

Attachment C

LOCAC

Los Osos Community Advisory Council

August 31, 2012

To: Board of Supervisors, San Luis Obispo County

Re: Water Conservation Implementation Plan for the Los Osos Wastewater Project

**COUNCIL
MEMBERS
2012-2013**

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Debby Grisanti
Nathaniel Blair

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Carolyn Atkinson
Alan Fraser
Vicki Milledge,
Chairperson

Gentlemen:

We wish to thank both the Board and County Staff for developing the above referenced Plan and making it available to the Los Osos Community Advisory Council (LOCAC) and our community for review and response. Our observations, questions and suggestions are presented below (all page number references are to the Plan unless otherwise noted). For convenience, we have segregated these observations, etc. into global or specific items.

Global

- Given the proposed \$5,000,000 budget (p. 6) and the existence of 5,000 residences in the wastewater service area (p. 16), \$1,000 per residence is available. Seemingly, this is sufficient to retrofit each and every residence and thereby eliminate the complicating processes of self-testing, third party certification, etc. Even with an allocation of 20% of the budget to administration and oversight, it still would allow \$800 per residence for direct, fully subsidized retrofitting of all residences in the service area. We request that all retrofits be paid for out of the proposed \$5,000,000 budget.
- We request that those residents who have previously retrofitted their homes be included in the rebate program as well as those who will in the future. They have voluntarily contributed to conservation and should be recognized for being proactive in this vital effort.
- It is quite possible that many of our lower income residents would naturally defer their retrofit expenditures as long as possible and the reduction in rebates after the first year would impact them disproportionately.
- Can conservation save the aquifer? Nitrate pollution seems to have eased but saltwater intrusion seems to be accelerating despite dramatic reductions in actual water consumption. Every effort should be made to save the basin before build-out is allowed. If the basin is or will inevitably be lost, perhaps our efforts and resources would be better focused elsewhere, although many of us fear that imported water would be so costly that it may destroy our community.
- Would we be better served by a less invasive conservation approach? We understand that the retrofit condition is mandatory and we heard from both members of LOCAC and community members that they feel that the current requirement of two entries of plumbers and/or inspectors into people's homes feels invasive to them.

Specific

- Target more closely other high water savings items after the required items are installed.
- Consider requiring 1.28 g/f type toilet retrofit on sale of properties.
- Provide consistency and clarity in goals and data by either requiring purveyors to provide usage date in gallons/day or convert goals to “units” as used by purveyors.
- Incentives for clothes washers seem to be a low return item given the number of units projected. Consider reallocating these rebate funds to other areas.
- Staffing and related costs consume an excessive amount of the budget. One full time supervisor, two full time administrative people and two full time inspectors should be reduced and the funds reallocated.
- Consider radio and television ads as a possible more impactful method of outreach.
- A \$377 cost per residential survey (p. 6) seems excessive and the return on investment seems low given the expected 23 acre ft./year savings. A similar program in the City of San Luis Obispo was accomplished for a much lower unit cost according to Richard Margetson’s conversation with Ron Munds.
- Consider self-testing, and/or eligibility for all licensed plumbers rather than a County approved group and voluntary audits.
- Educate vendors (hardware stores, etc.) so they can be more effective in assisting residents in the purchase of water conserving devices.
- Include the cost of toilet seats in the rebate program.

Please consider our comments in light of the Herculean past conservation efforts of our community that have already reduced our per capita daily residential water use to approximately 55 gallons per day – an amount very close to the stated goal of 50 gallons per day.

Thank you again for reaching out to our community and we hope you will consider and implement our suggestions.

Yours truly,



Vicki Milledge, LOCAC Chairperson

Electronic cc: Paavo Ogren, Carolyn Berg, Regional Water Quality Control Board, California Coastal Commission, LOCAC members