

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
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Th12b

Prepared August 7, 2023 for August 10, 2023 Hearing

To: Commissioners and Interested Persons

From: Kevin Kahn, Central Coast District Manager
Devon Jackson, Coastal Planner

**Subject: Additional hearing materials for Th12b
CDP Number A-3-SLO-23-0020 (Dick Residence)**

This package includes additional materials related to the above-referenced hearing item as follows:

Staff report addendum

Additional correspondence received in the time since the staff report was distributed

J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN
Specializing in Water Neutral Development

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July 25, 2023

JUL 25 2023

RE: A-3-SLO-0020, DICK MUP/CDP C-DRC2021-00145
Substantial Issue Determination (TH12. b.)
1153 11th Street, Los Osos, CA APN 038-061-047

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST AREA

Ladies and Gentlemen of the Commission,

By way of introduction, my name is Jeff Edwards and my firm represents Roger Dick, the owner/applicant of 1153 11th Street in Los Osos. The matter before you involves a determination as to whether, or not, the decision to approve the Minor Use/Coastal Development Permit (MUP/CDP) for the above referenced project by San Luis Obispo County will impact coastal resources. The proposed project includes the replacement of a single-family residence that was demolished, with a new single-family home.

The approved MUP/CDP, as conditioned by the County, ensures all coastal resources are addressed including most notably the availability of water for the community of Los Osos. Staff has suggested there are inadequate water supplies for existing and future development. Additionally, staff has conflated water supply and wastewater services. Regarding the latter, the existing Wastewater Recycling Facility (WRF) is operating at less than 50% of capacity. The WRF approved by the California Coastal Commission (CCC) in 2010 completed construction in 2016 at a cost of close to \$200 million. By design, the WRF serves over 80% of the community and is addressing nitrate levels in the groundwater with incremental improvements in water quality as predicted.

Staff suggests Special Condition 6, attached to the WRF approval in 2010, prohibits development on "vacant lots". The Dick property is not "vacant" in the context of Special Condition 6. The Los Osos Wastewater Assessment District No. 1 was formed on October 23, 2007, and established assessments secured by the real property in the amount of \$24,941.19 per single-family home. The Dick residence received an assessment and continues to pay for a single-family home under Assessment No. 278. In 2007, the subject property was assessed and capacity in the WRF was accounted for. The demolition of the Dick residence occurred in June 2010, well after the assessment and service capacity for wastewater was established, as evidenced by the WRF Will-Serve Letter from the San Luis Obispo County Public Works Department dated May 6, 2021.

Regarding water supply questions more broadly, since the WRF was approved by the CCC in 2010, urban demand for water supplied by the local purveyors has been reduced from 1620 acre-feet to 1016 acre-feet (2022 Annual Monitoring Report) conserving over 600 acre-feet, in large part from the County's Title 19 Offsite Retrofit-to-Build Program. This is nearly a 40% reduction in urban demand and associated groundwater production. The conservation has been achieved with a community population that has remained constant for over 30 years, at

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ACQUISITION MARKETING LAND USE REDEVELOPMENT

J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN
Specializing in Water Neutral Development

approximately 14,000 people. Expressed in another way, the urban water demand in Los Osos between 1988 and 2022 dropped from 159 gallons per capita per day (gpcd) to 63 gpcd, respectively. Ironically, the current total demand on the groundwater basin with a population approaching 14,500 people is virtually identical to total groundwater demands in 1970 when the population of Los Osos was barely 3500 people.

The Los Osos Groundwater Basin is not in overdraft. The staff report confirms the total production for all uses overlying the Los Osos Groundwater Basin, including urban, rural and agricultural, is approximately 2000 acre-feet. The recognized annual safe yield for the basin is 2380 acre-feet. Clearly, 2380 acre-feet is greater than 2000 acre-feet, demonstrating the groundwater basin is not in overdraft. Furthermore, the staff report purports "the basin is still over drafted and essentially over tapped for even existing development." This statement is irresponsible and alarmist, failing to consider the facts with respect to groundwater resources and supplies for the community of Los Osos. The County of San Luis Obispo has continuously, since completion of the WRF in 2016, monitored riparian and wetland areas with no evidence of adverse impacts to any of these coastal resources. Staff continues to make false assertions with no evidence to substantiate the claims.

Staff is recommending your commission find Substantial Issue in this matter without any basis for such a determination. In the staff report, staff represents the applicant "refused" to waive time and "demanded" a Substantial Issue hearing. The staff report further suggests that they are "working with the County" and expects to resolve decades old concerns surrounding coastal resources, particularly water, by the end of 2023. These efforts and such optimism were never mentioned by staff to the applicant or applicant's agent as a basis or reason to waive time. Moreover, the issues surrounding new development are not applicable in the instant case because it is a replacement dwelling unit with water and sewer service already established. Therefore, the San Luis Obispo County approved MUP/CDP for the Dick residence is not subject to Special Condition 6 or any other questions about the availability and adequacy of public services (water and sewer). Lastly, the subject proposal is not subject to any determinations of growth/buildout projections because the proposed residence is a replacement dwelling.

In conclusion, on behalf of the applicant, Roger Dick, I respectfully request the Commission determine no Substantial Issue exists with respect to the grounds in which the appeal was filed.

Please feel free to contact me with any questions you may have.

