



Carpinteria Valley Water District

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SEP 26 AM 11:50

September 20, 2007

Ms. Diane Riddle
Division of Water Rights
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812-2000

RE: CACHUMA DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Riddle,

This letter details concerns of the Carpinteria Valley Water District regarding proposed Alternative 4B of the DEIR for the Cachuma Project.

Alternative 4B:

This alternative proposes using State Water Project (SWP) water as a replacement for Cachuma water for injection into the Lompoc Plain (Below Narrows Account). Presently, an annual average of 1,683 AF (acre-feet) of water is sent to this area (low = 0 AF, high = 4,215 AF). The ostensible reason for this would be to improve the water quality of the Lompoc Plain, and increase available Cachuma supplies for South Coast contractors.

Principal concerns:

1. Impact of Alternative on SWP Allotment(s)

Presently, Carpinteria Valley Water District (District) has 2,200 AF of SWP allotment (w/ drought buffer), of which 410 AF is used in exchange water for Santa Ynez River Water Conservation District ID#1. Major steps are being taken by the District, however, that would reduce District SWP allotment in half, as well as half of the District's cost obligations. Plains Exploration and Production Company (PXP) near Lompoc has recently secured an option agreement with the District to purchase 400 AF of allotment, and a possible sale of 500 AF of allotment by the District to the City of Guadalupe is also now in negotiation. Should PXP successfully exercise its option agreement, and the proposed sale to Guadalupe be consummated, the District would then have 1,210 AF of allotment (1,100 AF plus 110 AF drought buffer).

Given the average annual SWP delivery rate of 68%¹, a total of 603 AF of SWP allotment is needed to ensure the District's use of 410 AF for ID#1 exchange, leaving the District with approximately 1,600 AF for other purposes. Sales of allotment to PXP and Guadalupe as proposed would result in some 607 AF of available SWP water for Alternative 4B. Presumably the District would be responsible for 10.938% of any SWP water for Alternative 4B (District's share of Cachuma allotment) or 184 AF given the average identified in the alternative. With the average SWP delivery rate, the District would need to set aside an average of 271 AF in order to meet Alternative 4B (range between 0 AF to 678 AF).

Alternative 4B in some years would adversely impact the desirable and possible sales of water by the District to PXP and Guadalupe. Alternative 4B would also limit the District from utilizing SWP capacity for participation in water banking programs and addressing shortages in dry years. Alternative 4B would in general reduce the District's ability to meet the needs of its customers in drought years.

2. Degradation of superior water quality source

The District believes that its customers would prefer to see SWP water used for higher purpose needs than groundwater quality improvement. Immediate supply enhancing opportunities for treated SWP water – municipal, agricultural – should be first sought out before this alternative is adopted. The concern is that the customers of Carpinteria Valley will take a negative view of the alternative, given the expense incurred by the District for the SWP project and lack of perceived benefit to District customers.

3. Fundamental change in SWP role / purpose to the District.

Using the SWP infrastructure for fish habitat would essentially change the fundamental purpose of this water source of supply from an emergency or reliability based source of supply for the District to something for which it was not intended. Under Alternative 4B, should the District reduce its SWP allotment as discussed above, its use of this asset for its original purpose would be severely restricted. Although the District might gain some Cachuma allotment in an exchange, the cost of SWP debt carried by District consumers might be regarded as too great for the derived benefit. Additionally, relying more heavily on Cachuma water will likely increase the severity of shortages during local drought conditions, as the remaining SWP water would not be sufficient to meet Cachuma cutbacks.

Thank you for the opportunity to comment as well as for your consideration of these comments.

Sincerely,



Charles B. Hamilton

¹ California Department of Water Resources (2005). *The State Water Project Delivery Reliability Report*. Sacramento, CA: State of California.