November 14, 2016

Los Osos Basin Management Committee

Subject: Recommendations and observations regarding the proposed Addendum to the LOWWP Water Conservation Implementation Plan (WCIP) (Agenda Item 7c: "Water Conservation Program Update," November 16, 2016)

Dear Committee Members,

The Los Osos Sustainability Group (LOSG) is submitting the following recommendations and observations to help maximize the benefits of the LOWWP Water Conservation Implementation Plan (WCIP), consistent with the goals of the Basin Plan and LOWWP Coastal Development Plan (CDP Special Condition 5). We ask the BMC to encourage the County to include them in the plan and to fully fund and implement the plan in the very near future.

General observations/recommendations:

1. *The introduction to the addendum should mention CDP Special Condition 5 and quote some of the language (e.g., that it is intended to "help basin residents to reduce their potable water use as much as possible") so that the objective of the program and parameters are clear to decision makers and the public.*
2. *Like the 2012 WCIP, the Addendum should have time-specific targets for implementation of each measure.* The targets should be relatively near term (1-2 years) because near-term targets are achievable and because the objective of the WCIP (Special Condition 5) and Basin Plan is for the program to benefit the Basin as much as possible. The sooner measures are put in place, the greater the benefits to the Basin. A main reason for the WCIP and Special Condition 5 is to mitigate (avoid) impacts from the LOWWP, and that is best achieved with early implementation. The cumulative impacts of the LOWWP, drought, and Basin Plan infrastructure programs make rapid implementation even more necessary. Time-specific targets also allow the BMC to gauge the success of implementation and know when to ramp up outreach and incentives, if necessary.
3. *The plan should stress the critical need of strong outreach for program success and identify specific outreach measures*. It should support full implementation of the Education and Outreach Program of the 2012 WCIP (Residential Water Surveys, Commercial, Industrial and Institutional Surveys, Public Information Program, and Media Campaign) (WCIP, Pages 46-52). The Public Information Program was supposed to include radio and TV ads (in part to present the goals of the program and get the public excited about it). Water Surveys were supposed to provide property owners an evaluation of current water use, leak detection, and recommendations for how to best reduce water use indoor and outdoors. Surveys weren't implemented despite language in the DWR grant requiring them for every property prior to sewer

hook up. Immediate implementation of these measures is key to helping Basin residents reduce water use as much as possible per the CDP (e.g., understand the benefits of repurposing their septic tanks).

4. *We encourage the Parties to set a target of 50 gpcd or below on average for residential indoor-outdoor potable water use, and support that target with purveyor rate structures and a County basin-wide ordinance to achieve the target.*

Specific measure observations/recommendations—

BMC Outdoor 1 and 2:

5. *Outdoor measures 1 and 2 could be combined since they do basically the same thing—provide incentives for septic tank or rainwater tank collection and use of non-potable water for outdoor landscaping.* If it is necessary for the parties to develop a program (e.g., to make recycled water available for this purpose or establish a delivery service), it could be a separate item.
6. R*ainwater tank rebates should include a $500 rebate for installation of systems with 1000 gallons of storage or more plus a $400 rebate for 500 to 1000 gallon systems.* This would provide equitable benefits to homeowners who have abandoned their septic tanks (had them filled with sand or cement) since septic tanks provide about 1000 gallons of storage. Smaller tanks usually cost more per gallon of capacity and there are certain minimum costs involved in setting up systems (pumps, filters, overflows, etc.) so a $400 minimum rebate is appropriate. These changes provide an incentive to collect as much rainwater as possible. Storage is the only limiting factor to collecting rainwater since virtually an unlimited amount can be collected from rooftops. About 3000 gallons of storage should allow most homes in Los Osos to have zero outdoor potable water use—a target we recommend since water from the Basin is too valuable to use out-of-doors.

BMC Outdoor 3:

7. *Greywater reuse systems should not be limited to systems that treat and store the water or to systems that reuse all water except toilet water, as the Addendum implies.* The most cost-effective systems (which most experts recommend) use gravity to move the water directly to landscaping requiring no storage or treatment. Drainpipes are plumbed to below-ground-level watering stations in flowerbeds or near trees. A $500 rebate is still appropriate since accessing and diverting drainpipes, especially in homes with slab foundations (which often requires opening up walls), can be costly, and permits can be costly (several hundred dollars) unless the County reduces or waives these fees. The Addendum should also recognize that it is likely not cost-effective for homes with slab foundations to capture a significant amount of greywater. A survey of how many homes in the community have raised foundations will help tune in realistic targets.

