

Exhibit 7-A — Hydrology & Water Supply Violations

Poverty Flats Ranch UP 23-09 / IS 23-20 (PL 25-198)
(Sorted by jurisdictional severity — Federal → State → County/Local)

Federal / Foundational Standards

- California Water Code § 13751 (Requires well completion reports documenting static water levels, depths, and screened intervals; omitted from record.)
- California DWR Bulletins 74-81/90 & 118 (Mandate calibrated 24–72 hour pump tests and usable-storage quantification; only two-hour air-lift test performed.)

State CEQA Guidelines / Case Law

- CEQA Guidelines § 15130 (Cumulative impacts omitted; no basin-wide accounting or drought-year modeling.)
- CEQA Guidelines § 15125 (Baseline data on groundwater levels, withdrawals, and aquifer connectivity missing.)
- CEQA Guidelines § 15124 (Inconsistent description of well locations and project scope.)
- CEQA Guidelines § 15126.2(a) (No quantitative analysis of drawdown, interference, or recharge during dry years.)
- CEQA Guidelines § 15151 (Record lacks reasonable good-faith effort at full disclosure.)
- CEQA Guidelines § 15144 (Speculative conclusions based on air-lift estimates; lacks factual foundation.)
- CEQA Guidelines § 15126.4(a)(1)(B) & (a)(2) (Mitigation improperly deferred; no measurable triggers or enforcement.)
- CEQA Guidelines § 15097 (No monitoring, schedule, or responsible party; mitigation unenforceable.)
- CEQA Guidelines § 15088.5 (Post-approval corrections would require EIR; significant new information.)

- CEQA Guidelines § 15384 (Unsupported assumptions fail substantial-evidence standard.)
- Vineyard Area Citizens v. Rancho Cordova (2007) 40 Cal.4th 412 (No proof of long-term reliable water supply under dry-year conditions.)
- Sierra Club v. Fresno (Friant Ranch, 2018) 6 Cal.5th 502 (Conclusions not connected to facts; mitigation vague.)
- Kings County Farm Bureau v. Hanford (1990) 221 Cal.App.3d 692 (Cumulative analysis conclusory; lacks substantial evidence.)
- Communities for a Better Environment v. South Coast AQMD (2010) 48 Cal.4th 310 (Baseline must reflect existing conditions; violated.)
- Save Our Peninsula v. Monterey (2001) 87 Cal.App.4th 99 (Site-specific hydrologic analysis required; boilerplate insufficient.)

County / Local Ordinances

- Lake County Code Article 27 § 27.11 (Requires defined water monitoring, reporting, and compliance framework; absent.)
- Lake County Code Ch. 30 (Project graded without hydrology verification of recharge or runoff impacts.)
- County Conditions of Approval p.6 (Contingency to reduce canopy or add storage lacks objective triggers; unenforceable.)