## **Los Osos - On the Edge of Wetness**

By Carole Mintzer

The relationship between Los Osos and its sole water supply, the Los Osos Groundwater Basin, has a long and storied history. Here are a few of the highlights:

**1970s - 1980s -** Rapid development with inadequate septic systems led to groundwater overdraft, seawater intrusion, and nitrate contamination.

**1988** - A building moratorium was imposed to prevent further degradation of the town's water supply.

**2016** (Yes, it took that long, and no, we're not going into <u>all the sordid details</u> here.) A water recycling facility came online to treat sewage and put the cleaned water back in the ground. Over the years, local residents also became increasingly diligent about water conservation, removing lawns, taking shorter showers, collecting rainwater to water plants and wash cars, etc.

**2024** - Despite efforts to resume building new homes in Los Osos, the moratorium remains in effect until monitoring evidence shows the basin is trending for sustainability - but that may change soon.

June 13, 2024 - the California Coastal Commission (CCC) certified, with modifications, the Los Osos Community Plan (LOCP), finding that there is sufficient water to end the 35-year old building moratorium. They pointed to evidence that the basin is no longer in overdraft and chloride and nitrate levels are improving. The Los Osos Sustainability Group contends that this decision should not be made so soon after 2 years of above average rainfall, which makes the situation look better than it is. They also argue that the methodologies for determining sustainability are flawed.

Along with the Santa Lucia Chapter (see letter below), many community members asked the Commissioners to postpone their decision on the Los Osos Community Plan until there is more rigorous analysis of the data on the status of the groundwater basin. They also cited the short 3-week timeframe for reviewing the CCC's lengthy report with appendices, and lack of dialog with local residents. Part of the report is the complicated and disjointed amendment to the Local Coastal Plan (LCP), filed May 22.

Because the CCC approved the LCP amendment with modifications, the matter will go back to the SLO County Board of Supervisors for a vote to accept the modifications, and then the CCC will vote one more time, probably in December. After final approval, the doors will open for more residential units in a very limited way - up to 1% of current levels, or about 50 units, per year within existing residential areas. In the meantime, the basin will continue to be heavily managed and adjudicated. We'll be watching, too.

To be clear, most Los Osos residents are not opposed to new housing, but there needs to be enough water for the people and wildlife who currently live there before new homes are developed, and confident claims about metrics allegedly showing the abatement of seawater intrusion into the basin need to be borne out in reality. With just one source of water, it's hard to be too careful.



June 6, 2024

California Coastal Commission

Hearing date June 13, 2024

Item 14: San Luis Obispo County Local Coastal Program Amendment Number LCP-3-SLO-21-0028-1-Part G (Los Osos Community Plan)

## **Dear Commissioners:**

We urge a very cautious approach in moving the Los Osos Community Plan forward. Your staff report notes the unclear and confusing status of the Plan in relation to the LCP and the Estero Area Plan. What is missing and sorely needed is: "...a clear, succinct, and directive set of policies that address today's understanding of core water, wastewater, and habitat protection issues" (Staff Report, p. 22).

While current usage is estimated at 69% of the estimated sustainable yield of 2,380 AF/y, the levels of chloride and nitrate are important indicators of basin health.

"And while the BMC's 2023 report shows that the chloride and nitrate metrics are above target values (with two of the four chloride-monitoring wells above the 100 mg/l target

(at 211 mg/l and 346 mg/l respectively), and four of the five nitrate-monitoring wells above 10 mg/l (for an average of about 14 mg/l)...." (Staff Report, p. 23).

While the Basin Management Committee expects these metrics to vary but to be trending lower, we have concerns about this casual approach to chloride levels. In comments in 2021 we expressed concerns that the levels that had trended down in 2017/18 moved up again through Spring of 2020 and are even higher now at 346 mg/l.

"Water Level and Chloride Metric trends from spring 2020 show that seawater intrusion is advancing in lower aquifer Zones D and E. After showing signs of improvement in 2017 and 2018, the Chloride Metric, which the BMC uses as an indicator of seawater intrusion, has risen from 145 mg/l in fall of 2018, to 163 mg/l in fall of 2019, to about 180 mg/l in spring of 2020, indicating worsening conditions (WL and CL Metrics, Spring 2020 Draft)" (Santa Lucia Chapter Comments, 2021).

Specific policies and goals should be identified in the Community Plan to guarantee that as water usage rises, chloride and nitrate levels will actually trend down. Clear metrics should be identified and adopted that guarantee that chloride levels will not rise above a defined level and, at that point, pumping will be cut back. If water quality declines as use increases, there are no alternative water supplies available.

Your Commission has unquestionably been an important backstop preserving marine resources, wetlands, and environmentally sensitive habitat areas (ESHAs) and overseeing the health of the basin for the benefit of the environment and the residents by requiring the new development be served by an adequate water supply.

A readable accurate Plan in plain language would be beneficial to all and more likely to achieve the goals of environmental enhancement and a reliable stable water supply.

Kind regards,

Susan Harvey, Chair

Conservation Committee

Santa Lucia Chapter, Sierra Club

Santa Lucia Chapter of the Sierra Club

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