

TO: **Das William, 1st District Supervisor, County of Santa Barbara**
Tom Fayram, Deputy Public Works Director, Santa Barbara County
Rob Lewin, Director, Santa Barbara County Office of Emergency Management

FROM: Floyd Wicks, Board President, Montecito Water District
Nick Turner, General Manager, Montecito Water District

DATE: February 28, 2019

SUBJECT: Premature Termination of Drought Emergency Status /
Water Shortage Condition Persists

We are writing on behalf of Montecito Water District (MWD) to express concern about the County's proposed action to terminate the drought emergency at its March 5, 2019 Board of Supervisors meeting: **MWD respectfully requests that the County delay any action for approximately 60 days as authorized under Government Code §8630(c)** until the water supply outlook is more certain.

Our top three concerns are:

1. **The proposed action is contrary to actual water supply conditions** on the South Coast, where a water shortage condition persists.
2. The County has not consulted MWD (or other water purveyors) regarding its (their) ongoing **water shortage emergency** prior to proposing such action.
3. This action is likely to confuse the public, **promote inappropriate water consumption behavior**, generate negative dialogue, and erode public relations efforts of the County's RWEF, and all participating agencies. Public misunderstandings can be both time-consuming and costly to alleviate.

Below is a brief update on the status of MWD supplies demonstrating that the near-term availability of all our water supplies is uncertain:

Jameson Lake - All water is currently undeliverable due to water quality challenges resulting from the Thomas Fire, even though Jameson Lake is currently at 100% of capacity. We remain hopeful that treatment plant enhancements currently underway will enable us to use this water in the coming months. Results regarding the effectiveness of the treatment enhancements are expected sometime in March or April.

Groundwater - Prior to this winter, the Montecito Groundwater Basin was at or near a historic low level and has yet to show significant signs of recovery. This year's above-average rainfall will likely result in some recharge of the Montecito Groundwater Basin, but data evidences that **several years of above average rainfall is needed before the basin is expected to return to 'normal' conditions.**

Lake Cachuma - Cachuma Project allocation for the 2019 water year remains far below average at 20%, although the capacity of Lake Cachuma is in excess of 62% and rising. To our knowledge, the County has yet to submit a request to and receive subsequent approval from USBR for an increase in the

Cachuma Project allocation which, based on current lake level and historical management of supplies, should be at or near a full (100%) allocation.

State Water Project - The 2019 State Water Project allocation is far below historical average at 35% irrespective of the significant rainfall and snowpack received across the state this winter. We anticipate this will likely increase but there is no certainty. To complicate things, **deliveries of State Water Project water to Lake Cachuma are temporarily suspended** due to the rising lake level and USBR's operation of Bradbury Dam. **It is currently unknown as to when State Water Project deliveries to Lake Cachuma will resume.** Finally, the Central Coast Water Authority ("CCWA") is continuing its Supplemental Water Purchase Program for the 2019 water year, with the expectation that participants will be required to purchase water to meet customer demand, and to accommodate long term water budgets.

Throughout the prevailing period of drought in its service area, MWD has been diligent in adopting, evaluating and modifying measures authorized under the Water Code to respond to emergency conditions. Currently Montecito has in place Ordinance 95 ("An Ordinance of the Board of Directors of the Montecito Water District Continuing the Declaration of a Water Shortage Emergency, Providing for Modifications to Restrictions on Use of Water and Supporting Ongoing Conservation Measures") passed on August 23, 2017. Ordinance 95 was enacted in accordance with the District's power to declare a water shortage emergency under Water Code §350 and to adopt restrictions on water use pursuant to Water Code §31026. Ordinance 95 continues until the District makes a contrary finding pursuant to Water Code §31028. The MWD Board has not made the requisite finding to repeal the water shortage emergency due to the persistent drought in its service area, as exemplified by the issues concerning Jameson Lake, groundwater, Lake Cachuma, and the State Water Project that are raised above.

While MWD remains hopeful that the improved hydrological condition across the State, and Santa Barbara County in particular, will translate into improved water supply availability, it is premature for the County to conclude that drought emergency conditions are over. In **late April**, MWD will undoubtedly have a better understanding of its water supply outlook, not just through the end of 2019 but over a three-year planning horizon, and will be in a position to make a determination as to what actions may be necessary regarding the water shortage emergency.

If the proposed termination is approved by the Board of Supervisors, it will likely result in confusion among our constituents—we are already seeing clear signs of this in the press countywide and in customer relations. We ask for your cognizance and assistance in public messaging both at the Board of Supervisors meeting and in any subsequent public messaging in helping to clarify that **water shortage conditions remain across much of the County**, including for MWD.

Thank you for your diligence and your careful consideration of the timing on this matter.