced that the Subbasin's GSPs were collectively determined to be "incomplete" pursuant to SGMA (23 CCR §355.2(e)(2)). The deficiencies identified by DWR are provided verbatim below.

- A. *The GSPs do not set their sustainable management criteria for chronic lowering of groundwater levels in a manner consistent with the requirements of SGMA and the GSP Regulations.*
 - a. *The GSPs lack justification for, and the effects associated with, the undesirable result definition for the chronic lowering of groundwater levels. The GSAs do not consider the effect the groundwater conditions, associated with the undesirable result definition, would have on the interests of the Subbasin's beneficial uses and users of groundwater. Additionally, the definition appears to be inconsistent with the intent of SGMA to manage groundwater basins sustainably and for the avoidance of undesirable results.*
 - b. *The GSPs did not establish their minimum thresholds in a manner consistent with SGMA and the GSP Regulations. Specifically, the GSPs established minimum thresholds that were decoupled from the Subbasin's undesirable result definition and do not represent an actual threshold that, if exceeded, may cause an undesirable result.*

- B. The GSPs do not set minimum thresholds and measurable objectives for land subsidence in a manner consistent with their undesirable result definition and the requirements of SGMA and the GSP Regulations.*
- a. The SKGSA did not provide adequate information and data to demonstrate that undesirable results related to land subsidence are not present and are not likely to occur.*
 - b. The GSPs did not include similar methods to identify the structures, infrastructure, and/or major roads within individual plan areas nor did they provide any metrics to determine the level of functionality loss that is deemed significant and unreasonable, per the Subbasin's undesirable result definition.*
 - c. Each GSP, except for JGSA and SKGSA, established minimum thresholds that were greater than or equal to an individual plan area's maximum historical land subsidence rate. Collectively, the GSAs established minimum thresholds which ranged from 4 to 12.5 inches per year. These GSPs do not provide adequate information and criteria to justify the established minimum thresholds. 4.*
 - d. The GSPs established measurable objectives which ranged from 3 to 10 inches per year. These measurable objectives do not appear to be consistent with the intent of SGMA to avoid or minimize land subsidence once basins achieve their sustainability goal.*
- C. The GSPs do not consistently identify interconnected surface water systems, or provide the location, quantity, and timing of depletions of those systems due to groundwater use. The GSPs do not define sustainable management criteria for the depletions of interconnected surface water in the manner required by the GSP Regulations. .*
- a. The GSPs do not include a subbasin-wide integrated surface water-groundwater numerical model or an equally effective method, tool, or analytical model.*
 - b. The GSAs do not currently have a sufficient technical understanding of interconnected surface waters in the Subbasin and do not identify this lack of understanding as a data gap.*
 - c. The GSPs do not establish sustainable management criteria for the depletions of interconnected surface water nor do the GSPs sufficiently demonstrate that undesirable results for the depletions of interconnected surface water are not applicable for the Subbasin.*
- D. The GSPs do not provide adequate information to support the selection of degraded water quality sustainable management criteria.*
- a. The CKGSA did not provide sufficient rationale for not establishing sustainable management criteria for degraded water quality until the first five-year update.*
 - b. The remaining GSPs do not provide numerical minimum threshold values at groundwater wells where the historical concentrations of a constituent of concern was greater than the constituent's maximum contaminant level (MCL).*

- c. *The GSPs do not provide information related to how the GSAs evaluated whether GSA actions, which occur during GSP implementation, are attributing to the degradation of groundwater quality and whether the monitoring network can sufficiently determine the cause(s) of future groundwater quality degradation.*

Pursuant to 23 CCR §355.2(e)(2), the GSAs had 180 days from the date of the determination (i.e., 27 July 2022) to correct the identified deficiencies. Subsequently, the GSAs organized to revise the GSPs to address DWR recommendations. The revised GSPs were resubmitted to DWR in July 2022 and DWR officially approved the collective GSPs and coordination agreement in August 2023 (DWR, 2023a).

As defined under SGMA, sustainable yield means “the maximum quantity of water, calculated over a base period representative of long-term conditions in a basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing undesirable results (CWC §10721(w)).” The CKGSA GSP estimated sustainable yield as the total groundwater recharge (from natural and artificial sources) minus the groundwater outflow. The sustainable yield for the Subbasin is estimated to be 1,140,000 AFY (CKGSA, 2022). While the CKGSA GSP defined a Subbasin-wide sustainable yield value, the sustainable yield has not been allocated at the present time. The CKGSA GSP also notes that this value cannot be used to estimate sustainable yield in local areas, and that the effective sustainable yield on a per acre basis will be different for each GSA and may also vary in different parts of a GSA (CKGSA, 2022).

Projects and management actions to support achievement of the Subbasin’s sustainability goal under SGMA are proposed by the GSAs and documented in their respective GSPs. The main program proposed by the CKGSA GSP to address overdraft conditions in the Subbasin is to increase surface water infiltration through conversion of farmland to dedicated intentional recharge projects with the intention of stabilizing the water table at current levels by 2040. Other projects include a surface water-groundwater interconnection data analysis to fill existing data gaps, and a domestic well mitigation program for mitigating domestic wells that go dry or are in imminent threat of going dry. The CID will carry out the activities of the CKGSA (CKGSA, 2022).

While there are no allocations or pumping restrictions currently proposed by the CKGSA, the CKGSA has listed “Groundwater Allocation” and “Groundwater Pumping Restrictions” as management actions that “are envisioned to be employed if project development is not proceeding sufficiently to achieve interim milestones”. The GSAs in the Subbasin have agreed upon initial quantities of storage change for each GSA to correct in order to achieve sustainability. The CKGSA and South Kings GSA’s proposed initial responsibility is 7,100 AFY, collectively (CKGSA, 2022). The assigned responsibility for reducing Subbasin overdraft is subject to revision at least every five years. Therefore, while groundwater allocations and pumping restrictions are not currently implemented, allocations may be implemented in the future to achieve sustainability, which could affect the District.

As reported in the Kings Subbasin Groundwater Sustainability Annual Report for Water Year (WY) 2023, the GSAs have made progress towards implementing projects and management actions

since the release of their respective GSPs (Kings Subbasin GSAs, 2024). For example, in the CKGSA, the CID executed an agreement with DWR for the removal of agricultural plantings on up to 200 acres for the development of new groundwater recharge basins, purchased an additional 77 acres of farmland for the construction of a groundwater recharge basin, initiated construction of four new recharge basins totaling 160 acres, and removed agricultural plantings, constructed a 50-acre recharge basin, and installed temporary canal turnouts in Fresno County. Additional details regarding implementation of projects and management actions for all the GSAs within the Subbasin are included in the Kings Subbasin Groundwater Sustainability Annual Report for WY 2023 (Kings Subbasin GSAs, 2024).

