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Golden State Water

February 25, 2013

Honorable Paul Teixeira  
Chairperson, Board of Supervisors  
County of San Luis Obispo  
1050 Monterey Street  
San Luis Obispo, CA 93408

Subject: WRAC Comments on Water and Wastewater Components of the 2010 -  
2012 Resource Management System Biennial Summary Report

Dear Chairperson Teixeira:

At the November 7, 2012 Water Resources Advisory Committee (WRAC) meeting, Planning and Building Department Staff reported that a draft Resource Management System Biennial Summary Report (2010-2012) would be available for members to consider. At that meeting WRAC members approved formation of an ad hoc subcommittee tasked with reviewing the water and wastewater components of the subject report.

On January 2, 2013, the WRAC reviewed the subcommittee's comments on the report and directed the subcommittee chair to submit the revised comments to Planning and Building Department Staff. These comments and track-changed documents were provided to staff on January 14, 2013. At the February 6, 2013 WRAC meeting, the WRAC reviewed and approved the ad hoc subcommittee's report and voted to submit this letter to your honorable Board for consideration.

Please consider the WRAC's comments during your consideration of the subject report on March 12, 2013.

Thank you for your consideration.

Respectfully,

Sue Luft  
Acting Chairperson, Water Resources Advisory Committee

cc: SLO County Board of Supervisors (All Districts)  
James Caruso, SLO County Department of Planning and Building  
Michael Wulkan, SLO County Department of Planning and Building

#### 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 8/28/2012*

## **Water Resources Advisory Committee General Comments on the Resource Management System Biennial Summary Report (2010-2012)**

The Water Resources Advisory Committee (WRAC) considered the WRAC subcommittee comments on the Resource Management System (RMS) Biennial Summary Report (2010-2012) at their January 2, 2013 meeting. A considerable amount of additional comments were received from the WRAC members and the public present at that meeting.

Separately, comments have been and will be submitted to the Planning and Building Department by various water purveyors within SLO County.

James Caruso, Department of Planning and Building, explained to the WRAC that reporting forms to gather water demand data are provided to the water purveyors (cities, CSDs, etc.). Information from these forms was used in the report for the water purveyors who responded. Only eight (8) of the water purveyors report to the California Department of Water Resources, so that data would be of limited value.

Comments regarding specific communities were incorporated into the attached Word documents using "track changes" shortly after the meeting. General comments received during the January 2, 2013 WRAC meeting are listed below. These general comments are not marked in the documents; however, these comments apply throughout the Resource Management System Biennial Summary Report.

- Water supply and water demand should be described in more detail to allow the reader to understand the meaning of these values. These values do not seem to be used consistently.
- Information on peak demand capacity should be added under water systems.
- Allocation of State Water should be explained in a similar manner as done in the Master Water Report to give context, noting that the State Water Project delivers only 66% on average. Notations should also be made throughout the document whenever the term "allocation" is used. The water supply allocation, drought buffers, and the maximum amount of deliverable water should all be listed when the State Water Project allocations are referenced.
- Future reports should also address the watersheds (e.g. Edna Valley, Pismo Creek) that are not currently included in the report.
- Add summary chart in introduction which summarizes Level of Severity for each water supply/system/wastewater treatment plant.
- Water use estimates through 2020 should remain in the document.

- Need a list of water providers who did not respond to the County's request for information. This list should be provided to the WRAC so that peer pressure can be used to encourage reporting.
- Water purveyors provide this information voluntarily. Due to personnel/financial limitations, some water purveyors are unable to provide the requested data. In those cases, County staff should obtain data from DWR. Additionally, County staff should compare water purveyor submitted data to DWR data.
- Some of the smaller communities are missing from the report and need to be added – e.g. Garden Farms, Carrizo, etc.
- Review water demand figures – average gallons of water per capita vs. gallons per household – for accuracy. Need to verify that water use data is for single family residence vs. per capita. Need to include assumed number of people per household in each case.
- Include references to water conservation efforts by all the water purveyors.
- Many terms are used without definition or quite far away in the document where there they were defined. E.g., acre-feet (AF), acre-feet per year (AFY), mutual water company (MWC), County Service Area (CSA), and Community Services District (CSD). Include definitions of common terms in the Introduction, and refresh the reader's memory of the terms every so often--e.g., use "acre-feet (AF)" again from time to time.
- Provide a brief introduction to each community as it is discussed. These data could easily be extracted from the Land Use Element for the County.
- Add a small map of the area/agency being surveyed at the beginning of its section, following its name.
- Insert a small chart at the beginning of each water supply section, showing water supplier(s), source(s), acre-feet demand in the most recent year reported, Level of Severity (if appropriate), and the date an LOS was certified (if applicable).
- Changing the titles in the water tables from "Water Supply" to "Water Demand" does provide accurate metrics for the acre/feet of water being delivered annually now, but that also means that the report fails to answer the basic questions about water supply. The Water Supply section of the Biennial Summary Report is designed to report supply, not current pumping. Allowing this confusion to be incorporated into the Biennial Summary Report will result in no real information about how close our demand is to our supply.
- Senior Planner Michael Wulkan assured the WRAC, when requested, that the report would include the documentation for the information agencies provided. (It's on the

meeting report recording.) This lets readers of the Biennial Summary Report know how old (and thus possibly outdated) the data are, whether it was in a CEQA document, a court ruling, a LAFCO finding, some other officially approved document, or just a verbal assurance provided off the cuff.

- There are still a number of places where the annotation "No data received", yet Planning has ready access to such data from the DWR reports providers must file annually. Also such data are readily available from the agencies' Urban Water Management Plans, public documents which are updated every 5 years. The Biennial Summary Report should not encourage agencies to omit data they'd prefer not to be made available to the public.
- Each incorporated City, Community Services District, and other region cited needs an introduction, including its boundaries, its legal status (e.g., incorporated city, independent Community Services District, County-operated Community Services Area, CPUC-regulated water company, mutual water company), and its population projections. All three of these descriptors help readers of the Biennial Summary Report to evaluate the significance of the data provided.