

June 26, 2020



Ms. Kylie Hensley
Department of Planning and Building
County of San Luis Obispo
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Dear Ms. Hensley,

Thank you for the opportunity to comment on the planning efforts underway for the community of Los Osos. The Los Osos Community Services District (CSD) is keenly aware of the amount time and energy the County's staff has given to this project and are appreciative of the effort. The CSD's comments are focused on the water issues and the references to the Basin Plan in the draft Los Osos Community Plan and incorporated by reference in the draft Growth Management Ordinance and Resource Summary Report.

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Since the finalization of the Los Osos Basin Plan (Plan) and the approval by the court as part of the integrated Stipulated Judgement in 2015, the three water purveyors in Los Osos have been actively implementing the programs described in the Plan. The results have been encouraging but the CSD is recommending that a very cautious and measured approach be taken when planning for new development to proceed. There are four metrics in the Plan (see attached table from the Basin Plan) to assist the water purveyors in measuring the effectiveness of the programs and projects. The 2019 data indicates the groundwater basin's health is improving but the CSD believes more time may be needed to be fully confident in the results. That said, it is important to understand that the intent of the metrics and the underlying objectives of the Plan are to stabilize and improve the sustainability of the water supply existing residents and businesses in Los Osos.

The CSD's other concern moving forward is there is no funding mechanism or fee structure in place that would assure new development pays it fair share of the costs to supply and deliver water to that development. To date, existing customers have borne the cost of the Basin Plan projects and administrative overhead through their rates and charges. A basin-wide AB 1600 fee study needs to be completed before any new connections can be considered by the CSD.

In summary, the CSD is requesting a cautious and measured approach to approving any new development in the CSD's service area. The variables that can impact the groundwater basin health have been analyzed extensively but it will take additional time to confirm if the trends are sustainable. The follow up concern is the fiscal impact to existing customer which will need to be addressed in front moving forward.

Thank you for your consideration of the information provided in this correspondence. Please feel free to reach out to me if you have any questions.

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Sincerely,

Ron Munds
General Manager
Los Osos Community Services District

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	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