Sincerely,

Jeff Edwards

Jeff Edwards

J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN
Specializing in Water Neutral Development

Cc: Roger Dick, Property Owner/Applicant
San Luis Obispo County Public Works Department, Director John Diodati
San Luis Obispo County Planning Department, Director Trevor Keith
Los Osos Community Services District, General Manager, Ron Munds
California Coastal Commission, Central Coast District Director, Dan Carl
California Coastal Commission, Coastal Program Analyst, Devon Jackson

CA Coastal Commission August 10, 2023, TH 12.b. Appeal No. A-3-SLO-23-0020 (Dick SFD, Los Osos)

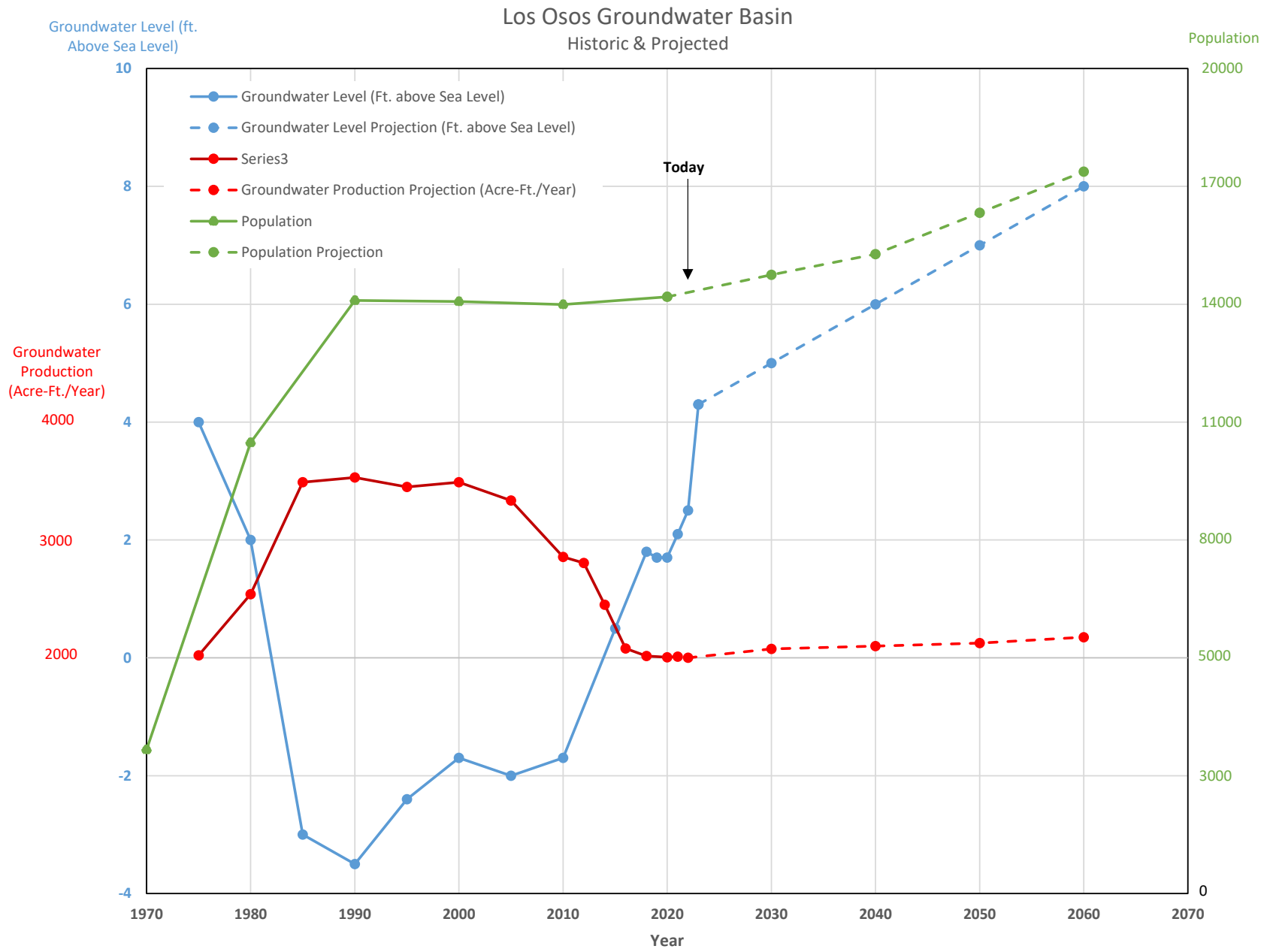
Take-aways from July 2023 Los Osos Groundwater Basin graph.

- 1) The water level in the lower aquifer (Zones D&E) has risen 7.8 feet between 1990 and 2023.
- 2) Peak groundwater production for all uses (urban, rural and agriculture) dropped from 3720 AF in 1988 to 2010 AF in 2022 a reduction of more than 45%.
- 3) Peak urban demand supplied by purveyors dropped from 2560 AF in 1988 to 1016 AF in 2022 a reduction of more than 60%.
- 4) Since the California Coastal Commission approved the Los Osos Water Recycling Facility (WRF) in 2010 the urban demand dropped from 1620 AF to 1016 AF a reduction of nearly 40%.
- 5) Between 1988 and 2022, the per capita water demand dropped from 159 gallons per capita per day (gpcd) to 63 gpcd, respectively.
- 6) The total population of Los Osos has been constant since 1990 at just over 14,000 people.
- 7) The residential growth rate between 1983 and 1988 was approximately 5% annually with construction of about 225 dwelling units per year.
- 8) The projected average residential growth rate for the next thirty plus years in Los Osos is 0.5% with a build-out population of approximately 17,500 people by 2060 which averages about 35 new dwelling units per year.
- 9) Presently the \$200 Million Los Osos WRF has excess capacity of 100% or in other words is operating at just under 50% of design capacity (1.2 million gallons per day).