6.2.3 Groundwater Use

The District operates 16 wells within the District boundaries, all of which overlie the Subbasin (**Figure 3**; Cal Water, 2021b). Pursuant to CWC §10910(f)(3) and CGC §66473.7(2)(A), the amount of groundwater pumped by Cal Water within the District for the past 20 years and prior years is provided in **Table 6**. The groundwater pumping data shown in **Table 6** extends beyond the required period and includes data from 2000 through 2023 (Cal Water, 2024). The available groundwater supplies have been sufficient to meet all of the District's demands in all prior years.

As can be seen from the data shown in **Table 6**, the groundwater pumping volumes within the District in recent years (an average of 4,406 AFY from 2019 through 2023) are approximately 30% lower than they were in previous years (an average of 5,926 AFY from 2000 through 2018), reflecting Cal Water's successful implementation of water conservation measures in response to the drought and continued long-term efficiency due to active and passive conservation (Cal Water, 2024).

6.2.4 Analysis of Sufficiency of Groundwater Supply

As described in Section 6.1, the sole source of supply for the District is groundwater pumped from the Subbasin. Although the 2020 UWMP anticipates sufficient groundwater supply under all conditions for the District as a whole, given that the demands associated with the Proposed Project were not included in the 2020 UWMP demand projections for the District, an analysis of the sufficiency of the groundwater supply to meet Project demands is required pursuant to CWC §10910(f)(5) and CGC §66473.7(a)(2)(E).

6.2.4.1 Sustainable Yield Analysis

Historically, the groundwater supplies available to the District from the underlying Subbasin have always been sufficient to meet District demands and the Cal Water supply wells have not dewatered, even during historical drought periods. The District's 2020 UWMP provided an analysis of the availability of groundwater supply for the District based on historical groundwater use and review of available information regarding groundwater supply availability to the District, including the impacts of SGMA. The analysis found that groundwater supplies are expected to be sufficient to meet the projected future demands of the District through 2045. While this analysis did not include the additive demands associated with the Proposed Project, it is estimated that the District's demands inclusive of the Proposed Project will still be well below historical

groundwater demands. By 2045, groundwater demands for the District, inclusive of water demands associated with the Proposed Project, are projected to be approximately 4,962 AFY, or 965 AFY less than the average historical groundwater demands from 2000 through 2018 (see **Table 6**).

Additionally, the City and Cal Water have a settlement agreement with CID to collect money as part of water rates to construct recharge facilities within the groundwater basin. Although there are no specific projects currently proposed, the City and District anticipate and are planning for more recharge in the future, and thus the impacts to the groundwater basin would still be negligible to serve the Proposed Project.

It is also important to note that from a regional and Subbasin-wide standpoint, the District pumping is only a small fraction of total groundwater pumping. Based on the Kings Subbasin Groundwater Sustainability Annual Report for WY 2023, groundwater pumping within the Subbasin was approximately 864,000 AFY in WY 2023. Irrigated agriculture accounted for approximately 83% of total pumping within the Subbasin, while total urban pumping only accounted for approximately 17% of total pumping within the Subbasin, of which the District is only a portion (Kings Subbasin GSAs, 2024). Therefore, it is likely that management of agricultural groundwater use, rather than urban use, will be a much larger determining factor in maintaining groundwater sustainability in the Subbasin in the future.

Because of the demonstrated ability of the District to meet historical demands from the Subbasin that are even greater than the projected demands inclusive of the Proposed Project, and given that the CKGSA has not indicated any plans to limit urban pumping as part of GSP implementation (see Section 6.2.2.2), it is reasonable to conclude the groundwater supply from the Subbasin is sufficient to meet the District's groundwater demand inclusive of the Proposed Project.

Pursuant to CGC §66473.7(g), it is important to note that there may be other industrial or agricultural users within the District's service area who rely on groundwater from the Subbasin and are not currently receiving water from the District. However, the Proposed Project will not have any foreseeable impacts on these users, as the District's projected groundwater pumping (inclusive of the Proposed Project) is expected to be less than the District's historical groundwater pumping.

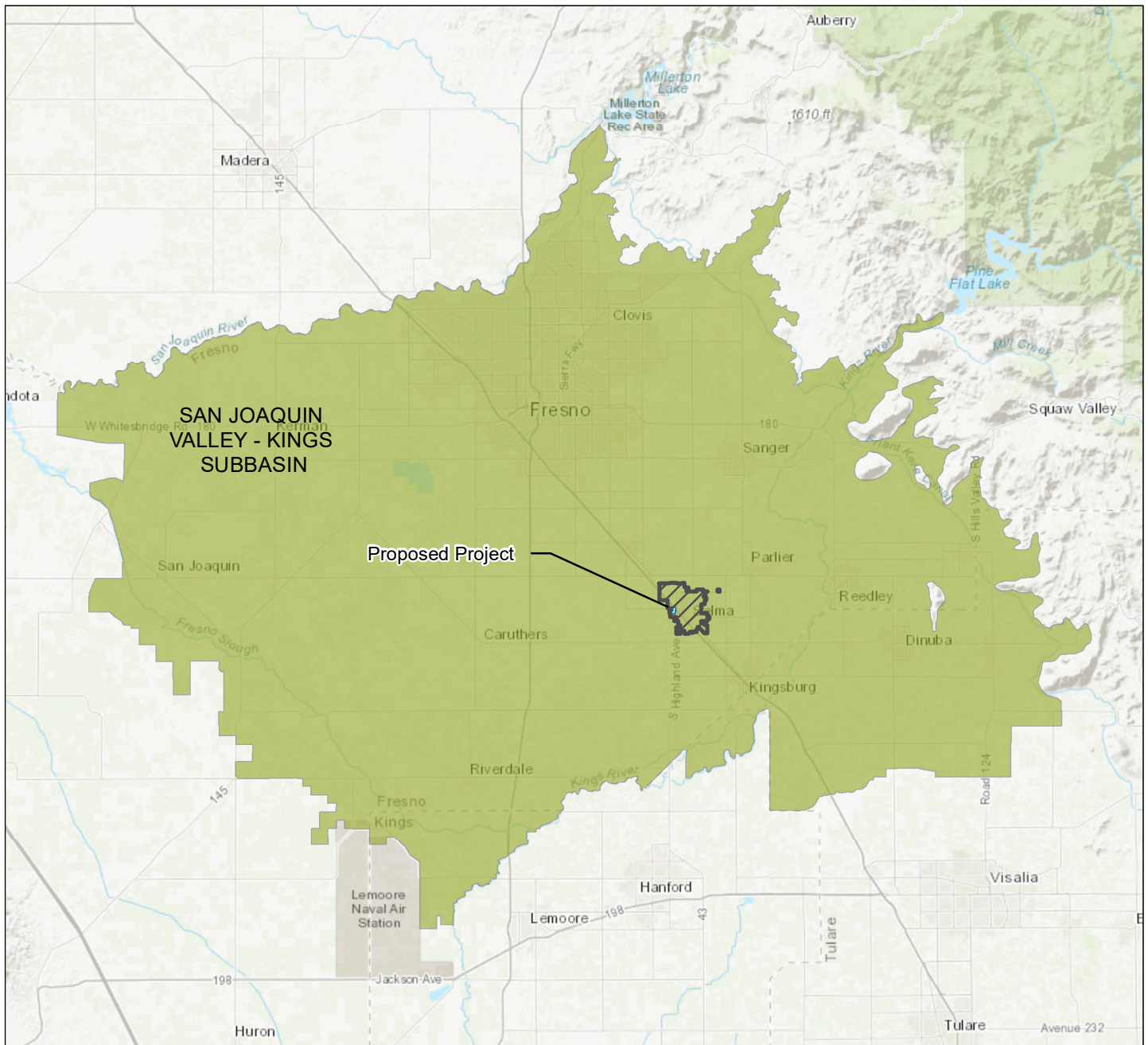
Cal Water holds certain water rights to groundwater it has pumped and used as an overlying owner and appropriator. Cal Water's water rights have been dedicated to public use, and Cal Water is required by the CPUC to provide water to all customers within its designated service area under reasonable rules and regulations. Further, under California law municipal water rights and uses have a higher priority and are entitled to more protection than other uses of water, including in connection with SGMA. Use of water for domestic purposes is recognized as the "highest use" of water in the State of California pursuant to CWC §106, and the rights of urban water purveyors should be protected to the fullest extent necessary for existing and future uses, pursuant to CWC §106.5.

