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August 30, 2010

Ms. Leslie Tang Schilling, Chair, Committee on Grounds and Building
University of California Regents
Office of the Secretary and Chief of Staff to the Regents – Regents Office
1111 Franklin St., 12th Floor
Oakland, CA 94607

Re: UCSB 2010 Long Range Development Plan

Dear Ms. Leslie Tang Schilling, Chair, UC Regents Committee on Grounds and Building:

The Goleta Water District (“District”) supplies drinking water to a community of over 80,000 people, including the campus population of the University of California, Santa Barbara (“UCSB”).

In March, 2009, the District, as the California Environmental Quality Act (CEQA) Responsible Agency, provided extensive comments to UCSB regarding its Long Range Development Plan (LRDP) and associated Environmental Impact Report (EIR).

We are disappointed, to say the least, that UCSB’s Response to Comments does not in any significant way address the concerns we voiced about water availability and the substantial increase in potable water demand that will arise from UCSB’s development plan.

I am writing today to inform you directly that the District stands by the forty pages of comments (attached) which we sent to UCSB at the direction, by unanimous vote, of our Board of Directors. We ask that the Regents seriously consider the issues we have raised. Our concerns are summarized in the first two pages of that comment material. In short, we believe that the university has underestimated the increase in its demand and overestimated our available supply of water.

In our comment material to UCSB, we corrected university misinterpretations of virtually all facets of District operations, including: the District’s policies and procedures; sources and limitations of water supply; functionality of the District’s wells; the District’s recycled water program; the legal restrictions of our adjudicated groundwater basin; and the voter-approved ordinances that control the release of water for new uses, among other things. We also questioned the methodology used by UCSB to estimate future water demand created by the growth in campus facilities and in the UCSB-related population. Our forecasts for the future acknowledged the increasing unpredictability of water supply caused by a multitude of factors including global climate uncertainty and judicial constraints on State Water.

We also notified UCSB that the District was in the process of developing several water management plans that would provide greater clarity about our future water supply, and without which, the university could make no reasonable forecasts on its own. These plans include a Groundwater Management Plan which we completed this

Ms. Leslie Tang Schilling
August 30, 2010
Page 2

year (to help us better understand and manage the water in our underground aquifer), a Water Supply Management Plan which we are currently preparing (to help us strategically make use of our portfolio of water supplies), and a mandated Urban Water Management Plan which we will begin later this year (which will combine material from the two other studies, along with the latest District and community information, into one comprehensive document). This material will offer support for the projections we provided in our comments to the university.

All of the comments we provided to UCSB were developed over a period of months by District staff and board members working with nationally recognized hydrology consultants.

UCSB, in its Response to Comments, dismissed our comment letter and announced that it preferred to rely on a 2008 Water Supply Assessment (WSA) prepared in 2007 by the District for the City of Goleta. The District feels that this WSA has been rendered obsolete and in 2009 specifically notified the City of Goleta, and UCSB, of that fact. We have stated publicly and in writing that the 2008 Water Supply Assessment should not be used for long-range planning purposes for the availability of water and we stand by that announcement.

By this letter to the Regents, the District reiterates that the University of California needs to carefully consider the comments we have provided regarding water availability at the UC's Santa Barbara campus.

Although to date the LRDP team at UCSB seems to have chosen to disregard our comments, we remain eager to work with the campus as it prepares for the future. We are encouraged by UCSB's "Campus Sustainability Plan" of February, 2008, which calls for the campus to "reduce potable water use." We also very much appreciate UC President Mark Yudof's September 1, 2009 letter to the Chancellors in which he reminds them that you, the Regents, have adopted Guidelines for Sustainable Practices. These guidelines include the direction that "campuses will also cooperate with local water districts in efforts to conserve water and to meet reduced water use goals of the local districts."

In that spirit of shared concern for water---this precious resource the District manages for our entire community---we ask you to carefully review our comments and thank you for your thoughtful attention to them as you consider UCSB's LRDP request.

Sincerely yours,



John McInnes
General Manager

cc: Chairman Gould and University of California Regents
Office of the Secretary and Chief of Staff to the University of California Regents
Henry Yang, UCSB Chancellor
Gene Lucas, UCSB Executive Vice Chancellor
Honorable Bill Rosen, President and Members, Goleta Water District Board of Directors
Honorable Eric Onnen, Mayor and Members, City of Goleta City Council
Honorable Janet Wolf, Chair and Members, Santa Barbara County Board of Supervisors



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March 30, 2009

University of California Santa Barbara
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 Santa Barbara, CA 93106-1030

Via e-mail www.UCSBVision2025.com
 and hand delivery

RE: Comment Letter to the University of California at Santa Barbara 2008 Long Range Development Plan,
 Recirculated Draft Environmental Impact Report Sections

The Board of Directors of the Goleta Water District has directed me to submit this letter and attachments which together constitute the Goleta Water District's formal comments on the University of California at Santa Barbara (the University) 2008 Long Range Development Plan (LRDP) Recirculated Draft Environmental Impact Report (RDEIR). These comments (Attachment A) focus on RDEIR Section 4.14, Water. In addition, the District provides comments on portions of RDEIR Section 4.10, Population and Housing, that discuss topics that affect water demand yet are not considered in the Water section. Attachment B consists of a copy of the 1991 Measure H91, Goleta Water District Ordinance No. 91-01, SAFE Water Supplies Ordinance (SAFE Ordinance) and the 1994 Measure J94, Goleta Water District Amendment to the SAFE Ordinance. Attachment C consists of written comments on LRDP RDEIR Section 4.14 made to Goleta Water District representatives by Mr. Bill Brennan, Executive Director of the Central Coast Water Authority (CCWA). Comments by Mr. Brennan are incorporated herein by reference.

GENERAL COMMENT

The Goleta Water District (the District) is a California Environmental Quality Act (CEQA) Responsible Agency which has discretionary approval power over the project. During the scoping and initial research period of the Draft Environmental Impact Report (DEIR), the District was not asked to participate in the development of the DEIR. Because of this, the District believes the RDEIR presents incomplete data regarding both current and future water supplies and demands. Below is a summary of the problematic issues within the RDEIR.

- The University misinterprets and incorrectly cites District documents as well as current regulations and ordinances. The RDEIR cites data from the District's 2005 Urban Water Management Plan (UWMP) and May 22, 2008 Water Supply Assessment (WSA) for the City of Goleta. Significant changes have rendered much of the material in those documents obsolete; updates are included in the attached comments. The RDEIR additionally misinterprets regulations and ordinances in place (e.g., the SAFE Ordinance). The comments provided by the District will assist in a better analysis of these issues. The District is in the process of developing a Groundwater Management Plan (GWMP) leading to an updated Water Supply Management Plan (WSMP) and preparation of a 2010 Urban Water Management Plan. The District suggests that the University refer to these plans as well as work with the District in revising the RDEIR and in future planning.

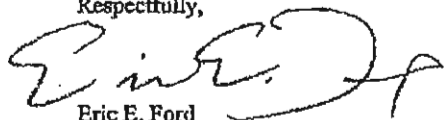
- The University states "rights" to specific water amounts, with these amounts used as a baseline for future development scenarios. This is inaccurate; certain water agreements between the University and the District are subject to modification and termination.
- The University's water supply figures are overestimates. The University's analysis within the RDEIR demonstrates an incomplete understanding of Santa Barbara County's dynamic water supply system. Water supply figures are not static numbers; water supplies from groundwater, Lake Cachuma and the State Water Project (SWP) are constantly in flux and subject to legal, regulatory, seismic, and climatic constraints which can reduce availability. The RDEIR does not demonstrate a realistic understanding of how these constraints affect water supply.
- The University assumes that greater water storage and pumping capacity equates to greater potable water supply, and that the increased use of recycled water will offset portions of future potable water demand. It is the District's opinion that pumping capacity does not equal water supply, and that recycled water cannot offset 100% of future potable water demand. Although improvements are being made to augment both potable and recycled water capacity, current and future water supply conditions warrant more conservative estimates of water supply. In addition, there is no market or funding for the recycled water production and distribution described in the University's document.
- The University's water demand figures are underestimates. The University is not using the correct water duty factors (wdf). Usage estimates are based upon limited data periods; calculations should be derived from data that spans a longer period. The University should provide its calculations and support its conclusions with factual data. Absent such data, the District cannot accept the water duty factors as provided in the document.
- The University's baseline water use calculations are incorrect and the most current data is not being used to support future demand calculations. Baseline calculations should come from current water usage values or usage at the time of application.

It is the District's opinion that within the RDEIR, the University must address these critical issues and develop more comprehensive mitigation options. In the current document, the RDEIR overestimates water supply and underestimates water demand. The District believes the University's LRDP potable water demand exceeds the District's available potable water supply. In accordance with CEQA, the proposed project will have Significant and Unavoidable Class 1 impacts to potable water supply that cannot be feasibly mitigated during the planning period.

The Board of the Goleta Water District encourages the University to work cooperatively with the District in the future to make the most efficient and productive use of the community's limited water supplies.

Please see Attachment A for a detailed list of comments.

Respectfully,



Eric E. Ford
Interim General Manager
Goleta Water District

Att: Attachment A – Specific Comments on the UCSB LRDP Draft Recirculated EIR
Attachment B – SAFE Water Supplies Ordinance (1991 and 1994, as amended)
Attachment C – Comments by Mr. Bill Brennan, Executive Director of the Central Coast Water Authority

Attachment A

UCSB LONG RANGE DEVELOPMENT PLAN

Recirculated Draft EIR Sections (RDEIR)

Comments on RDEIR Section 4.14 Water

Provided by the Goleta Water District

Section 4.10.2

Comment (1):

In addition to Section 4.14, the Goleta Water District (District) reviewed Section 4.10, Population and Housing, which discusses topics that affect water demand and are not considered in the water section.

Section 4.10.2 concludes that the Long Range Development Plan (LRDP) will directly and indirectly induce growth on and off campus. The section uses a figure of 2,214 non-university jobs that will be generated by the growth in campus jobs and population. Standard population analysis uses a multiplier of 1.2 jobs per household. The average size of a South Coast household is 2.6 persons. From this we calculate an additional 4,797 people not included in the growth in campus population. The LRDP does not offer an analysis of the additional water demand that will result from this increased commercial activity and any associated increase in local population.

Separately, the section discusses the "retiring in place" of up to one half of the University of California, Santa Barbara's (University) current faculty and staff, and speculates that their replacements will live outside the immediate community. The District feels this is an unrealistic expectation and believes that the increased water demand of the replacement faculty and staff is not adequately addressed in the document.

Section 4.14, P. 4.14-1

Comment (2):

It should be added for clarity that the University's 2008 LRDP was not included in the District's 2005 Urban Water Management Plan (UWMP) analysis.

Section 4.14, P. 4.14-1, Paragraph 4

09 RDEIR:

If the District completes its plans to increase the contribution of recycled water to offset potable water demand, there will be sufficient supplies available from the District to meet LRDP demand under cumulative conditions. If not, then the combination of the 2008 LRDP at full development and other growth within the District may require more water than available through the District.

Comment (3):

Currently, the District does not have the plans or funds to increase the contribution of recycled water. The current market for recycled water is saturated. There is not sufficient funding to expand the District's recycled water system under current market conditions.

Section 4.14, P. 4.14-2, The Cachuma Project

Comment (4):

It should be added that the Cachuma Operations and Maintenance Board (COMB) has no forecasts of what normal allocation will be in future years. The Cachuma Project is currently the subject of a water rights proceeding before the California State Board, which could adversely affect and indefinitely reduce total available water supply.

Section 4.14.1.2, P. 4.14-3 The Cachuma Project, Paragraph 2

Comment (5):

This paragraph makes several incorrect statements. While the District has, in the past, had a carry-over of a portion of its Cachuma allotment from one year to the next, this has resulted in exposure to the risk of Lake spills and the loss of that water. The District, going forward, intends to develop different supply management strategies, using both the Ground Water Management Plan (GWMP) and the Water Supply Management Plan (WSMP). It is not correct to assume the continuing use of this timing strategy.

With regard to the phrase, "banked groundwater (about 41,000AF)," the correct description of this water is the "SAFE Ordinance-mandated Drought Buffer" (Drought Buffer). The paragraph states that this water would be available for pumping in multiple dry years. Per the SAFE Ordinance, the Drought Buffer is available for pumping *only* if the allocation from Lake Cachuma is reduced, which may or may not occur during a dry year or period of dry years. Furthermore, the SAFE Ordinance specifically states that the Drought Buffer "cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the District."

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

09 RDEIR:

Under the District's agreement with the CCWA, its share of the conveyance facilities that deliver SWP water to Cachuma Lake is limited to 4,500 AFY, which is used as the District's basic supply.

