



Michael Winn
Chairperson

Sue Luft
Vice Chairperson

Courtney Howard
Secretary

Room 207, County Government Center
San Luis Obispo CA 93401

PH (805) 781-1016
FAX (805) 788-2182

Members

Steve Sinton
District 1

Bill Garfinkel
District 2

Marilee Hyman
District 3

James Toomey
District 4

Della Barrett
District 5

Tim Brown
Arroyo Grande

Russ Thompson
Atascadero

Bill Nicolls
Grover Beach

Noah Smukler
Morro Bay

Christopher Alakel
Paso Robles

Ed Waage
Pismo Beach

John Ashbaugh
San Luis Obispo

Bob Gresens
Cambria CSD

John D'Omellas
Heritage Ranch CSD

Leonard Moothart
Los Osos CSD

Michael Winn
Nipomo CSD

Carole Henson
Oceano CSD

Mike Ellison
San Miguel CSD

John Russell
San Simeon CSD

Jeff Hodge
Templeton CSD

Linda Chipping
Coastal San Luis RCD

Tom Mora
Upper Salinas RCD

Jackie Crabb
County Farm Bureau

Ray Allen
Agriculture At-Large

Lowell Zelinski
Agriculture At-Large

Eric Greening
Environmental At-Large

Sue Luft
Environmental At-Large

Annie Gillespie
Environmental At-Large

Greg Nester
Development At-Large

John Neil
Atascadero MWC

Mike Vela
California Men's Colony

John Reid
Camp SLO

Edralin Maduli
Cuesta College

Mark Zimmer
Golden State Water

May 12, 2011

Honorable Adam Hill
Chairperson, Board of Supervisors
County of San Luis Obispo
976 Osos Street
San Luis Obispo, CA 93408-2040

Subject: Water Resources Advisory Committee Comments on the draft
Supplemental Environmental Impact Report for the Santa Margarita
Drought Reliability Project

Dear Chairperson Hill:

On November 3, 2010, the Water Resources Advisory Committee (WRAC) formed an ad hoc subcommittee to review the water related sections of the draft Supplemental Environmental Impact Report (SEIR) for the Santa Margarita Drought Reliability Project.

Subcommittee members included Member Barrett (District 5), Chairperson Winn (Nipomo CSD), Alternate Member Chipping (Environmental At-Large), Member Greening (Environmental At-Large), and Member Reid (Camp San Luis Obispo). Member Barrett served as chair to the ad hoc subcommittee. The subcommittee reviewed the draft SEIR and submitted their report to the WRAC for consideration.

On May 4, 2011, the WRAC reviewed the ad hoc subcommittee's comments on the draft SEIR and unanimously voted (13-0-3) to submit the attached comments to you for further consideration.

Respectfully,

MICHAEL WINN
Chairperson, Water Resources Advisory Committee

cc: SLO County Board of Supervisors
Mark Hutchinson, SLO County Public Works Department

Attachment: WRAC Report on the draft SEIR

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 Bylaws dated 3/2/2011

Comments of the WRAC commenting on the Draft Supplemental Impact Report on Santa Margarita Drought Reliability Options

The subcommittee members were chair Della Barrett, and members Mike Winn, David Chipping, Eric Greening, and John Reid. They limited their examination and comments to the portions of the DSEIR that dealt with water, water supply and reliability (Sections 1 through 5.1.5). The subcommittee also met with Paavo Ogren of the County Public Works Department who answered questions and explained some aspects of the proposed project. Rather than comment on the DSEIR on a line-by-line basis, the subcommittee chooses to address several broad issues that arise, so that the public can better evaluate the project from the Final Supplemental Environmental Impact Report.

In General

In general the subcommittee considers the DSEIR to be of high quality and inclusive of most issues, but has the following suggestions for improvement:

Is the Project water volume too small?

The subcommittee suggests that, assuming the State Water option is chosen, the volumes being considered may be too low and that doubling the volume might be translated into a larger drought hedge for CSA 23. It is possible that an increase of 5 AFY of additional SWP water would cost residents an additional \$1/month, which would not be prohibitive.

