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State of California  
Central Coast Water Board

Santa Lucia Chapter  
P.O. Box 15755  
San Luis Obispo, CA 93406  
(805) 543-8717

[www.santalucia.sierraclub.org](http://www.santalucia.sierraclub.org)

August 11, 2014

Central Coast Regional Water Quality Control Board  
895 Aerovista Place - Suite 101  
San Luis Obispo, CA 93401

Dear Board Members,

With the Los Osos Basin facing the threat of severe seawater intrusion, the worst drought on record, climate change and changes in pumping regimes, we are urging specific actions to ensure the sustainability of this vital resource. To that end, we ask for your support for the measures proposed in our attached letter to the San Luis Obispo County Board of Supervisors and also ask that you implement the actions below, along with other actions needed to preserve the Basin.

- Require an immediate and thorough updated seawater intrusion assessment.
- Request presentation of the Basin Plan to the public and agencies before it is finalized.
- Request that state agencies designate the Basin a high-priority threatened Basin.
- Develop and incorporate into the Regional Basin Plan a water quality objective for chlorides based on historic levels in the Los Osos Basin, and a water quality control plan aimed at reversing seawater contamination in the Basin as soon as possible. The objective and plan should focus on reducing chlorides at the source, maximizing conservation and recycled water use to reduce pumping in the seawater-impacted Western and Central Areas of the Basin.
- Modify permits and plans for the Basin to achieve the objectives/goals of the water quality objective and water quality control plan, including the Los Osos Water Recycling Facility, Master Recycling Permit, the LOWWP Waste Discharge Requirement (WDR), the Sanitary Sewer Management Plan, the Storm Water Management Plan, the Salt and Nutrient Management Plan, and a Septic System Management Plan outside the wastewater service area.
- Require no new building over the Basin until seawater intrusion is reversed and excess water is found to exist via well tests over time.
- Support maximizing conservation before supplemental water sources are pursued.

The Sierra Club supports the requests of the Los Osos Sustainability Group as presented to your board at your December 2013 and February 2014 meetings. We appreciate the board's recognition of the Los Osos Groundwater Basin as vital to the health of high-value environmental and human resources. We hope you will agree that reversing the long-term degradation of the Basin from seawater contamination must be a top priority. We thank you for your early attention to this matter and look forward to your response.

Sincerely yours,

Michael Jencks, Chapter Chair





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August 4, 2014

San Luis Obispo County Board of Supervisors  
Room D-430, County Government Center  
San Luis Obispo, California 93408

Dear County Supervisors,

The lengthening drought is giving rise to serious concerns for groundwater sustainability county-wide. In Los Osos, in view of the additional factors of significant seawater intrusion and the impacts of the Los Osos Wastewater Project, we urge you to take specific actions to improve the Los Osos Wastewater Project's (LOWWP) Recycled Water Management Plan (RWMP) consistent with Coastal Development Permit Special Condition 5, which requires programs (e.g., recycled water and conservation programs) to "maximize the health and sustainability of the ground and surface waters." We also ask that you take actions to improve the *Basin Plan of the Los Osos Groundwater Basin* (Basin Plan), currently under development by the County, LOCSD, Golden State Water and S & T Mutual water companies as part of an adjudication process. The RWMP programs the County has implemented and proposes to implement, by themselves and in conjunction with the provisions of the Basin Plan, do not currently maximize benefits on the Basin, consistent with the LOWWP's Coastal Development Permit.

The RWMP and Basin Plan offer a unique and limited opportunity to address the severe, long-term seawater intrusion problem in the Los Osos Basin and possibly reverse seawater intrusion to establish a sustainable water supply for the community, farms over the Basin, and vital habitat of the Morro Bay National Estuary. We support and ask you to support the actions proposed by the Los Osos Sustainability Group (LOSG) in their letter to the California Coastal Commission on May 4, 2014, and request that you enact the requests we list below to take advantage of this opportunity to preserve the irreplaceable, sole water source for the Los Osos area.

Requested actions/improvements in the Basin Plan and RWMP

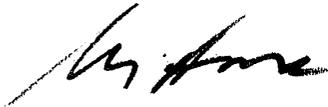
- A requirement for an immediate and thorough seawater intrusion assessment with semi-annual updates after that. The assessment should measure and evaluate the condition of each aquifer and the entire Basin, providing adequate data and analysis to show current conditions and changes since the 1970's, along with predicted impacts from the drought, climate change, the LOWWP, and changes in pumping patterns. It should measure chloride and water levels in all supply and test wells in all aquifers, the rate and location of seawater fronts in all aquifers, the freshwater storage capacity above sea level—and the changes in all of these factors since the 1970's and predicted in the future (e.g., with much less rainfall and rising sea levels).
- A provision for overseeing agencies to retain the authority to take action to preserve the Basin, e.g., in response to requests from the public, and designation of the Basin as a high-priority, threatened basin.

- A County Basin Management Ordinance as provided for in the Basin planning agreement, with measurable, time-specific, and enforceable objectives set to reverse seawater intrusion as soon as possible incorporating our other requests listed here. The ordinance should also ensure all pumping in the Basin is monitored, conservation and recycled water use is maximized, and pumping is limited if necessary.
- A provision that conservation, recycled water use, and low impact development (LID) are maximized and given ample opportunity to reverse seawater intrusion before outside sources of water or desalination are pursued. (LID provides the triple benefit of reducing water use, reducing polluted run off, and increasing Basin recharge with clean rainwater.)
- Improvements to the LOWWP recycled water use program to prioritize recycled water reuse in the Western and Central Basin, in order to maximize pumping reductions and seawater intrusion offset. Improvements should include added recycled water pipes and connections to allow a greater reduction in potable water use in the Western and Central parts of the Basin. They should also include an Ag exchange program and wells installed in the Eastern Basin (or use of existing wells) to return potable water to replace the recycled water used there, maintain/improve water balance in all parts of the Basin, and optimize management options. Recycled water use should be mandated, if necessary, per State Water Code Section 13550.
- Improvements to the LOWWP conservation program to achieve an aggressive conservation target and encourage the elimination of potable water for outdoor use. It should include a stronger outreach program to the community informing residents of the seawater intrusion problem (including radio and TV spots), a stronger indoor program (e.g., a stronger washer replacement program, more options, leak detection and repair), and a complete outdoor conservation program with grey water, rainwater harvesting, and LID options. We suggest that the County ask SLO Green Build to expand the septic system repurposing program into a comprehensive outdoor program. The \$5 million the CDP requires for conservation should be spent to maximize this program, with any remaining money spent on improving recycled water programs.

Consistent with CDP Special Condition 6, there should be no new building over the Basin, inside or outside the wastewater service area, until seawater intrusion is reversed and conclusive well tests show ample surplus water exists to sustainably support added development, with a margin of safety to account for impacts from the LOWWP, climate change, and other impacts and uncertainties.

Finally, the community and agencies should be able to review the final draft of the Los Osos Basin Management Plan prior to its submission to the Superior Court for approval.

Sincerely yours,



Michael Jencks, Chapter Chair

cc: Central Coast Regional Water Quality Control Board  
 California Coastal Commission  
 Golden State Water Company  
 Los Osos Community Services District  
 S & T Mutual Water Co.