Comment (6):

While this statement is factually accurate with regard to the District's share of the conveyance facilities, the SAFE Ordinance states that for long term planning purposes, the District may not use more than 3,800 acre feet per year (AFY) as the State Water Project (SWP) yield. Current water supply availability through the SWP is more limited than in previous years; this year's allocation is currently at 20% and could be reduced further.

Furthermore, a March 21, 2009 Los Angeles Times news article, "*California's water system at risk from a major Bay Area earthquake,*" states that according to a Department of Water Resources report, there is a 40% probability in the next 25 years of an earthquake of magnitude 6.7 or higher causing 27 or more Sacramento-San Joaquin River Delta islands to flood at the same time. An earthquake of this magnitude would cause the earthen levees that help channel water to sink, leading to flooding on the islands and salt water intrusion into the freshwater delivery system. The state's water system would be crippled and take about three years to repair.

Due to the continuing uncertainty about State water, the SWP figure should be a range from 0 - 3,800 AFY, not 4,500 AFY throughout the document.

Section 4.14.1.2, P. 4.14-3 Groundwater, Paragraph 1

09 RDEIR:

As of April 2008, the District was able to pump its five fully operational wells at a total rate of about 2,900 gallons per minute (gpm), which is equivalent to about 4,200 AFY if the wells are operated 90 percent of the time

Comment (7):

The functional ability of the District to pump its five operational wells at the above rate does not equal available water supply. The District can pump up to 2,350 AFY only if groundwater is above 1972 levels or a different amount limited by pumping capacity in a designated drought as defined by the SAFE Ordinance. See Comment 10, below, for further discussion.

Section 4.14.1.2, P. 4.14-4 Groundwater, Paragraph 1

09 RDEIR:

If the grant is approved, work on the San Ricardo well will begin in 2008

Comment (8):

The grant to rehabilitate the San Ricardo well was approved, however State funding may not be available. If State funding is not available, well rehabilitation plans could cease.

Section 4.14.1.2, P. 4.14-4 Groundwater, Paragraph 1

09 RDEIR:

These projects are intended to bring the District's total groundwater production capacity up to about 6,700 AFY if all the wells were operated 90 percent of the time

Comment (9):

Similar to Comment 7; production capacity does not equal available water supply. At this time, funding sources for the two additional wells are unknown. If funding cannot be found, these project plans could cease.

Section 4.14.1.2, P. 4.14-4 Groundwater, Paragraph 2

09 RDEIR:

As a result of this adjudication, the GWD now has the right to pump 2,350 AFY of naturally occurring groundwater from this basin

Comment (10):

This statement needs clarification. As restricted by the provisions of the SAFE Ordinance, the District has the right to pump 2,350 AFY of groundwater if water is above 1972 levels. Only in a SAFE defined drought can water be pumped from below the 1972 levels.

Section 4.14.1.2, P.4.14-4 Groundwater, Paragraph 4

09 RDEIR:

There is an additional 10,000 to 20,000 acre-feet of available storage remaining for additional banking

Comment (11):

The 10,000 to 20,000 acre-feet of available storage remaining for additional banking is an unverified estimate using a 10-20% porosity factor. While this number may have appeared in the UWMP, the District's GWMP will assess these numbers; until this plan is completed, these numbers should not be relied on for any purposes.

Section 4.14.1.2, P.4.14-4 Groundwater, Paragraph 5

09 RDEIR:

The District may pump the banked water at a rate of 400 AFY

Comment (12):

This is a misinterpretation of the District's Water Supply Assessment (WSA). "Banked" water should be referred to as "stored" water throughout the document. Pumping stored water at a rate of 400 AFY is an estimate based on a historical number and is not guaranteed in the future. Therefore it should not be used as the GW/Conjunctive Use figure throughout the water supply analysis. The District's WSMP will assess an appropriate conjunctive use figure; until this plan is completed, this number should not be relied on.

Section 4.14.1.2, P.4.14-4 Groundwater, Paragraph 6

09 RDEIR:

As long as the basin holds water at a level above the level it held in 1972, then in normal years the District must maintain a 2,000 AF buffer above 1972 levels but otherwise may use the water in the annual amounts described above

Comment (13):

The sentence is incorrect and should be deleted.

Section 4.14.1.2, P.4.14-4 Groundwater, Paragraph 6

09 RDEIR:

If the basin falls below the 1972 level, then in normal years, the District may only use its Wright Judgment entitlement; banked water is available only in dry years

Comment (14):

The statement is incorrect. If the basin falls below the 1972 levels, no water may be pumped in normal years. The Drought Buffer is only available during a SAFE defined drought year.

Section 4.14.1.2, P. 4.14-5 Recycled Water, Paragraph 2

09 RDEIR:

The Goleta Sanitary District's WTP currently (2008) has a seasonal treatment capacity of 3,000 AFY for recycled water. Improvements will enable the District to reliably increase the production of recycled water to about 3,300 AFY

Comment (15):

The District does not have the market, distribution, or storage capacity for recycled water at these estimates. Recycled water production capacity at Goleta Sanitary District (GSD) cannot be used as the figure for available recycled water that could be supplied by the District. Production capacity does not equal delivery feasibility or marketability. Therefore the figure 3,300 AFY is unreasonable and should not be used within the water supply analysis; the figure should remain at 1,000 AFY throughout the document.

Section 4.14.1.2, P. 4.14-7 Table 4.14-1

09 RDEIR:

Table 4.14-1. Water Supply Sources and Amounts Available to the Goleta Water District in Normal Rainfall Years		
Sources	Available Water Supplies in Future Years in Acre-Feet Per Year (Actual Deliveries Depend On Demand)	
	2010	2015 - 2030
Cachuma Project	9,322	9,322
State Water Project	4,500	4,500
Groundwater	2,350	2,350
GW/Conjunctive Use	400	400
Total:	16,572	16,572
Recycled	1,000	3,300
Total Plus Recycled:	17,572	19,872

Source: Water Supply Assessment City of Goleta General Plan/Coastal Land Use Plan, May, 2008, Table 3.2, and the Goleta Sanitary District, 2006

Comment (16):

The table is inaccurate based on the following:

- Cachuma Project - Due to siltation and uncertainty about the annual Lake Cachuma recharge, from the years 2015 onward, a baseline of 9,000AF should be used. Refer to Comment 4
- State Water Project - Refer to Comment 6
- GW/Conjunctive Use - Refer to Comment 12
- Recycled Water - Refer to Comment 15

Based upon additional and updated analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

Table 4.14-1. Water Supply Sources and Amounts Available to the Goleta Water District in Normal Rainfall Years		
Sources	2010	2015 - 2030
Cachuma Project	9,322	9,000 *
State Water Project	0 - 3,800	0 - 3,800
Annual Groundwater Right	2,350**	2,350**
GW/Conjunctive Use	0	0
7% System Loss	(817 - 1083)	(795 - 1061)
Total Potable Supply	10,855 - 14,389	10,555 - 14,089
Recycled Water	1,000	1,000
Total Plus Recycled	11,855 - 15,389	11,555 - 15,089

* Based upon siltation and the Department of Water Resources 2008 White Paper

** Assumes levels are maintained at or above 1972 levels

Section 4.14.1.2, P. 4.14-8 Critical Dry Year – Cachuma Project

09 RDEIR:

The District also assumes that an average of 3,584 AFY of the Cachuma Surface Water Buffer is available for use during a critical dry year

Comment (17):

The statement is incorrect; it is an assumption and needs to be removed. The University is double counting available supplies. The Cachuma Surface Buffer is only a timing strategy, not an additional source of water. Furthermore, to assume the buffer will continue in each critical dry year is incorrect. The District's GWMP and WSMP will determine if any carryover is available in any given year. Refer to Comment 5.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year – Groundwater

09 RDEIR:

The District has sufficient banked groundwater (41,000 AF) to meet shortfalls in the other supplies in a critical dry year

Comment (18):

The statement is incorrect. Stored groundwater below the 1972 levels may only be pumped in a SAFE defined drought. In addition, the SAFE Ordinance states: "The Drought Buffer cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the District." See Attachment B.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year, Last Paragraph

09 RDEIR:

The supply of potable water available to the District in a critical dry year increases over time as the District supplements its other sources of potable water by drawing on its 'banked' groundwater drought resources

Comment (19):

The sentence is unclear. The District may only draw stored groundwater below the 1972 levels in a SAFE defined drought, which may or may not be a critical dry year.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year, Last Paragraph

09 RDEIR:

The SAFE ordinance allows the District to pump up to 3,950 AFY of previously stored groundwater to augment other supplies during critical dry years.

Comment (20):

The statement is incorrect and should be deleted. The 3,950 AFY figure is a number used by the District to address a hypothetical scenario using historical data, which is now unreliable. It is not a figure stated in the SAFE Ordinance. The SAFE Ordinance allows the District to pump its Drought Buffer only in a SAFE defined drought; the amount is limited to the District's pumping capacity.

Section 4.14.1.2, P. 4.14-9 Table 4.14-2

09 RDEIR:

Sources	2010	2015	2020	2025	2030
Cachuma Project	6,898	6,898	6,898	6,898	6,898
State Water	522	522	522	522	522
Annual Groundwater Right	2,350	2,350	2,350	2,350	2,350
Groundwater/Conjunctive Use	0	0	0	0	0
Groundwater Above 1972 Water Levels	0	0	0	0	0
SAFE Groundwater Drought Buffer	1,400	2,550	3,550	3,950	4,350
Lake Cachuma Buffer ¹	3,584	3,584	3,584	3,584	3,584
Total Potable Supply	18,254	16,404	17,304	17,704	17,794
Recycled Water	1,000	1,000	1,000	1,000	1,000
Total Plus Recycled	17,254	15,404	16,304	16,704	16,794

Notes:
 1. Based on 1964 and 1967 data cited in average Cachuma Project of 1,994 AFY with the average amount of water in storage. Projected water stored in 2010, 2015, 2020, 2025, and 2030.
 Source: State Water Assessment by City of Goleta District, Final Report, June 2011, 2010, 2015, 2020, 2025, and 2030.

Comment (21):

The table is inaccurate based on the following:

- Cachuma Project – It should be noted that the Cachuma Project figure of 6,898 is not a static number; this number is determined by the COMB participants and may be less in future critical dry years
- Groundwater/Conjunctive Use - Refer to Comment 12
- SAFE Groundwater Drought Buffer – The SAFE Groundwater Drought Buffer figure depends on pumping capacity and the number of wells in operation. In a critically dry year, this figure is calculated by subtracting the Annual Groundwater Right from the available pumping capacity. In 2010, pumping capacity will remain at approximately 5,400 AFY, producing a SAFE Groundwater Drought Buffer figure of 3,050 AFY. By 2015 – 2030, pumping capacity could increase to 6,700 AFY if two additional wells are added, producing a SAFE Groundwater Drought Buffer figure of 4,350 AFY
- Lake Cachuma Buffer – Refer to Comment 17
- Recycled Water - Refer to Comment 15

Based upon additional analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

Sources	2010	2015	2020	2025	2030
Cachuma Project	6,898	6,898	6,898	6,898	6,898
State Water Project	0 - 522	0 - 522	0 - 522	0 - 522	0 - 522
Annual Groundwater Right	2,350	2,350	2,350	2,350	2,350
GW/Conjunctive Use	0	0	0	0	0
Groundwater Above 1972 Water Levels	0	0	0	0	0
SAFE Groundwater Drought Buffer	3,050	4350*	4350*	4350*	4350*
Cachuma Surface Water Supply Buffer	0	0	0	0	0
7% System Loss	(861 - 897)	(952 - 988)	(952 - 988)	(952 - 988)	(952 - 988)
Total Potable Supply	11,437 - 11,923	12,646 - 13,132	12,646 - 13,132	12,646 - 13,132	12,646 - 13,132
Recycled Water	1,000	1,000	1,000	1,000	1,000
Total Plus Recycled	12,437 - 12,923	13,646 - 14,132	13,646 - 14,132	13,646 - 14,132	13,646 - 14,132

* Assuming construction/development of two additional wells by the District in 2015 for a total pumping capacity of 6,700 AFY

Section 4.14.1.2, P. 4.14-9 Multiple Dry Years – Cachuma Project

09 RDEIR:

The District also assumes that an average of 3,584 AFY of the Cachuma Surface water Buffer is available for multiple dry years

Comment (22):

The statement is incorrect. The District does not assume an average of 3,584 AFY of the Cachuma Surface Water Buffer to be available in multiple dry years, similar to the critical dry year scenario. Refer to Comment 17.

