

1 SOMACH, SIMMONS & DUNN
A Professional Corporation
2 STUART L. SOMACH, ESQ.
SANDRA K. DUNN, ESQ
3 400 Capitol Mall, Suite 1900
Sacramento, California 95814
4 Telephone: (916) 446-7979
Facsimile: (916) 446-8199

5 LAW OFFICES OF DONALD B. MOONEY
6 DONALD B. MOONEY
129 C Street, Suite 2
7 Davis, California 95616
Telephone: (530) 758-2377
8 Facsimile: (530) 758-7169

9 Attorneys for City of Lompoc

10 BEFORE THE STATE WATER RESOURCES CONTROL BOARD

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Hearing to Review the U.S. Bureau of)
Reclamation Water Right Permits 11308)
and 11310 (Applications 11331 and 11332))
To Determine Whether Any Modifications)
in Permit Terms and Conditions are Necessary)
to Protect Public Trust Values and Downstream)
Water Rights on the Santa Ynez River Below)
Bradbury Dam (Cachuma Reservoir))

CITY OF LOMPOC'S
CLOSING BRIEF FOR PHASE I
OF THE CACHUMA PROJECT
HEARING

1 The City of Lompoc ("Lompoc") respectfully submits the following closing brief on Key
2 Issue No. 1 regarding the United States Bureau of Reclamation's ("Reclamation") Consolidated
3 Petitions for Change in the Place of Use and Purpose of Use ("Change Petition").

4 **I.**

5 **INTRODUCTION**

6 Lompoc has several concerns regarding Reclamation's and the Member Units' testimony
7 on the Change Petition. In evaluating the changes in operation of the Cachuma Project,
8 Reclamation and the Member Units' analysis relies upon the existing uses of the water as
9 compared to permitted uses. Thus, the analysis assumes an inappropriate baseline for evaluating
10 impacts to the operation of the Cachuma Project or the flows of the Santa Ynez River. Neither
11 Reclamation nor the Member Units presented evidence to demonstrate how the Project would
12 have operated under permitted conditions or whether such operations would change by expanding
13 the place of use and purpose of use. Prior to making any determination as to the potential
14 impacts to Project operations, the State Water Resources Control Board ("SWRCB") must have
15 competent evidence that evaluates how the Project should have been operated under the permitted
16 uses. Once this evidence is submitted, the SWRCB can evaluate and compare whether the
17 proposed changes in the place of use and purpose of use results in any significant change to the
18 operation of the Cachuma Project or the flow in the Santa Ynez River below Bradbury Dam.

19 **II.**

20 **BACKGROUND INFORMATION**

21 **A. The City of Lompoc's Interest in the Cachuma Project**

22 The City of Lompoc was an original participant to these proceedings when Reclamation first
23 sought to appropriate water from the Santa Ynez River for the Cachuma Project. Lompoc's
24 concern then was that the operation of the Cachuma Project would have an impact on the
25 groundwater basin and Lompoc's water rights. In an effort to protect its downstream water
26 rights, Lompoc participated in the SWRCB's proceedings regarding Decision No. D 886, Water
27 Rights Order 73-37, 89-18, and 94-5. Each of these proceedings was for the purpose of

1 developing an operating regime for the Cachuma Project that protected downstream water rights
2 as required in SWRCB Decision 886.

3 The City of Lompoc's purpose and goal in this proceeding is likewise to protect the
4 quantity and quality of its downstream water rights. When Lompoc engaged in this process
5 many years ago, it feared the Cachuma Project's potential impact to groundwater recharge and
6 resulting reduction in groundwater levels in the Lompoc region. In the last several years, Lompoc,
7 through its consulting groundwater hydrologists, Timothy J. Durbin and Dr. Jeffrey Lefkoff,
8 conducted an extensive investigation of the current and past operation of the Cachuma Project and
9 the Project's relationship with the groundwater basin in Lompoc. Lompoc's consultants
10 prepared a detailed groundwater model demonstrating the impact of the Cachuma Project on the
11 groundwater basin in the Lompoc Plain and on Lompoc's groundwater wells. Lompoc spent in
12 excess of \$1.5 million for this investigation and modeling.

