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**SANTA YNEZ RIVER
WATER CONSERVATION DISTRICT**

IMPROVEMENT DISTRICT NO. 1

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STATE WATER RESOURCES CONTROL BOARD
HATCH & PARENT
A Law Corporation
General Counsel
2003 OCT -3 PM 3:00
ON WATER RIGHTS
CACHUMA

October 7, 2003

Mr. Andrew Fecko
Division of Water Rights
State Water Resources Control Board
P.O. Box 2000
Sacramento, California 95812-2000

Re: Comments on Draft Environmental Impact Report in Connection with Consideration of
Modifications to the U.S. Bureau of Reclamation's Water Right Permits Nos. 11308 and 11310

Dear Mr. Fecko:

Santa Ynez River Water Conservation District, Improvement District No. 1, (ID No.1) is located downstream of Lake Cachuma in the Santa Ynez Valley. The primary responsibility of ID No.1 is to serve water to its customers consisting of residential, commercial, institutional, and agricultural water users within its service area. ID No.1 appreciates the opportunity to provide comments on the above-referenced draft Environmental Impact Report (EIR) by the State Water Resources Control Board (SWRCB). Comment letters have been submitted on the draft EIR by the Santa Ynez River Water Conservation District (SYRWCD) and Cachuma Conservation Release Board (CCRB) to the SWRCB. ID No.1 joins SYRWCD and CCRB in comments submitted in those letters.

ID No.1 is a Cachuma Project Member Unit which has a contract with the U.S. Bureau of Reclamation (USBR) through the Santa Barbara Water Agency for annual supply of Cachuma Project water. In addition, ID No.1 produces water from the Santa Ynez River subflow and Santa Ynez Upland ground-water basin. It also has an entitlement of 500 acre-feet per year from the State Water Project (SWP). The Cachuma Project provides about 40% of the District's annual water supply. In reviewing the draft EIR, we are concerned that impacts on Cachuma water supply (shortages) which directly affect ID No.1 are understated. Furthermore, the environmental document overstates the District's supply of water from other sources, namely the Santa Ynez River wells and the Upland ground-water basin.

Impacts on Water Supply. The draft EIR understates the impacts of alternatives on Cachuma water supply during the critical drought period (1949-51). The project shortages shown in Table 4-16 are based on a perfect forecasting of the duration and severity of the drought. In a real-time operation, water supply managers have to plan for water supply assuming the year following the worst historical drought period would be also dry. With reserves set aside for an additional dry year, the shortages would be substantially greater than those shown in Table 4-16 of the draft EIR. Table 1 (attached) shows shortages to Cachuma

Project deliveries under the proposed alternatives with reserves for an additional dry year. As indicated in Table 1, ID No.1 could experience shortages as much as 64 percent in a critical drought year (1951) and 40 percent annually during the three-year drought period (1949-1951) under Alternative 3A.

Groundwater Supply During Drought Periods. During drought periods, lowered water levels (increased dewatered storage) significantly reduce yields from the 4 and 6 cfs well fields. The critical drought supply from ID No.1's Santa Ynez River wells were determined based on declines in water levels (dewatered storage) in 1951 using the Santa Ynez River Hydrology Model (SRYHM) for Alternative 3A. The yield from the 4 and 6 cfs well fields for critical drought (1951) is estimated to be 1,450 acre-feet, not 3,600 acre-feet shown in Table 4-24. (Refer to Exhibit B attached to comments submitted by CCRB.) The EIR should be corrected accordingly.

Similarly, the yield from the ID No.1 wells from the Santa Ynez Upland basin is over-stated in the draft EIR. The production capacity of ID No.1 from the Upland ground-water basin has been reduced in recent years due to well destruction, water quality problems, and lowering of water table. The production capacity from the Upland wells is expected to be about 2,320 acre-feet in critical drought year, not 4,700 acre-feet shown in Table 4-24. (Refer to Exhibit B attached to comments submitted by CCRB.) The EIR should be corrected accordingly.

Water Supply Comparisons with Draft EIR. The draft EIR sets forth in Table 4-14 the normal year water supply (average production) for ID No. 1. It also tabulates in Table 4-24 the supply in critical year (1951) under Alternative 3A for ID No. 1. The District has made an independent determination of its water supply and demand. The District's determination of its water supply under the above conditions is shown in Table 2 (attached). The comparisons between the District's determination and those shown in Tables 4-14 and 4-24 of the draft EIR for normal and critical year water supplies are shown in Tables 3 and 4 (attached), respectively.