Section 4.14.1.2, P. 4.14-10 Multiple Dry Years – Groundwater

09 RDEIR:

The District may only draw on groundwater to the extent allowed by SAFE's Drought Buffer requirements

Comment (23):

The statement needs clarification. The sentence should read: The District may only draw on groundwater to the extent allowed by SAFE's Drought Buffer requirements and constrained by the pumping capacity of District wells.

Section 4.14.1.2, P. 4.14-10 Multiple Dry Years – Recycled Water

Comment (24):

The District does not have the market, distribution, or storage capacity for recycled water at these estimates. Refer to Comment 15.

Section 4.14.1.2, P. 4.14-10 Table 4.14-3

09 RDEIR:

Table 4.14-3, Goleta Water District Projections of Available Water Supplies in Multiple Dry Years

Supply Source	Multiple Dry Years:					
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Cachuma Project	9,322	9,322	9,322	6,898	6,898	6,898
State Water Project	2,533	2,533	2,533	2,533	2,533	2,533
Annual Groundwater Pumping Right	2,350	2,350	2,350	2,350	2,350	2,350
Groundwater Conjunctive Use	400	400	400	400	400	400
Groundwater Above 1972 Water Levels	1,450	1,450	1,450	0	0	0
SAFE Ordinance Required Groundwater Buffer	0	0	0	1,450	1,450	1,450
Cachuma Surface Water Supply Buffer ¹	3,584	3,584	3,584	3,584	3,584	3,584
Total:	19,639	19,639	19,639	17,215	17,215	17,215
Recycled Water Production ²	1,000	1,000	1,000	1,000	1,000	3,300
Total Plus Recycled:	20,639	20,639	20,639	18,215	18,215	20,515

Notes:

1. Represents the average amount of unused Cachuma Project water carried over from prior years since 1994.
2. If the multiple dry year period is assumed to start in 2010, the total available supply of recycled water will increase to 3,300 AFY by 2015 as improvements to the wastewater treatment plant are completed.

Sources: Goleta Water District UWWP, 2005, and CMCA, 2007. Water Supply Assessment City of Goleta General Plan/Coastal Land Use Plan, May, 2009 and the Goleta Sanitary District, 2008

Comment (25):

The table is inaccurate based on the following.

- Cachuma Project – It should be noted that these numbers would likely continue to drop in multiple dry years, especially in years 4, 5, and 6. To assume these figures remain constant is incorrect
- State Water Project – The figure should consist of a range between 0- 2,533, as the supply could be less than 34% in multiple dry years
- Annual Groundwater Pumping Right – In Years 4, 5, and 6 this figure will be zero, because it is factored into the SAFE Ordinance Required Groundwater Drought Buffer
- Groundwater/Conjunctive Use – Refer to Comment 12
- Groundwater Above 1972 Water Levels – It should be noted that in years 1, 2, and 3, the stated 1,450 of available water is only an assumption, this water supply may or may not be available in multiple dry years
- SAFE Ordinance Required Groundwater Buffer - The SAFE Groundwater Drought Buffer figure depends on pumping capacity and the number of wells in operation. For District calculations in Table 4.14-3, the District assumes in Years 4, 5, and 6, pumping capacity will remain at 5,400 AFY. It should be noted that pumping capacity could increase to 6,700 AFY if two additional wells are added
- Cachuma Surface Water Supply Buffer – In year 1, the Cachuma Surface Water Supply Buffer should be a range of 0 – 3,584; in all subsequent years, this supply of water will not exist and should be assumed as zero. Refer to Comment 17
- Recycled Water Production – Refer to Comment 15
- Unaccounted for Water Losses at 7% should be added into the table

Based upon additional analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

Supply Source	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
Cachuma Project	9,322	9,322	9,322	6,898	6,898	6,898
State Water Project	0 - 2,533	0 - 2,533	0 - 2,533	0 - 2,533	0 - 2,533	0 - 2,533
Annual Groundwater Right	2,350	2,350	2,350	0	0	0
GW/Conjunctive Use	0	0	0	0	0	0
Groundwater Above 1972 Water Levels	0	0	0	0	0	0
SAFE Groundwater Drought Buffer	0	0	0	5400*	5400*	5400*
Cachuma Surface Water Supply Buffer	0 - 3,584	0	0	0	0	0
7% System Loss	(817 - 1,245)	(817 - 994)	(817 - 994)	(861 - 1,038)	(861 - 1,038)	(861 - 1,038)
Total Potable Supply	10,855 - 16,544	10,855 - 13,211	10,855 - 13,211	11,437 - 13,793	11,437 - 13,793	11,437 - 13,793
Recycled Water	1,000	1,000	1,000	1,000	1,000	1,000
Total Plus Recycled	11,855 - 17,544	11,855 - 14,211	11,855 - 14,211	12,437 - 14,793	12,437 - 14,793	12,437 - 14,793

*This figure could be 6,700AFY with the addition of two wells under consideration by the District

Section 4.14.1.2, P. 4.14-11 State Water Project Reliability

Comment (26):

The University uses the District's WSA that cites the 2007 draft State Water Project Delivery Reliability Report. This report was prepared prior to recent conditions that severely limit the State's ability to move water through the California Delta. These limitations are due to endangered species concerns, judicial

constraints and the California Governor's declared drought in February 2009. Allocation of state water is currently at 20% and could be reduced.

The University's water supply analysis, including discussion of SWP reliability, should reflect the reality of current water supply conditions rather than conditions as they were in 2007 and earlier. The use of historic water delivery averages to determine future deliveries is inappropriate due to these changed circumstances.

Section 4.14.1.2, P. 4.14-12 Reliability of the Cachuma Project

09 RDEIR:

The approach of analysis of Cachuma deliveries by simulating a 76-year sequence based upon historical weather patterns restricts the subsequent simulation to no more extreme droughts or severe storms than have historically occurred

Comment (27):

To base reliability of the Cachuma Project on historical weather patterns is incorrect. The University needs to consider more extreme scenarios than have historically occurred. According to the Department of Water Resources' (DWR) October 2008 White Paper entitled *Managing an Uncertain Future, Climate Change Adaptation Strategies for California's Water* (pg. 2), "extreme climatic events will become more frequent, necessitating improvements in flood protection, drought preparedness and emergency response...historic hydrologic patterns can no longer be solely relied upon to forecast the water future."

Section 4.14.1.2, P. 4.14-13 Climate Change, Paragraph 2

09 RDEIR:

The District's conjunctive use program is one such option

Comment (28):

The statement is incorrect; the District's WSMP will assess a conjunctive use program. Until this plan is adopted, its use cannot be relied upon and should be removed as a water supply source.

Section 4.14.1.2, P. 4.14-3 Siltation

09 RDEIR:

During the summer 2008 COMB will perform a bathymetric study to determine Cachuma's current capacity

Comment (29):

The Cachuma Lake Bathymetric survey was completed in June 2008, with the final study completed in September 2008. The study revealed that the new lake capacity at the 750 foot elevation is 186,636 AF, resulting in a loss in capacity of 1,395 AF compared to the survey completed in 2000. This loss is due to siltation from storm runoff and a portion of the siltation results from the 2007 Zaca Fire. The next study is scheduled for 2010 to determine the continuing effects of the Zaca fire, which is expected to result in further capacity loss due to siltation. More frequent South Coast wildfires could accelerate the rate of siltation, thus more quickly reducing lake capacity. In addition to siltation, capacity could be affected by the implementation of a pass-through agreement regarding Santa Barbara's Gibraltar Reservoir.

Overall, for the years 1956 - 2000, Lake Cachuma storage capacity at the 750 foot elevation fell from 205,000AF to 188,000AF, which is approximately 17,000 AF of loss due to siltation. Between the years 2000 - 2008, an additional 1,395 AF of loss has occurred; the rate of capacity loss due to siltation is approximately 358 AFY for the years 1956 - 2008. At this rate, approximately 6,000 AF of loss will occur during the University's planning period from 2008 - 2025, further reducing lake capacity to 180,600 AF. Reduced storage capacity and changing climatic conditions affecting Lake Cachuma's annual recharge could lead to reductions in the District's normal annual allotment.

Section 4.14.1.2, P. 4.14-3 The SAFE Ordinance

09 RDEIR:

First, SAFE limits the water available for new service connections to 1% of the District's yearly supply

Comment (30):

The statement needs clarification. The sentence should read: First, SAFE limits the water available for new service connections to a *maximum of 1%* of the District's yearly *potable* supply.

The District's yearly potable supply does not include recycled water and, pending District Board approval, may not include up to 800 AF of water delivered through the Goleta West Conduit.

Section 4.14.1.2, P.4.14-14 The SAFE Ordinance, Paragraph 1

09 RDEIR:

According to the District, the conditions of paragraph 4 had all been met by 1997. GWD is thus authorized to provide new service connections each year, allocating no more than 1 percent of its total annual supply

Comment (31):

The University has misinterpreted the 1% potable water supply allocation. Although it is true that conditions of paragraph 4 were met in 1997, the conditions must be met annually. There could come a year when not all of the conditions are met. Therefore, authorization to provide new service connections each year is not guaranteed. Furthermore, in times of a SAFE defined drought, no new connections are permitted.

Section 4.14.1.2, P.4.14-15 The SAFE Ordinance, Paragraph 4

09 RDEIR:

The amount available for new connections each year is therefore 154 AFY (1% of 15,472 AFY)

Comment (32):

The figure of 154 AFY is unreliable. The amount available for new connections is re-calculated yearly, therefore the 1% potable water supply allocation figure of 154 AFY should not be used. Refer to Comments 30 and 31.

Section 4.14.1.2, P.4.14-16 Table 4.14-4

09 RDEIR:

Water Supplies	2010	2015	2020	2025	2030
Cachuma ¹	9,322	9,322	9,322	9,322	9,322
State Water Project (per SAFE) ²	3,800	3,800	3,800	3,800	3,800
Groundwater ³	2,350	2,350	2,350	2,350	2,350
Total:	15,472	15,472	15,472	15,472	15,472
1% Per Year Allocation	154	154	154	154	154

Notes:

- Does not include Lake Cachuma Surface Water Buffer.
- SAFE directs that "Due to the controversy concerning the physical ability of the State Water Project to deliver its full contractual commitments, the District shall plan for the delivery of acre feet per year of water as the amount of firm average long-term yield." Therefore, 3,800 acre-feet is used for this calculation.
- Does not include conjunctive use amounts, surplus water, return water or stored water.

Source: Water Supply Assessment: City of Goleta General Plan/Coastal Land Use Plan, May 22, 2008 Table 4.5

Comment (33):

The table is inaccurate based on the following:

- Cachuma – It should be noted that the Cachuma figure may be reduced by up to 800 AF of water that may not be considered as a potable water supply. Refer to Comment 30. Due to siltation and uncertainty about the annual Lake Cachuma recharge, from the years 2015 onward, a baseline of 9,000 AF should be used. Refer to Comment 16
- State Water Project – It should be noted that while the 3,800 is used as the planning figure per SAFE, the figure is subject to judicial and other constraints, reducing supply to a range of 0 – 3,800
- 1% potable water supply allocation - Refer to Comments 30-32
- Notes (1) - This note implies the existence of the Lake Cachuma Surface Water Buffer as an additional source of water, which is incorrect. Refer to Comment 17
- Notes (3) – This note implies the existence of conjunctive use amounts, which is incorrect. Refer to Comment 12

Based upon additional analyses, the District has updated the data and recommends that the University use the following table in analyzing future water supplies:

Table 4.14-4. Projected SAFE Potable Water Calculation (in a Normal Year)					
Water Supplies	2010	2015	2020	2025	2030
Cachuma Project	9,322	9,000	9,000	9,000	9,000
State Water Project (per SAFE)	0 - 3,800	0 - 3,800	0 - 3,800	0 - 3,800	0 - 3,800
Annual Groundwater Right	2,350	2,350	2,350	2,350	2,350
Total Potable Supply	11,672 - 15,472	11,350 - 15,472	11,350 - 15,472	11,350 - 15,472	11,350 - 15,472
1% potable water supply allocation*	117 - 155	114 - 155	114 - 155	114 - 155	114 - 155

*Does not include 7% System Loss

Section 4.14.1.2, P.4.14-16 The SAFE Ordinance, Paragraph 1

09 RDEIR:

At those times, groundwater beyond the District's *Wright* Judgment entitlement may only be used during dry years, when Cachuma deliveries are restricted. In 2007, the District found that 1972 levels had been reached, and so the District had met its obligation to create the Drought Buffer and was free, pursuant to SAFE, to use banked groundwater during normal years

Comment (34):

The first sentence is incorrect and should be deleted.

The second sentence should read: "...was free, pursuant to SAFE, to use *stored* groundwater *above the 1972 levels* during normal years."