SGMA is intended to preserve the security of water rights in the state to the greatest extent possible, and was not intended to determine, modify or alter any surface water or groundwater rights or priorities (CWC §10720.1(b), 10720.5(a) and (b)). While SGMA, and consequently implementation of the GSPs, are not anticipated to change the availability of groundwater to meet the District's projected demands, the long-term impacts of SGMA implementation in the Subbasin are still uncertain. The GSAs are continuing the implementation of the GSPs to stabilize water levels and provide for sustainable management of the groundwater resource.


6.3 Total Projected Potable Supply in Normal, Single Dry, and Multiple Dry Years

As discussed above, groundwater constitutes the sole source of supply for the District. Historical (2010 through 2023) and projected (every five years from 2025 through 2045) groundwater pumping rates per the 2020 UWMP are presented in **Table 7**.

As demonstrated above and in the 2020 UWMP, there is sufficient groundwater supply available to meet the projected future District demands based on the demonstrated ability of the District to meet historical demands from the Subbasin that are even greater than the District's projected demands. In addition, the CKGSA has not indicated any plans to limit urban pumping as part of CKGSA GSP implementation (see Section 6.2.2.2). Therefore, consistent with the District's 2020 UWMP, the available supplies to the District are considered to be equal to demands under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a 5-year drought period). The total projected potable supplies for the District for normal, single dry, and multiple dry years are presented in **Table 8**, **Table 9**, and **Table 10**.




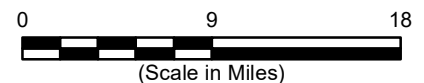
Legend

 Service Area Boundary

 Proposed Project

Groundwater Basins

 San Joaquin Valley - Kings Subbasin



Regional Setting and Groundwater Subbasins

Casitas Selma Mixed-Use Development Project

Notes

1. All locations are approximate.

Sources

1. Basemap provided by ESRI.
2. DWR groundwater basins are based on the boundaries defined in California's Groundwater, Bulletin 118-2019 Update.

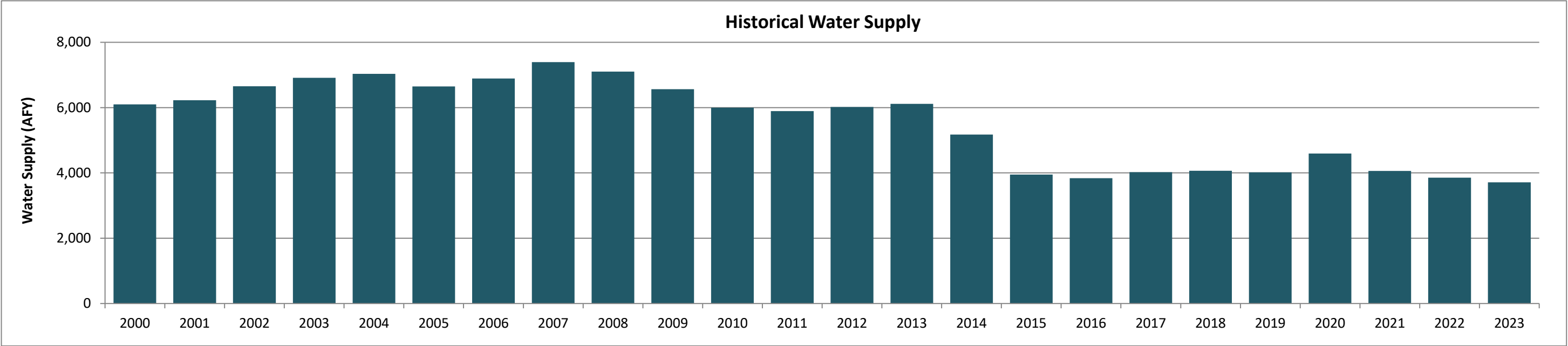


Selma, CA
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Figure 3

Table 6
Historical Water Supply for the Selma District
Casitas Selma Mixed-Used Development Project, Selma District, California

District Water System	Historical Water Supply (a) (AFY)																							
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Groundwater Wells	6,099	6,228	6,652	6,912	7,032	6,648	6,893	7,391	7,100	6,563	6,000	5,891	6,019	6,113	5,173	3,952	3,839	4,021	4,063	4,017	4,592	4,060	3,852	3,711
Total Water Supply	6,099	6,228	6,652	6,912	7,032	6,648	6,893	7,391	7,100	6,563	6,000	5,891	6,019	6,113	5,173	3,952	3,839	4,021	4,063	4,017	4,592	4,060	3,852	3,711