13 As will be discussed in significant detail in Phase II of this hearing, through Mr. Durbin's
14 and Dr. Lefkoff's investigation and modeling, Lompoc has determined that under the current
15 operating scenario for the Project, the Lompoc Plain is not in overdraft, but the Cachuma Project
16 has resulted in an adverse impact to the groundwater quality of the groundwater basin. The
17 adverse impact to the groundwater quality results from an increase in the total dissolved solids in
18 the water that recharges the groundwater basin.

19 Lompoc's modeling concludes that under the current operating regime that includes the
20 required downstream water rights releases using the upper curve as discussed in Order 89-18 and
21 the commingling of water imported by the Central Coast Water Authority ("CCWA"), the
22 groundwater quality in the eastern portion of the Lompoc groundwater basin will return to a no
23 Project condition within the foreseeable future. Any change in the downstream release program
24 under Order 89-18, including a shift from the upper curve to the lower curve or a change in the
25 commingling of the CCWA's imported water, will result in the adverse water quality impact noted
26 above continuing for an extended number of years or indefinitely. Thus, Lompoc's objective in
27 both phases of this hearing is to ensure that the current operating regime for the Project is not
28 altered, and in that context, insure that Lompoc's groundwater rights continue to be protected.

1 Therefore, Lompoc's concerns regarding Reclamation's Change Petition can be satisfied if
2 Lompoc is provided enforceable assurances in a permit condition that the current operations will
3 not be modified.

4 B. The Santa Ynez River Watershed

5 The Santa Ynez River originates in the Juncal Canyon area of the Santa Ynez Mountains
6 and traverses Santa Barbara County from east to west. The river runs for approximately 70 miles
7 to the Pacific Ocean, passing the cities of Santa Ynez, Solvang, Buellton, and Lompoc, and its
8 mouth is near the town of Surf. (Decision No. D 886 at pp. 9-10.)

9 Three dams are located on the Santa Ynez River: (1) Juncal Dam (Jameson Lake), owned
10 and operated by the Montecito Water District; (2) Gibraltar Dam and Reservoir, owned and
11 operated by the City of Santa Barbara; and (3) Bradbury Dam (Cachuma Reservoir), owned and
12 operated by Reclamation, completed in 1953 as part of the Cachuma Project. (*Id.*) Bradbury
13 Dam and Cachuma Reservoir are, by far, the largest on the Santa Ynez River. Bradbury Dam is
14 located approximately 20 miles downstream of Gibraltar Dam. Diversion of water from Cachuma
15 Reservoir is made to five of the Cachuma Member Units via the 6.4-mile long Tecolote Tunnel.
16 (*Id.* at p. 13.)

17 Below Bradbury Dam, the Santa Ynez River flows west through the broad part of the Santa
18 Ynez Valley near Buellton. From Buellton, the Santa Ynez River flows west through a narrow
19 stretch to the Narrows located adjacent to the City of Lompoc. From the Narrows, the river
20 emerges onto the broad flat Lompoc Plain and flows past Lompoc across the Lompoc Plain. The
21 Lompoc Plain is a flat alluvial plain and is bordered on the north, east, and south by hills or low
22 mountains. The Plain is about twelve miles long and three miles wide at its maximum extent. The
23 Santa Ynez River empties into the Pacific Ocean at Surf.

24 C. The Cachuma Project

25 The Cachuma Project is located on the Santa Ynez River, about 25 miles northwest of
26 Santa Barbara. (DOI Exh. 1 at p. 2.) Bradbury Dam impounds the runoff from the upper
27 Santa Ynez River, creating Cachuma Reservoir. Bradbury Dam is located approximately
28 45.7 miles from the mouth of the Santa Ynez River and has a drainage area of approximately

1 421 square miles. Cachuma Reservoir has a current water storage capacity of approximately
2 188,000 acre-feet. (Member Units Exh. 2 at p. 4.) Cachuma Project facilities include Bradbury
3 Dam, Cachuma Reservoir, Tecolote Tunnel, the South Coast Conduit, and four small regulating
4 reservoirs along the South Coast. (DOI Exh. 1 at p. 3.)