Section 4.14.1.2, P.4.14-16 The SAFE Ordinance, Paragraph 3

09 RDEIR:

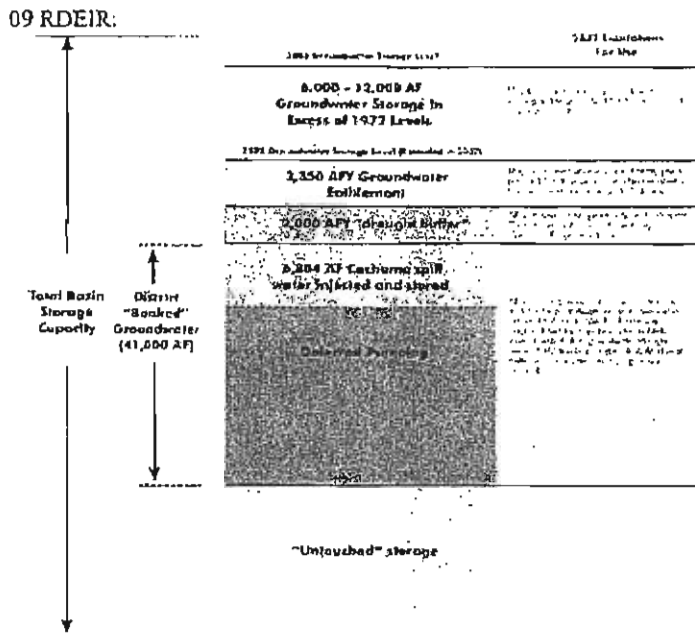
As of December 2007, there was a total of about 6,000-12,000 AF of water in storage in the Central Basin above 1972 levels. This water is available for District production at a rate of 400 AFY in addition to its annual appropriative groundwater right of 2,350 AF

Comment (35):

The first sentence needs further clarification. The sentence should read: As of December 2007, it was estimated that there might be a total of about 6,000-12,000 AF of water in storage in the Central Basin above 1972 levels.

The second sentence is incorrect. The production rate figure of 400 AFY is not a hard number. Until the District completes the GWMP, any University analysis using this figure is unreliable and should not be used throughout the document.

Section 4.14.1.2, P.4.14-17 Figure 4.14-2



Comment (36):

The figure is inaccurate based on the following:

- 2,350 AFY Groundwater Entitlement – The description under “SAFE Limitations For Use” is incorrect; the groundwater entitlement may be pumped annually, only when the basin is above the 1972 water levels
- 2,000 AFY “drought buffer” – The figure is incorrect, the University has double counted available supplies; the 2,000 AFY figure should be deleted
- District “Banked” Groundwater (41,000 AF) – The correct term to use is the SAFE Drought Buffer; the SAFE Drought Buffer may only be pumped during a SAFE defined drought

Section 4.14.1.3, P.4.14-18 Bishop Ranch, Paragraph 2

09 RDEIR:

The District’s projection of future demand assumes future potable water demand will be partially offset by the increased use of recycled water

Comment (37):

The statement is incorrect. The University is assuming that recycled water will offset the increased potable water demand in the future, which is a misunderstanding of the District’s WSA. The District’s projection of

future demand does not assume potable water will be partially offset by recycled water. The District does not have the market, distribution, or storage capacity to increase the use of recycled water at these estimates. Refer to Comment 15.

Section 4.14.1.3, P.4.14-19-20 Tables 4.14-5, 4.14-6, and 4.14-7

Comment (38):

The Recycled/Potable Water Offset figure is not realistic and should be removed from Tables 4.14-5, 4.14-6, and 4.14-7. The unaccounted for water losses on each table should be 7% and the total demand figures need to be recalculated. Refer to Comments 15, 37, and 40.

Section 4.14.1.3, P. 4.14-20 Water Conservation Measures

Comment (39):

The information used in this RDEIR is outdated since the Best Management Practices (BMP) reporting data used is from 2004. Please refer to the updated information below.

It should be noted that the structure of the California Urban Water Conservation Council (CUWCC) BMPs was revised in December 2008.

Section 4.14.1.3, P. 4.14-21 Water Conservation Measures, BMP 3

Comment (40):

In January of 2005, JBS Associates Inc. completed a Water Distribution System Audit for the District. In the study, the District's unaccounted for water loss was determined to be between 6% and 8% of total production. It should be noted that the District uses an average of 7% unaccounted for water losses for its calculations in the updated tables provided in this attachment.

Section 4.14.1.3, P. 4.14-21 Water Conservation Measures, BMP 5

09 RDEIR:

The water budgets are expected to be sent to customers by 2006

Comment (41):

The District has partnered with both the City and County of Santa Barbara to implement voluntary water budgets for landscape irrigation meters serving large landscapes through www.landscapebudgets.com. Currently, approximately 120 landscape accounts are signed up. Up until 2009, the program has been paid for through a grant obtained by the Santa Barbara County Water Agency, which has now ended. The District is currently exploring the option of sending information to customers once per month instead of participating in the www.landscapebudgets.com program.

Section 4.14.1.3, P. 4.14-21 Water Conservation Measures, BMP 6

09 RDEIR:

The District currently offers a \$100 rebate to Commercial, Industrial and Institutional (CII) customers who purchase a qualifying washing machine

Comment (42):

The District offers High Efficiency Washing Machine (HEW) rebates to residential customers through the Smart Rebates program, administered by the CUWCC and partially funded through a grant from the DWR. The DWR funding is on hold at this time due to State budget constraints; it is estimated that District rebates are expended for this year. There is currently a CII rebate program in effect through the lead agency of Santa Barbara County. Over time, the rebate amounts have increased and the CII rebate program is now \$350. The program was partially funded with a grant from DWR, which is also on hold at this time.

Section 4.14.1.3, P. 4.14-21 Water Conservation Measures, BMP 7

09 RDEIR:

District Staff provides conservation materials at several public events throughout the year such as the Sustainable Landscape Fair

Comment (43):

The Sustainable Landscape Fair has been phased out and replaced with other events such as the Santa Barbara Home Improvement Expo.

Section 4.14.1.3, P. 4.14-22 Water Conservation Measures, BMP 9

09 RDEIR:

The District is in the process of re-ranking its customers as Commercial, Industrial, and Institutional according to use

Comment (44):

Currently, all of the District's customers in the CII sector are classified as Commercial even though some of the customers are Industrial or Institutional as defined by the CUWCC. BMP 9 requires that these classes of customer be separated. There are inherent problems with trying to re-classify (not re-rank) these customers in the District's billing system. Research is ongoing in determining the classification of commercial customers by CUWCC standards. Since all customers are labeled "Commercial" in the District's billing system (including Institutional and Industrial), they all qualify for rebates offered to the CII sector under this BMP.

Section 4.14.1.3, P. 4.14-22 Water Conservation Measures, BMP 11

09 RDEIR:

The District is currently conducting a rate study to determine if it would be feasible to implement an increasing block volumetric rate in the future

Comment (45):

This sentence should be removed. The District is no longer conducting a rate study to determine if it would be feasible to implement an increasing block volumetric rate in the future. The rate study was ended in 2005. The District currently implements conservation pricing in that all water is sold at a uniform volumetric rate. In addition, volumetric rates are deemed sufficiently consistent with the definition of conservation pricing because the total annual revenue from the volumetric rates is greater than or equal to 70% of the total revenue for the District.

Section 4.14.1.3, P. 4.14-22 Water Conservation Measures, BMP 12

09 RDEIR:

The District has implemented this BMP by designating a full-time Conservation Coordinator for the District

Comment (46):

Due to budgeting constraints and decreased staffing levels, the Conservation Coordinator is not a full-time position at this time.

Section 4.14.1.3, P. 4.14-22 Water Conservation Measures, BMP 14

Comment (47):

The District currently offers ultra low flow toilet (ULFT) and HEW rebates through the Smart Rebates Program, administered by the CUWCC and partially funded through a grant from DWR. The DWR funding is on hold at this time, and District rebates are estimated to be expended for this year.

Section 4.14.1.4, P.4.14-23 Current Potable Water Use

09 RDEIR:

Annual potable water use on the Main Campus averaged 558 AFY between 1999 and 2004...When the demand from approved projects is added to existing demand, the total demand is about 872 acre-feet per year.

Comment (48):

The University does not provide a correct baseline figure for current potable water use. According to District records, the University's most current potable water use was 687 AFY in 2008 and 703 AFY in 2007. For California Environmental Quality Act (CEQA) purposes, the District suggests the University use a figure of 700 AFY, rather than 872 AFY, as a baseline for current potable water use.

Section 4.14.1.5, P.4.14-24 Goleta Water District

09 RDEIR:

Such regulations include water supply treatment system testing and monitoring, as specified in Title 23

Comment (49):

This sentence contains a typographical error. The sentence should read Title 22, rather than Title 23.

Section 4.14.1.5, P.4.14-24 Goleta Water District

Comment (50):

It should be added that the District is the CEQA Responsible Agency for this project.

Section 4.14.1.5, P.4.14-24 Water Supply Assessment, Amended City of Goleta General Plan/Coastal Land Use Plan

Comment (51):

The District is in the process of reviewing the 2008 WSA because water supply conditions have changed. Refer to the General Comment. The District's upcoming GWMP and WSMP will better reflect the realities of water availability in the future. The 2005 UWMP will be revised and superseded in 2010.

Section 4.14.1.5, P.4.14-25 SENATE BILL 610 and SENATE BILL 221, Paragraph 4

09 RDEIR:

Appendix 4.14-1 of this EIR is the functional equivalent of a water supply assessment for the 2008 LRDP

Comment (52):

Appendix 4.14-1 of the RDEIR is not the functional equivalent of a water supply assessment for the 2008 LRDP; this document was not prepared or approved by the District, which is the CEQA Responsible Agency.

Section 4.14.2.1, P.4.14-26 Standards of Significance

Comment (53):

The proposed standard reflects the fundamental fallacy in the entire water supply section. A more correct Standard would show:

If the University's 2008 LRDP potable water demand exceeds the District's available potable water supply in the planning period, it is a Class I Significant and Unavoidable Impact.

Section 4.14.2.3, P.4.14-30 Water Demand Duty Factors for Future Development, Paragraph 2

09 RDEIR:

This factor is calculated using a water demand duty factor of 0.152 AFY per dwelling unit.

Comment (54):

The housing water duty factor (wdf) is supported using data from two academic years, 2004/2005 and 2005/2006. This factor should be supported with data from a 5-10 year span to guarantee accuracy.

The District believes the University has calculated the 0.152 wdf using the following assumptions:

- An individual student will use 40 gallons of water per day
- An individual student will be in residence 300 days (from the University's 2004 Infrastructure Study)
- The remaining 65 days of the year would have 40% campus occupancy (3 quarters of 20,000 students and 1 quarter (summer) of 8,000 students)

Therefore:

$$40 \text{ gal.} \times 300 \text{ days} = 12,000 \text{ gal.}$$

$$40\% \times 40 \text{ gal.} \times 65 \text{ days} = 1,040 \text{ gal.}$$

$$12,000 + 1,040 = 13,040 \text{ gal. per student bedspace per year}$$

$$\text{Using } 326,000 \text{ gal.} = 1 \text{ AF,}$$

$$13,040 \text{ gal.} / 326,000 \text{ gal.} = .04 \text{ AF per student bedspace per year}$$

Using the University number of 3.8 bedspaces per housing unit,

$$0.04 \times 3.8 = 0.152 \text{ AF per housing unit}$$

The District questions the above calculation as follows:

- An individual student will use 40 gallons of water per day - References to United States college student water use ranges from a low of about 30 gal/day up to 75 gal/day. The University should provide factual data to conclude 40 gal/day. The wdf should also account for an increasing proportion of faculty, staff, graduate students and their families in campus housing; the University must incorporate these groups into the above estimate.
- 40 % Campus Occupancy Rate - The assumption that campus housing will have a 40% occupancy rate for the summer months might be unrealistic. In addition to summer school students, the University houses outside organizations for various events over these months. In addition, faculty, staff, graduate students and their families are more likely to remain in University housing year round. The University should reflect these conditions in its calculations.

The University should provide its calculations and support its conclusions with factual data to support an accurate water duty factor. Absent such data, the District cannot accept the wdf as provided by the University.

Section 4.14.2.3, P.4.14-31 Water Demand Duty Factors for Future Development, Paragraph 1

Comment (55):

The District is concerned with the assumptions in this paragraph. Using a wdf of 0.152 AFY per unit "because residential water use at UC Santa Barbara is generally less than that of comparable multi-family housing in the community" is not a sound argument to support the University's reasoning. Producing an

average water usage from only two academic years to support the stated wdf is not a realistic scenario. Refer to Comment 54.