Selection of partner for emergency water supply (capacity considerations)

The subcommittee considers the following requirements of any partner that would be holding water in reserve for use by Santa Margarita, and that these be stated in the FEIR to facilitate public understanding of why State Water would be the preferred project relative to the alternatives.

- (1) That it have sufficient storage, either as surface reservoir or as underground aquifer, to guarantee that sufficient reserve for the needs of Santa Margarita are available at all times.
- (2) That the storage capacity and immediately-available reserve of any aquifer being used for storage be known in the case that it was being used for the purposes of providing emergency water, or at least show that the aquifer will be available as a water supply given surrounding demands by urban and agricultural users.
- (3) That water quality be sufficient in the emergency water supply

On the basis of the above constraints, the subcommittee considers that surface water storage in either Whale Rock, Zone 3's Lopez Lake, or Santa Margarita Lakes have a greater likelihood of being available in time of need. Groundwater storage may be available in Atascadero and Shandon in sufficient quantities, but there are both quantitative and qualitative uncertainties relative to use of groundwater. The subcommittee considers that underground water banking would not guarantee emergency supply due to the lack of extraction controls on those users overlying the storage basin.

As a result of the discussions with Mr. Ogren, the issue of using water allocated to California Men's Colony arose. The County itself could be a partner. The County gets 425 AFY at Kansas Avenue, and uses 80 AFY or so. It gives CMC 250 AFY in exchange for waste water treatment. If CSA 23 needed to "draw from its partner", then it could just pay for the County's waste water treatment. (CMC is a state water subscriber.) This and other possibilities for partnership with CSA 23 are being deferred in the DSEIR. The subcommittee would appreciate the inclusion of a list of most probable SWP partners, or at least an expansion of Exhibits 2-3 and 2-4 to show the basis on which an SWP contractor could be considered a reliable partner.

The water being used in association with the County Operations Center and CMC may be considered a viable option for partnering with the CSA 23. Although peripheral to this DSEIR, the subcommittee notes that there may be issues surrounding the volume of water being released into the Chorro Creek drainage during time of drought that might affect both steelhead viability and irrigators.

Regarding Shandon as a partner, the subcommittee raises the issue that using Shandon groundwater as an emergency supply constitutes a possible "export out of basin" in a basin with Class III severity, as well as a conflict with the Planning Department's current efforts to update the Shandon Community Plan.

Selection of partner for emergency water supply (cost considerations)

The subcommittee concurs with the DSEIR that use of Nacimiento water would be expensive for the CSA regarding direct treatment. The subcommittee further notes that wheeling treated water through Atascadero would also be expensive and possibly growth inducing due to desire to amortize the cost of the pipeline through recruitment of additional users.

The subcommittee does not consider wheeling Nacimiento water through Santa Margarita Ranch a possibility due to violation of agricultural policy, and due to the uncertainties associated with water storage capacity in ranch aquifers.

Could there be more than one partner with CSA 23?

The DEIR has restricted itself to consideration of single partner options. The subcommittee suggests that partnerships with more than one water source might be useful in terms of a safety net. These could be useful if there are successive years of water emergency, or if unknown future circumstances place unexpected constraints on the emergency water donor.

Issues associated with multi-year emergencies

The subcommittee would like to see clarification of contractual obligations given successive years of emergencies. For how many years would a partner be expected to provide emergency water, and should storage of emergency water be guaranteed for two years supply or longer?

Issues surrounding the CSA becoming more self-sufficient as an option

The subcommittee considers that some effort should be taken to establish some new well sites, as it is reasonable to assume that some groundwater is bypassing the CSA and could be extracted in times of emergency. However, the clustering of wells, as in the cluster of the old wells #1 and #2, puts the supply at risk from the most likely source of water emergency after drought, that being a chemical spill from either the railroad, highway or residential accident. The subcommittee would expect new wells to lower the probability of needing emergency water, but has not seen evidence that the need would be eliminated.

The subcommittee received communication from Mr. David Blakely of Santa Margarita who expressed a concern that the subsurface sources of water from Well #4 may be from a different source than Santa Margarita Creek. We mention this in the context of DSEIR alternatives that address drilling new wells, as it might illustrate some uncertainty as to the underlying expectations of drought frequency and therefore the need for, and scale of, the project.