

COUNTY OF SANTA BARBARA



STATE WATER RESOURCES
CONTROL BOARD

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WATER RIGHTS
SACRAMENTO

October 6, 2003

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

Re: Comments on Draft EIR for Modifications to Bureau of Reclamation Water Right Permits 11308 and 11310 (Cachuma Reservoir)

Dear Mr. Fecko:

This letter transmits comment from staff of the County of Santa Barbara (the "County") on the Draft Environmental Impact Report ("DEIR") prepared for the Consideration of Modifications to the U.S. Bureau of Reclamation's Water Right Permits 11308 and 11310 (Applications 11331 and 11332) to Protect Public Trust Values and Downstream Water Rights on the Santa Ynez River below Bradbury Dam (Cachuma Reservoir) (the "Cachuma Project Water Rights").

As participants in the Memorandum of Understanding for fish studies and implementation of the Plan, we appreciate the efforts of the Cachuma Member Units to protect and enhance fish resources in the lower Santa Ynez River. The County also understands and supports the three major public policies underlying the DEIR: 1) ensuring a reliable water supply; 2) protecting endangered species; and 3) protecting public recreation and related public trust resources at the lake and river. We understand the challenges faced by the involved public agencies in balancing the sometimes competing interests in these public policy areas. We also believe that local solutions, developed within broad state and federal policy direction, are most effective in achieving such balance and thus best serve the public interest. In light of this perspective, we have reviewed the DEIR and submit the following comments regarding that document and the State Water Board's pending review of the Water Right Permits.

In order to most effectively, fairly, and efficiently balance the interests affected by implementation of the Plan, the County recommends the State Water Board approve a phased surcharge of Lake Cachuma from 0.75 feet to 1.8 feet, ultimately reaching the full 3.0-foot surcharge as County Park facilities are modified. This phased alternative would avoid impacts to public recreation, minimize risk to water supply, and provide sufficient water to implement the Plan. This alternative would best achieve a balancing of the three major public interests affected