Section 4.14.2.3, P.4.14-31 Table 4.14-9

09 RDEIR:

Table 4.14-8. Summary of Future Potable Water Demand Associated With the 2008 LRDP			
Land Use Category	Quantity	Water Duty Factors	Total Potable Water Demand (AFY) ⁴
Housing	3,304 units ¹	0.152 AFY per unit ²	502
Instruction, Research and Other	Up to 1,500,000 assignable square feet	0.184 AFY per 1,000 square feet ³	354
Total Additional Future Demand From 2008 LRDP			856
Notes: 1. Net new units. 2. See Table 4.14-10. 3. Average of water demand for classrooms and laboratories and other from 3RD UWMP 2005. 4. See also Appendix A for water demand for individual service areas. Sources: UCSB and CMC 2008			

Comment (56):

The table is inaccurate based on the following:

- Housing – Refer to Comment 54
- Instruction, Research and Other – The University prepared a final Infrastructure Assessment Report in December of 2004. A wdf of 0.19289 can be calculated from the University's data. The District believes this is a more appropriate wdf using University-specific calculations, rather than using the District's UWMP figure of 0.184 for "classrooms, labs and other"
- To fully reflect the University's anticipated overall water usage at the end of the planning period, the District believes the table should state current baseline usage (calculated by the District to be approximately 700 AFY) as well as usage associated with buildings the University describes as recently completed or approved. The University reports this number to be 256 AFY. Adding these two figures to the total in Table 4.14-9 will give *total demand* at the end of the planning period. Subtracting the baseline usage will total *additional demand* at the end of the planning period.

Based upon additional and updated analyses, the District has updated the data and recommends that the University re-title and use the following table in analyzing future water supplies:

Table 4.14-9. Summary of Future Potable Water Demand to the End of the Planning Period (2025)			
Land Use Category	Quantity	Water Duty Factors	Total Potable Water Demand (AFY)
UWMP estimates from 1990 LRDP	TBD		256
Housing	3,304	0.152 AFY per unit	502
Instruction, Research and Other	Up to 1,900,000 assignable square feet	0.19289 AFY per 1,000 square feet	367
Total Additional Demand From the 2008 LRDP and completion of the 1990 LRDP			1,125*

* Current baseline usage is an additional 700 AFY, and is not reflected in this value

Section 4.14.2.3, P.4.14-32 Table 4.14-10

09 RDEIR:

Table 4.14-10. Water Use For Selected University-Demand Housing Projects FY0504 & 0607

Facility	Facility Type	Facility Size	JA	ALSO	SOFT	OLJ	MOJ	DEJ	JAN	FEB	MAR	APR	MAY	JUNE	NET Total	Monthly Average	APY ¹	APF ² Per Unit ³
Spring Gardens	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Two	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake One	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Three	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Four	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Five	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Six	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Seven	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Eight	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Nine	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Ten	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Eleven	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Twelve	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Thirteen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Fourteen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Fifteen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Sixteen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Seventeen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Eighteen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Nineteen	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
Spring Lake Twenty	Residence Hall	1500 (Residence)	467	270	270	270	270	270	270	270	270	270	270	270	2700	450	26.6	0.11
TOTALS			14670	8640	8640	8640	8640	8640	8640	8640	8640	8640	8640	8640	86400	14400	86.4	0.35

Notes:
 1. APY = Annual Pumping Yield
 2. APF = Annual Pumping Factor
 3. APF Per Unit = APF divided by number of units

Comment (57):

The table is inaccurate based on the following:

- The table does not provide reliable average use figures because it only gives one year's data rather than several. At least 5-10 year averages should be used
- Information on faculty housing should be incorporated into the table

Section 4.14.2.3, P. 4.14-33 Water Demand Duty Factors for Future Development, Paragraph 1 and 3

09 RDEIR:

Increased groundwater pumping would be limited to GWD's allocation of 2,350 AFY of the adjudicated groundwater basin's supply, plus banked groundwater up to the GWD's pumping capacity of 6,700 AFY which is expected by 2020.

This impact is considered adverse but not significant because, according to GWD's UWMP, GWD has already banked sufficient water to meet projected demands during critical dry and multiple dry years.

Comment (58):

The statement is incorrect; it is in violation of the SAFE Ordinance. To be consistent with the SAFE Ordinance, the ability of the District to meet projected demands during critical dry and multiple dry years is based solely upon maintaining water levels above the 1972 levels. The amount of water stored in prior years is not a consideration for servicing additional development if the water levels are below the 1972 levels.

Section 1, para. 2 of the SAFE Ordinance states that the "Drought Buffer cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the district."

Section 4.14.2.3, P. 4.14-33 Water Demand Duty Factors for Future Development, Paragraph 3

Comment (59):

This paragraph is not consistent with the SAFE Ordinance; "critical-dry years" must be replaced with "drought years" throughout the document.

Section 4.14.2.3, P. 4.14-34 LRDP Mitigation W-3A

09 RDEIR:

Recycled water will be used for bathroom fixtures and/or irrigation

Comment (60):

This mitigation measure needs to state that recycled water shall be used for *both* bathroom fixtures *and* irrigation. It should be added that for recycled water to be used in bathroom fixtures, health department standards shall be followed.

Section 4.14.2.3, P. 4.14-34 LRDP Mitigation W-3B

Comment (61):

Mitigation should read: Individually meter and/or sub-meter all new *and existing* University buildings. *Maintain monthly meter reading data for all meters and provide data to the District.*

Utilization of a graduated fee structure is not a mitigation option available to the University unless the graduated fee structure is revenue-neutral to the University, in line with the District's fees and charges, pursuant to California State law.

Section 4.14.2.3, P. 4.14-34 LRDP Mitigation W-3C

09 RDEIR:

The water saving devices that will be installed shall include, but will not be limited to, the following: shower heads, toilets, urinals, washing machines and irrigation systems

Comment (62):

It should be added that water saving devices shall also include dishwashers and hot water recirculation systems.

Section 4.14.2.3, P. 4.14-35 LRDP Mitigation W-3G

Comment (63):

Mitigation W-3G is not a lawful CEQA mitigation measure. The California Supreme Court held in 2007 *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* ruling, that:

CEQA's "informational requirements may not be met simply by providing that future development will not proceed if the anticipated water supply for a project fails to materialize."

Section 4.14.2.3, P. 4.14-35 LRDP Mitigation W-3G

09 RDEIR:

1. When potable water demand is projected to be within 50 AF of the available supply for the areas subject to the 1991 Reclamation Agreement

Comment (64):

The amount of water discussed in Circumstance 1 requires modification. The 1991 Reclamation Agreement expires in October 2010, and may be terminated by written notice. Permit 14 can also be modified or terminated by the District at its sole discretion.

Section 4.14.2.3, P. 4.14-35 LRDP Mitigation W-3G

09 RDEIR:

Residual Significance: Less than significant

Comment (65):

The Residual Significance should read: Class I Significant and Unavoidable Impact. Refer to Comment 53.

Section 4.14.2.3, P. 4.14-36 Table 4.14-11

09 RDEIR:

	Normal Year 2025	Normal Year 2030
Total Supply ¹	16,572	16,572
Potable Demand		
Total Future Potable Demand Assumed By Goleta General Plan WSA For All Customers Within the GWD ²	15,269	15,733
Recycled/Potable Water Offset	-750	-1,000
Additional Potable Demand From 2008 LRDP ²	856	856
Total Future Potable Demand To GWD With 2008 LRDP	12,375	15,589
Overall Surplus (Potable Water Only)	4,197	983

Notes:
 1 2020 & 2030 supply only. (See Table 4.14-1)
 2 Including unaccounted for losses and future development under the Goleta General Plan and the Urban Master Plan.
 3 See Table 4.14-9.

Source: Water Supply Assessment City of Goleta General Plan/Conservation Use Plan, July 21, 2008 and CWC's 2008 and 2030 Goleta Water District 2008 Urban Water Management Plan.

Comment (66):

The table is inaccurate based on the following:

- Total Supply - Refer to Comment 16
- Additional Potable Demand from the 2008 LRDP – Refer to Comment 56
- Recycled/Potable Water Offset – Refer to Comment 38
- Unaccounted for Water Losses at 7% need to be factored into the table. Refer to Comment 40.

Based upon additional and updated analyses, the District has updated the data and recommends that the University use the following table:

	Normal Year 2025	Normal Year 2030
Total Potable Supply	10,555 - 14,089	10,555 - 14,089
Demand		
Total Future Potable Demand Assumed By Goleta General Plan WSA For All Customers Within the GWD	15,269	15,733
Recycled/Potable Water Offset	0	0
Total Additional Demand From the 2008 LRDP and completion of the 1990 LRDP	1,125	1,125
Total Potable Demand	16,394	16,876
Surplus/(Shortage)	(5,839) - (2,305)*	(6,321) - (2,787)*

* Including 7% System Losses

Section 4.14.2.3, P. 4.14-36 Water Demand Duty Factors for Future Development, Paragraph 1

09 RDEIR:

The annual increased demand associated with the LRDP would be: 856/16 years = 53.5 AFY, which is slightly more than one-third of the 154 AFY annual limit set by the SAFE ordinance

Comment (67):

The sentence is inaccurate in several respects. The annual 1% potable water supply allocation is not a static number; it changes yearly and is zero in years when the SAFE Ordinance conditions have not been met. The University has created an average annual demand figure that doesn't accurately reflect the project-by-project nature of the LRDP, nor does it include the water demands from the remaining construction to be completed from the 1990 LRDP. The total increased demand over the period is 1125 AF, not 856 AF. Refer to Comments 30-32.

Section 4.14.2.3, P. 4.14-36 Water Demand Duty Factors for Future Development, Paragraph 2

Comment (68):

The paragraph misinterprets the 1% potable water supply allocation. Refer to Comments 30-32.

Section 4.14.2.3, P. 4.14-37 Table 4.14-12

09 RDEIR:

	2010	2015	2020	2025	2030
Total Supply	11,204	16,404	17,764	17,704	17,204
Demand					
Single Family Residential	5,807	5,254	4,968	5,741	5,034
Multi-Family Residential	2,410	2,600	2,808	2,718	2,784
Commercial	2,226	2,731	3,081	2,907	2,840
Industry	154	318	317	315	320
Agriculture	1,556	2,024	2,044	2,708	2,753
2008 LRDP	734	428	642	555	656
Other Customer Demands	73,237	13,038	14,521	18,281	15,851
City Year Demand Surcharge (7%)	0	0	0	0	0
Unaccounted Losses (10%)	794	854	874	818	830
Recycled/Potable Water Offset	-54	-254	-568	-253	-1,683
Total Demand including the 2008 LRDP	83,961	34,422	34,873	45,427	40,940
Surplus (Deficit)	2,243	1,582	2,761	2,277	2,064

Notes:
 1. Potable supply only. Not DWS 10.4.1. This surplus appears to be because of a 2008 LRDP in using 100% of the water supply available by the SAFE ordinance.
 2. Assumes 100% of water is recycled 100% of time. Unaccounted losses are based on the 100% of water recycled by the District in year 100% of time. The amount of recycled water is based on the 100% of time.

Source: Water Supply Assessment City of Goleta, Santa Barbara County Water Users Plan, 10/1/08, Page 22 of 44
 Goleta Water District 2008 Urban Water Management Plan

Comment (69):

The surplus amounts shown in Table 4.14-12 are unrealistic. The table is inaccurate based on the following:

- Total Supply - Refer to Comment 16
- 2008 LRDP- The 2008 LRDP figure should factor in 1/3 of 256 AF (85 AF) remaining from the 1990 LRDP in Year 2010, 2/3 of 256 AF (170 AF) in Year 2015, and 256 AF in Year 2015. Years 2025 and 2030 would add the full amount of 1,125 AF. Refer to Comment 56
- Recycled/Potable Water Offset – Refer to Comment 38
- Notes (1) – The comment is a misinterpretation of the SAFE ordinance and should be deleted
- Dry Year Demand Surcharge (7%) and Note (2) should be removed because this table refers to a stand-alone critical dry year

Based upon additional and updated analyses, the District has updated the data and recommends that the University use the following table:

	2010	2015	2020	2025	2030
Total Potable Supply	12,298 - 12,820	13,598 - 14,120	13,598 - 14,120	13,598 - 14,120	13,598 - 14,120
7% System Loss	(861 - 897)	(952 - 988)	(952 - 988)	(952 - 988)	(952 - 988)
Demand					
Single Family Residential	5,007	5,284	5,488	5,761	6,034
Multiple Family Residential	2,410	2,509	2,609	2,710	2,785
Commercial	2,736	2,793	2,851	2,907	2,940
Landscape	314	316	317	319	320
Agriculture	2,556	2,604	2,654	2,706	2,763
2008 LRDP*	299	598	898	1125	1125
Total Customer Demand	13,322	14,104	14,817	15,528	15,967
Dry Year Demand Surcharge (7%)	0	0	0	0	0
Recycled/Potable Water Offset	0	0	0	0	0
Total Potable Demand Including the 2008 LRDP*	13,322	14,104	14,817	15,528	15,967
Total Potable Supply with 7% System Loss	11,437 - 11,923	12,646 - 13,132	12,646 - 13,132	12,646 - 13,132	12,646 - 13,132
Surplus/(Shortage)	(1,885) - (1,399)	(1,458) - (972)	(2,171) - (1,685)	(2,882) - (2,396)	(3,321) - (2,835)

* Adding proportional amount of 1990 LRDP values until 2025. Refer to Comments 56 and 69

Section 4.14.2.3, P. 4.14-37 Water Demand Duty Factors for Future Development, Paragraph 2

09 RDEIR:

The District has injected over 6,800 AF into the basin that is now available for use

Comment (70):

The statement needs clarification. The 6,800 AF of injected water is not necessarily available for use; the 6,800 AF of injected water was used to rehabilitate the aquifer and to recharge the basin to 1972 water levels. Only in a SAFE defined drought is this water available for use.

