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December 16, 2010

Vicki Parker, Deputy Director  
Santa Barbara County Planning Department  
123 E. Anapamu St.  
Santa Barbara, CA 93101

Re: Goleta Community Plan Update

Dear Ms. Parker,

We appreciate the opportunity to review the proposed Administrative Draft of the Goleta Community Plan (Draft GCP), and we would like to offer comments for your consideration relating to Draft GCP Section III – Public Services and Facilities (See Attachment 1).

We commend the focus the Draft GCP gives to water conservation and the maintenance of safe and secure water supplies. To assist with Santa Barbara County's (County) conservation efforts, consider that the Water Conservation in Landscaping Act of 2006 (Assembly Bill 1881, Laird) requires cities and counties to adopt a landscape water conservation ordinance. Information on this requirement is available through the California Department of Water Resources ([www.water.ca.gov](http://www.water.ca.gov)).

During the past year, we have completed a Groundwater Management Plan with new data related to our groundwater basin. Over the coming months, we will be completing a Water Supply Management Plan and updating our Urban Water Management Plan. Together, these tools are sure to inform the County's land use planning and decision-making process. Please visit our website to view the latest versions of these documents ([www.goletawater.com](http://www.goletawater.com)).

As you may be aware, the SAFE Water Supplies Ordinance provides overarching policy and regulation related to the acceptance of new Goleta Water District customers/connections in times of drought. Without question, this framework enables us to serve customers more reliably now and into the future.

We look forward to continued dialogue through the Draft GCP update process, and if you have any questions, please contact Chris Rich, Water Supply & Conservation Manager, at (805) 879-4604 or [crich@goletawater.com](mailto:crich@goletawater.com).

Sincerely,

John McInnes  
General Manager

cc. Erika Leachman, Senior Planner

Attachment

## **Attachment 1 –**

### **Goleta Water District Comments on the October 19, 2010 Draft Goleta Community Plan**

#### **1. Page 93, Section III A., Table of Responsible Service Agencies, Water.**

The Goleta Water District (GWD) is the only public entity serving the planning area. The La Cumbre Mutual Water Company (it is not a District) is the largest private water organization within the GWD's boundaries. There are also numerous smaller mutual water companies within our boundaries, as well as private individual wells.

In this section we suggest you mention the Cachuma Operation and Maintenance Board (COMB). COMB is a joint powers agency that is responsible for:

- The diversion of water to the South Coast through the Tecolote Tunnel
- Operation and maintenance of the South Coast Conduit (the underground pipeline delivering water from Lake Cachuma to the water purveyors of the South Coast)
- Control valves, meters, and instrumentation at control stations
- Turnouts along the South Coast Conduit and at four regulating reservoirs.

The South Coast conduit traverses the Goleta planning area in the foothills.

#### **2. Page 117, Section III E, Water Resources and Conservation**

In addition to discussing available water supplies, it is important to note factors and legal restrictions that apply to these water supplies. For example, the GWD Groundwater Management Plan explains that the adjudicated central groundwater basin has a judicially-determined annual safe yield of 3,410 Acre Feet/Year, apportioned among the GWD and other users. Further, the "SAFE Water Supplies Ordinance," which was approved by voters in 1991 and amended in 1994, sets conditions limiting the annual release of water for new uses. Notably, SAFE prohibits the release of water for additional uses if conditions have not been met.

In the Draft GCP, the phrase "recycled or reclaimed water" is used several times, beginning on the third paragraph in this heading. We suggest you define this phrase in the document accordingly: "At the date of the writing of this Plan, recycled water (also called reclaimed water) is defined as wastewater that has been treated at a sanitary district to federal and state standards. Recycled water is distributed through a dedicated pipeline system and is used for landscape irrigation, as well as certain commercial and institutional toilet systems."

We suggest that your sentence in paragraph three be modified as follows: "Requirements for water efficient landscaping and plumbing fixtures, regulations which encourage groundwater recharge, and use of recycled water when available, and rainwater catchment and on-site graywater systems, all reduce the need for potable water.

We suggest you provide a definition of "on-site graywater systems," such as: "On-site graywater systems direct water that has been used in a fixture such as a washing machine, through dedicated piping, for use as irrigation water for the customer's non-edible plantings."

#### **3. Page 118, Policy WAT-EGV-1.1:**

We suggest that this Policy item include reference to the limitations and requirements imposed by the voter-approved "SAFE Water Supplies Ordinance." The GWD Groundwater Management Plan includes a summary of SAFE, and is available here:

[http://www.goletawater.com/gwplan/Groundwater\\_Management\\_Plan\\_Final\\_05-11-10.pdf](http://www.goletawater.com/gwplan/Groundwater_Management_Plan_Final_05-11-10.pdf)

In addition, Policy WAT-EGV-1.1 should be modified accordingly: "For ~~discretionary~~ all projects which would result in a net increase in water use, there shall be a sufficient supply of water to serve ~~known~~ existing commitments, plus the proposed project.

**4. Page 118, Policy WAT-EGV-2.1:**

We suggest that this item be modified as follows: "In order to minimize water demand, development, including renovations and expansions, shall utilize water conserving landscaping, low flow irrigation and plumbing fixtures, and all other conservation mechanisms required by the State of California and the Goleta Water District, which could include recycled water use where feasible, as well as rainwater catchment and graywater systems."

**5. Page 119, Objective WAT-EGV-3:**

We suggest this item be modified as follows: "Encourage the use of recycled/ reclaimed water, rainwater and graywater where safe, efficient, and practical."

**6. Page 119, Policy WAT-EGV- 3.1:**

We suggest the following modification: "The County shall support the collection, processing, storage, distribution and use of recycled/reclaimed water, rainwater and graywater consistent with applicable Federal, State and County regulations for health and safety, including but not limited to...."

Change Bullet 3: "Purveyor-provided reclaimed/recycled water."