BMC Outdoor 4:

8. *Laundry to Landscape rebates should be at least $100 to provide an adequate incentive for people to implement the measure, and they could be combined*

with the additional measure we recommend below—conversion to low water-use landscaping with LID.

New outdoor measure:

9. *A variable rebate of $100 to $400 should be added for low water-use landscaping, especially landscaping that includes Low Impact Development (LID) measures, which capture and infiltrate storm water runoff (including rainwater tank overflow).* Low water use landscaping is known to be one of the most effective means of reducing outdoor potable water use.

Cap on outdoor rebates (footnote on chart):

10. *The $500 cap on rebates for outdoor measures should include a $100 rebate for Laundry to Landscape and rebates for low water use landscaping*. This encourages property owners to install multiple measures (e.g., a rainwater tank and Laundry to Landscape system or low water use landscaping). The BMC should raise the $500 cap to $1000 if it is discovered that a significant portion of residents are not taking advantage of the outdoor measures after learning of their options via Water Surveys. This will allow people participating in the program to maximize conservation and benefits to the Basin.

BMC Indoor Measures 1 & 2:

11. *We note that the rebates for hotwater recirculators and efficient washers will likely have to be raised to $350 or more to incentivize homeowners to participate.* Increasing the rebate, however, may be something the BMC does if implementation of the measure falls below targets (e.g., as shown by a 6-month review). Good recirculators installed cost between about $650 and $750, and good-quality efficient washers will cost that much or more. Cost is likely a factor for homeowners who do not already have efficient washers. Note that the current WCIP rebate for residents who do not use rebates for other measures is $450 although implementation still fell more than 95% below targets. Industry rebates are available, as the WCIP points out, to augment WCIP rebates, but $250 is still most likely not adequate. Also, the cost benefits of washer rebates should be re-evaluated. Assumptions regarding the number of loads per week may be low. We know two-person households that do five loads per week. Studies show efficient washers to be a significant source of water savings so cost benefits should be closer to that of toilets if rebates are similar. A higher recirculator rebate will still mean recirculators are one of the most cost-effective measures.

BMC Indoor Measure 3:

12. *Toilet rebates should include rebates for 1.28 toilets and dual flush toilets.* Both provide a substantial water savings over 1.6 gpf toilets many of which remain in the community. Also, 1.28 and dual flush toilets are available in a much wider range of options.

Final observations

13. *Conservation is one of the most vital components of the LOWWP, and the County should restore conservation money to the LOWWP budget without any further costs to residents.* The County had a grant of $3.8 million for

conservation awarded by the DWR but redirected about $2.4 million to "construction administration." The County should restore that funding without any additional costs for property owners in the wastewater service area to fully fund the WCIP and "help Basin residents to reduce their potable water use as much as possible" per the CDP. Also, plans for how the other $1.2 million will be spent should be spelled out. The LOWWP CDP requires the County to commit $5 million "to initiate the water conservation program as soon as possible." The County has spent about $1.5 million so far, leaving a commitment of about $3.5 million.

14. *Some of the remaining DWR grant money (we understand about $400,000 remains) should be spent immediately to implement the Education and Outreach program of the 2012 WCIP, including the Water Survey program, which the DWR grant required prior to project hook up.*
15. *We note that this Addendum, like the WCIP, applies to water use within the wastewater service area although a Basin-wide program is needed to establish Basin sustainability.* The Basin Plan recognizes that a basin-wide program is essential largely because properties outside the LOWWP service area account for over 30% of Basin water use. The 2015 Annual Report points out that water use outside purveyor areas (which corresponds roughly to water use outside the LOWWP service area) rose by 70 AFY in 2015 (Page 23), offsetting much of the decline in water use within the purveyor/LOWWP service area. This clearly highlights the need for a basin-wide program. A program outside the LOWWP service area cannot be funded with LOWWP funding and must be implemented primarily by the County. That program should be developed in cooperation the County and implemented immediately with a County ordinance.

Thank you for your work on this vital program. With full funding and implementation of the LOWWP WCIP in the near future, including the Addendum with the improvements we recommend, the Basin will move much closer to sustainability. We encourage the BMC to continue to work with the County to ensure conservation measures are implemented Basin wide to capture the significant remaining conservation potential within the Basin.

Respectfully,

Patrick McGibney, Chuck Cesena, Keith Wimer, Elaine Watson, Larry Raio

Los Osos Sustainability Group