

From: Gamboa-Arce, Justina <jgamboaarce@IID.com>
Sent: Thursday, October 5, 2023 2:43 PM
To: Shannon Baer <sbaer@rickengineering.com>
Cc: Brian Mooney <bmooney@rickengineering.com>; Sabrina Sessarego <ssessarego@rickengineering.com>; Matthew Valerio <mvalerio@dudek.com>; Jim Minnick <JimMinnick@co.imperial.ca.us>; Rebecca Terrazas <rebeccaterrazas-baxter@co.imperial.ca.us>; Asbury, Jamie <jlasbury@IID.com>; Shields, Tina L <tlshields@IID.com>; Smith Hoff, Joanna <jshoff@IID.com>; Humes, Jessica <jllhumes@IID.com>; Smelser, Matthew H <mhsmelser@IID.com>; Barber, Sabrina <scarber@IID.com>; Vargas, Donald A <DVargas@IID.com>
Subject: RE: Lithium Valley Specific Plan and Programmatic EIR Discussion

Good afternoon Shannon,

Thank you for the opportunity to review the Lithium Valley Specific Plan Area. Below, attached, and as linked is a summary of the information requested for the parcels provided:

2023 Apportionment – The total acre-feet of water apportioned in 2023 to the area as a whole is approximately 149,000 acre-feet. As noted below, not all parcels are entitled to water service and not all parcels entitled to water service received an apportionment in 2023; eligibility to receive water service does not constitute entitlement to a specific water supply; thus, changing the land use does not guarantee that volume of water for an alternative use nor is it a guarantee of a future supply of that volume.

Apportionment for non-agricultural uses is based on a historical use period (2003-2012) and does not adjust for projected growth. New non-agricultural development would have to enter into water supply agreements that in turn may be tied to water conservation programs and/or projects to meet the project's anticipated water supply demand. Please review IID's Equitable Distribution Plan (EDP) for more detail regarding apportionment: [Equitable Distribution Plan \(iid.com\)](#); and our Interim Water Supply Policy for new water supply requests for non-agricultural development: [Interim Water Supply Policy \(iid.com\)](#)

1. **Agricultural Apportionment- Approximately 126,000 acre-feet (of the 149,000 acre-feet) of water is apportioned to agricultural land uses within the planning area, inclusive of IID Trust Lands leased to growers.** The Agricultural Water User's apportionment is a hybrid apportionment consisting both of the historical use for the same period (2003-2012) and a straight-line component as described in the EDP.
2. **Water Service Not Available– There are three (3) parcels (682 acres) that are outside of IID's water service area and thus unable to receive water under any circumstances** (one of these parcels does have a portion of land inside IID's water service area and as such, acreage was discounted). IID staff would not be able to disclose private parcel/ownership information, but your team may access our water service map which delineates the water service/district boundaries: [Public Water Map \(iid.com\)](#)
3. **Federal Land- There are four (4) parcels (97 acres) owned by the USA with no water use history and thus have no water right priority.** These federal parcels would be unable to receive water: 020-090-005, 020-010-018, 003-230-017 and 020-110-032. Please refer to the 1988 San Luis Rey Indian Water Rights Settlement Act if more information is needed: [Settlement — San Luis Rey Indian Water Authority \(slriwa.org\)](#)

4. **Private Land with No Water Availability** – There are 191 parcels (500 acres) owned by private or non-profit entities that are currently not able to receive water. These parcels, for the most part, constitute of smaller lot subdivisions within the SS wetland and east of ss wetland areas. They are not eligible to receive water because they have no record of paying IID’s “Water Availability Charge” which is a “standby” water service fee. The majority of these properties also lack irrigation and drainage infrastructure. IID would be unable to disclose parcel/ownership information for these private properties.
5. **IID Lands Not Receiving an Apportionment- IID owns 201 parcels (13,136 acres) of SS, playa, wetland, east of wetland subdivision land that do not receive a water apportionment.** These lands are similar to, and largely adjacent to, the lands identified under 4 above. There is no irrigation or drainage infrastructure in these areas. Some of these IID properties are primarily intended to be used for environmental mitigation/conservation purposes and could be subject to lease or easement provisions that restrict their use. We have attached an APN listing of these IID owned lands without water apportionment for your use.

Please don't hesitate to contact me should you have any questions.

Best Regards-

Justina Gamboa-Arce