



GK/DKR

September 25, 2007

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

2007 SEP 28 PM 1:17

Subject: Revised Draft Environmental Impact Report prepared for the
Cachuma Reservoir Project

Dear Ms Riddle,

The Montecito Water District is a Member Unit of the Cachuma Project. As General Manager of the Montecito Water District I have concerns regarding any alternative which may result in a reduction of water supply. In particular, the newly proposed alternatives 5B and 5C appear to result in further reductions in present water yield from the project, with a wholly superficial, factually inaccurate and completely inadequate analysis of the resulting significant impacts to public water supply. It should be noted that the present project yield has already been reduced from previous yield in order to provide additional water for Public Trust resources and downstream water rights in accordance with a Water Rights Settlement Agreement, and a Biological Opinion and Fishery Management Plan developed through years of detailed study and broad-based consensus. Perhaps an explanation of the District's present water supply/demand situation will help you understand why I am so concerned about any further reduction in water supply from the Cachuma Project, and believe that analysis of the impacts of such reduction needs to be better described.

In the Montecito Water District Final Urban Water Management Plan Update – 2005 it is shown that during a normal year water supply is 7380 acre feet (AF), and in the critical drought year as shown in DEIR Table 4-11, August 2003, with revision, the water supply is 2963 AF. In fiscal year 2007 the District's water demand was 7194 AF. You can see from these numbers that during a dry period District customers will already need to make significant cutbacks. The District is implementing an aggressive conservation program to accomplish such necessary reductions. With any further supply reduction, the District may be forced to implement severe rationing during dry/drought periods, which will have significant primary and secondary environmental impacts.

Subsequent to preparation of the Urban Water Management Plan – 2005 report, the District received a Future Water Demand and Water Supply Options Report, March 2007 (Report) prepared by Steven Bachman PhD. The Report states that the District has 4,599 customer water meters. Based on an analysis of the Montecito

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Community Plan Update, December 1995; Summerland Community Plan, May 1992; and Toro Canyon Plan, February 2002, as many as 914 water meters will be added to the District customer base by 2030. In addition, those plans provide for approximately 1400 acres of land for agricultural purposes, which will result in approximately an additional 2900AF/year demand on District water supplies.

The District is hard-pressed to provide for the water needs of existing customers. It is unknown if the District can provide water for additional residences and agricultural zoning as shown in the community plans. Based on existing demand, the District can expect significant shortages during dry periods, which may be exacerbated if the District continues to full build out. District staff, recognizing its water supply/demand dilemma, embarked on a two-year search for additional water supplies. The results of that search have been incorporated into the Report. The District was unable to find any additional long-term water supplies. District staff is hopeful that by implementing an inclined block rate structure that gives significant financial incentives for water conservation, along with other conservation measures such as replacing existing water intensive landscaping with xeriscape and requiring new construction to have water efficient landscaping, severe rationing could be avoided during a dry period under existing water supply/demand conditions. Any proposal such as 5B or 5C that would further reduce limited and already obligated District water supplies would only exacerbate the likelihood and severity of rationing during dry periods. The impact of such proposals must be thoroughly analyzed, since it would have a significant negative impact on District customers and the District's environment.

Montecito Water District customers and the District's environment were traumatized by the severe drought which ended in March 1991. Coming out of that drought, the Cachuma Member Units, including the District, understood the need to provide for water supply balanced with appropriate protection for Public Trust resources and downstream water rights. Seeking an end to over 70 years of water wars on the Santa Ynez River, the District helped develop and accepted the provisions of the Fishery Management Plan and the Water Rights Settlement Agreement. Alternative proposals such as 5B and 5C ignore that recent history, and unnecessarily push the District in the direction of water vulnerability that was experienced during the last drought. Before the SWRCB can reasonably expect to consider such irresponsible alternatives, the true and full cumulative impacts to water supply must be fully analyzed.

Sincerely,



Robert L. Roebuck
General Manager
Montecito Water District

CC: Jan Abel, MWD President
Kate Rees, COMB/CCRB
Chip Wullbrandt, Counsel