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DIV. OF WATER RIGHTS

August 29, 2011

Ms. Jane Farwell
Water Rights Section
State Water Resources Control Board
PO Box 2000
Sacramento, CA 95812-2000

RE: Response to Comments Submitted by Environmental Defense Center – 2nd Revised Draft EIR, Cachuma Project

Dear Ms. Farwell,

The Goleta Water District (District) appreciates to opportunity to respond to information included in the May 27, 2011 letter submitted by the Environmental Defense Center (EDC) in response to the State Water Resources Control Board (SWRCB) April 1, 2011 2nd Revised Draft of the Environment Impact Report (2nd Revised DEIR), prepared in connection with consideration of modifications to the U.S. Bureau of Reclamation's Water Rights Permits 11308 and 11310 regarding the Cachuma Project. With these comments, the District's goal is to help ensure the accuracy of information used during the environmental review process.

The May 27, 2011 EDC Letter (EDC Letter) appropriately and thoroughly references the District's 2011 Water Supply Management Plan; however, given the complex interplay between the District's water supply sources and the local policy framework, several points of clarification are necessary, as described below.

Groundwater Management

- Page 4 of the EDC Letter states that the District is extracting less than the groundwater basin's safe yield (2,350 AFY versus 3,410). Important to note, the District's adjudicated entitlement to a portion of the total annual safe yield is 2,350 AFY. Other entities are entitled to use the remaining portion of the safe yield, including the La Cumbre Mutual Water Company, which is entitled to 1,000 AFY.

Other overlaying landowners are entitled to use the balance of the total annual safe yield.¹

- Page 5 of the EDC Letter states that the District's banked groundwater could help offset the District's and other agencies' projected water supply shortfalls. Without question, banked groundwater, referred to by the SAFE Water Supplies Ordinance (SAFE) as the "Drought Buffer," represents a significant water supply and reliability asset; however, it is important to recognize that SAFE requires this banked groundwater to be maintained for use by existing District customers during times of drought. The Drought Buffer cannot be used as a supplemental supply for new or additional water demands, other than those demonstrated by existing customers.²
- On a related note, when recovering from a drought, the District is required to meet the SAFE "Annual Storage Commitment," which requires injection of water using another supply source – either Cachuma water or State water – coupled with no groundwater pumping, each year until the basin reaches 1972 levels.³ Recovering from a drought where the basin has dropped significantly below 1972 levels, while also meeting normal customer demand without the use of groundwater as a supply source (due to SAFE), represents a potential operational constraint for the District. Accordingly, the District manages supplies to ensure that 1972 levels are well understood and monitored.

Recycled Water

- Page 6 of the EDC Letter comments on the District's ability to provide recycled water. Currently, the recycled water facility operated by the Goleta Sanitary District has a total theoretical production capacity of 3,000 AFY; however, distribution system infrastructure and customer demand limit the ability to achieve this theoretical annual capacity. The existing recycled water distribution system is able to serve the District's current recycled water customer base, and deliver on average about 1,000 AFY. However during peak hours of usage (normally during the nighttime), the distribution system reaches capacity limitations. In addition, the system experiences storage limitations, and additional reservoirs would be required to use the full plant capacity. Long range improvements to the recycled water distribution system are included in the District's 2011 Infrastructure Improvement Plan; however, funding is not currently available for these projects. Moreover, the District has limited ability to legally compel existing customers to convert from the use of potable water to recycled water. In many cases, the costs associated with conversion are prohibitive, especially when the recycled water mains need to be extended or booster stations enhanced. The District has instituted economic incentives by offering a reduced rate for recycled water irrigation and connection,

¹ Bachman, S. 2010. Goleta Water District Groundwater Management Plan (pages 1-2 and 1-3).

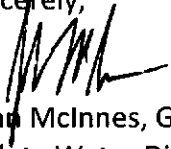
² Section 1, paragraph 2 of the SAFE Water Supplies Ordinance 91-01. Available at: http://www.goletawater.com/assets/documents/other/SAFE_ORDINANCE.pdf.

³ Bachman, S. 2011. Goleta Water District Water Supply Management Plan (page 33).

and new projects being developed along or near to existing infrastructure are required to use recycled water and make feasible distribution system improvements, consistent with State law.⁴

Thank you for considering these clarifications, and please do not hesitate to contact me if further assistance is needed.

Sincerely,



John McInnes, General Manager
Goleta Water District

cc: Kate Rees, General Manager, Cachuma Conservation Release Board,
629 State Street, Suite 244, Santa Barbara, CA 93101

⁴ California Water Code Sections 13550 et seq.