Based on the determination by ID No.1, as shown in Table 4 (attached), ID No.1 would have a deficit of supply (about 580 acre-feet) in critical drought (1951) to meet its year 2002 level of demand compared to a surplus (5,440 acre-feet) shown in Table 4-24 of the draft EIR. Similarly, ID No.1 would have deficit of 1,400 acre-feet to meet the demand of year 2020 compared to a surplus of 1,700 acre-feet shown in Table 4-24.

The draft EIR (page 4-36) indicates that other member units (City of Santa Barbara, Goleta, and Montecito) with shortages in drought years can buy water from ID No.1. First, ID No.1 does not have surplus water to sell. Second, overlying groundwater pumpers inside and outside of ID No.1, within the Santa Ynez Valley, will oppose such transfer of water. Third, there are no physical facilities to transfer pumped ground water from the Santa Ynez Valley to the South Coast.

In addition to the above comments, ID No.1 provides the following specific comments to assist you in completing a final EIR.

1. Section 2.1.2 Page 2-1, Last Paragraph Second Sentence
Insert: A portion of...

2. Section 2.2.2, Page 2-4, Table 2-1

Row SWRWCD, ID#1	1996-97	1997-98	1998-99	1999-00	2000-01
Delete	22% 1,869	60	70	79	
Insert	46% 1,913	2,761	2,658	2,648	2,534

Explain ID#1 receiving its Cachuma Project entitlement through an exchange with South Coast Project members.

3. Section 2.2.2, Page 2-5, Table 2-2 Rows

Row WY1997	Column Direct Diversions	- Delete 84	Insert 73
	Column SYRWCD ID#1	- Delete 1,785	Insert 1,840
Row WY1998	Column Direct Diversions	- Delete 62	Insert 60
	Column SYRWCD ID#1	- Blank	Insert 2,701
Row WY1999	Column SYRWCD ID#1	- Blank	Insert 2,588
Row WY2000	Column Direct Diversions	- Delete 80	Insert 79
	Column SYRWCD ID#1	- Blank	Insert 2,569
Row WY2001	Column Direct Diversions	- Delete 77	Insert 86
	Column SYRWCD ID#1	- Blank	Insert 2,448

Insert: Water production from Cachuma Project is based on the October 1 through September 30 water year. Section 2.2.2, Page 2-6, Table 2-2 - Revise Averages under Direct Diversions and SYRWCD, ID#1

4. Section 2.3, Page 2-11, First Paragraph, ID#1 left out of signatories

Section 2.4.2.5, Page 2-16, First Paragraph, ID#1 left out of Adaptive Management Committee

5. Section 2.2.4 Page 2-9 Bullet SYRWCD, ID#1 2,000 afa Insert - 500 afa to SYRWCD, ID#1 and under Water Supply Agreement 1,500 afa to the City of Solvang.

6. Section 2.2.4 Table 2-4 Page 2-9

Row "SYRWCD, ID#1"	1997-98	1998-99	1999-00
Delete	506	1,085	726
Insert	300 ¹	1,291 ²	700 ³

Insert Note 1 - SWP deliveries include 50 afa of Drought Buffer water

Note 2 - SWP deliveries include 200 afa plus 841 afa of DWR Turnback Pool B water

Note 3 - SWP deliveries include 200 afa of Drought Buffer water.

Row "Total" should be recalculated to reflect corrections.

7. Section 3.1.2, Page 3-2, Second Bullet SYRWCD, ID#1 Production from 1995 - 2000 insert 2002...

Section 3.1.2 Page 3-2, Third Bullet SYRWCD, ID#1 Last Sentence: Production from 1995 - 2000 insert 2002... ranged from 38 to 438 insert 3,364 afa.

Section 3.1.2 Page 3-2, Fourth Bullet SYRWCD, ID#1 Last Sentence: No water was produced during the period 1992 - 2000 insert 2002 due to the surface water treatment rule. In-lieu filings under section 1005.4 of the California Water Code are submitted to the SWRCB.

8. Section 3.1.3 Page 3-4, Fifth Bullet – Recreational and public activities in the Santa Ynez River, downstream of Bradbury Dam and within the Santa Ynez River Water Conservation District, Improvement District No.1 boundaries, are prohibited by private property ownership. This statement should only address the Lake Cachuma County Park lands.

9. Section 4.3.1, Page 4-30, Santa Ynez River Water Conservation District, Improvement District # 1, First Paragraph, Last Sentence: Delete sentence and insert SYRWCD, ID#1 supplies Municipal and Industrial water to the City of Solvang on an as-needed basis to supplement its water sources of supply and in the event of emergency.