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AUG 04 2023

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CENTRAL COAST AREA**



Sources: Basin Management Committee Basin Plan, Annual Monitoring Report, & Decennial US Census

Prepared by: J.H. Edwards Co. July 2023

San Luis Obispo County Board of Supervisors

Tuesday, May 16, 2023
1153 11th Street
Los Osos

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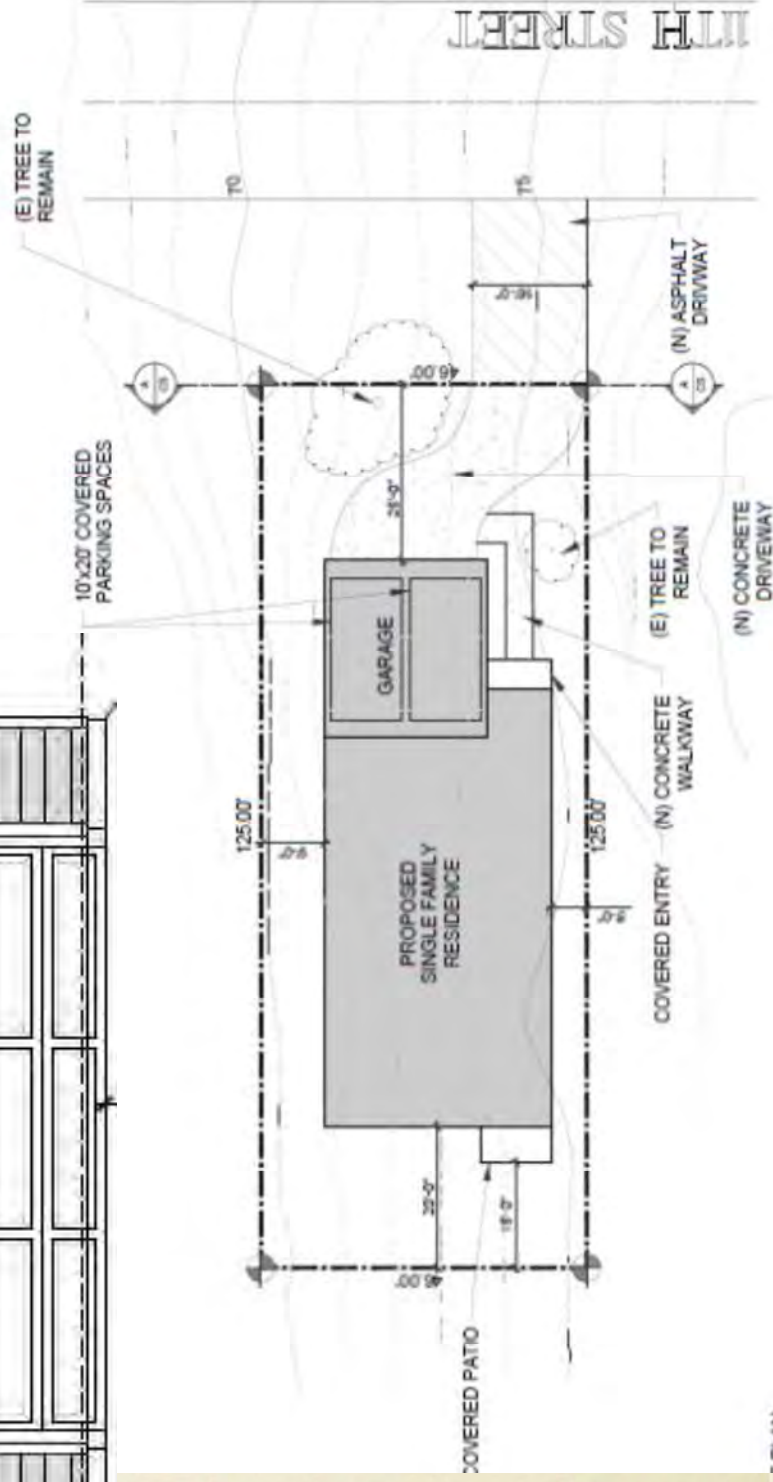
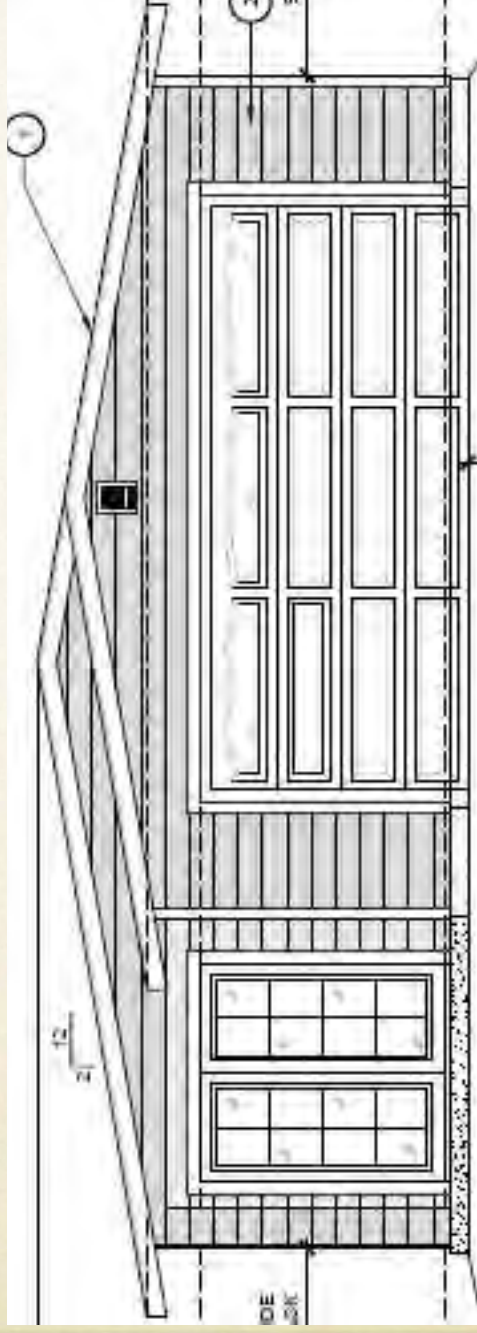
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DICK MUP/CDP DRC2021-00145

