

Sierra Club submittal to the Regional Water Board 11.19.15

Basic elements of a sustainable management plan for a "high priority" basin missing from the current plan

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Central Coast Water Board

1. **A thorough impacts and alternatives analysis of potential adverse impacts and alternatives that identifies environmentally superior options for mitigating impacts and seawater intrusion.**
2. **A sustainable yield definition and modeling that are protective of the Basin.** (The current definition allows seawater to progress further in Zone D, does not stop it in Zone E, and results in unacceptable salt levels in the internal parts of the Basin due to no outflow. The Basin Plan recommends a "buffer" of 20% to reverse seawater intrusion in Zone D, but the Basin Plan also recommends the same 20% to account for uncertainties. A peer review of the model recommended that uncertainty values were stated and that transient modeling is done to show seasonal and drought effects. Therefore, modeling predictions, even with the 20% buffer do not account for uncertainties and impacts that could reduce yields and program benefits).
3. **Measureable, time-specific, objectives and benchmarks for implementing programs, reducing pumping, and reducing seawater intrusion enforced by an ordinance and all options available to the parties.** (Metrics are developed in the Basin Plan, but are not set as objectives. The County has the authority to implement an ordinance to require mandatory conservation, recycled water use, and private well monitoring outside of the purveyor area, and the parties can implement mandatory measures inside, but they do not.)
4. **Fully developed conservation, recycled water use, and storm water recharge programs that offset seawater intrusion and maximize Basin sustainability as soon as possible and as much as possible.** (The Basin Plan adopts the LOWWP conservation and reuse programs, but they do not offset seawater intrusion as much as possible per the CDP. The Basin Plan's outdoor conservation program is basically non-existent, and more urban reuse is needed to increase benefits of the reuse program. A good deal of storm run off that could be infiltrated to recharge the Basin and support habitat is still polluting the estuary and creeks, and the voluntary septic system repurposing program should be supported with rebates.)
5. **Monitoring and metrics that measure and protect the entire Basin.** (Gus Yates points out that there are not enough monitoring and metric wells to detect and avoid seawater intrusion in all parts of the Basin, and the water level metric does not stop seawater intrusion in the deep aquifer. Also, a Basin storage capacity metric is needed to gauge the sustainability of the Basin.)
6. **An adaptive program with specific, feasible contingency measures and identified triggers or thresholds for implementation for all measures that have significant uncertainties.** (According to experts, Broderson leach fields and moving wells may not have the benefits expected or have adverse impacts on seawater intrusion and habitat. Stetson Engineers, who reviewed the model and plan to move wells in 2009, recommended having contingency measures in place).
7. **A full range of funding strategies and alternatives, with grant funding prioritized, to avoid delay and further loss of the Basin.**

(over)

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item 14 - Nov mtg

How the Stipulated Judgment further weakens the Basin Plan

1. Limits Basin management to only 60% of the Basin (purveyor customers); 40% of the Basin (private well owners) are not affected.
2. Requires an unlikely unanimous vote of the Basin Management Committee for any substantive changes in the Basin Plan and Stipulated Judgment, and to implement mandatory conservation and restrict water service to new properties (the only options for restricting water use).
3. Sets production and conservation “goals” for purveyors that were achieved in 2014.
4. Sets Basin “sustainable yield” (2400 AFY) that was achieved in 2014.
5. Sets a purveyor allocation of 1430 AFY that allows purveyors to increase production about 200 AFY (2014 production 1246 AFY). (This allows the “sustainable yield” to be exceeded, purveyors to not meet governor’s order to reduce 2013 use by 25%, and it could be used to justify about 1000 new homes in purveyors service areas without any infrastructure programs in place or improvement in seawater intrusion).