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May 14, 2009

Honorable Sarah Christie  
Chairperson, County Planning Commission  
Department of Planning and Building  
976 Osos Street, Room 300  
San Luis Obispo, CA 93408

Subject: Water Resources Advisory Committee Comments on the Los Osos Wastewater Project

Dear Chairperson Christie:

The Water Resources Advisory Committee (WRAC) had discussions concerning the County's proposed sewer system for Los Osos in its March and April meetings. Also it held a public workshop on April 4, which created a subcommittee under the leadership of Sue Luft for further analysis of the County's project, and then concluded its deliberations (for now) in its regular monthly meeting in May.

Attached you will find that subcommittee's report, which was adopted in its entirety by the membership May 6.

The WRAC is a diverse group, with a broad range of expertise and interests, so our members hold a variety of views; but there is broad agreement on several issues:

- 1) We recommend that tertiary treatment of the effluent to Title 22 standards be adopted as an important design criterion.
- 2) We understand the necessity of a fail-safe site for the disposal of treated effluent, and thus sprayfields are acceptable during startup of the project – the wastewater project should not be further delayed. However, we recommend that other options – recharge, purple pipe for reclaimed water, agricultural exchange, etc. – be pursued in a phased approach, possibly rendering the sprayfields unnecessary.
- 3) We recommend further examination of various creek sites, potential recharge ponds and constructed wetlands as opportunities for recharge and disposal.

#### Purpose of the Committee:

To advise the County Board of Supervisors concerning all policy decisions relating to the water resources of the SLO County Flood Control & Water Conservation District. To recommend to the Board specific water resource programs. To recommend methods of financing water resource programs.

Excerpts from WRAC By-Laws dated 3/6/07

- 4) We urge the parties in the ISJ to begin developing comprehensive water conservation plans now, instead of waiting until the other issues are resolved.

We will be watching your deliberations with great interest, and the WRAC may add to its recommendations as more comes to light.

Respectfully,



MICHAEL WINN  
Chairperson, Water Resources Advisory Committee

cc: SLO County Planning Commissioners  
SLO County Board of Supervisors

Attachment: Report on Los Osos Wastewater Project from WRAC ad hoc subcommittee

# **WRAC Los Osos Wastewater Project Subcommittee Report**

## **Subcommittee Purpose**

The WRAC formed a subcommittee to look at the Los Osos Wastewater Project, and the ancillary items discussed at the April 4, 2009 meeting, with the intent of bringing their comments to the WRAC in May. (Motion passed 14-0-1)

Subcommittee met on April 10 and April 16, 2009. The report was finalized via email.

## **Subcommittee members**

Chair – Sue Luft – Environmental at Large  
Mike Winn – District 4, WRAC Chair  
Maria Kelly – Los Osos CSD  
Linda Chipping – Coastal San Luis RCD  
Joy Fitzhugh – Farm Bureau

## **Issues Considered**

Subcommittee considered the issues brought up by WRAC members at the April 4, 2009 meeting, as follows:

- Tertiary treatment – The WRAC moved to recommend to the Board that the project scope include tertiary treatment and that the budget for the project scope include the costs for tertiary treatment. (Passed 15-0) [Note: Tertiary treatment implies Reclaimed Title 22 Water.]
- Conservation – The WRAC moved to recommend that the County start encouraging, as they may, every water purveyor to develop and implement water conservation programs now. (Passed unanimous)
- STEP/STEG – A motion failed to recommend to the Board to have staff keep all technologies open, including STEP-STEG, within the design-build process. (2 votes in favor)
- Removal of agricultural land – alternate sites – to the extent this impacts water resources.
- Use of spray fields / effluent disposal.
- Scope of project, that it should be more comprehensive.

## **Summary of Discussion**

### General

The subcommittee had some general comments that they want to include in their report.

We are pleased that the County's process has worked, and that the County is carrying it forward. The subcommittee's intent is not to delay the project. Our concern is protection of water resources. The sewer project is a necessary project that must go forward to meet the RWQCB's mandate, alleviate nitrate contamination of groundwater, and allow for pumping pressure on the lower aquifer to be reduced.

We hope that the County will continue to move the process forward with flexibility in the decision making process so that the final project that is approved is the best, all things considered, even if it is not the currently Proposed Project. The process has studied all of the components of the Los Osos Wastewater Project (LOWWP). The specific project that is constructed will include various pieces which have been studied. We urge the County to keep in mind the long-term design of the project even if some other temporary measures are needed.