Replacement Residence



Professional Services Performed

- Biological Resources Assessment
- Morro shoulderband snail surveys
- Archeological Survey
- Arborist Report
- Engineered Grading Plan
- Topographic Survey
- Architecture

Replacement Residence 374 Mitchell Ave., Los Osos



Replacement Residence 370 Mitchell Ave., Los Osos



Replacement Residence 600 Woodland Dr., Los Osos



Replacement Residence 1261 Pasadena Dr., Los Osos



Replacement Residence 1187 8th St., Los Osos



Water & Wastewater Continue-to-Serve Letters



February 25, 2021

Frank Johnston
c/o JH Edwards Co
PO Box 6070
Los Osos, CA 93412

President
Christine M. Womack

Vice President
Matthew D. Fourcroy

Directors
Charles L. Cesana
Troy Gatchell
Marshall E. Oryshko

General Manager
Ron Munds

District Accountant
Robert S. Sina, CPA

Unit Chief
Eddy Moore

Battalion Chief
Paul Provence

Mailing Address:
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Los Osos, CA 93412

Offices:
2122 9th Street, Suite 110
Los Osos, CA 93402

Phone: 805/528-9370
FAX: 805/528-9377

www.lososcsd.org

RE: 1153 11th Street, Los Osos, CA
Acknowledgement to Continue to Provide Water Service

This letter is to confirm that the property does have existing water service at the above referenced address, is in good standing with the District and that the District will continue to serve water to the property into the future.

Since the District does not have land use authority and therefore neither approves nor disapproves new development projects, any proposed development at the address does not need approval from the District to proceed unless it requires a water meter that is more than 1 inch in size and/or requires additional water meters to support the development.

Please feel free to contact me with any questions or concerns.

Thank you,

Ron Munds
General Manager
805-528-9379
rmunds@lososcsd.org



COUNTY OF SAN LUIS OBISPO
Department of Public Works
John Diodati, *Interim Director*

SAN LUIS OBISPO COUNTY WASTEWATER ASSESSMENT DISTRICT NO. 1
WILL SERVE WASTEWATER LETTER

WASTEWATER ASSESSMENT DISTRICT NO.1 IS WILLING AND ABLE TO CONTINUE TO PROVIDE WASTEWATER SERVICE TO THE FOLLOWING PROPERTY FOR PURPOSES OF ~~Construction of a single~~ Family Residence: ASSESSOR PARCEL NUMBER 038-061-047, LOCATED AT 1153 11th Street, IN THE COMMUNITY OF Los Osos, SUBJECT TO ALL FEES AND CONDITIONS OF THE RULES AND REGULATIONS OF THE DISTRICT.

ANY WATER SOFTENER INSTALLED SHALL BE THE TYPE WHICH IS REGENERATED AT A LOCATION WHERE SALT BRINES OR OTHER WASTE SUBSTANCES RESULTING FROM SAID REGENERATION ARE NOT DISCHARGED INTO THE PUBLIC SEWER, AND SHALL BE PLUMBED SO THAT WATER PASSING THROUGH SAID WATER SOFTENER DOES NOT SERVE ANY TOILET OR URINAL, OR ANY HOSE BIB, PIPELINE OR FUTURE SUPPLYING WATER FOR IRRIGATION OR OTHER EXTERIOR USES, NO PERSON SHALL CAUSE OR PERMIT SALT BRINES OR OTHER SUBSTANCES RESULTING FROM SAID WATER SOFTENER REGENERATION PROCESS TO BE DISCHARGED INTO THE PUBLIC SEWER.

BY ACCEPTING CONTINUED SEWER SERVICE FROM THE WASTEWATER ASSESSMENT DISTRICT NO. 1, THE PROPERTY OWNER SHALL DEFEND, AT THE PROPERTY OWNER'S SOLE EXPENSE, THE COUNTY OF SAN LUIS OBISPO ANY ACTION BROUGHT AGAINST THE COUNTY OF SAN LUIS OBISPO, ITS PRESENT OR FORMER OFFICERS, AGENTS OR EMPLOYEES, BY A THIRD PARTY CHALLENGING THE ISSUANCE OF THIS CONTINUED WILL SERVE LETTER OR THE DETERMINATION THAT THE PROPERTY IS "DEVELOPED" WITHIN THE MEANING OF CONDITION OF APPROVAL NO. 6 FOR THE LOS OSOS WATER RECYCLING FACILITY.