10. Section 4.3.1, Page 4-30, Santa Ynez River Water Conservation District, Improvement District # 1, Second Paragraph, Third sentence: SYRWCD, ID#1 has an entitlement for SWP water of 2,000 afa plus 200 afa of CCWA drought buffer. The District's entitlement is 500 afa plus 200 afa of drought buffer. The remaining 1,500 afa is allocated to the City of Solvang under a water supply contract, which includes an entitlement of 1,500 afa for the City of Solvang.

11. Section 4.3.1, Page 4-30, Table 4-14, refer to Table 2 and 3 in this letter

12. Table 4-15, page 4-31, Column SYRWCD, ID#1

Row:	1989-90	Delete	7,902	Insert	6,864
	1990-91	Delete	6,363	Insert	6,343
	1991-92	Delete	6,050	Insert	5,320
	1992-93	Delete	6,343	Insert	6,048
	1993-94	Delete	6,236	Insert	5,592
	1994-95	Delete	6,138	Insert	5,377
	1995-96	Delete	6,812	Insert	6,111
	1996-97	Delete	6,506	Insert	6,277
	1997-98	Delete	5,110	Insert	4,290
	1998-99	Delete	6,163	Insert	5,310
	1999-00	Delete	6,681	Insert	5,303
	Ave=	Delete	5,858.75	Insert	5,712

13. Section 4.3.1, Page 4-31, Bullet Five – SYRWCD, ID#1 Delete 22%
 Insert 46%

14. Section 4.3.2, Page 4-35, Table 4-18, Row SYRWCD, ID#1 (Table 4-14)

This table should be modified to reflect accurate water supplies from previous tables.

Row 13	Delete	4,700	Insert	<u>2,320</u>
Row 14	Delete	3,600	Insert	<u>1,450</u>
Row 15	Delete	8,300	Insert	<u>3,770</u>

15. Section 4.3.2, Page 4-35, Table 4-19,

This table should be modified to reflect accurate water supplies from previous tables.

Row: SYRWCD, ID#1	Delete	5,300	Insert	<u>5,792 (2002)</u>
	Delete	9,050	Insert	<u>6,619</u>

16. Section 4.3.2, Page 4-36, Second Paragraph, Second Sentence. The surplus for SYRWCD, ID#1 has been greatly overstated at 5,443 af. Based on accurate numbers provided in Table 4 in this letter, there is actually a shortage of 577 af using 2002 level of demand. In addition, there is no interconnection of infrastructure to allow for the purchase of water between SYRWCD, ID#1 and the south coast water agencies.

17. Section 4.3.2, Page 4-38, Table 4-24, refer to Table 4 in this letter. This table should be modified to reflect accurate water supplies in critical drought year (1951) under Alternative 3A.

18. Section 4.3.2, Page 4-38, Table 4-25

This table should be corrected to reflect accurate water supplies for SYRWCD, ID#1 in a three-year period (1949-1951) under Alternative 3A.

Row 11.	Local Groundwater supply & Santa Ynez River diversion	Delete	24,900	11,823
Row 12.	Average State Water Project Deliveries	Delete	30,456	25,425
Row 13.	Cachuma Project supply	Delete	960	45,918

19. Section 4.3.2, Page 4-40, Third Paragraph, Increased ground water pumping during droughts could have a detrimental effect on ground water quality by increasing the flux of water from poorer water quality areas in the absence of fresh water recharge. Also, depending on how long overdraft conditions persist, wells will go dry or operate with reduced yields and increased pumping lifts.

20. Section 4.3.2, Page 4-40, Fourth Paragraph, Last Sentence. The statement that temporary transfers and SWP water "delivery directly to SYRWCD, ID#1 pursuant to an exchange agreement with the other Member Units" is a generalization without detail or consideration given to turnout capacity or timing. This statement should be withdrawn.

21. Section 4.3.2, Page 4-41, Second Paragraph, First Sentence. SYRWCD, ID#1 cannot receive the benefit of the City's Desalination facility because there is not interconnection of infrastructure and therefore, should be restated to accurately reflect the conditions.

Mr. Andrew Fecko
State Water Resources Control Board
October 7, 2003
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The District believes that overall the State Board staff has done a good job in preparing the referenced draft environmental document. The District would be happy to provide additional information if needed for the final EIR.

Sincerely,



Chris Dahlstrom, General Manager
Santa Ynez River Water Conservation District,
Improvement District No. 1

CD

Attachments

Cc: Mr. David Young, United States Bureau of Reclamation
Mr. Bruce Wales, Santa Ynez River Water Conservation District
Ms Kate Rees, Cachuma Conservation Release Board
Mr. Robert Wignot, Cachuma Operation & Maintenance Board
Ms Marlene Demery, City of Solvang
Mr. Gary Keefe, City of Lompoc
Mr. Steven A. Amerikaner, Hatch & Parent
Mr. Gregory Wilkinson, Best, Best & Krieger
Stetson Engineers, Inc.

