

In its comment letter dated December 9, 2016, the Santa Ynez River Water Conservation District (SYRWCD) contends that the State Water Resources Control Board (State Water Board or Board) has not fully studied and disclosed the impacts of Alternative 5C to groundwater quantity and quality based on potential effects on the Above Narrows Account (ANA) and the Below Narrows Account (BNA). This argument appears to be based, in part, on a misunderstanding of the Board's response to SYRWCD's comments on this issue in 2011. (FEIR, Vol. I, pp. 2.0-154 to -155 [Response 11-16].) Staff have prepared a supplemental response to comments in order to address this misunderstanding. This supplemental response to comments is authorized pursuant to title 14, section 15088 of the California Code of Regulations.

As provided in State Water Board Order WR 73-37 and Order 89-18, the inflow to Cachuma Reservoir is credited to the ANA to the extent there is no visible flow (live stream) at designated locations in the river from Bradbury Dam to Floradale Avenue in the Lompoc Valley. (FEIR, Vol. II, p. 2.0-9.) Water is released from the Cachuma Project ANA to recharge the basin as long as there is water in the account, and the dewatered storage of the basin exceeds 10,000 acre-feet (af). (FEIR, Vol. II, p. 4.4-3.) If the ANA is exhausted, and there is no flow in the river, then the supply of water from the basin is limited to what is in storage and subsurface inflow from upstream subareas and surrounding basins. (*Ibid.*)

The BNA is based on the difference between the actual percolation below the Lompoc Narrows and the estimated percolation that would have occurred if river flows were not impounded by Cachuma Reservoir. (FEIR, Vol. II, p. 2.0-9.)

The California Environmental Quality Act (CEQA) requires that the State Water Board evaluate and disclose foreseeable direct physical changes to the environment and reasonably foreseeable indirect physical changes to the environment when it prepares an Environmental Impact Report (EIR). (Pub. Resources Code, § 21002.1, subd. (a); see also *id.*, § 21068; Cal. Code Regs., tit. 14, § 15358, subd. (a)(2).) The ANA and BNA are accounting methods, not the environment. (Pub. Resources Code, § 21060.5.) Therefore, a change to the ANA or BNA is not a foreseeable direct physical change to the environment. A change to the ANA or BNA could cause an indirect physical change to the environment, however, such as changes in groundwater elevations or quality in the Above Narrows Alluvial Groundwater Basin and the Lompoc Groundwater Basin.

The State Water Board disagrees with SYRWCD's argument that evaluating and disclosing changes to the Above Narrows Alluvial Groundwater Basin and the Lompoc Groundwater Basin requires the Board to specifically quantify and disclose any changes to operation of the ANA and BNA accounting tools. It is the groundwater basins themselves, not the accounts, that constitute the environment for the purposes of CEQA. The Final EIR (FEIR) exhaustively studied direct and reasonably foreseeable indirect changes to both basins.

The Santa Ynez River Hydrologic Model (SYRHM) was used to model Cachuma Project operations under the various alternatives, and the potential changes to a number of parameters, including groundwater storage and elevations in the Above Narrows Alluvial Groundwater Basin. A description of the model is provided in section 4.2.2.1 of the FEIR. A detailed description of the modeling and the results of the hydrological simulations are provided in technical memoranda by Stetson 2001a and 2006a (2006a is included in FEIR, Vol. IV, Appendix F.)

Physical features simulated in the SYRHM include the Above Narrows Account riparian ground water sub-basins for Santa Ynez, Buellton, and Santa Rita East and West; and percolation to the Lompoc Plain below Narrows (Lompoc Groundwater Basin). (FEIR, Vol. II, p. 4.2-10.) The SYRHM accounted for differences in ANA operations under the various alternatives. The modeling results indicated that average water rights releases pursuant to State Water Board Order WR 89-19 would decrease under Alternative 5C relative to Alternative 2 (the baseline) because additional releases for fish under Alternative 5C would reduce the need for releases to replenish groundwater basins, which would reduce the credits in the ANA. (*Id.*, pp. 4.2-19, 4.2-20.) Nonetheless, the model found that groundwater elevations in the Above Narrows Alluvial Groundwater Basin would remain unchanged or slightly higher under Alternative 5C. (*Id.*, p. 4.4-7.) This analysis is extensively described in section 4.4 of the FEIR.

The FEIR used two separate models to evaluate the effect of the project alternatives on water quality and quantity in the Lompoc Groundwater Basin; one developed by the United States Geological Survey (USGS) and the other developed by Hydrologic Consultants, Inc. (HCI). (FEIR, Vol. II, p. 4.6-6.) Both model simulations utilize local precipitation and recharge for the historical period 1942 to 1988, and Santa Ynez River flow and TDS data from the SYRHM, which as stated above took into account differences in ANA operations under the various alternatives. (*Ibid.*) Both models indicate no significant changes in groundwater quality or levels in the Lompoc Basin under Alternative 5C. (*Id.*, pp. 4.6-13, 4.6-15.) This analysis is extensively described in section 4.6 of the FEIR.

The State Water Board's previous response to comment 11-16 states that the 2011 2nd Revised Draft EIR (RDEIR) did not "specifically evaluate the downstream condition for the ANA." This statement should not be construed to mean that the RDEIR did not evaluate changes to Cachuma Project operations, including ANA and BNA operations, and the potential indirect effects on the Above Narrows Alluvial Groundwater Basin and the Lompoc Groundwater Basin. The FEIR exhaustively studied direct and reasonably foreseeable indirect changes to groundwater quantity and quality in both basins under the various alternatives and found no impact.