5 Reclamation began impounding water behind Bradbury Dam in 1953. Cachuma Project
6 water is diverted out of the watershed (exported) via the Tecolote Tunnel to the Cachuma Member
7 Units in the South Coast area of Santa Barbara County.

8 D. SWRCB Decisions and Orders Regarding Reclamation's Water Rights Permits

9 On February 28, 1958, the State Water Resources Board ("WRB"), predecessor of the
10 SWRCB, adopted Decision No. D 886 which approved Reclamation's Applications 11331 and
11 11332. On March 19, 1958, the WRB issued Permits 11308 (Application 11331) and 11310
12 (Application 11332). Permit 11308 allows for a year-around direct diversion of 100 cubic feet
13 per second ("cfs"). Permit 11310 allows for a year-around direct diversion of 50 cfs. The total
14 amount of water that may be appropriated for storage under both permits is 275,000 acre-feet per
15 annum ("afa").

16 During the water rights permitting process, Lompoc and others filed protests to
17 Reclamation's applications, expressing concern over harm to downstream users. (Decision 886
18 at pp. 5-6.) In response to the protests, Reclamation committed not to export water which would
19 interfere with the natural percolation of water below the Cachuma Project. (*Id.* at pp. 29-30.)
20 Based upon this commitment, the WRB imposed a condition that the Cachuma Project "not
21 reduce natural recharge of groundwater from the Santa Ynez River." (Decision 886,
22 Condition 11, at p. 33; Permit 11308, Condition 5.) The WRB also retained jurisdiction for
23 15 years over Reclamation's permits to enforce this condition. (Decision 886 at pp. 21-30,
24 Condition 13, at p. 36.) Reclamation's permits required Reclamation to perform studies and
25 investigations to determine the amount, time, and rate of releases to protect downstream water uses
26 and provide for the natural recharge of the groundwater.

27 In accordance with its retained jurisdiction over the permits, the SWRCB issued orders
28 modifying Reclamation's water rights permits in 1973 (Order WR 73-37) and in 1989 (Order

1 WR 89-18). The modifications established methods for calculating the amount and timing of
2 releases from Bradbury Dam for the purpose of recharging groundwater basins below Bradbury
3 Dam. The 1973 and 1989 Orders do not alter the fundamental requirement that water be released
4 to provide natural recharge of groundwater basins. Both the 1973 and 1989 SWRCB Orders
5 contain the following:

6 Water of the Santa Ynez River shall be stored in and released from Lake
7 Cachuma in such amounts and at such times and rates as . . . (b) will be
8 sufficient, together with inflow from downstream tributary sources, to
9 maintain percolation of water from the stream channel as such percolation
10 would occur from unregulated flow, in order that the operation of the
11 project shall not reduce natural recharge of groundwater from the
12 Santa Ynez River. (Water Rights Order 73-37, Condition 5; Water Rights
13 Order 89-18, Condition 5 (emphasis added).)

14 In July of 1990, the SWRCB commenced a Consolidated Hearing on the Santa Ynez River
15 to consider all the outstanding actions within the Santa Ynez River watershed. After several days
16 of testimony, the Consolidated Hearing was recessed at the end of August 1990. To this date, the
17 Consolidated Hearing remains recessed.

18 In 1994, the SWRCB adopted Order WR 94-5 continuing its reserved jurisdiction. Order
19 WR 94-5 also required Reclamation to conduct the studies and investigations that were initially to
20 have been conducted by WRB Decision No. D 886, Permits 11308 and 11310, Order WR 73-7
21 and Order WR 89-18. Order WR 94-5 mandates that the studies and investigations that were to
22 have commenced in 1958 be complete in the year 2000, 42 years after the issuance of
23 Reclamation's permits. In addition, Order 94-5 also requires the preparation of an environmental
24 review document pursuant to the California Environmental Quality Act.