The 6,800 AF of injected water is dynamic number that changes and cannot be assumed as constant. For example, water is currently being removed from the basin to blend with treated Lake Cachuma water due to the impacts on water quality resulting from the 2007 Zaca Fire. In addition, the District does not control private pumping that also draws water from the basin.

Section 4.14.2.3, P. 4.14-37 Table 4.14-13

09 RDEIR:

Table 4.14-13. Estimate of Supply and Demand to the Goleta Water District for Multiple Dry Years of 2025 through 2030 including the 2008 LRDP

	2025	2026	2027	2028	2029	2030
Supply						
Cachuma project	9,322	9,322	9,322	8,829	8,868	8,868
State Water	2,533	2,533	2,533	2,533	2,533	2,533
Annual Groundwater Right ¹	2,350	2,350	2,350	2,350	2,350	2,350
Groundwater/Conjunctive Use	0	0	0	0	0	0
Groundwater Above 1972 Water Levels	1,283	1,331	1,319	0	0	0
SAFE Groundwater Drought Buffer ²	0	0	0	2,763	2,806	2,853
Lake Cachuma Surface Water Buffer ³	3,584	3,584	3,584	2,854	3,584	3,584
Total Supply⁴	18,072	18,120	18,158	16,126	16,171	16,217
Demand						
Single Family Residential	5,761	5,215	5,959	5,523	5,878	6,024
Multiple Family Residential	2,710	2,721	2,733	2,754	2,769	2,785
Commercial	2,607	2,313	2,630	2,624	2,633	2,649
Landscape	319	319	320	320	320	320
Agriculture	2,705	2,719	2,720	2,741	2,752	2,763
2008 LRDP	856	856	856	856	856	856
Total Customer Demand Inclusive of 2008 LRDP	19,251	18,347	19,424	18,526	18,603	18,669
Dry Year Demand Surcharge (7%) ⁵	1,045	1,074	1,080	0	0	0
Unaccounted Losses (6%) ⁶	855	865	861	861	872	882
Recycled/Potable Water Offset ⁷	-750	-823	-850	-800	-923	-1,000
Total Demand including 2008 LRDP	16,856	17,287	18,335	15,526	15,780	15,649
Surplus/(Shortage)	2,513	2,613	2,513	2,677	2,571	2,577
Notes: 1. Total well capacity is 0,700 AFY 2. Drought buffer pumped as allowed by SAFE 3. Total available storage increases for the first three years because of groundwater pumping. 4. Assumed demand in years 2025 through 2027 is 107% of normal year demand. Increased demand is assumed not to occur in years 2028, 2029 and 2030 because the District would be in years four to six of an intended drought and will be implementing a demand reduction program. 5. Represents the average amount of unused Cachuma Project water carried over from prior years to year 2008. Source: Water Supply Assessment City of Goleta General Plan/Coastal Loma Job Plan, May 23, 2008, Tab 4-3 and Goleta Water District 2008 Water Management Plan						

Comment (71):

The surplus amounts shown in Table 4.14-13 are unrealistic. The table is inaccurate based on the following:

- Cachuma Project – Refer to Comment 25
- State Water – Refer to Comment 25
- Annual Groundwater Right - In Years 2028, 2029, and 2030, this figure will be zero because it is factored into the SAFE Groundwater Drought Buffer
- Groundwater/Conjunctive Use – Refer to Comment 12
- Groundwater Above 1972 Water Levels – Refer to Comment 25
- SAFE Groundwater Drought Buffer – In Years 2028, 2029, and 2030, District pumping capacity is estimated at 6,700 AFY, assuming two wells have been added
- Lake Cachuma Surface Water Buffer – Refer to Comment 25
- 2008 LRDP Demand – Refer to Comments 56 and 69
- Unaccounted Losses (6%) – Refer to Comment 40
- Recycled/Potable Water Offset – Refer to Comment 38

Based upon additional analyses, the District has updated the data and recommends that the University use the following table:

	2025	2026	2027	2028	2029	2030
Supply						
Cachuma Project	9,000	9,000	9,000	6,898	6,898	6,898
State Water Project	0 - 2,533	0 - 2,533	0 - 2,533	0 - 2,533	0 - 2,533	0 - 2,533
Annual Groundwater Right	2,350	2,350	2,350	0	0	0
GW/Conjunctive Use	0	0	0	0	0	0
Groundwater Above 1972 Water Levels	0	0	0	0	0	0
SAFE Groundwater Drought Buffer	0	0	0	6,700	6,700	6,700
Lake Cachuma Surface Water Buffer	0 - 3,584	0	0	0	0	0
Total Potable Supply	11,350 - 17,467	11,350 - 13,883	11,350 - 13,883	13,598 - 16,131	13,598 - 16,131	13,598 - 16,131
Total Potable Supply with 7% System Loss	10,555 - 16,244	10,555 - 12,911	10,555 - 12,911	12,646 - 15,002	12,646 - 15,002	12,646 - 15,002
Demand						
Single Family Residential	5,761	5,815	5,869	5,923	5,978	6,034
Multiple Family Residential	2,710	2,725	2,739	2,754	2,769	2,785
Commercial	2,907	2,913	2,920	2,926	2,933	2,940
Landscape	319	319	320	320	320	320
Agriculture	2,708	2,719	2,730	2,741	2,752	2,763
2008 LRDP (including completion of the 1990 LRDP, Table 4.14-9)	1,125	1,125	1,125	1,125	1,125	1,125
Total Customer Demand Inclusive of 2008 LRDP	15,530	15,616	15,703	15,789	15,877	15,967
Dry Year Demand Surcharge (7%)	1,087	1,093	1,099	0	0	0
Recycled/Potable Water Offset	0	0	0	0	0	0
Total Demand Including the 2008 LRDP*	16,617	16,709	16,802	15,789	15,877	15,967
Surplus/(Shortage)	(6,062) - (373)	(6,154) - (3,798)	(6,247) - (3,891)	(3,143) - (787)	(3,231) - (875)	(3,321) - (965)

* Includes the Total Additional Demand From the 2008 LRDP including completion of the 1990 LRDP

Section 4.14.2.3, P. 4.14-39 Potential Environmental Impacts of Supplying Water to Meet LRDP Demand, Paragraph 5

Comment (72):

The University is assuming the use of recycled water will reduce future potable water demand, thus freeing supplies for future development. This assumption is both invalid and infeasible; it should not be used to calculate future potable water supplies.

Section 4.14.2.3, P. 4.14-44 Potential Effects of Limited Recycled Water Capacity, Paragraph 1

09 RDEIR:

The District has adopted a capital improvement program which would provide expanded recycled water capacity. However, the program is not currently funded

Comment (73):

It should be added that there are no plans to fund this capital improvement program. The market for recycled water is saturated and no funding currently exists.

Section 4.14.2.3, P. 4.14-44 Potential Effects of Limited Recycled Water Capacity, Paragraph 1

09 RDEIR:

Water supply demand...would exceed GWD supplies by approximately 17 AFY

Comment (74):

The deficit figure of 17AFY arrived at in the document is unrealistic based on the District's supply and demand comments. The deficit figure of 17 AFY should be higher. The District's calculations indicate the deficit could go as high as 6,247 AFY.

Section 4.14.2.3, P. 4.14-44 Table 4.J4-14

09 RDEIR:

Table 4.14-14. Estimate of Goleta Water District 2025 and 2030 Supply and Demand for Normal Years Assuming No Offset From The Increased Use of Recycled Water		
	Normal Year 2025	Normal Year 2030
Potable Supply		
Lake Cachuma	9,322	9,322
State water project	4,500	4,500
Groundwater	2,350	2,350
Groundwater/Conjunctive Use	400	400
Total Supply (potable only)	16,572	16,572
Potable Demand		
Total Future Potable Demand Assumed by Goleta General Plan 2008 For All Customers Within the GWD	14,405	14,842
Unaccounted For Losses (6%)	884	891
Recycled/Potable Water Offset	0	0
Additional Potable Demand From 2008 LRDP	353	353
Total Future Potable Demand To GWD With 2008 LRDP	16,125	16,589
Overall Surplus (Potable Water Only)	447	-17
Notes: 1 Including direct General Plan and a Vista Master Plan Sources: Water Supply Agreement City of Goleta General Plan/General Plan Use Plan May 22, 2008 and CIMCA, 2007 Bishop Ranch Concept Plan, May 2003		

Comment (75):

The surplus/deficit amounts shown in Table 4.14-14 are unrealistic. The table is inaccurate based on the following:

- Lake Cachuma Supply – Refer to Comment 33
- State Water Project – Refer to Comment 6
- Groundwater/Conjunctive Use – Refer to Comment 12
- Unaccounted For Losses (6%) – Refer to Comment 40
- Recycled/Potable Water Offset – Refer to Comment 38
- Additional Potable Demand From the 2008 LRDP – Refer to Comment 56

Based upon additional analyses, the District has updated the data and recommends that the University use the following table:

Table 4.14-14. Estimate of Goleta Water District 2025 and 2030 Supply and Demand for Normal Years Assuming No Offset From The Increased Use of Recycled Water		
	Normal Year 2025	Normal Year 2030
Potable Supply		
Cachuma Project	9,000	9,000
State Water Project	0 - 3,800	0 - 3,800
Annual Groundwater Right	2,350	2,350
GW/Conjunctive Use	0	0
Total Potable Supply	11,350 - 15,150	11,350 - 15,150
Total Potable Supply with 7% System Loss	10,555 - 14,089	10,555 - 14,089
Potable Demand		
Total Future Potable Demand Assumed By Goleta General Plan WSA For All Customers Within the GWD	14,405	14,842
Recycled/Potable Water Offset	0	0
2008 LRDP (including completion of the 1990 LRDP, Table 4.14-9)	1,125	1,125
Total Demand Including the 2008 LRDP*	15,530	15,967
Surplus/(Shortage)	(4,975) - (1,441)	(5,412) - (1,878)

* Includes the Total Additional Demand From the 2008 LRDP including completion of the 1990 LRDP

Section 4.14.2.3, P. 4.14-45 Effect and Feasibility of Mitigation, Paragraph 1

Comment (76):

Paragraph 1 misinterprets the 1% potable water supply allocation. Refer to Comments 30-32.

Section 4.14.2.3, P. 4.14-46 Surface Water – The State Water Project, Paragraph 1

Comment (77):

The University claims that “this source of additional water has a high likelihood of being available”. SWP is a supplemental supply of water; it should not be the primary source of water to support new development because it is subject to various legal, regulatory, and climatic constraints which reduce availability.

To meet the CEQA standard for an adequate water supply, the California Supreme Court held in the 2007 *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* that:

“Future water supplies identified and analyzed in an EIR must be reasonably likely to prove available; speculative sources and unrealistic allocations such as “paper water” do not provide an adequate basis for decision making under CEQA”.

Section 4.14.2.3, P. 4.14-46 Surface Water – The State Water Project (1)

09 RDEIR:

The University can purchase an unused allotment of SWP water from the Santa Barbara County Flood Control and Water Conservation District

Comment (78):

This measure is a misinterpretation of the SWP. The University is not able to purchase an unused allotment of SWP water from the Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD). The Central Coast Water Authority (CCWA) is the responsible agency, as known through the 1991 Transfer of Financial Responsibility agreement with the SBCFCWCD and the Water Supply Agreements with the individual project participants. Therefore, all State water purchase agreements must first be approved by the CCWA. Regardless of the responsible agency, all 45,486 AF of State water are spoken for and no more water, treatment plant, or pipeline capacity exists to make this option feasible (see Attachment C).