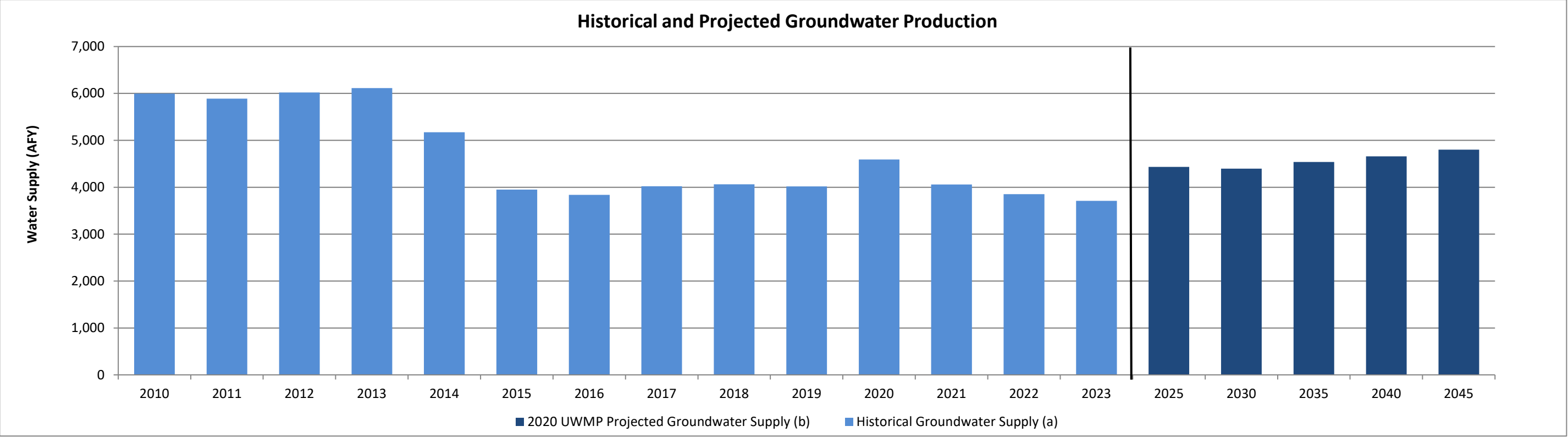
Abbreviations:
"AFY" = acre-feet per year
"District" = California Water Service, Selma District

Notes:
(a) Historical water supply values per Reference 1.

References:
1. Cal Water, 2024a. Historical Demand and Production Data provided by Cal Water on 9 May 2024.

Table 7
Historical and Projected Groundwater Pumping
Casitas Selma Mixed-Used Development Project, Selma District, California

Water Supply Source	Groundwater Production (AFY)																		
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2025	2030	2035	2040	2045
Historical Groundwater Supply (a)	6,000	5,891	6,019	6,113	5,173	3,952	3,839	4,021	4,063	4,017	4,592	4,060	3,852	3,711	--	--	--	--	--
2020 UWMP Projected Groundwater Supply (b)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	4,434	4,397	4,540	4,659	4,800



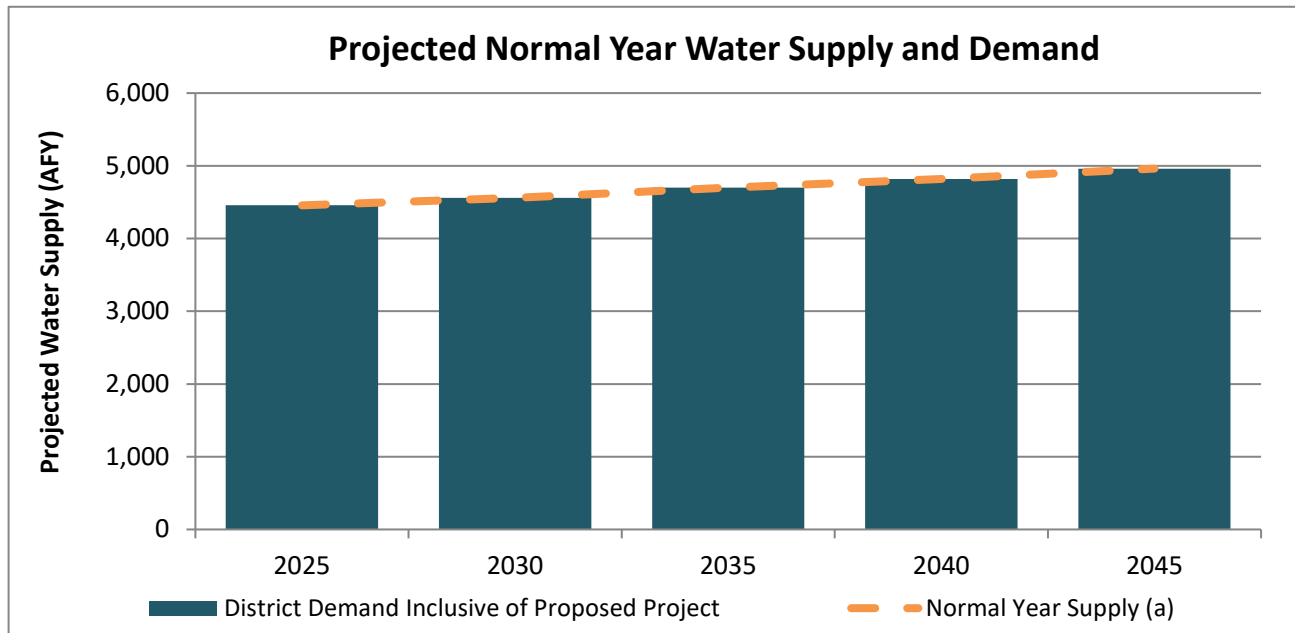
Abbreviations:
"AFY" = acre-feet per year
"District" = California Water Service, Selma District
"UWMP" = Urban Water Management Plan

Notes:
(a) Historical groundwater supply per Reference 1.
(b) Projected pumping values per the District's 2020 UWMP per Reference 2.

References:
1. Cal Water, 2024a. Historical Demand and Production Data provided by Cal Water on 9 May 2024.
2. Cal Water, 2021b. 2020 Urban Water Management Plan, Selma District, prepared by California Water Service, dated June 2021.