LAURA HOLDER
PROGRAM MANAGER

March 3, 2021
DATE

PMT No. N/A

Jeff Edwards

File: 321.600.01
L:\Utilities\2021\March\Will Serve 1153 11th Ltr.docx.LH.kkm

County of San Luis Obispo Department of Public Works

County Govt Center, Room 206 | San Luis Obispo, CA 93408 | (P) 805-781-5252 | (F) 805-781-1229
pwd@co.slo.ca.us | slocounty.ca.gov

Action Requested

- Affirm the decision of the Planning Department Hearing Officer to approve a Minor Use Permit / Coastal Development Permit (DRC2021-00145) to allow for the construction of a single-family residence.
- Affirm the decision of the Planning Department Hearing Officer that the project is categorically exempt from environmental review under the California Environmental Quality Act (CEQA).
- Affirm the decision of the Planning Department Hearing Officer establishing Findings and Conditions of Approval

August 3, 2023

RE: Appeal No. A-3-SLO-23-0020

Dick-SFD-Los Osos

Item TH12b

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CENTRAL COAST AREA

Dear Commissioners:

I do not have a "dog in this fight" so to speak, and write to you simply as a concerned citizen and property owner in Los Osos. I feel the need to point out some of the false assertions that are being promulgated by the CCC staff with respect to water in Los Osos and the status of the LCP update in progress.

The staff has been more than vocal for some time now in alleging that the Los Osos Basin is being over-drafted. In this effort they have offered nothing in the way of supporting documentation, but merely prior letters and memos to and between the County of SLO, where they have made the same assertions in the past. These prior letters are not documentation or facts. It is not a fact simply because CCC staff says it is. The facts are contained in the Basin Management Annual Monitoring Reports from 2015 thru 2022 which show the Basin Yield Metric trending generally downward from 89% to 72% of Safe Annual Yield over this period with 2022 showing an uptick to 84% of Safe Annual Yield simply because they changed the way it is calculated. I have attached the relevant pages for each of these years to this letter. This is not assertion or speculation. These are facts. The entire annual reports are easily available should you choose to review them.

Additionally, the staff goes out of their way to spend much dialogue regarding the Los Osos Wastewater system and its history in their report. This is a non-issue. The wastewater system is operating at about 50% of capacity and there is more than adequate capacity for any future build out. In fact, the flow rates at 50% have caused concern with the plant operation in the past with discussions about injecting stormwater to increase flow. There is no legitimate reason for staff to try and conflate these issues by the dialogue they have offered on the Wastewater system. It has no bearing on the case before you.

Further, in prior memos and letters from staff they seem to mix Los Osos and Cambria into the same or similar arguments to try and show over-drafted water. This too is a false assertion. There is no comparison between the two communities. Los Osos, unlike Cambria, has a significant water basin. It has been adjudicated and has a functioning Basin Management Committee that is generally doing good work to promote the long-term sustainability of the basin. These two communities should not be discussed again in any similar context. It is a disservice to both communities to do so.

The staff report seems to try and chastise the property owner for failing to waive his 49 day period in which to have a hearing. The writer states that it is likely the LCP update in progress will be finished by the end of the year (see page 4 of staff report for this assertion), and presumably the owner should wait for that. This again is a false narrative. The LCP update has been in the works for about 20 years. The document was approved by the SLO Board of Supervisors on December 15, 2020. It has been somewhere with CCC staff now for almost 3 years. We, the engaged public, have not heard a word about what has gone on behind the scenes with it since it left SLO County. And now, your staff wants us to believe it will be concluded by year end? Don't hold your breath.

Lastly, the property in question will be required to obtain a Title 19 Water Conservation Certificate and therein save twice the amount of water that it will use. This in no way will add a burden to the basin, but rather provide a water savings in the basin. There is no denying the water savings that have been achieved in Los Osos, significantly attributable to water retrofits.

In conclusion, please deny this baseless appeal and allow this poor guy to proceed ahead to replace a single-family home that was demolished with a new residence. It is the right thing to do. This will allow you to direct staff to spend valuable time on higher priority coastal issues.

Respectfully,

Rick Kirk

805-459-4101

rick.kirk52@gmail.com

Table ES-2. LOBP Metric Summary			
Metric ¹	LOBP Goal	Calculated Value from 2022 Data	Change in Condition from 2021
Basin Yield Metric ²	80 or less	84	Increase from 72 (deterioration)
Water Level Metric	8 feet above mean sea level or higher	2.5 feet above mean sea level	Increase from 2.1 ft. (improvement)
Chloride Metric	100 mg/L or lower	184 mg/L	Decrease from 202 mg/L (improvement)
Nitrate Metric	10 mg/L or lower	17.5 mg/L (NO ₃ -N)	Increase from 17 mg/L (deterioration)

¹Revisions to the Water Level, Chloride, and Nitrate Metrics were initiated in 2021 and are currently on hold as the BMC Staff evaluates opportunities to improve the Basin Monitoring Network.

²On October 27th, 2021 the BMC unanimously adopted a new methodology for calculating the Sustainable Yield for Basin that reduced the Sustainable Yield estimate from 2,760 to 2,380 AF for Calendar Year 2022. Reducing the Sustainable Yield estimate increased the Basin Yield Metric from 72 to 84, assuming a consistent amount of pumping.

Approval of the Annual Monitoring Report by the BMC does not constitute unanimous approval of actions listed under Section 5.11.4 (Approval Requirements) of the Stipulated Judgment or setting the Sustainable Yield for a given year. These actions require a separate action and unanimous approval by the BMC.