Section 4.14.2.3, P. 4.14-46 Surface Water – The State Water Project (2)

09 RDEIR:

The University can acquire an unused allotment of SWP water from another CCWA member agency

Comment (79):

This measure needs clarification. Although it is true that the University can acquire an unused allotment of SWP water from another CCWA member agency, and agencies must express interest in selling unused Table A allotments. To date, only the Carpinteria Valley Water District (CVWD) has expressed interest in selling, and is also in negotiations to sell the water to other customers. For planning purposes, the University should not count on option 2 unless current negotiations with the CVWD are already in place (see Attachment C).

Section 4.14.2.3, P. 4.14-46 Table 4.14-15

09 RDEIR:

Table 4.14-15. State Water Entitlements in Santa Barbara County			
Agency/Participant	Allocation (AFY)	2005 Deliveries	Percentage of Allocation
California Cities Water Company	500	194	38%
Carpinteria Valley Water District	2,000	493	25%
City of Buellton	576	605	104%
City of Guadalupe	550	404	73%
City of Santa Barbara	3,000	749	25%
City of Santa Maria	16,200	13,268	82%
Goleta Water District	4,500	1,129	25%
La Cumbre Municipal Water Co.	1,000	330	33%
Mammoth Water District	3,000	749	25%
Morehart Land Company	200	84	42%
Santa Barbara Research Center	50	50	100%
Santa Ynez River Water Conservation District	2,000	630	32%
Vandenberg Air Force Base	5,500	3,436	62%
Total:	38,078	22,119	57%

Notes:
 1. Actual deliveries from the State Water Project may be substantially less than the Table A allocation to member agencies, as described in the Draft 2007 State Water Project Delivery Reliability Report. For example, the draft Reliability Report estimates that deliveries could be reduced to 34% of the member agency's Table A amount as a result of various elements of uncertainty.
 Source: Department of Water Resources

Comment (80):

Table 4.14-15 is not an accurate portrayal of State Water Entitlements in Santa Barbara County. The year 2005 was not typical, and to base the table on a single year skews this information greatly. See Attachment C.

Section 4.14.2.3, P. 4.14-47 Potential Environmental Impacts of Acquiring Additional State Water, Paragraph 2

09 RDEIR:

The University is currently using approximately 150 AFY (54% of available recycled water)

Comment (81):

The statement needs clarification; sentence should read 54% of *contractually available* recycled water.

Section 4.14.2.3, P. 4.14-48 Potential Environmental Impacts of Acquiring Additional State Water, Paragraph 5

Comment (82):

The limitations to future enrollments are based on inaccurate numbers and need to be recalculated.

Section 4.14.2.3, P. 4.14-49 Conclusion

Comment (83):

The concluding statement misinterprets the UWMP to state that District will have sufficient water supplies to meet demand from the University's 2008 LRDP. Although sufficient infrastructure exists to convey this water, the dynamic conditions of current and future water supplies warrant more conservative estimates of water availability. It is the District's opinion that the University must further understand and state these critical issues instead of overestimating supply and underestimating demand. As stated in the General Comment, the District believes that the University's LRDP proposed project will have Significant and Unavoidable Class I Impacts to potable water supplies that cannot be feasibly mitigated during the planning period.

List of Abbreviations and Acronyms

AF/AFY	Acre Feet/Acre Feet per Year
BMP	Best Management Practices
CCWA	Central Coast Water Authority
CEQA	California Environmental Quality Act
CII	Commercial, Industrial and Institutional
COMB	Cachuma Operations and Maintenance Board
CUWCC	California Urban Water Conservation Council
CVWD	Carpeantaria Valley Water District
DWR	Department of Water Resources
GSD	Goleta Sanitary District
GW	Groundwater
GWD/District	Goleta Water District
GWMP	Groundwater Management Plan
HEW	High Efficiency Washing Machine
LRDP	Long Range Development Plan
RDEIR	Recirculated Draft Environmental Impact Report
SAFE	SAFE Water Supplies Ordinance
SBCFCWCD	Santa Barbara County Flood Control and Water Conservation District
SWP	State Water Project
UCSB/University	University of California, Santa Barbara
ULFT	Ultra Low Flow Toilet
UWMP	Urban Water Management Plan
WDF	Water Duty Factor
WSA	Water Supply Assessment
WSMP	Water Supply Management Plan
WTP	Water Treatment Plant

Attachment B

SAFE WATER SUPPLIES ORDINANCE

FULL TEXT OF MEASURE 1191 GOLETA WATER DISTRICT

Ordinance 91-01

SAFE WATER SUPPLIES ORDINANCE

THE PEOPLE OF THE GOLETA WATER DISTRICT, COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA, DO ORDAIN AND ENACT THE FOLLOWING ORDINANCE WHICH SHALL BE KNOWN AS THE SAFE WATER SUPPLIES ORDINANCE:

RECTALS:

Whereas, the Goleta Water District ("District") faces a significant shortage of water to meet current long-term water demands of its customers as determined by the State Department of Water Resources and the Santa Barbara County Flood Control and Water Conservation District in their 1984 Santa Barbara County Water Project Alternatives study; and

Whereas, a drought emergency was declared in Santa Barbara County in 1990 following four years of below normal precipitation within Santa Barbara County and, in the future, the District will continue to be subject to recurring drought cycles which will threaten the ability of the District to meet the health and safety needs of its customers unless new and diversified, long term water projects are developed; and

Whereas, the District relies exclusively on local water supplies to meet its current water demand, which supplies originate entirely within Santa Barbara County and which supplies are all subject to the same climatic conditions; and

Whereas, in the absence of a system limiting the District's authority to provide new and/or additional water service connections without first providing groundwater storage of water in wet years for use in dry years to "drought buffer program" District customers may face severe water shortage in the future; and

Whereas, on October 1, 1990 the Board of Directors of the Goleta Water District adopted a Water Supply Management Plan which includes use of water supplies from both a desalting plant and the State Water Project; and

Whereas, the District is a party to an agreement with the Santa Barbara County Flood Control and Water Conservation District entitled "Water Supply Retention Agreement" dated December 11, 1984 which it executed on June 28, 1986 (the "WSRA") entitling the District to 4,500 acre feet per year from the State Water Project; and

has executed amendments thereto; and

Whereas, the District is also a party to a "Contract for Preliminary Studies for Financial Feasibility, Preliminary Design and Environmental Review Under State Water Supply Contract" (the "Design and EIR Agreement") dated June 2, 1986 but did not identify itself as a proposed participant in the preliminary studies in response to the "Notice of Intent to Request Preliminary Studies" for the Coastal Branch and the Mission Hills Extension of the California Aqueduct given by the City of Santa Maria on or about May 24, 1986; and

Whereas, the WSRA and its amendments and the Design and EIR Agreement contain the ways and means to provide for a long term solution to the existing drought emergency and to the ongoing water shortage within the County of Santa Barbara; and

Whereas, the District has a duty to provide a permanent, reliable water supply to its residents;

NOW, THEREFORE, THE FOLLOWING ORDINANCE IS ENACTED INTO LAW:

I Drought Buffer

1. In each year, commencing in the first year the State Water Project makes deliveries to the District, the District shall, after providing service to its existing customers, commit at least 2,000 acre feet of its water supply (the "Annual Storage Contribution") to the Goleta Central Basin either by direct injection or by reduction in groundwater pumping. The water so stored in the Central Basin shall constitute the District's "Drought Buffer".

2. The Drought Buffer may be pumped and distributed by the District only to existing customers and only in the event that a drought on the South Coast causes a reduction in the District's annual deliveries from Lake Cochitocas. The Drought Buffer cannot, under any circumstances, be used by the District as a supplemental water supply to serve new or additional demands for water within the District.

3. Unless and until the Central Basin water level rises to 100% of its 1972 levels, the District shall be required to make its Annual Buffer Commitment. Therefore, for so long as the District maintains the Central Basin at or above 1972 levels, the District may utilize the yield of the Central Basin to lower the cost of water service to existing customers.

II Water Supply Distribution Plan

4. The District shall be forbidden from providing new or additional potable water service connections to any property not previously served by the District until all of the following conditions are met:

a. District is receiving 100% of its deliveries normally allowed from the Cochitocas Project;

AB-4

Goleta Water District 1991-1992

b. The District has met its legal obligations required by the judgment in *Wright v Goleta Water District*;

c. Water rationing by the District is eliminated;

d. The District has met its obligation to make its Annual Storage Commitment to the Drought Buffer.

5. For each year in which the conditions of paragraph 4. have been met, the District shall be authorized to release 1% of its total possible water supply to new or additional service connections and if such new releases are authorized, the District shall permanently increase the size of the Annual Storage Commitment made to the Drought Buffer by 2% of the amount of any release for new or additional uses so that safe water supplies in times of drought shall not be endangered by any new or additional demands.

111 State Water Supply

6. Due to controversy concerning the physical ability of the State Water Project to deliver its full contractual commitments, District shall plan for delivery of only 2,500 acre feet per year as the amount of the firm new yield from the State Water Project. Any excess water actually delivered shall be stored in the Goleta Groundwater basin for use in drought.

7. The District shall immediately either (a) give Notice of its Intention to Request Construction of Described Project Facilities under the State Water Contract, as provided for in Section 5(a)(1) of the WSRRA or (b) respond to any such notice previously given by any other Contractor as provided for in Section 5(a)(2) of the WSRRA that it wishes to participate in the described project.

8. The Project Facilities to be constructed pursuant to the Notice of Intention shall be the Mission Hills and Santa Ynez Extensions of the Coastal Branch of the California Aqueduct and required water treatment facilities and other appurtenant facilities therein the "Project Facilities".

9. The District agrees, pursuant to section Section 5(a)(2) of the WSRRA, that the time for determination of participation and sizing of the Project Facilities may be any date on or after September 1, 1992 agreeable to the other participants.

10. The District shall, in the shortest time lawfully possible, exercise all of its rights and fulfill all of its obligations under the WSRRA, including the payment of any amounts required thereunder.

11. The District shall file a Late Request to Amend pursuant to Section 3(f) of the Design and EIR Agreement and agrees to pay its proportionate share of all costs required by said Section 3(f) and any amounts required under Section 3(g) of said Design and EIR Agreement.

12. The District, or the Santa Barbara Water Purveyors Agency or any other joint powers agency of which the District is a member or may become a member for such purposes, may issue revenue bonds ("bonds") from time to time in an amount not to exceed Forty-Two Million Dollars (\$42,000,000.00) to provide funds to

finance the District's pro rata share of the costs and expenses under the WSRRA and the Design and EIR Agreement. Said bonds shall be used for the purposes of constructing the Project Facilities, including without limitation, any and all necessary facilities required for the delivery of State Project Water pursuant to the WSRRA to the District through the Coastal Branch of the California Aqueduct, including any and all expenses incidental therein or connected therewith, and shall include, without limitation, the cost of acquiring rights of way, the cost of constructing and/or acquiring all buildings, equipment and related personal and real property required to complete the Project Facilities, and the engineering, environmental review, inspection, legal and fiscal agent's fees, costs incurred by the District or joint powers agency in connection with the issuance and sale of such bonds, and reserve fund and bond interest estimated to accrue during the construction period and for a period of not to exceed twelve (12) months after completion of construction, such bonds to be payable from the District's water revenues, to bear interest at a rate or rates not to exceed the legal maximum from time to time, and to mature in not more than forty (40) years from the date of issuance.

13. This Ordinance shall be submitted to a vote of the people of the District in compliance with the requirements of Section 5(a)(4)(1) of the WSRRA and pursuant to Elections Code Section 5201.

14. All actions taken pursuant to this Ordinance shall be in compliance with all local, state and federal environmental protection laws. Nothing in the Ordinance shall be construed to require such compliance prior to the election provided for herein.

15. This Ordinance shall be liberally construed and applied in order to fully promote its underlying purposes. If any word, sentence, paragraph or section of this Ordinance is determined to be unenforceable by a court law, it is the intention of the District that the remainder of the Ordinance shall be enforced.

16. If adopted, this ordinance shall be an amendment to the Responsible Water Policy Ordinance adopted by the people in May, 1973, and may not be modified except pursuant to the vote of the electorate of the District. To the extent that the provisions of this ordinance conflict with that ordinance or any prior ordinance or measure previously enacted by the District or the voters of the District, the provisions of this ordinance shall control. To the extent that the provisions of this Ordinance conflict with any other ordinance or measure adopted in the same election, the ordinance or measure receiving the highest number of affirmative votes shall control.