Table 8
Projected Normal Year Water Supply and Demand for the Selma District
Casitas Selma Mixed-Used Development Project, Selma District, California

Water Demand and Supply	Projected Normal Year Water Supply and Demand (AFY)				
	2025	2030	2035	2040	2045
Normal Year Supply (a)	4,457	4,559	4,702	4,821	4,962
District Demand Inclusive of Proposed Project	4,457	4,559	4,702	4,821	4,962
District 2020 UWMP Water Demand	4,434	4,397	4,540	4,659	4,800
Proposed Project Demand (b)	23	162	162	162	162
Supply Shortfall (% demand)	None	None	None	None	None



Abbreviations:

"AFY" = acre-feet per year

"UWMP" = Urban Water Management Plan

"District" = California Water Service, Selma District

"WSA" = Water Supply Assessment

"Proposed Project" = Casitas Selma Mixed-Use Development Project

"WSV" = Water Supply Verification

Notes:

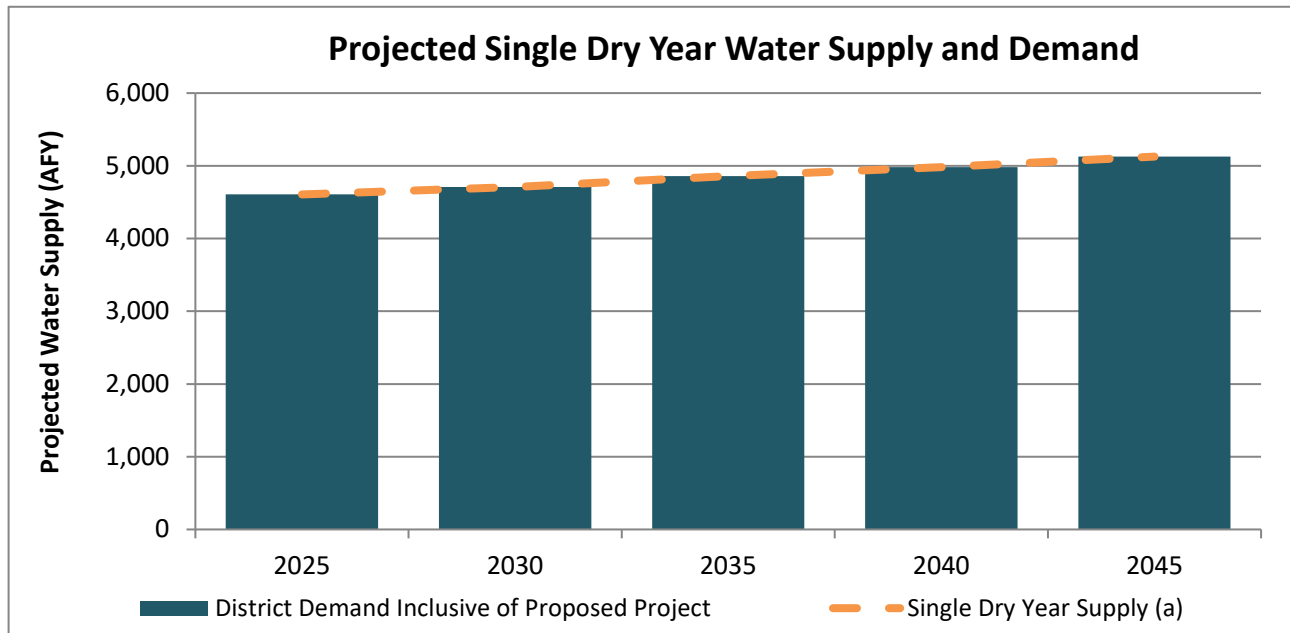
- (a) Since the groundwater supply is expected to be sufficient to meet the projected future District demands inclusive of the Proposed Project demands based on the demonstrated ability of the District to meet historical demands from the Subbasin that are even greater than the District's projected demands, the available supplies are considered equal to the sum of the District UWMP demands per Reference 1 and the Proposed Project demands.
- (b) As discussed in Section 5 of the WSA/WSV, the Proposed Project demands are not included within the 2020 UWMP and are therefore considered additive to District demands.

References:

1. Cal Water, 2021b. 2020 Urban Water Management Plan, Selma District, prepared by California Water Service, dated June 2021.

Table 9
Projected Single Dry Year Water Supply and Demand for the Selma District
Casitas Selma Mixed-Used Development Project, Selma District, California

Water Demand and Supply	Projected Normal Year Water Supply and Demand (AFY)				
	2025	2030	2035	2040	2045
Single Dry Year Supply (a)	4,607	4,709	4,857	4,981	5,127
District Demand Inclusive of Proposed Project	4,607	4,709	4,857	4,981	5,127
District 2020 UWMP Water Demand	4,584	4,547	4,695	4,819	4,965
Proposed Project Demand (b)	23	162	162	162	162
Supply Shortfall (% demand)	None	None	None	None	None



Abbreviations:

"AFY" = acre-feet per year

"UWMP" = Urban Water Management Plan

"District" = California Water Service, Selma District

"WSA" = Water Supply Assessment

"Proposed Project" = Casitas Selma Mixed-Use Development Project

"WSV" = Water Supply Verification

Notes:

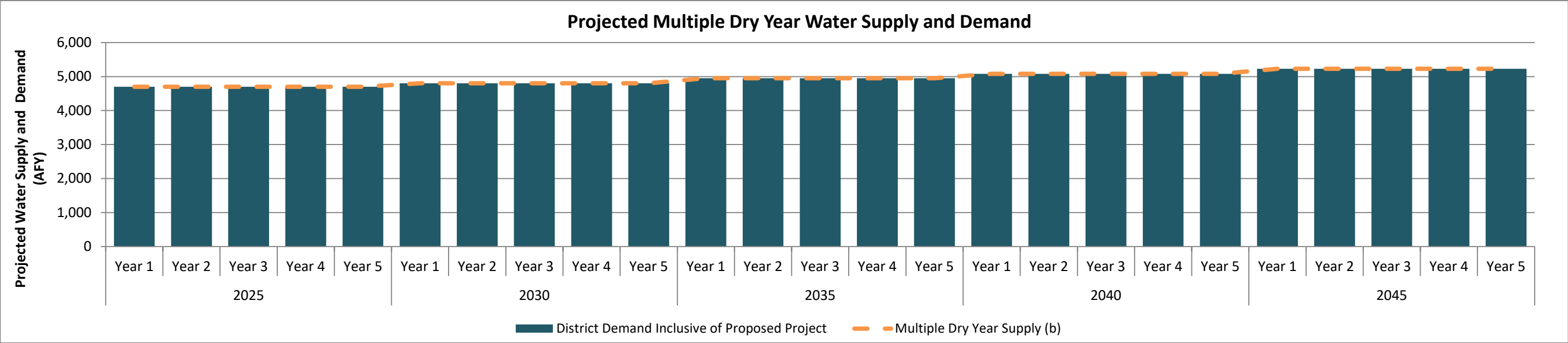
- (a) Since the groundwater supply is expected to be sufficient to meet the projected future District demands inclusive of the Proposed Project demands based on the demonstrated ability of the District to meet historical demands from the Subbasin that are even greater than the District's projected demands, the available supplies are considered equal to the sum of the District UWMP demands per Reference 1 and the Proposed Project demands.
- (b) As discussed in Section 5 of the WSA/WSV, the Proposed Project demands are not included within the 2020 UWMP and are therefore considered additive to District demands.