25 E. Reclamation's Petition to Change the Permitted Place and Purpose of Use for
26 the Cachuma Project

27 In 1996, Reclamation submitted an amended Change Petition. The Change Petition seeks to
28 expand the authorized place of use of water from the Cachuma Project to allow water to be
delivered to all the lands within the Member Units' respective service areas. Over 17,000 acres of
land is proposed to be added to the existing authorized place of use. The Change Petition also
seeks to expand the purposes for which Cachuma Project water may be used.

1 On May 22, 1997, the SWRCB issued a "Notice of Requested Changes in Water Rights
2 Permits for the Bureau of Reclamation's Cachuma Project on the Santa Ynez River in
3 Santa Barbara County, Permits 11308 and 11310 (Applications 11331 and 11332)." The
4 SWRCB's notice states that "the SWRCB is the lead agency under CEQA and must evaluate the
5 environmental impacts relating to the proposed changes in place of use and purpose of use."

6 **III.**

7 **DISCUSSION**

8 Before the SWRCB may grant a petition to change the place of use or purpose of use, the
9 petitioner shall establish to the SWRCB's satisfaction, and the SWRCB shall find, that the
10 change will not operate to the injury of any legal uses of the water involved. (Wat. Code,
11 § 1702.) In considering Reclamation's Change Petition, the SWRCB's Notice of Public
12 Hearing divides the issues associated with the Change Petition into two keys issues that are
13 further divided between the two phases of the hearing. In Phase I, Key Issue No. 1 states:

14 Would approval of the petitions for change in purpose and place of use
15 result in any changes in Cachuma Project operations and flows in the Santa
16 Ynez River, compared to the operations and flows that would exist if water
from the Project were delivered only to areas within the current place of use?

17 The findings the SWRCB must make in Phase I of this hearing are limited and not
18 sufficient to rule on Reclamation's Change Petition. The issue of whether the proposed changes
19 would injure any legal user of water is reserved for Phase II of the hearing. Key Issue No. 6,
20 states:

21 Should the petitions for change in purpose and place of use be approved?

- 22 a. Will approval of the change petitions operate to the injury of any
legal user of the water involved?
- 23 b. Will approval of the change petitions adversely affect fish, wildlife,
24 or other public trust resources?

25 Lompoc intends to present evidence in Phase II regarding Lompoc's water rights and the
26 potential impact that the Change Petition may have on Lompoc's water rights.

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1 A. Reclamation and the Member Units Failed to Demonstrate How the Project Would Have
2 Been Operated Under Permitted Conditions

3 Key Issue No. 1 specifically requested an analysis using the permitted place of use as the
4 baseline. Neither Reclamation nor the Member Units presented evidence to demonstrate how the
5 Project would operate under permitted conditions as compared to operations pursuant to the
6 proposed change in place of use and purpose of use. In evaluating the changes to operation of
7 the Cachuma Project, the Member Units' analysis relies entirely upon existing uses of the water;
8 not the permitted uses. As a result, the analysis assumes an inappropriate baseline for evaluating
9 the impacts resulting from the proposed changes. Accordingly, Reclamation and the Member
10 Units cannot establish whether approval of the Change Petitions will result in any changes in
11 Cachuma Project operations, flows in the Santa Ynez River, or injury to any legal user of water.

12 Reclamation's testimony regarding Key Issue No. 1 was limited to the testimony of
13 Michael Jackson and Gale Heffler-Scott. Both concluded that the proposed changes to the place
14 of use and purposes of use would not alter the operation of the Cachuma Project. (See
15 Testimony of Michael P. Jackson ("Jackson Testimony") at p. 8; Testimony of Gale Heffler-
16 Scott ("Heffler-Scott Testimony") at p. 3.) On cross-examination, however, Mr. Jackson
17 acknowledged that he conducted no technical analysis other than to confer with his staff and
18 review the data provided by the Member Units' expert, Kate Rees. (Reporter's Transcript
19 ("R.T.") at p. 71.) Neither Reclamation nor Mr. Jackson conducted any computer modeling to
20 evaluate the proposed changes. (*Id.*) Additionally, Ms. Heffler-Scott testified that as the Project
21 is an integrated facility, water supplies are commingled and delivered throughout the Member
22 Units existing service areas. (R.T. at p. 72.) No technical data was offered supporting
23 Reclamation's witnesses' conclusions.

