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August 4, 2014

San Luis Obispo County Board of Supervisors
Room D-430, County Government Center
San Luis Obispo, California 93408

Dear County Supervisors,

The lengthening drought is giving rise to serious concerns for groundwater sustainability county-wide. In Los Osos, in view of the additional factors of significant seawater intrusion and the impacts of the Los Osos Wastewater Project, we urge you to take specific actions to improve the Los Osos Wastewater Project's (LOWWP) Recycled Water Management Plan (RWMP) consistent with Coastal Development Permit Special Condition 5, which requires programs (e.g., recycled water and conservation programs) to "maximize the health and sustainability of the ground and surface waters." We also ask that you take actions to improve the *Basin Plan of the Los Osos Groundwater Basin* (Basin Plan), currently under development by the County, LOCSD, Golden State Water and S & T Mutual water companies as part of an adjudication process. The RWMP programs the County has implemented and proposes to implement, by themselves and in conjunction with the provisions of the Basin Plan, do not currently maximize benefits on the Basin, consistent with the LOWWP's Coastal Development Permit.

The RWMP and Basin Plan offer a unique and limited opportunity to address the severe, long-term seawater intrusion problem in the Los Osos Basin and possibly reverse seawater intrusion to establish a sustainable water supply for the community, farms over the Basin, and vital habitat of the Morro Bay National Estuary. We support and ask you to support the actions proposed by the Los Osos Sustainability Group (LOSG) in their letter to the California Coastal Commission on May 4, 2014, and request that you enact the requests we list below to take advantage of this opportunity to preserve the irreplaceable, sole water source for the Los Osos area.

Requested actions/improvements in the Basin Plan and RWMP

- A requirement for an immediate and thorough seawater intrusion assessment with semi-annual updates after that. The assessment should measure and evaluate the condition of each aquifer and the entire Basin, providing adequate data and analysis to show current conditions and changes since the 1970's, along with predicted impacts from the drought, climate change, the LOWWP, and changes in pumping patterns. It should measure chloride and water levels in all supply and test wells in all aquifers, the rate and location of seawater fronts in all aquifers, the freshwater storage capacity above sea level—and the changes in all of these factors since the 1970's and predicted in the future (e.g., with much less rainfall and rising sea levels).
- A provision for overseeing agencies to retain the authority to take action to preserve the Basin, e.g., in response to requests from the public, and designation of the Basin as a high-priority, threatened basin.

- A County Basin Management Ordinance as provided for in the Basin planning agreement, with measurable, time-specific, and enforceable objectives set to reverse seawater intrusion as soon as possible incorporating our other requests listed here. The ordinance should also ensure all pumping in the Basin is monitored, conservation and recycled water use is maximized, and pumping is limited if necessary.
- A provision that conservation, recycled water use, and low impact development (LID) are maximized and given ample opportunity to reverse seawater intrusion before outside sources of water or desalination are pursued. (LID provides the triple benefit of reducing water use, reducing polluted run off, and increasing Basin recharge with clean rainwater.)
- Improvements to the LOWWP recycled water use program to prioritize recycled water reuse in the Western and Central Basin, in order to maximize pumping reductions and seawater intrusion offset. Improvements should include added recycled water pipes and connections to allow a greater reduction in potable water use in the Western and Central parts of the Basin. They should also include an Ag exchange program and wells installed in the Eastern Basin (or use of existing wells) to return potable water to replace the recycled water used there, maintain/improve water balance in all parts of the Basin, and optimize management options. Recycled water use should be mandated, if necessary, per State Water Code Section 13550.
- Improvements to the LOWWP conservation program to achieve an aggressive conservation target and encourage the elimination of potable water for outdoor use. It should include a stronger outreach program to the community informing residents of the seawater intrusion problem (including radio and TV spots), a stronger indoor program (e.g., a stronger washer replacement program, more options, leak detection and repair), and a complete outdoor conservation program with grey water, rainwater harvesting, and LID options. We suggest that the County ask SLO Green Build to expand the septic system repurposing program into a comprehensive outdoor program. The \$5 million the CDP requires for conservation should be spent to maximize this program, with any remaining money spent on improving recycled water programs.

Consistent with CDP Special Condition 6, there should be no new building over the Basin, inside or outside the wastewater service area, until seawater intrusion is reversed and conclusive well tests show ample surplus water exists to sustainably support added development, with a margin of safety to account for impacts from the LOWWP, climate change, and other impacts and uncertainties.

Finally, the community and agencies should be able to review the final draft of the Los Osos Basin Management Plan prior to its submission to the Superior Court for approval.

Sincerely yours,

Michael Jencks, Chapter Chair

cc: Central Coast Regional Water Quality Control Board
California Coastal Commission
Golden State Water Company
Los Osos Community Services District
S & T Mutual Water Co.