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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

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.

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.