24 As discussed above, the purpose of use for Reclamation's water rights Permit 11308 is
25 limited to irrigation, domestic, salinity control, incidental recreation, and stock watering. (See also
26 DOI Exh. 2 at p. 9.) The permit does not include municipal and industrial as a purpose of use.
27 Permit 11308 also provides for a direct diversion rate of 100 cubic feet per second ("cfs") from

1 January 1 to December 31, and diversion to storage of 275,000 acre-feet from October 1 to
2 June 30. (*Id.*)

3 The purpose of use for Permit 11310 is limited to municipal and industrial. (See also DOI
4 Exh. 2 at p. 9.) Permit 11310 provides for a direct diversion rate of 50 cfs from January 1 to
5 December 1 and diversion to storage from October 1 to June 1. (*Id.*) In operating the Project,
6 Reclamation does not distinguish between the two permits. (R.T. at p. 65.) Reclamation makes
7 no effort to break down its water usage based upon the water rights permits. Without this
8 information, it cannot be determined whether the Project has operated in a manner consistent with
9 the terms and conditions of the applicable water rights permits. The result is a lack of evidence as
10 to whether proposed Change Petition would result in a change in the operation of the Project from
11 permitted uses.

12 The Member Units' expert witness Kate Rees opined that the proposed change in place of
13 use and purposes of use would not result in any changes to the Cachuma Project operations or
14 flows in the Santa Ynez River. However, Ms. Rees acknowledged that her analysis did not take
15 into consideration any of the issues associated with the change of purpose of use of the water.
16 (R.T. at p. 144.) The baseline for Ms. Rees' analysis did not establish how much water would be
17 used for irrigation under Permit 11308 or how much used for M&I under Permit 11310. Instead,
18 the analysis lumps together all the uses. Neither the evidence nor the testimony provides any
19 indication how the Project would have operated had diversions pursuant to Permit 11308 been
20 limited to irrigation and diversions pursuant to Permit 11310 limited to M&I. (See R.T. at p.
21 154.) Moreover, neither Reclamation, nor the Member Units can assert that all of the diverted
22 water was taken from storage, as Ms. Rees stated her data and subsequent analysis did not
23 distinguish between water diverted under Reclamation's direct diversion right versus its diversion
24 from storage. (See R.T. at pp. 144-145.)

25 The baseline used in the analysis is premised on existing uses of water, not the permitted
26 uses. Consequently, there is a lack of evidence upon which the SWRCB can rely in making its
27 determination on the Change Petition.

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1 B. Reclamation and the Member Units Failed to Consider That the Cachuma Project's
2 Operational Yield Has Changed

3 Another issue regarding the existing operation and the future operation of the Cachuma
4 Project is the uncertainty as to the Project's Operational Yield. Reclamation and the Member
5 Units testified that the Project's Operational Yield is 25,714 acre-feet per year. (DOI Exh. 1 at
6 p. 5; Member Units Exh. 2 at p. 8.) That operational yield is based upon, among other things, a
7 reservoir capacity of 190,000 acre-feet. (R.T. at p. 62.) The reservoir capacity, however, is
8 currently 188,000 acre-feet, which arguably should reduce operational yield. (DOI Exh. 1 at
9 p. 62; Member Units Exh. 2 at p. 4; R.T. at p. 146.) Thus, to the extent the analysis of the
10 Cachuma Project's current operations is based upon an Operational Yield of 25,714 acre-feet, the
11 analysis is inaccurate. Moreover, the analysis does not take into account that the Project's
12 Operational Yield will continue to decrease as siltation further reduces the reservoir's capacity
13 below 188,000 acre-feet. (See R.T. at p. 62.)