TABLE 1
IMPACTS ON CACHUMA PROJECT WATER SUPPLY IN CRITICAL DROUGHT PERIOD, 1949-1951,
WITH RESERVES SET ASIDE FOR ADDITIONAL DRY YEAR (ACRE-FEET)

Cachuma Operations	Shortage in Critical Drought Year 1951	Shortage as Percentage of Annual Draft	Cumulative Shortage in Critical Drought Period 1949-1951	Shortage as Percentage of Annual Draft for 3 Years
Alt 1	12,740	50%	22,800	30%
Alt 2	14,790	58%	27,030	35%
Alt 3A	16,500	64%	31,220	40%
Alt 3B	15,940	62%	29,460	38%
Alt 3C	15,380	60%	27,750	36%
Alt 4A-B	15,090	59%	24,530	32%

Note: Annual draft from Cachuma Project is 25,714 acre feet.

TABLE 2
SANTA YNEZ RIVER WATER CONSERVATION DISTRICT, ID No.1
WATER SUPPLY AND DEMAND – NORMAL AND CRITICAL DROUGHT (1951)

Supplies	Normal (acre-feet per year)	Critical Drought Year	Comment
Cachuma Project	2,651	1,095	Fixed percentage of Cachuma Project at 10.31%; Cachuma Project represents approximately 40% of total supply.
Santa Ynez Upland Groundwater Basin	1,430	2,320	Production for normal year is based on an average of the last five years (1998-2002) which reflects Well Nos. 3, 4, and 5A remaining out of production (destroyed or water quality problems) and Well No. 7 producing at a reduced rate due to lower water levels. Drought supply is based upon average annual production during the 1987-1991 drought adjusted for Well Nos. 3, 4, and 5A and reduced production from Well No. 7.
Gallery Well	0	0	Currently inactive due to SWTR. Maximum permitted diversion is 515 AFY.
Santa Ynez River Underflow	1,480	1,450	Production for normal year based on an average of last five years (1998-2002). Critical drought supply determined based on declines in water levels (dewatered storage) in 1951 using SYRHM simulation for Alternative 3A. Permitted maximum productions of 2,220 and 3,400 AFY for 4 and 6 cfs well fields would be reduced to 670 and 780 acre-feet, respectively, in 1951.
State Water Project	525	350	SWP entitlement is 2,000 AFY plus 200 AFY of CCWA drought buffer. District's entitlement is 500 AFY plus 200 AFY of drought buffer. The remaining 1500 AFY is allocated to the City of Solvang under a water supply contract. District assumes 75% delivery of its 700 AFY allocation in normal year and 50% during drought.
Total	6,086	5,215	
Current (2002) Demand	5,792		
Planned Future (2020)	6,619		

TABLE 3
WATER SUPPLY AND DEMAND IN NORMAL YEAR
SANTA YNEZ RIVER WATER CONSERVATION DISTRICT, ID No.1 (ACRE-FEET/YEAR)

	Draft EIR Table 4-14	Determination by ID No. 1
Cachuma Project	2,651	2,651
Santa Ynez Upland Groundwater Basin	4,700	1,430
Gallery Well	0	0
Santa Ynez River Underflow	3,600	1,480
State Water Project	1,000	525
Total	11,951	6,086
Current Demand ¹⁾	5,300	5,792
Planned Future ²⁾	9,050	6,619

1) Draft EIR uses 1999 for current demand; determination by ID No. 1 uses 2002.

2) Draft EIR uses 2010 for build-out level; determination by ID No. 1 uses 2020.

TABLE 4
WATER SUPPLY AND DEMAND IN CRITICAL DROUGHT YEAR (1951) UNDER ALTERNATIVE 3A
SANTA YNEZ RIVER WATER CONSERVATION DISTRICT, ID No.1 (ACRE-FEET/YEAR)

	Draft EIR Table 4-24	Determination by ID No. 1
1. Local groundwater supply	4,700	2,320
2. Santa Ynez River diversion	3,600	1,450
3. State Water Project supply	1,010	350
4. CCWA drought buffer (include in 3 above)		
5. Cachuma Project supply in critical drought year	1,433	1,095
6. Total Supply	10,743	5,215
7. Year 2000 demand	5,300	5,792
8. Surplus (6-7)	+5,443	-577
9. Year 2020 demand	9,050	6,619
10. Surplus (6-9)	+1,693	-1,404