References:

1. Cal Water, 2021b. 2020 Urban Water Management Plan, Selma District, prepared by California Water Service, dated June 2021.

Table 10
Projected Multiple Dry Year Water Supply and Demand for the Selma District
Casitas Selma Mixed-Used Development Project, Selma District, California

Water Demand and Supply	Projected Water Supply and Demand During Multiple Dry Years (AFY) (a)																								
	2025					2030					2035					2040					2045				
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 1	Year 2	Year 3	Year 4	Year 5	Year 1	Year 2	Year 3	Year 4	Year 5	Year 1	Year 2	Year 3	Year 4	Year 5	Year 1	Year 2	Year 3	Year 4	Year 5
Multiple Dry Year Supply (b)	4,700	4,700	4,700	4,700	4,700	4,802	4,802	4,802	4,802	4,802	4,953	4,953	4,953	4,953	4,953	5,080	5,080	5,080	5,080	5,080	5,229	5,229	5,229	5,229	5,229
District Demand Inclusive of Proposed Project	4,700	4,700	4,700	4,700	4,700	4,802	4,802	4,802	4,802	4,802	4,953	4,953	4,953	4,953	4,953	5,080	5,080	5,080	5,080	5,080	5,229	5,229	5,229	5,229	5,229
District 2020 UWMP Water Demand	4,677	4,677	4,677	4,677	4,677	4,640	4,640	4,640	4,640	4,640	4,791	4,791	4,791	4,791	4,791	4,918	4,918	4,918	4,918	4,918	5,067	5,067	5,067	5,067	5,067
Proposed Project Demand (c)	23	23	23	23	23	162	162	162	162	162	162	162	162	162	162	162	162	162	162	162	162	162	162	162	162
Supply Shortfall (% demand)	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None	None



Abbreviations:

"AFY" = acre feet per year

"District" = California Water Service, Selma District

"Proposed Project" = Casitas Selma Mixed-Use Development Project

"UWMP" = Urban Water Management Plan

"WSA" = Water Supply Assessment

"WSV" = Water Supply Verification

Notes:

(a) While WSA regulations only require an analysis of a three-year drought scenario, UWMP regulations were updated in 2018 to include a five-year drought scenario (California Water Code §10635), Therefore, a five-year drought scenario is presented here.

(b) Since the groundwater supply is expected to be sufficient to meet the projected future District demands inclusive of the Proposed Project demands based on the demonstrated ability of the District to meet historical demands from the Subbasin that are even greater than the District’s projected demands, the available supplies are considered equal to the sum of the District UWMP demands per Reference 1 and the Proposed Project demands.

(c) As discussed in Section 5 of the WSA/WSV, the Proposed Project demands are not included within the 2020 UWMP and are therefore considered additive to District demands.

References:

1. Cal Water, 2021b. 2020 Urban Water Management Plan, Selma District, prepared by California Water Service, dated June 2021.

7 COMPARISON OF SUPPLY AND DEMAND

☒ CWC § 10910

(c)(3) If the projected water demand associated with the proposed project was not accounted for in the most recently adopted urban water management plan, or the public water system has no urban water management plan, the water supply assessment for the project shall include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses.

☒ CGC § 66473.7

(a)(2) "Sufficient water supply" means the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that will meet the projected demand associated with the proposed subdivision, in addition to existing and planned future uses, including, but not limited to, agricultural and industrial uses. In determining "sufficient water supply," all of the following factors shall be considered:

(A) The availability of water supplies over a historical record of at least 20 years.

(B) The applicability of an urban water shortage contingency analysis prepared pursuant to Section 10632 of the Water Code that includes actions to be undertaken by the public water system in response to water supply shortages.

(C) The reduction in water supply allocated to a specific water use sector pursuant to a resolution or ordinance adopted, or a contract entered into, by the public water system, as long as that resolution, ordinance, or contract does not conflict with Section 354 of the Water Code.

(D) The amount of water that the water supplier can reasonably rely on receiving from other water supply projects, such as conjunctive use, reclaimed water, water conservation, and water transfer, including programs identified under federal, state, and local water initiatives such as CALFED and Colorado River tentative agreements, to the extent that these water supplies meet the criteria of subdivision (d).

(a)(3) If the written verification provided by the applicable public water system indicates that the public water system is unable to provide a sufficient water supply that will meet the projected demand associated with the proposed subdivision, then the local agency may make a finding, after consideration of the written verification by the applicable public water system, that additional water supplies not accounted for by the public water system are, or will be, available prior to completion of the subdivision that will satisfy the requirements of this section. This finding shall be made on the record and supported by substantial evidence.

(e) If there is no public water system, the local agency shall make a written finding of sufficient water supply based on the evidentiary requirements of subdivisions (c) and (d) and identify the mechanism for providing water to the subdivision.

(f) In making any findings or determinations under this section, a local agency, or designated advisory agency, may work in conjunction with the project applicant and the public water system to secure water supplies sufficient to satisfy the demands of the proposed subdivision. If the local agency secures water supplies pursuant to this subdivision, which supplies are acceptable to and approved by the governing body of the public water system as suitable for delivery to customers, it shall work in conjunction with the public water system to implement a plan to deliver that water supply to satisfy the long-term demands of the proposed subdivision.

☒ CGC § 66473.7

(j) The determinations made pursuant to this section shall be consistent with the obligation of a public water system to grant a priority for the provision of available and future water resources or services to proposed housing developments that help meet the city's or county's share of the regional housing needs for lower income households, pursuant to Section 65589.7.

☑ **CGC § 66473.7**

(o) Any action challenging the sufficiency of the public water system's written verification of a sufficient water supply shall be governed by Section 66499.37.

Pursuant to CWC §10910(c)(3) and CGC §66473.7(a)(2), this WSA/WSV includes a summary of the availability of water supplies over a historical record of 20 years, an estimate of the projected water supplies available to the District under normal, single dry, and multiple dry years, and a discussion of whether those supplies will meet the projected demand associated with the Proposed Project, in addition to the water system's existing and planned future uses. This assessment is parallel to the multiple-dry year supply reliability analysis required for UWMPs under CWC §10635. In 2018, CWC §10635 was revised to require UWMPs to extend this analysis to consider "a drought lasting five consecutive water years." Although CWC §10910(c)(3) has not yet been updated to require this for WSAs, a five-year drought scenario is also evaluated herein for purposes of a conservative analysis.