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report.

- Lower Aquifer Monitoring Improvements
- Updated Metric Evaluation
- Program C Adaptive Management
- Lower Aquifer Nitrate Investigation
- Los Osos Basin Well Database
- Evaluation of Water Conservation Measures
- WRFP/Transient Groundwater Model
- Discussion and Recommendation of Criteria for Future Growth



Table ES-2. LOBP Metric Summary			
Metric ¹	LOBP Goal	Calculated Value from 2021 Data	Change in Condition from 2020
Basin Yield Metric ²	80 or less	72	Decrease from 73 (improvement)
Water Level Metric	8 feet above mean sea level or higher	2.1 feet above mean sea level	Increase from 1.8 ft. (improvement)
Chloride Metric	100 mg/L or lower	202 mg/L	Decrease from 205 mg/L (improvement)
Nitrate Metric	10 mg/L or lower	17 mg/L (NO ₃ -N)	Decrease from 20 mg/L (improvement)

¹Revisions to the Water Level, Chloride, and Nitrate Metrics were initiated in 2021 and are currently on hold as the BMC Staff evaluates opportunities to improve the Basin Monitoring Network.

²On October 27, 2021, the BMC considered and adopted a revised methodology for estimating sustainable yield, along with a sustainable yield for Year 2022 that will likely increase the Basin Yield Metric to a value above the LOBP goal. See Appendix M for additional details.

Approval of the Annual Monitoring Report by the BMC does not constitute unanimous approval of actions listed under Section 5.11.4 (Approval Requirements) of the Stipulated Judgment or setting the Sustainable Yield for a given year. These actions require a separate action and unanimous approval by the BMC.

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report.

- Lower Aquifer Monitoring Evaluation
- Updated Metric Evaluation
- Contingency Plan Development
- Lower Aquifer Nitrate Trends
- Evaluation of Water Conservation Measures
- Transient Groundwater Model
- Discussion and Recommendation of Criteria for Future Growth

Table ES-2. LOBP Metric Summary

Metric	LOBP Goal	Calculated Value from 2020 Data	Change in Condition from 2019
Basin Yield Metric	80 or less	73	Increased (deterioration)
Water Level Metric	8 feet above mean sea level or higher	1.8 feet above mean sea level	Stable (no change)
Chloride Metric	100 mg/L or lower	205 mg/L	Increased (deterioration)
Nitrate Metric	10 mg/L or lower	20 mg/L (NO ₃ -N)	Decreased (improvement)

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report:

Upper Aquifer Water Level Profile. As discussed in Section 7.5.4, an Upper Aquifer Water Level Profile has been developed to track the potential for sea water intrusion in the Upper Aquifer. This profile currently shows that water levels in the Upper Aquifer remain safely above the Protective Elevation. The profile will be evaluated annually.

Updated Metric Evaluation. Included in the Calendar Year 2021 BMC Budget is an initiative to evaluate the existing Basin Monitoring Metrics and to develop recommendations for opportunities to improve those metrics and/or add additional metrics to be able to better assess the health of the basin. The updated Basin Metric evaluation will take into account monitoring data collected after development of the Basin Plan, along with new monitoring locations/wells (e.g. Lupine/Cuesta by the Sea Monitoring Well). Any modifications to the LOBP Metrics will require approval by the BMC through the Adaptive Management process.

Contingency Plan Development. As metric trends and Basin response become better defined, the BMC intends to develop contingency plans to respond to unforeseen conditions. As funding and siting for Program C projects progress, detailed milestone schedules will also be developed.

Lower Aquifer Nitrate Trends. The BMC will continue to monitor the leakage of groundwater with elevated nitrate concentrations from the Upper Aquifer through the regional aquitard into the Lower Aquifer. Trends of increasing nitrate concentrations at some Lower Aquifer community supply wells are projected to exceed State drinking water standards, possibly within the next 10 years, as reported in the 2019 Adaptive Management TM (CHG, 2019a).



Table ES-2. LOBP Metric Summary			
Metric	LOBP Goal	Calculated Value from 2019 Data	Recommended Actions in Addition to LOBP Programs
Basin Yield Metric	80 or less	69	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Water Level Metric	8 feet above mean sea level or higher	1.8 feet above mean sea level	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Chloride Metric	100 mg/L or lower	162 mg/L	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Nitrate Metric	10 mg/L or lower	22 mg/L (NO ₃ -N)	None recommended

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report:

Potential Adaptation of Urban Water Use Efficiency Program. The BMC plans to evaluate the status and the effectiveness of the program throughout the year. The County has implemented a series of rebates as described in Section 10.

Development of Contingency Plan. The BMC plans to develop a contingency plan and related actions in the event Basin Metric trends fail to demonstrate progress toward LOBP goals, including defined schedules and milestones.

Lower Aquifer Nitrate Trends. The BMC will continue to monitor the leakage of groundwater with elevated nitrate concentrations from the Upper Aquifer through the regional aquitard into the Lower Aquifer. Trends of increasing nitrate concentrations at some Lower Aquifer community supply wells are projected to exceed State drinking water standards, possibly within the next 10 years, as reported in the 2019 Adaptive Management TM (CHG, 2019a). The BMC will address this issue as part of strategic planning.