14 C. Increasing the Authorized Place of Use Will Increase the Demand on the Cachuma Project

15 Reclamation and the Member Units' deny that increasing the authorized place of use by
16 17,000 acres results in an increased demand on water from the Cachuma Project. Ms. Rees' own
17 testimony evidences the contrary. Ms. Rees testified that the Member Units' supplemental water
18 (non-Cachuma Project water) may not be enough to meet demand, that water from the Cachuma
19 Project in excess of the 25,714 Operational Yield could be used. (R.T. at p. 151.) In fact, water
20 diversions from the Cachuma Project exceeded the Operational Yield of 25,714 acre-feet in 1993,
21 1994, 1995, 1996 and 1999. (See Member Units' Exh. 2 at p. 7.) Ms. Rees also testified that in
22 one year over 30,000 acre-feet of water was used from the Project. (R.T. at p. 152.)

23 Expanding the authorized place of use by 17,000 acre-feet will place an increased demand
24 on water from the Cachuma Project. As the delivery of water to the Member Units has exceeded
25 the Project's Operational Yield in most of the recent years, it can reasonably be expected that
26 deliveries of water from the Cachuma Project will grow with the increased demand.

27 The SWRCB reserved its jurisdiction over Reclamation's water rights permits and stated
28 that at some future date it will conduct evidentiary hearings to evaluate how the Cachuma Project

1 must be operated in order to protect instream resources and downstream water rights. (See
2 Decision No. D 886, Water Rights Orders 73-37, 89-18, 94-5.) If Reclamation is allowed to
3 change the place of use and purpose of use to areas that have already become dependent upon
4 water from the Cachuma Project prior to the evidentiary hearing, the result will be increased
5 pressure and reliance on the limited water resources of the Santa Ynez River, which Lompoc relies
6 upon as its sole source of water. Thus, prior to ruling on the Change Petition, the SWRCB must
7 determine how the Cachuma Project must operate to protect downstream water rights. (See Wat.
8 Code, § 1702.) Only after the SWRCB determines how the Project will in fact be operated for
9 the foreseeable future, can the SWRCB make a finding regarding whether the proposed changes
10 to place of use and purpose of use will injure any other legal user of water.

11 IV.

12 CONCLUSION

13 Reclamation and the Member Units did not address the specific question raised by the
14 SWRCB in Key Issue 1: Would approval of the Petitions change the operations of the Cachuma
15 Project as compared to operation within the current place of use. The SWRCB framed Key
16 Issue 1 appropriately.

17 The baseline for evaluating the impact and injury from the proposed expansion cannot be
18 based upon Reclamation's unauthorized use of the water to areas outside the permitted place of
19 use and purpose of use. In evaluating impacts to downstream water users, the SWRCB must
20 look at the amount of water that was lawfully used within the authorized place of use and the
21 amount of water that was lawfully used for a permitted purpose. To do otherwise rewards
22 Reclamation and the Member Units for ignoring the terms and conditions of its water rights

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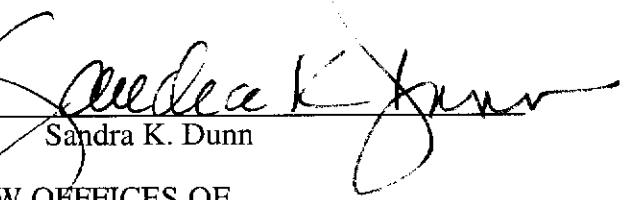
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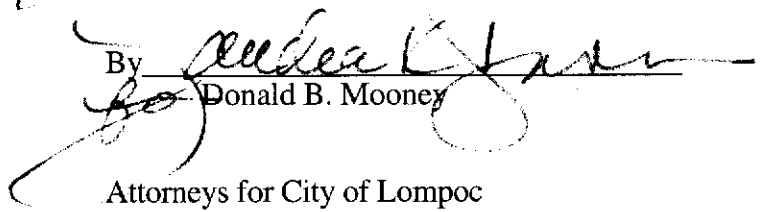
1 permits. The SWRCB needs to evaluate how the Project would have, and should have, been
2 operated under the permitted uses. Thus, the SWRCB should not rule on the Petitions for
3 Change until completion of the Phase II hearing when all evidence has been submitted on all the
4 key issues involving the Cachuma Project.

