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Mark Zimmer  
Golden State Water

August 27, 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 Partial Comments on the  
Water Chapter of the Conservation and Open Space Element

Dear Chairperson Christie:

On December 3, 2008, the Water Resources Advisory Committee (WRAC) formed an ad hoc subcommittee to review the Water Resources chapter of the Conservation and Open Space Element (COSE) and develop comments for WRAC consideration. Subcommittee members include Michael Winn (District 4), Ray Allen (Agriculture At-Large), Betty Winholtz (Morro Bay), and Sue Harvey (Environmental At-Large Alternate).

On July 1, 2009, the WRAC reviewed the draft COSE comments developed by the subcommittee. WRAC members' comments and suggestions from the July meeting were incorporated into another revision of the comments that was brought back to the WRAC at a special meeting held August 26, 2009.

At its well-attended special meeting in August, the WRAC was only able to analyze part of the revised COSE comments, and the partial version with the noted changes was unanimously approved. This portion of the approved COSE comments is attached for your consideration.

The WRAC will consider the remainder of the COSE comments at their regular meeting on September 2, 2009. It is the WRAC's intention to bring those approved comments to your Commission prior to your September 10, 2009 meeting.

Respectfully,

MICHAEL WINN  
Chairperson, Water Resources Advisory Committee

#### 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

cc: SLO County Planning Commissioners w/attachments  
SLO County Board of Supervisors w/attachments  
James Caruso, SLO County Planning w/attachments

Attachment: Subcommittee Report on the Water Element of the COSE

## **WRAC Subcommittee on the Water Element of the COSE**

August 26, 2009

Members: Michael Winn, Ray Allen, Betty Winholtz, Sue Harvey

The following comments considered by the WRAC July 1 were unanimously adopted - as amended - by the WRAC membership on August 26:

Generally we agreed that the new format and principles articulated are good, but the policies need more detail, especially re implementation.

The subcommittee has come to believe that some of our earlier comments (e.g., need for stream gauge data, environmental water metrics, separate reports per each watershed) would be better placed in the Master Water Plan instead of the COSE. Others not repeated here are due to their being more like projects instead of planning policies.

General Comments from Members on July 1, 2009:

Clearly define "imported water", "supplemental water", and "surface water".

Develop an implementation plan in order to clearly understand how strategies would be implemented.

Be cognizant of policies/implementation strategies which would result in "government crippling government", i.e. unfunded mandates (this was mentioned regarding Implementation Strategy WR 3.1.6).

p. 10.1

### **Introduction**

2<sup>nd</sup> ¶, 2<sup>nd</sup> sentence: Most areas of the county are experiencing groundwater problems. Most have declining water supply and water quality due in part to a lack of available surface water supplies, periods of inadequate rainfall insufficient and unreliable recharge, and previous development in many places permitted without adequate sustainable water supply.

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[The quotation by Zekster is only partially adequate. What someone should have said is more like:

*The safe yield of groundwater is exceeded when long-term groundwater extraction exceeds aquifer recharge, producing*

*declining trends in aquifer storage. Overdraft may be evidenced by declines in surface-water levels and stream flow, reduction or elimination of vegetation, land subsidence, decline in groundwater quality, and/or seawater intrusion.*

**Water Quality** [Add a third bullet]

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- Self-regenerating water softeners using salts of various types pose a serious threat to the quality of the county's groundwater supplied.

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**Table WR-1**  
**GOALS FOR WATER RESOURCES**

**Goal WR 2**      The County will collaborative manage groundwater resources to ensure sustainable supplies for all beneficial uses, including riparian demands.

...

**Goal WR 4**      The County will achieve a significant decline in per-capita potable water use by 2020, correlated with the Levels of Severity outlined in the County Resource Management System.

Chapter 10 **WATER RESOURCES**

[There is a need for contextual history beyond administration and regulation, either here and/or in the Water Resources Appendices. Issues critical to water policy include the county being a long-term semi-arid region, frequency of droughts, cyclical nature of rainfall (with averages), and interrelationship between the long-term trends in rainfall and those in population (both growth rate and total population).]

[A map of the county is needed here, showing the various watersheds, with an overlay showing areas currently experiencing seawater intrusion and/or having a Level of Severity III for water supply.]