Table 8, Table 9, and Table 10 provide a comparison of the demands and supplies of the District, inclusive of the Proposed Project, in normal year, single-dry year, and multiple-dry year hydrologic scenarios for the District. As discussed above, consistent with the District's 2020 UWMP and the CKGSA GSP, it is projected that available water supplies will be sufficient to meet the demands under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years) through 2045, inclusive of the Proposed Project.

While supply shortfalls are not projected, shortfalls resulting from any cause (e.g., droughts, impacted distribution system infrastructure, regulatory-imposed shortage restrictions, etc.) that could occur in the future would be managed through the implementation of the District's WSCP. The overall reduction goals in the WSCP are established for six drought stages ranging from 10% to greater than 50% shortfalls (Cal Water, 2021b). Beyond the WSCP, the District does not have any resolutions or ordinances reducing water supply allocated to a specific water use.

In 2015, Governor Brown issued the fourth in a series of Executive Orders (EOs) regarding actions necessary to address California's severe drought conditions between 2013 and 2017. With implementation of its WSCP during the historic five-year 2013 – 2017 drought, the District achieved a demand reduction of almost 34% (2017 water demand compared to 2013 water demand; Cal Water, 2024a).

In 2016, Governor Brown signed EO B-37-16 *Making Water Conservation a California Way of Life* and subsequently SB 606 and AB 1668 were passed. SB 606/AB 1668 set new requirements for urban water agencies to continue to increase water efficiency beyond the 2020 water use targets developed under the Water Conservation Act of 2009 (SB X7-7). Beginning in 2024, agencies will be required to report an annual Urban Water Use Objective (UWUO; discussed in more detail below). In addition, SB 606/AB 1668 added new requirements related to drought planning and WSCPs, including requirements for agencies to: (1) conduct a drought risk assessments part of

their future UWMPs to assess water supply reliability (or vulnerability) for a period of drought lasting five consecutive water years (CWC §10635(b)), and (2) conduct annual water supply and demand assessments to determine its water supply reliability for the current year and one dry year (CWC §10632(a)). These elements are included in the District's 2020 WSCP.

Pursuant to CGC §66473.7(a)(2)(B), this WSA/WSV provides a description of how the WSCP has been applied in the District in response to water supply shortages. California experienced yet another severe drought three years after the 2013-2017 record-setting drought. In response to drought conditions, Governor Newsom signed EO N-10-21 in July 2021 calling Californians to voluntarily reduce water use by 15% compared to 2020 levels and issued EO N-7-22 in March 2022 calling on local water suppliers to move to Stage 2 of their WSCPs. The District enacted Stage 2 of its WSCP in June 2022 and implemented numerous drought response actions, including, but not limited to, irrigation day restrictions, restrictions on single pass cooling systems in new connections, community outreach, rebates, and penalties (Cal Water, 2021c; 2022). The District demands decreased by 2% in 2022 compared to its 2020 demands (Cal Water, 2024a). In March 2023, Governor Newsom signed EO N-5-23 easing emergency drought requirements and no longer mandating urban water suppliers to implement Stage 2 demand reduction actions.

In July 2024, the State Water Resources Control Board (SWRCB) officially adopted the *Making Water Conservation a California Way of Life* regulation to implement SB 606/AB 1668 annual water use objective requirements. As mentioned above, part of this regulation urban suppliers are required to calculate and report their UWUO beginning on January 2024 and every year thereafter. The UWUO is an estimate of efficient urban water use based on the adopted urban water use efficiency standards and local service area characteristics. By January 2027, compliance with the UWUO will be enforced. Based on the District's most recent UWUO Report submitted to DWR in 2023, the District's actual water use was approximately 12% below the District's estimated UWUO in 2022 (DWR, 2023c). While the District is meeting its UWUO, it is expected that UWUOs will become incrementally more stringent over time, and achieving UWUOs in the future could potentially require an increase in the District's conservation programming.

It should be noted that the District does not have reductions in water supply allocated to a specific sector pursuant to CGC §66473.7(a)(2)(C). However, as a customer within the District, the Proposed Project would be obligated to comply with the demand reduction efforts imposed by Cal Water through implementation of the WSCP in any future water shortage conditions. As such, the Proposed Project would contribute a proportionate share of the reduction in water demands during dry years.

Therefore, given (1) that the District's 2020 UWMP does not identify supply shortfalls for the District under any hydrologic conditions evaluated, (2) the projected reliability of groundwater available to the District, (3) the demonstrated effectiveness of the District's WSCP in the case of supply shortages, and (4) the increasing efficiency and drought planning requirements from the State, sufficient water supply is estimated to be available to Cal Water to meet all future demands within the District service area and those associated with the Proposed Project.

Cal Water is committed to supporting the development needs of the Proposed Project and will be able to provide water service, with infrastructure tailored to the Proposed Project's plans. This infrastructure includes, but is not limited to, transmission lines, distribution systems, meters, and water system monitoring. Cal Water anticipates collaborating with the Project Proponent, the City/County, and the SWRCB Division of Drinking Water throughout the design, construction, and operation phases. Cal Water will need to ensure that all current and future state standards are met regarding pipe sizes, fire flows, equipment, and materials and will be responsible for ongoing operations, maintenance, and design of any proposed constructed water facilities. Cal Water may require additional facilities to provide water service to the Proposed Project depending on the pressure zone's specific needs for pressures and flows. To accomplish this, Cal Water may request dedication of parcels of land for the future needs of pumped storage and/or additional well supply. Additional evaluation may be needed to determine the optimized location and required minimum area. Cal Water's commitment to the development needs of the Proposed Project may need to be reassessed in the case of changing water supply conditions within the District and will expire five years after the date of this WSA/WSV if the Proposed Project has not begun construction and made on-going progress towards completion.

8 CONCLUSIONS

As listed in CWC §10910(c)(4) and CGC §66473.7(a), the primary purpose of this WSA/WSV is to evaluate whether sufficient water supply is available to meet all future water demands within the water supplier's service area, including those associated with the Proposed Project, during normal and multiple dry hydrologic years for a 20-year time horizon.

As described in Section 4, the total water demand of the Proposed Project (i.e., 162 AFY by 2045) has been conservatively estimated. As discussed in Section 5, these demands are considered additive to the projected water demand growth in the adopted 2020 UWMP.

As discussed in Section 6, groundwater supply to the District is considered reliable based on the findings of the 2020 UWMP and review of the CKGSA GSP. Therefore, sufficient water supply is estimated to be available to Cal Water to meet the future District demands inclusive of the additive demands associated with the Proposed Project from 2020 through 2045 under all hydrologic conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a five-year drought period). In addition, due to new requirements by the State, Cal Water will be required to continue to increase water efficiency in its service area into the future (Section 7).