5
6 DATED: January 5, 2001

7 SOMACH, SIMMONS & DUNN
8 A Professional Corporation

9 By 
10 Sandra K. Dunn

11 LAW OFFICES OF
12 DONALD B. MOONEY

13 By 
14 Donald B. Mooney
15 Attorneys for City of Lompoc

1 PROOF OF SERVICE

2 I am employed in the County of Sacramento; my business address is 400 Capitol Mall,
3 Suite 1900, Sacramento, California; I am over the age of 18 years and not a party to the foregoing
4 action.

5 On January 5, 2001, I served the following document(s):

6 CITY OF LOMPOC'S CLOSING BRIEF FOR PHASE I
7 OF THE CACHUMA PROJECT HEARING
8 (Original and 6 Copies to SWRCB)

9 X (by mail) on all parties in said action, in accordance with Code of Civil Procedure
10 § 1013a(3), by placing a true copy thereof enclosed in a sealed envelope in a designated area for
11 outgoing mail, addressed as set forth below. At Somach, Simmons & Dunn, mail placed in that
12 designated area is given the correct amount of postage and is deposited that same day, in the
13 ordinary course of business, in a United States mailbox in the City of Sacramento, California.


14 Via facsimile transmission.

15 (by overnight delivery) on all parties in said action, by placing a true copy thereof enclosed
16 in a sealed envelope in a designated area for outgoing, same-day pickup by Federal Express at the
17 offices of Somach, Simmons & Dunn for overnight delivery, billed to Somach, Simmons &
18 Dunn, and addressed as set forth below.

19 (by personal delivery) by having a true copy thereof hand delivered to the person
20 and at the address set forth below:

21 SEE ATTACHED SERVICE LIST

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct. Executed on January 5, 2001, at Sacramento, California.

24 
25 _____
26 Julie L. Proctor
27
28

CACHUMA HEARING SERVICE LIST

Cachuma Conservation Release Board
c/o Arthur G. Kidman
McCormick, Kidman & Behrens, LLP
695 Town Center Drive, Suite 400
Costa Mesa, CA 92626

City of Solvang
c/o Christopher L. Campbell
Baker, Manock & Jensen
5260 N. Palm Avenue, Suite 421
Fresno, CA 93704

U.S. Bureau of Reclamation
c/o Kaylee Allen
2800 Cottage Way, Room E-1
Sacramento, CA 95825

Department of Water Resources
c/o David Sandino
1416 Ninth Street, Room 1118
P.O. Box 942836
Sacramento, CA 94236-0001

Santa Ynez River Water Conservation District
Irrigation District No. 1
c/o Gregory K. Wilkinson
Best, Best & Krieger
3750 University Avenue, Suite 400
Riverside CA 92501

California Sportfishing Protection Alliance
c/o Robert J. Baiocchi
P.O. Box 1790
Graeagle, CA 96103

Gary Keefe
Utilities Director
City of Lompoc
P.O. Box 8001
Lompoc, California 93438-8001

Donald B. Mooney
Law Office of Donald B. Mooney
129 "C" Street, Suite 2
Davis, CA 95616

California Trout, Inc.
c/o Craig Fusaro
435 El Sueno Road
Santa Barbara, CA 93110

Santa Barbara County Parks
c/o Jennifer Briggs
610 Mission Canyon Road
Santa Barbara, CA 93105

Dos Pueblos Associates
c/o Richard W. Hollis
211 W. Cannon Perdido
Santa Barbara, CA 93101

Santa Ynez River Water Conservation District
c/o Ernest A. Conant
Law Offices of Young Wooldridge
1800 - 30th Street, Fourth Floor
Bakersfield, CA 93301

Nancee M. Murray
California Department of Fish and Game
Legal Office
1416 Ninth Street, 12th Floor
Sacramento, CA 95814