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*Implementation Strategy WR 1.1.1 Implement an Expanded Water Master Plan*

- c. Establish water demand and water efficiency monitoring programs in coordination with the County Planning Department's Resource Management System and the County Public Works' Master Water Plan to monitor municipal, industrial, agricultural, recreational, and environmental demand on an ongoing basis;

p. 10.6

**Policy WR 1.3 New Water Supply**

Development of new water supplies should focus first on efficient use of our existing resources. Use of reclaimed water, interagency cooperative projects, and groundwater recharge projects should be considered prior to using imported sources of water or seawater desalination.

◇ **[Retain] Policy WR 1.3**

Monitor and explore new technologies that lower the cost of desalination.

- ◇ Implementation Strategy 1.3.1 Work in concert with the DWR and other regulatory agencies to stay current with approved methods of facilitating desalination projects for the county's coastal communities. (See WR 1.15)

**Policy WR 1.6 Water-dependent species**

[Insert hyphen]

***Implementation Strategy WR 1.6.1 Evaluate ecosystem water needs.***

[spelling error]

**Policy WR 1.7 Agricultural operations**

- ◇ Implementation Strategy 1.7.1 Agricultural cluster subdivisions should be limited to legal lots with sufficient water supply on the project property.
- ◇ Implementation Strategy 1.7.2 Support no annexations and allow no residential subdivisions or (if the ordinance is retained) ag cluster subdivisions on land zoned AG or zoned RL or RR with a history of farming, unless they are supplied by supplemental water. (I.e., do not permit residential subdivisions outside of URLs or VRLs that draw on groundwater.)

**Policy WR 1.9 Limit and regulate new water systems**

### **Policy WR 1.11 Reduce RMS alert levels**

**[Add:**

- ◇ Implementation Strategy WR 1.11.2 Planning Area Standards  
Adopt planning area standards for all areas with an RMS Level of Severity for Water I, II, or III. [Use or adapt the standards developed by County Planning for the Nipomo Mesa Water Conservation Area.]

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### **Policy WR 1.12 Impacts of new development**

Accurately assess and mitigate the impacts of new development on water supply. (GM1) At a minimum, comply with the provisions of Senate Bills 610 and 211 and Assembly Bills 32 and 49.

### **Policy WR 1.13 Density increases in rural areas**

Do not approve General Plan amendments or land divisions, or support LAFCO annexations that increase the density or intensity of non-agricultural uses in rural areas that have a recommended or certified Level of Severity II or III for water supply until a Level of Severity I or better is reached.

[Delete the last clause, or this becomes unenforceable and relatively meaningless.]

p. 10.11

**Goal Number 2: The County will collaboratively manage groundwater resources to ensure sustainable supplies for all beneficial uses, including riparian demands.**

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#### ***Implementation Strategy WR 2.2.3***

Secure right of access to all new key wells together with retaining voluntary access to existing wells having useful histories to ensure that the County's investment in these records is protected. The County should obtain permission from each new well owner to obtain groundwater data for use by the County. (GM2)

### **Policy WR 2.3 Well permits**

[New:

◇ Implementation Strategy 2.3.2: Permit no new residential wells serving more than one household where groundwater is LOS II or III, unless it is to replace an existing well that will be legally abandoned.

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### **GOAL 3: EXCELLENT WATER QUALITY WILL BE MAINTAINED FOR THE HEALTH OF PEOPLE AND NATURAL COMMUNITIES.**

[New: Implementation Strategy WR 3.1.5 Gradual elimination of self-regenerating water softeners that discharge salts and implementation of a tracking program for exchange tank system salts disposal. Recognize the real impacts of self-regenerating water softeners on the County's ability to effectively treat and use reclaimed water. Amend ordinance to stop permitting new installations and to gradually eliminate existing equipment everywhere in the county, with the exception of the canister exchange type.

[New: Implementation Strategy WR 3.1.6 Tertiary Treatment of Waste Water

The County shall encourage community waste water systems to convert to tertiary treatment.

### **Policy WR 3.2 Protect watersheds**

Protect watersheds, groundwater and aquifer recharge areas, and natural drainage systems from potential adverse impacts of development projects.  
(GM1)

- This policy should identify the watersheds, groundwater, aquifer recharge areas, and natural drainage systems, possibly with maps.
- Add language to end of policy "... adverse impacts of development **and public infrastructure** projects."

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### **Policy WR 3.5 Support Resource Conservation Districts**

Continue support of and partnerships with Resource Conservation Districts to encourage education and technical assistance regarding erosion and sediment control.