

Jane Farwell - Coments on 2nd Revised Draft Santa Ynez River EIR from the Central Coast Water Authority

From: William Brennan <WJB@ccwa.com>
To: <JFarwell@waterboards.ca.gov>
Date: 5/27/2011 3:55 PM
Subject: Coments on 2nd Revised Draft Santa Ynez River EIR from the Central Coast Water Authority
Attachments: DOC052711.pdf

Dear Ms. Farwell:

I have attached a copy of the Central Coast Water Authority comments on the Second Revised Draft Environmental Impact Report prepared in connection with consideration of modifications to the United States Bureau of Reclamation's Water Rights Permits 11308 and 11210 (Applications 11331 and 11332) to protect public trust values and downstream water rights on the Santa Ynez river below Bradbury Dam (Cachuma reservoir), dated April 2011 (SCH#1999051051). A signed original follows in the mail.

Sincerely,

Bill Brennan

Executive Director
Central Coast Water Authority
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May 27, 2011

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

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Re: Second Revised Draft Environmental Impact Report Prepared in Connection with Consideration of Modifications to United States 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), dated April 2011 (SCH#1999051051)

Dear Ms. Farwell:

The Central Coast Water Authority (CCWA) is a joint powers agency that contracts with the State of California, through the Department of Water Resources (DWR), for water supplies from the State Water Project (SWP). Our mission is to treat and deliver potable SWP water to 27 project participants (mostly retail water districts and municipal water systems) in Santa Barbara and San Luis Obispo Counties. As such, we have a contractual relationship to provide SWP water to the Carpinteria Valley Water District, the Montecito Water District, the City of Santa Barbara, the Goleta Water District and the Santa Ynez River Water Conservation District, Improvement District number one (ID#1), commonly referred to as the Cachuma Member Units, which hold the entitlement to the Cachuma Project water.

We do not, however, have any contracts, agreements, objectives or responsibilities to deliver SWP water to the Santa Ynez River other than to state that we have, when feasible, attempted to coordinate SWP water deliveries with WR 89-19 releases from Lake Cachuma. CCWA considers this arrangement an accommodation to the Cachuma Member Units and will only make the deliveries if one or more its project participants make a request to deliver water in an alternate manner and/or location that does not otherwise affect our contractual responsibilities. Any such arrangement cannot have any cost or service impacts to the remainder of our project participants throughout both counties.

There are a number of jurisdictional and operational issues that the Second Revised Draft Environmental Impact Report should take into account, as well as some technical and factual inaccuracies that should be corrected before the report is finalized. It is also important to note that CCWA cannot accept responsibilities that are outside its mission and contractual authority, that benefit non-project participants, or that cause financial and contractual impacts to CCWA's project participants.

Those issues aside, CCWA has concerns with the EIR's conclusion that Alternative 4B is the environmentally superior alternative for the reasons stated in this letter. Our hydraulic analysis of Alternative 4B (incorporating a 20 inch pipeline connection to the CCWA pipeline in the vicinity of Rucker Road) shows that such a connection reduces the CCWA pipeline water pressure to a degree that CCWA would be unable to meet its downstream contractual delivery requirements.

To evaluate Option 4B, CCWA staff reviewed the engineering and as-built records of the CCWA pipeline, the various CCWA participant water supply contracts and conducted a hydraulic analysis of the pipeline near the proposed turnout.

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The section of the CCWA pipeline associated with the proposed new turnout in Alternative 4B is between two storage tanks that vent to atmosphere, is approximately 127,538 feet long and has a diameter of 39 inches, until just upstream of the proposed turnout where the diameter reduces to 36 inches. This section of the CCWA pipeline also includes the Vandenberg Air Force Base turnout. All water delivered through this section is via gravity flow.

The CCWA Participant Water Supply Contracts require CCWA to provide up to 28 cfs of water supply to participants located downstream of the affected area during the proposed four month window of operation outlined in Alternative 4B.

The CCWA analysis focused on the section of the CCWA pipeline between the two tanks. CCWA staff reviewed the Flow Capacity Study prepared by Penfield Smith in 2005, which utilized the Hazen Williams Equation as the basis for estimating flow capacity for the CCWA pipeline. Operating data was used by Penfield Smith to calibrate the Hazen Williams Flow Coefficients to produce acceptable modeling results. The CCWA hydraulic analysis utilized the calibrated flow model results and hydraulic grade line analysis, and confirms that CCWA can deliver up to 28 cfs of water supply downstream of Tank 7 as required in the Participant Water Supply Contracts. However, if the proposed Lompoc turnout and pipeline were added and operated as suggested, CCWA would no longer be able to deliver SWP water at the rates required by contract. Essentially, there is no additional capacity in the CCWA pipeline as constructed, above its current level of operation.

CCWA also notes that Alternative 4B should include a more comprehensive description of the necessary facilities for the proposed turnout and pipeline and a meaningful environmental analysis for the construction and operation of a turnout and dechloramination facility; the likely need for a new separately sited pumping facility; new transient pressure analysis of the pipeline and the probable need to upgrade several sections of pipeline to a different pressure class; delivery and storage of hazardous chemicals; placement of discharge dissipation and spreading facilities in the Santa Ynez River with associated mitigation for endangered species; and the recognition that a separate EIR would be necessary for such an effort.

Additionally, we found some factual inconsistencies, misunderstandings and possible misapplication of some data. We believe that these items are addressed in the comments of others so we will not reiterate them here.

Thank you for the opportunity to respond to the Second Revised Draft Environmental Impact Report. If you or your staff have questions regarding our comments, you may contact me at (805) 688-2292 extension 215 or wjb@ccwa.com.

Sincerely yours,



William J. Brennan
Executive Director

WJB/lfw