



November 21, 2014

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General Manager
and Secretary

Thomas R. Mosby

Re: Request for County Suspension on New Well Drilling Permits –
Montecito Water District Service Area

Dear County Officials,

As a public water agency, Montecito Water District is charged with managing groundwater resources within its service boundaries. However, Santa Barbara County is vested with the authority to permit the construction, rehabilitation and destruction of water wells in Santa Barbara County. As a result of this disconnect between our respective agencies, the County of Santa Barbara has the full authority to protect and control groundwater resources until such time as a groundwater basin becomes imperiled and is legally adjudicated. We are herein requesting that the County work with us in proactively bridging this illogical situation and protect our community's groundwater resources.

As you are aware, the County of Santa Barbara declared a Water Shortage Emergency on January 21, 2014 and the Montecito Water District (MWD) declared a Water Shortage Emergency and suspension of new meter water service within its service boundaries in February 2014. The District's dependence on surface water for 95% of its water supplies, coupled with an acceleration of water usage, was the cause of the current water shortage that resulted in the adoption of Ordinances 92 and 93.

In the months leading up to the adoption of Ordinances 92 and 93, MWD was informed by District customers of the failure of approximately three dozen private wells within its service boundary, resulting in residents who had previously used groundwater for outside irrigation purposes shifting from groundwater to the District's potable water supply for irrigation

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purposes. The combination of a rapidly increasing demand for water due to climatic conditions and well failures, coupled with severely curtailed community water supplies, led us to enact strict water rationing to all District customers. Along with water rationing, the District enacted penalty charges and other mechanisms to protect against water overuse.

MWD customers responded to the Water Shortage Emergency and have reduced their District water demand by an average of 45%. However, it remains unknown how much ground water is being extracted by District customers to supplement the water they are obtaining from MWD, nor is it known how much water private water companies are extracting within the MWD service area to service the domestic needs of their customers.

The bottom line is, with the Environmental Health Department issuance of over 550 well permits within District Boundaries since the 1970s, MWD has no mechanism for accurately determining the actual number of active wells, or private well water use and demand; nor does it have a viable mechanism for monitoring the extraction of groundwater from the aquifers within its service area.

Since declaring a Water Shortage Emergency, MWD has been able to supplement its diminishing water supplies with special water purchases; however, its local surface water supplies at Lake Cachuma and Jameson Lake will only provide 33% of their normal deliveries in the 2014/15 water year which began October 1, 2014. If conditions remain dry, it is estimated that the District may have only 50% of its 2014/15 water supply available to our customers in 2015/16. As a result, it is imperative that groundwater resources, which are expected to play a larger role in the District's water supply, be appropriately managed and monitored in order to protect everyone within the community.

The water shortage emergency condition and implementation of water rationing has caused District customers to turn to alternate water supplies, and we have observed a surge in new water well permit applications to the County. This is of serious concern to Montecito Water District since this increase in well construction permit applications and well construction will lead to additional demand on the groundwater basin. The District monitors groundwater levels through the different storage units bi-annually and has observed not only lowering of static groundwater levels, but also a significant reduction in groundwater production from our own District wells.

The District has conducted numerous studies by professional geologists over the last several decades and recognizes the finite safe yield limitations of groundwater in Montecito. Groundwater is being pumped from the different storage basins by customers for non-potable purposes without regard to the adverse effect to District and community public health and safety water supplies. In fact, District studies have indicated that there has been no measured recharge to the groundwater basin since the 2004-05 winter season.

The County must understand that the majority of our District's producing groundwater wells are located in Storage Unit 3 which is within the coastal zone. In addition to District water well production in Storage Unit 3, there are at least three other private water companies within the same storage unit that are the sole source of potable water to about 60 residential properties. These private water companies do not have backup water supplies and the further lowering of groundwater levels or water quality degradation due to possible seawater intrusion could lead to serious public health and safety consequences for these private water company customers as well as District customers. These groundwater water supplies, critical to the District and private water companies, could be permanently damaged if further extraction from the groundwater basin occurs through the permitting of new wells.

As a result of the above mentioned situation, MWD is requesting that the County take immediate action to protect the public health and safety by:

1. **Water Well Moratorium** - Placing a moratorium on the issuance of new well drilling permits within the service boundary of the Montecito Water District until such time as MWD's Water Shortage Emergency is lifted.
2. **Future County Permitted Wells** - Any future County-permitted new, rehabilitated or replaced water well within the District's service boundary shall include the following conditions:
 - a. Flow metering device, meeting MWD's requirements be installed at the wellhead discharge piping and the transmittal of the annual groundwater extraction information be provided by the owner to both the County and MWD.
 - b. District's Bi-Annual Well Monitoring Program Participation - MWD shall be provided reasonable access to the well twice annually to monitor the well static water levels.
 - c. Cross Connection Program Enrollment - A backflow device be installed in accordance with District standards and enrolled in MWD's Cross Connection Program in order to prevent cross-contamination of the District's potable water supply with the non-potable well water supply.
3. **Water Wells and County New Land Use Permits** - Whenever the County has permitting authority on a property with an existing well, numbers 2.a, 2.b, and 2.c above be conditions of the issuance of the permit.

The District is available to discuss this matter with you at your earliest convenience. We realize that the mechanisms outlined above fall within the authority of multiple departments within the County (i.e. Planning and Development, Environmental Health, etc) however, due to the urgency of this matter and the current groundwater basin degradation, it is important that a coordinated approach be undertaken to protect the

public health and safety in the near-term as well as the long-term. Please contact the undersigned at 969-2271 if you have any questions.

I look forward to working together with you on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Mosby', with a stylized, cursive script.

Tom Mosby
General Manager

cc: Chair, Board of Supervisors
Tom Fayram