

TO: Santa Barbara County Board of Supervisors

RE: Departmental Agenda Item 4 (15-00235), March 17, 2015
Water Well Permits and Policy Direction

FROM: Celeste Koeberl and John Gostovich
Owners of property and Montecito Water District customers at
1066 Toro Canyon Road, Santa Barbara, CA 93108

DATE: March 17, 2015

The Santa Barbara County Board of Supervisors (BOS) should reject the Montecito Water District's (MWD) request for a moratorium on well drilling permits at this time.

I. Inadequate Showing of Need for Moratorium

The MWD water shortage has been neither caused nor prolonged by private water wells.

The MWD's November 21, 2014, letter to the BOS says it depends on groundwater for only 5% of its water supplies, and the cause of the MWD water shortage is its 95% dependence on surface water, coupled with accelerated usage of its reduced surface water supplies.

But since the March 12, 2015, Town Hall meeting, we MWD customers are wondering if MWD's surface water supplies really are so limited after all. At that meeting we were informed the MWD has purchased enough supplemental water to meet projected needs for the next two water years—and the MWD Board had already approved increasing all customer water allocations by 26% at its March 3, 2015, meeting! Plus in its financial projections, the MWD adjusted anticipated district-wide customer water conservation from the actual about 50% rate to no more than about 20% for the balance of the water year.

If the MWD still has a water supply shortage, the cures are rain and snowpack—not an immediate moratorium on well drilling permits when groundwater makes up no more than 5% of the MWD water supply.

II. Misfit Between Moratorium and Montecito Groundwater Basin Concerns

Imposing a blanket moratorium on well drilling permits is a poor-fitting response to concerns about the Montecito groundwater basin.

Like us, many of our neighbors in upper Toro Canyon have both private wells and MWD meter connections (See: MWD Overview of Groundwater Basin, Montecito Planning Commission November 19, 2014, page 9, Map of Well Sites).

But the MWD service boundaries are not consistent with hydrological resource boundaries.

Although we are within the MWD service area, our private wells do NOT tap the Montecito groundwater basin. Toro Canyon is primarily within the Carpinteria groundwater basin and its foothill watershed, and our Toro Canyon wells are supplied by the Toro Canyon groundwater sub-basin which is a sub-unit of the Carpinteria groundwater basin (See: Toro Canyon Plan, Wastewater and Water Section, page 94, December 2004; and Santa Barbara County Conservation Element – Groundwater Resources Section, page 28, Republished May 2009).

The Carpinteria groundwater basin is not in overdraft (See: Q&A – Carpinteria Groundwater Basin, Carpinteria Valley Water District, August 20, 2014). Even if it were, a moratorium on drilling wells that draw from the Carpinteria groundwater basin would in no way address concerns about the Montecito groundwater basin.

Actions taken for the purpose of protecting groundwater resources must be well informed by timely and accurate data in order to be effective. The MWD has not yet provided the data required to define its concerns about the Montecito groundwater basin and tailor an appropriate remedy.

III. CEQA Analysis of Moratorium Impacts on Agriculture is Required

A CEQA analysis should be required before imposing a moratorium because it likely would result in significant negative impacts to productive agriculture within the MWD service area.

A number of upper Toro Canyon properties within the MWD service area are AG-zoned and contain productive avocado orchards that require consistent irrigation in order to remain economically viable agricultural operations (See: Toro Canyon Plan, Land Use – Agriculture and Rural Lands Section, pages 45 – 49, December 2004).

Some of these upper Toro Canyon agricultural operations have MWD meter connections, but MWD customers with agricultural water meters have suffered the greatest reductions in water allocations under MWD's Ordinances 92 and 93.

Growers without private wells for agricultural irrigation water already have had to stump their trees and take their orchards out of production.

A blanket moratorium on well drilling permits for the unknown duration of this drought will force growers who do not already have private wells entirely out of business.

It is a goal of the Toro Canyon Plan to “protect and support agricultural land use and encourage appropriate agricultural expansion, while maintaining a balance with protection of coastal and natural resources and protection of public health and safety” (Goal LUA-TC).

In these circumstances, CEQA analysis is required in order to ascertain and evaluate the impacts of a moratorium on existing agricultural land uses.

3. Toro Canyon Groundwater Sub-basin

Description of the Basin

Toro Canyon Sub-basin encompasses about 700 acres along Toro Creek. The sub-basin is a subunit of the Carpinteria Groundwater Basin. The geology of this basin is essentially the same as that described for the Montecito Basin (above). This sub-basin is treated separately because it has only a limited hydrologic connection with the Carpinteria Basin, it lies outside of the Carpinteria Water District, and it lies outside of the Montecito Planning area.

Land Use

The Toro canyon area includes residential and agricultural land uses. Field crops (flowers), orchards (avocado and lemon) and irrigated turf (polo fields) constitute the local agriculture. Large residential lots dominate the remainder of this area.

Current Overdraft and Supply/Demand Status

The Toro Canyon area is served by the MWD from general district supplies and through private pumpage. Demand on groundwater resources was analyzed based on the current pumpage and potential future use of parcels not served by MWD (an exception would be the Edgewood Ranch). MWD holds the water rights to this property (already served district water) and may pump from the Toro Sub-basin to satisfy its allocation.

As shown in Table 1, the perennial yield of the groundwater basin is 270 AFY (net) (modified from Hoover, 1980). Based on an estimated net groundwater demand of 122 AFY, the basin has a current net groundwater surplus of approximately 148 AFY.

The MWD is expecting the delivery of State Water Project beginning in 1996 (see previous section on Montecito Basin and Table 3) and may participate in a future permanent City of Santa Barbara desalination project. The expected State Water delivery and participation in a Santa Barbara desalination project could result in reduced pumpage, and an increased surplus, in this sub-basin (see Table 1).

Water Quality

This sub-basin is part of Storage Unit #1 of the Carpinteria Basin. Refer to Carpinteria Basin Section (1).

Existing Management Plans/Activities

The conjunctive use facility planned for the injection of Cachuma spillwater is discussed in the section on the Montecito Basin. The wells are located in the center of the Toro Canyon Sub-basin.