### Tertiary Treatment

The subcommittee is very pleased that tertiary treatment of the wastewater effluent to Title 22 (unrestricted reuse) will be part of the project. Tertiary treatment allows many options for the use of the treated water, which were not available with only secondary treatment.

Since tertiary treated water will be available, the subcommittee asks that the County consider moving the LOWWP Seawater Intrusion Mitigation Level from a Level 2b to Level 2a or 2c (pages 7-58 through 7-61 of LOWWP Draft EIR). Levels 2a and 2c both incorporate agricultural reuse and require much smaller sprayfields – which should be temporary, as discussed below.

### Water Conservation

Water conservation was discussed at length by the subcommittee. Los Osos CSD and Golden State Water Company have some conservation measures in place. SLO County has adopted toilet and showerhead retrofit ordinances for new development and all properties in Los Osos at the point of sale. The subcommittee believes that more needs to be done by all users of the basin.

Los Osos CSD, Golden State Water, and S & T Mutual need to develop water conservation plans, with information on consumption rates and consideration of

tiered rate structures and other measures (Nipomo CSD and SLO City were provided as examples). SLO County needs to assist by developing ordinances to address landscape water use, which is the largest water consumption on larger lots, and to encourage water conservation by properties which use individual water wells. The County also needs to encourage best management practices for agriculture and by rural water users. Short courses in irrigation management, soil moisture monitoring, ET water budgeting, etc. are helpful.

### Use of Sprayfields

The subcommittee believes that sprayfields are acceptable during startup of the wastewater project. Their use will be discontinued after the upper aquifer is dewatered adequately so that the Broderson leachfield can accept all of the water from the project and/or other options – purple pipe for reclaimed water, agricultural exchange, etc. – can be put to full use. Since the wastewater will be treated to tertiary standards, a crop can also be grown on the sprayfields while they are in use. The disadvantage to sprayfields outside the Los Osos basin at the Tonini site is that they do not provide any seawater intrusion mitigation benefits. (Page 7-63 of the Draft EIR)

Since tertiary treatment will be utilized, the subcommittee also requests that the County consider other methods – recharge ponds or constructed wetlands overlying the basin or creek discharges – instead of, or in addition to, the sprayfields. A phased approach of adding connections to the sewer system and removing the septic discharge might allow dewatering of the upper aquifer to occur in conjunction with testing of the full potential of the Broderson leachfield, possibly rendering the sprayfields unnecessary.

### Alternate Treatment Plant Sites

The subcommittee understands that most of the potential treatment sites are constrained by either biological resources or agricultural resources. Each site will involve a trade off. However, since the sprayfields should be removed in the future, consideration should be given to a treatment site within the basin. Ultimately, the treated water should be used entirely within the basin. Proposed Projects 1, 2, and 3 (Table 2-2, page 2-8 of the Draft EIR) and the Mid-Town site, as they are all located within the basin, should be strongly considered.

### Scope of Project

The subcommittee discussed the concern of some WRAC members that the project should be more comprehensive. Since the sewer project is long overdue, supported by the majority of the community, and mandated by the Regional Water Quality Control Board within a short timeframe, the subcommittee feels that the wastewater project should not be further delayed.

Seawater intrusion mitigation measures should be considered by the water purveyors in parallel with the wastewater project. These measures can include additional water conservation measures, reduced municipal pumping, additional ag exchange to reduce agricultural pumping within the basin, use of additional leachfields to introduce fresh water into the lower aquifer, re-injection of fresh water, etc. Investigation of these measures should be done through the Interlocutory Stipulated Judgment (ISJ).

The ISJ appears to provide an avenue for development of a groundwater management authority – once all basin users are included. However, the ISJ process is closed to the public, which is normal. An open process would create greater understanding, assuring the public that progress is being made towards resolution of the seawater intrusion issue.

The subcommittee requests that the County negotiate an interim report of the ISJ process to the community in the near future. The public needs to understand the ISJ process and how it can enable a solution to the seawater intrusion issue. Injection wells, leachfields, reduced pumping and other technologies involve a great deal of studies and testing in order to determine their effectiveness. Regular reports to the community would provide a level of understanding of the progress in remediating the seawater intrusion problem.