17. Nothing herein is intended to affect the rights of any parties or the obligations of the District pursuant to the judgment in the action known as *Wright v Goleta Water District*, Santa Barbara Superior Court Case No. SM57969.

18. This ordinance shall take effect immediately upon being approved by a majority vote of the votes cast at the election.

FULL TEXT OF MEASURE 194
GOLETA WATER DISTRICT

AN AMENDMENT TO THE SAFE WATER
SUPPLIES ORDINANCE

THE PEOPLE OF THE GOLETA WATER DISTRICT,
COUNTY OF SANTA BARBARA, STATE OF
CALIFORNIA, DO ORDAIN AND ENACT THE
FOLLOWING ORDINANCE WHICH SHALL BE AN
AMENDMENT TO THE SAFE WATER SUPPLIES
ORDINANCE:

RECALLS:

WHEREAS, the voters of the Goleta Water District
("District") enacted the SAFE Water Supplies Ordinance
("SAFE") in June 1991 authorizing the participation by
the District in the State Water Project and providing for
the bond financing to develop the Project Facilities
necessary for delivery of that water to the District; and

WHEREAS, the District is now a member of the Central
Coast Water Authority, the members of which are
cooperating collectively to develop the Project Facilities
which are now under construction; and

WHEREAS, SAFE provides for the creation of a Drought
Buffer of water stored in the Goleta groundwater basin to
protect against future drought emergencies and a Water
Supply Distribution Plan to protect the District's water
supplies against new demands until deliveries from the
State Water Project are available; and

WHEREAS, this proposed amendment to SAFE maintains
all the provisions regarding the protection of water
supplies provided by the Drought Buffer and the Water
Supply Distribution Plan; and

WHEREAS, pursuant to provisions of the judgment in the
lawsuit known as Wright v. Goleta Water District, the
District is required to develop a Water Plan to provide the
necessary water supplies to achieve a balance between
supply and demand for water within the District. The
District's Water Plan is based on continuing to use the
maximum amount of water available from the Cachuma
Project; prudent management of the Goleta groundwater
basin; use of the newly constructed wastewater
reclamation project to replace existing use of potable
water for turf irrigation; a continuing water conservation
planning effort; participation in the State Water Project;
and the necessary level of commitment to a desalinated
sea water project. As a result of the long-term water
supply deficit in the District, the District has been
operating under a water conservation ordinance for over
twenty years. Once fully implemented the District's
Water Plan should provide adequate supplies to meet
long-term water demand in the District; and

WHEREAS, the forty year water service contract with the
United States Bureau of Reclamation for delivery of water
from the Cachuma Project will expire in May 1995.
Negotiations are currently under way to renew that
contract. The Bureau of Reclamation has required that the
Cachuma Project be subjected to an environmental review
process which is now being undertaken. It appears likely
that the District's yield from the Cachuma Project after
contract renewal will be less than the current yield as a
result of the dedication of water for environmental
enhancement purposes on the lower Santa Ynez River; and

WHEREAS, the Southern California Water Company is a
Santa Barbara County water purveyor which currently
holds rights to an entitlement to 3,000 acre feet per year of
water from the State Water Project and has given notice of
its intent to sell 2,500 acre feet of that entitlement. The
Goleta Water District has identified itself as a potential
purchaser of the entitlement. It is the intent of this
Ordinance to authorize the acquisition and use of that
entitlement; and

WHEREAS, the District estimates the annual cost of the
Southern California Water Company entitlement to be
\$500 per acre foot of water delivered to the District. The
entitlement acquisition is intended to reduce the long-term
costs of water to the District and its customers in that
alternative supplies that would be available, and necessary
to meet the District's long-term demand would be more
expensive than the water available from Southern
California Water Company. The District's cost analysis of
the acquisition is available at the District office.

NOW, THEREFORE, THE FOLLOWING ORDINANCE
IS ENACTED INTO LAW:

1. The District is authorized to acquire an additional
entitlement to the State Water Project in an amount of
up to 2,500 acre feet per year, which is currently
available from the Southern California Water
Company. This entitlement will supplement the 4,500
acre feet per year authorized by the voters in originally
adopting the SAFE Water Supplies Ordinance. This
authorization shall provide for the payment of all costs
of the acquisition and use of any additional entitlement
acquired. Due to the controversy concerning the
physical ability of the State Water Project to deliver its
full contractual commitments, the District shall plan
for the delivery of 3,800 acre feet per year of water at
the amount of firm average long-term yield. The
District's total State Water Project entitlement
includes the basic entitlement of 4,500 acre feet per
year, the District's share of the drought buffer held by
the Central Coast Water Authority and the entitlement
acquired pursuant to this authorization. Any excess
water actually delivered over 3,800 acre feet per year

shall be stored in the Goleta groundwater Central basin until the basin is replenished to its 1972 level for use during drought conditions.

2. Enforcement of this Ordinance shall comply with all applicable law, including the California Environmental Quality Act.
3. If adopted, this Ordinance shall be an amendment to the SAFE Water Supplies Ordinance adopted by the electorate in June, 1991, which amended and superseded the Responsible Water Policy Ordinance originally adopted by the electorate in 1973. Paragraph 1 of this Ordinance shall amend and fully supersede paragraph 6 of the SAFE Water Supplies Ordinance. All other provisions of the SAFE Ordinance shall remain in full force and effect. If adopted, this Ordinance may not be modified except pursuant to a vote of the electorate of the District.
4. This Ordinance shall be liberally construed and applied in order to fully promote its underlying purposes. If any word, sentence, paragraph or section of this Ordinance is determined to be unenforceable by a court of law, it is the intention of the District that the remainder of the Ordinance shall be enforced.

Attachment C

UCSB LONG RANGE DEVELOPMENT PLAN

Recirculated Draft EIR Sections (RDEIR)

Comments on RDEIR Section 4.14 Water

Provided to the Goleta Water District

by

Mr. Bill Brennan

Executive Director, Central Coast Water Authority (CCWA)

Overall Impression

Comment (1):

The Recirculated Draft EIR illustrates an incomplete understanding of the current issues regarding state water through the SWP. Currently, allocation of state water is at 15% and could go lower if the drought continues. The State has limited ability to move water through the Delta because of endangered species regulations, and a regulatory drought now exists in addition to the drought of the last three years. As a result, water agencies have been forced to adopt increasingly restrictive water management approaches. Water supplies as listed in this RDEIR are unrealistic, at least within the next 3-5 years, and need to reflect the reality of the current water supply conditions.

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

09 RDEIR:

The 7,450 AFY figure includes a 450 AFY "Drought Buffer" (the District's share of CCWA's Drought Buffer), and 2,500 AFY of "additional" Table A allotment

Comment (2):

Language is incorrect. The 2,500 AFY should be referred to as a "special Drought Buffer" rather than an "additional" Table A allotment. Using "Table A" implies, incorrectly, that treatment plant and pipeline capacity is available for this water.

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

09 RDEIR:

Under the District's agreement with CCWA, its share of the conveyance facilities that deliver SWP water to Cachuma Lake is limited to 4,5000 AFY, which is used as the District's basic supply

Comment (3):

Treatment facilities should be added to the sentence to read: *...its share of the treatment and conveyance facilities that deliver SWP water...*

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 1

Comment (4):

This paragraph needs clarification. It should be added that the Drought Buffer amounts are used for reliability purposes and do not have treatment plant or pipeline delivery capacity associated with them.

Section 4.14.1.2, P. 4.14-3 The State Water Project, Paragraph 2

09

RDEIR:

While GWD will not use its additional allotments (beyond 4,500 AFY) during normal rainfall years, this additional allotment will help offset the effect of curtailments in SWP deliveries projected by DWR for future years

Comment (5):

The language used in this statement needs refinement; "additional allotments" should be changed to "Drought Buffer amounts" as explained in Comment (2). "Normal rainfall years" should be changed to "wet years" and "projected by DWR" should be deleted. Sentence should read: *While GWD will not use its Drought Buffer amounts (beyond 4,500 AFY) during wet years, this additional allotment will help offset the effects of curtailments in SWP deliveries in the future*

Section 4.14.1.2, P. 4.14-7 Normal Years

Comment (6):

It should be added that the Goleta Water District and The Department of Water Resources do not carry the same definitions. DWR does not define "normal year", only critical, dry, average, above average, and wet. Is the GWD definition of "normal year" consistent with DWR's definition of "average" and "above average"? Also, it needs to be understood that while high allocations are increasingly possible in above average years, allocation is determined by the evaluation of many other variables.

Section 4.14.1.2, P. 4.14-7 Table 4.14-1

Comment (7):

Title uses poor choice of terms; "normal rainfall years" should be characterized as "normal years" as defined by GWD or in terms defined by the DWR.

Section 4.14.1.2, P. 4.14-7 Table 4.14-1

Comment (8):

The State Water Project figure does not account for the spill risk in Lake Cachuma. On average, the lake spills once every three years; GWD will not take SWP water if there is a risk of this spillage from Lake Cachuma.

Section 4.14.1.2, P. 4.14-8 Critical Dry Year, Cachuma Project

09 RDEIR:

The District also assumes that an average of 3,584 AFY of the Cachuma Surface water Buffer is available for use during a critical dry year

Comment (9):

GWD needs to clarify if this is true, and is it true in multiple dry years, or only the first of a dry year series? Is it true that the Cachuma Surface Water Buffer of 3,584 AFY is only available once, not every year?

Section 4.14.1.2, P. 4.14-9 Table 4.14-2

Comment (10):

- Lake Cachuma Buffer is only available in the first dry year – Refer to Comment (9)

Table should read:

Lake Cachuma Buffer	3,584	0	0	0	0
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Section 4.14.1.2, P. 4.14-11 State Water Project Reliability

Comment (11):

It should be added that the 2007 SWP Delivery Reliability Report includes estimates of the potential future reductions to SWP delivery reliability.

Section 4.14.1.2, P. 4.14-11 State Water Project Reliability

09 RDEIR:

The long-term average SWP delivery is projected to be about 63 percent of “Table A amounts”

Comment (12):

It needs to be understood that the long-term average is only valid if excess water can be stored. Otherwise, excess water must be sold or forgone. Lake Cachuma storage is risky if local groundwater storage is full, therefore other storage is necessary.

Section 4.14.1.2, P. 4.14-12 Dry-Year Water Programs

Comment (13):

It needs to be clarified that the DWR and/or the State Water Contractors have, in some years, operated a dry-year water program for SWP contractors. The availability of water has been very small in relation to demand. DWR has not yet announced how much water is available in the program, when it may be available or the cost.

The last paragraph quoting the WSA needs amendment. It should be stated that a *water supply reliability agreement that will be a sale of surplus SLOC State Water Project water to CCWA in 2008 and 2009*

The last paragraph of the section should read: *as demonstrated in this chapter, development under the 2008 LRDP has not, to date, necessitated any of these backup supply options*

Section 4.14.2.3, P. 4.14-44 Table 4.14-14

Comment (14):

The State Water Project figure is again overstated, until Delta isolated facilities are constructed and off-site groundwater storage is available, this figure is not a realistic supply amount for the near future.

Section 4.14.2.3, P. 4.14-46 Surface Water—The State Water Project

Comment (15):

Option 1 is completely untrue; the University may not purchase an unused allotment of SWP water from the SBCPCWCD. The CCWA is the responsible agency, as known through the 1991 Transfer of Financial Responsibility agreement with the SBCPCWCD and the Water Supply Agreements with the individual project participants. Therefore, all state water purchase agreements must first be approved by the CCWA. Regardless of the responsible agency, all 45,486 AF of state water are spoken for and no more water treatment plant or pipeline capacity exists to make this option feasible.

Option 2 needs further clarification. Although it is true that the University can acquire an unused allotment of SWP water from another CCWA member agency, the agencies must express interest in selling unused Table A allotments. To date, only the Carpinteria Valley Water District (CVWD) has expressed interest in selling, and is also in negotiations to sell the water to other customers. For planning purposes, The University should not count on option 2 unless current negotiations with CVWD are already in place.

Section 4.14.2.3, P. 4.14-46 Table 4.14-5

Comment (16):

This table is not an accurate portrayal of State Water Entitlements in Santa Barbara County. 2005 was not a typical year, and to base the table off a single year skews this information greatly.

Section 4.14.2.3, P. 4.14-47 Feasibility of Acquiring Additional State Water Project Water, Paragraph 3

Comment (17):

The University will only be able to obtain a restrictive amount of surplus water from the SWP if the University acquires the water with capacity rights; there must also be enough water to get through short term SWP reliability issues.