Table ES-2. LOBP Metric Summary

Metric	LOBP Goal	Calculated Value from 2018 Data	Recommended Actions in Addition to LOBP Programs
Basin Yield Metric	80 or less	74	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Water Level Metric	8 feet above mean sea level or higher	2.0 feet above mean sea level	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Chloride Metric	100 mg/L or lower	145 mg/L	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Nitrate Metric	10 mg/L or lower	24 mg/L (NO ₃ -N)	None recommended

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report:

Potential Adaptation of Urban Water Use Efficiency Program. The BMC plans to evaluate the status and the effectiveness of the program throughout the year. The County has implemented a new series of rebates as described in Chapter 10.

Development of Contingency Plan. The BMC plans to develop a contingency plan and related actions in the event Basin Metric trends fail to demonstrate progress toward LOBP goals, including defined schedules and milestones.

Discussion and Development of Metrics for Future Growth. The BMC plans to provide input into the Los Osos Community Plan, including consideration of Basin Metrics and defined goals as they relate to the timing of future growth.

Additional Water Quality Metrics. The BMC intends to consider developing additional metrics and/or numerical goals as appropriate to protect the upper aquifer from water quality threats, such as seawater intrusion and chromium-6 contamination. An Upper Aquifer Water Level Profile was introduced in 2017, as described in Section 7.5 of this Annual Report.

Table ES-2. LOBP Metric Summary			
Metric	LOBP Goal	Calculated Value from 2017 Data	Recommended Actions in Addition to LOBP Programs
Basin Yield Metric	80 or less	75	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Water Level Metric	8 feet above mean sea level or higher	1.5 feet above mean sea level	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Chloride Level Metric	100 mg/L or lower	132 mg/L	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Nitrate Metric	10 mg/L or lower	32 mg/L (NO ₃ -N)	None recommended

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report:

Potential Adaptation of Urban Water Use Efficiency Program. The BMC plans to evaluate the status and the effectiveness of the program throughout the year. The County has implemented a new series of rebates as described in Chapter 10.

Development of Contingency Plan. The BMC plans to develop a contingency plan and related actions in the event Basin Metric trends fail to demonstrate progress toward LOBP goals, including defined schedules and milestones.

Discussion and Development of Metrics for Future Growth. The BMC plans to provide input into the Los Osos Community Plan, including consideration of Basin Metrics and defined goals as they relate to the timing of future growth.

Additional Water Quality Metrics. The BMC intends to consider developing additional metrics and/or numerical goals as appropriate to protect the upper aquifer from water quality threats, such as seawater intrusion and chromium-6 contamination. An Upper Aquifer Water Level Profile has been developed as described in Section 7.5 for this annual report.

Table ES-2. LOBP Metric Summary

Metric	LOBP Goal	Calculated Value from 2016 Data	Recommended Actions in Addition to LOBP Programs
Basin Yield Metric	80 or less	78	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Water Level Metric	8 feet above mean sea level or higher	1.0 feet above mean sea level	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Chloride Level Metric	100 mg/L or lower	225 mg/L	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Nitrate Metric	10 mg/L or lower	26 mg/L (NO ₃ -N)	None recommended

Increased Lower Aquifer production in the Western Area between 2015 and 2016, along with continued drought conditions resulted in a rising Chloride Metric and increased seawater intrusion, despite meeting the Basin Yield Metric goal in 2016. Analyses using the Basin Model confirms that this dynamic response would be expected.

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report:

Potential Adaptation of Urban Water Use Efficiency Program. The BMC plans to take a close look at the Urban Water Use Efficiency Program to determine which conservation measures are the most efficient and effective to meet the LOBP's goals. This analysis may result in adaptation of some of the conservation measure set forth in the LOBP, including the addition of outdoor measures as described in Section 10.

Development of Contingency Plan. The BMC plans to develop a contingency plan and related actions in the event Basin Metric trends fail to demonstrate progress toward LOBP goals, including defined schedules and milestones.



Table ES-2. LOBP Metric Summary

Metric	LOBP Goal	Calculated Value from 2015 Data	Recommended Actions in Addition to LOBP Programs
Basin Yield Metric	80 or less	89	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Water Level Metric	8 feet above mean sea level or higher	0.6 feet above mean sea level	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Chloride Level Metric	100 mg/L or lower	188 mg/L	Implement additional conservation measures to reduce indoor and outdoor demands (See Section 10.3.2)
Nitrate Metric	10 mg/L or lower	25.4 mg/L (NO ₃ -N)	None recommended

Adaptive Management Program

In addition to the programs described in the LOBP, the following additional measures are recommended in the context of adaptive management. Details regarding each program are provided in Section 10 of this Annual Report:

Potential Adaptation of Urban Water Use Efficiency Program. The BMC plans to take a close look at the Urban Water Use Efficiency Program to determine which conservation measures are the most efficient and effective to meet the Basin Plan's goals. This analysis may result in adaptation of some of the conservation measure set forth in the Basin Plan, including the addition of outdoor measures as described in Section 10.

Development of Contingency Plan. The BMC plans to develop a contingency plan and related actions in the event Basin Metric trends fail to demonstrate progress toward Basin Plan goals, including defined schedules and milestones.

Discussion and Development of Metrics for Future Growth. The BMC plans to provide input into the Los Osos Community Plan, including consideration of Basin Metrics and defined goals as they relate to the timing of future growth.