Therefore, this WSA/WSV concludes that sufficient water supply is available to the District to meet all future demands associated with current and planned development within the District service area, including those associated with the Proposed Project. It should be noted that the District will pump groundwater within the jurisdiction of the CKGSA. While water use is consistent with the CKGSA GSP, the long-term impacts of SGMA implementation are still uncertain, and pending decisions may have the potential to impact groundwater pumping.

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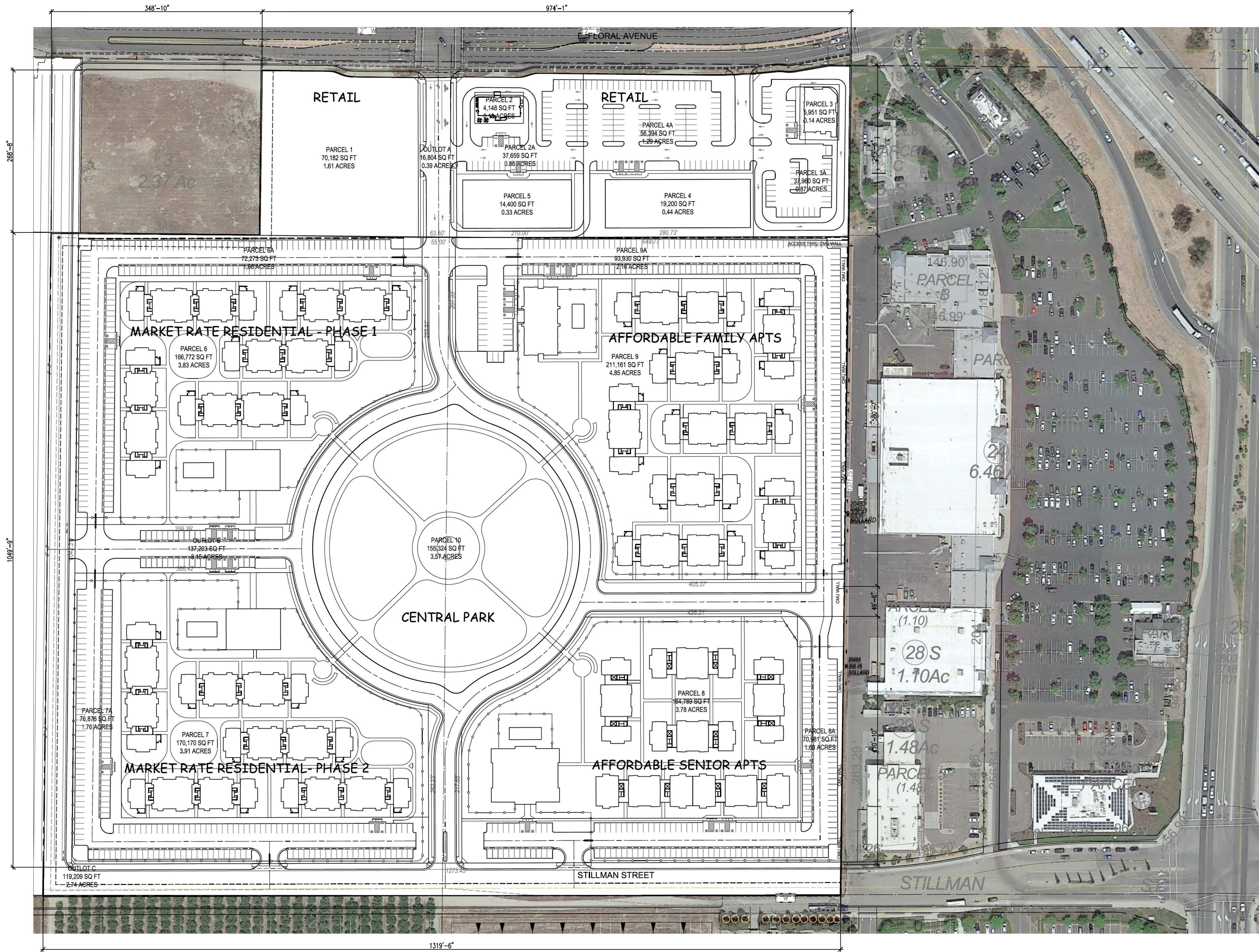
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Appendix A

Proposed Project Site Plans



CASITAS SELMA :

- GROSS SITE AREA: 39.07 ACRES
- RETAIL PARCELS: 5.64 ACRES
- 1. FUTURE : 1.61 ACRES
 - 2. PAD: 4,148 SF
0.10 ACRE
BLDG: 2,400 SF +/-
 - 2A: PARKING: 37,659 SF
0.86 ACRE
25 PKG STALLS
 - 3. PAD: 5,951 SF
0.14 ACRE
BLDG: 6,000 SF +/-
 - 3A: PARKING: 37,960 SF
0.87 ACRE
38 PKG STALLS +/-
 - 4. HOTEL: 19,200 SF
0.44 ACRES
100 KEYS (3 FLOORS)
 - 4A. PARKING: 56,394 SF
1.29 ACRE
115 STALLS +/-
 - 5. RETAIL: 14,400 SF
0.33 ACRE
- MARKET RATE HOUSING PARCELS: 11.16 ACRES
- 6. PHASE 1: 166,772 SF
3.83 ACRES
150 APTS - GATED ENCLOSURE
6,000 SF CLUBHOUSE
 - 6A. PARKING: 72,273 SF
1.66 ACRE
190 PARKING STALLS +/-
 - 7. PHASE 2: 170,170 SF
3.91 ACRE
150 APTS - GATED ENCLOSURE
6,000 SF CLUBHOUSE
 - 7A. PARKING: 76,876 SF
1.76 ACRE
181 PARKING STALLS +/-
- AFFORDABLE SENIOR PARCELS: 5.41 ACRES
- 8. HOUSING: 164,789 SF
3.78 ACRES
120 APTS - GATED ENCLOSURE
11,000 SF CLUBHOUSE/FITNESS/HEALTH
 - 8A. PARKING: 70,981 SF
1.63 ACRE
165 PARKING STALLS +/-
- AFFORDABLE FAMILY PARCELS: 7.01 ACRES
- 9. HOUSING: 211,161 SF
4.85 ACRES
180 APTS - GATED ENCLOSURE
6,000 SF CLUBHOUSE
 - 9A. PARKING: 93,930 SF
2.16 ACRE
236 PARKING STALLS +/-
- CENTRAL PARCEL:
- 10. PARK 155,324 SF
3.57 ACRES
- STREETS / CIRCULATION: 6.28 ACRES
- OUTLOT A: 16,804 SF
0.39 ACRES
 - OUTLOT B: 137,203 SF
3.15 ACRE
38 PARKING STALLS +/-
 - OUTLOT C: 119,209 SF
2.74 ACRE