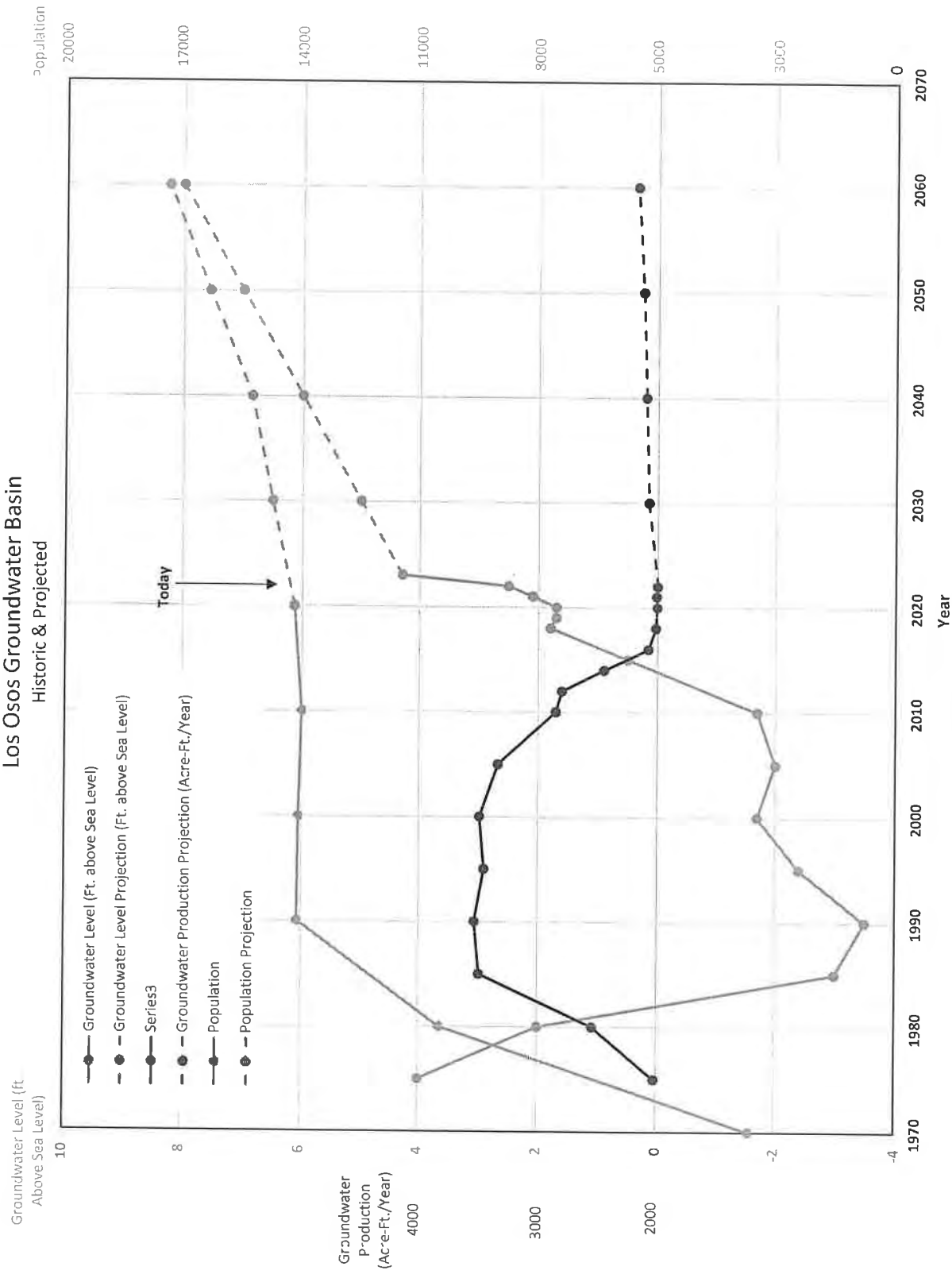
Additional Water Quality Metrics. The BMC intends to consider developing additional metrics and/or numerical goals to protect the upper aquifer from water quality threats, such as seawater intrusion and chromium-6 contamination.

CA Coastal Commission August 10, 2023, TH 12.b. Appeal No. A-3-SLO-23-0020 (Dick SFD, Los Osos)

Take-aways from July 2023 Los Osos Groundwater Basin graph.

- 1) The water level in the lower aquifer (Zones D&E) has risen 7.8 feet between 1990 and 2023.
- 2) Peak groundwater production for all uses (urban, rural and agriculture) dropped from 3720 AF in 1988 to 2010 AF in 2022 a reduction of more than 45%.
- 3) Peak urban demand supplied by purveyors dropped from 2560 AF in 1988 to 1016 AF in 2022 a reduction of more than 60%.
- 4) Since the California Coastal Commission approved the Los Osos Water Recycling Facility (WRF) in 2010 the urban demand dropped from 1620 AF to 1016 AF a reduction of nearly 40%.
- 5) Between 1988 and 2022, the per capita water demand dropped from 159 gallons per capita per day (gpcd) to 63 gpcd, respectively.
- 6) The total population of Los Osos has been constant since 1990 at just over 14,000 people.
- 7) The residential growth rate between 1983 and 1988 was approximately 5% annually with construction of about 225 dwelling units per year.
- 8) The projected average residential growth rate for the next thirty plus years in Los Osos is 0.5% with a build-out population of approximately 17,500 people by 2060 which averages about 35 new dwelling units per year.
- 9) Presently the \$200 Million Los Osos WRF has excess capacity of 100% or in other words is operating at just under 50% of design capacity (1.2 million gallons per day).

Los Osos Groundwater Basin



Sources: Basin Management Committee Basin Plan, Annual Monitoring Report, & Decennial US Census

Prepared by: J.H. Edwards Co. July 2023