



July 13, 2012

Mr. David LaCaro
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: REQUEST FOR COMMENTS ON THE WASTEWATER PROJECT

President
Marshall E. Ochylski

Vice President
Leonard A. Moothart

Directors
Craig V. Baltimore
David S. Vogel
R. Michael Wright

General Manager
Susan Morrow

District Accountant
Amparo Haber

Fire Chief
Robert Lewin

Battalion Chief
Phill Veneris

Dear Mr. LaCaro:

The Water Conservation Subcommittee of the Los Osos Community Service District (District) reviewed and commented on the Maddaus Report, which was presented to the Board of Directors in October 2011. The direction of the Board was to submit the comments to the ISJ and County. The Report was recently submitted to you in an email. As you may be aware, the Maddaus Report's data is used throughout the Wastewater Project (Project). The Water Conservation Subcommittee Report, which was presented last year, is being resubmitted.

On July 12, 2012, the District's Utility Advisory Committee (Committee) requested that another letter be sent. The Committee understands that a Plan is a set of actions, but has concerns about the model or the Maddaus Report. The Committee believes that the figures used are outdated by using 2006 to 2008 figures and should be recalculated to current figures; or go on record that the District does not support the figures in this Report. The District's water customers have been and continue to conserve water and those figures are close to the target per capita goal. If conservation goals have been met and the seawater intrusion has not improved, the District has concerns about the health of the Basin.

Indoor Residential Use Consumption Calculation from Maddaus Report:	
248,200,000	Water pumped CSD (gallons)
X .554	Indoor Residential Use - Consumption (3 purveyors)
÷ 365	Days in the Year
<u>÷ 7,086</u>	Population density as presented by District Engineer Rob Miller of Wallace Group (documented)
53.2	Current figure of Indoor Residential Use

The Committee knows that the population is greater, and therefore, the current Indoor Residential Use Consumption should be less than 53.2.

The District has become aware of significant shortcomings in the Maddaus Report, including but not limited to the per capita rate and use of old census data. The District needs a commitment from the County and other partners in managing the Basin to arrive at more consistent and reliable numbers. The District stands ready to assist in facilitating those numbers.

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Sincerely,

Susan Morrow


cc: ISJ Participants

www.locsd.org

**Item No. 12 Attachment No. 5
Los Osos Wastewater Project
Sept. 6-7, 2012 Meeting**



September 29, 2011

TO: LOCSD Board of Directors
FROM: Dan Gilmore, General Manager 
SUBJECT: **Agenda Item 3A – 10/06/2011 Board Meeting**
Consider Utilities Advisory Committee (UAC) Subcommittee
Comments on the Maddaus Water Demand Analysis and
Water Conservation Evaluation

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DESCRIPTION:

Consideration of comments from the Utilities Advisory Committee regarding the Maddaus Water Demand Analysis and Water Conservation Evaluation.

SUMMARY OF STAFF RECOMMENDATION:

Staff recommends that the Board consider the comments developed by the Utilities Advisory Committee and provide direction to staff.

STAFF RECOMMENDATION:

Staff recommends that the Board adopt the following motion:

Motion: I move that the Board direct staff to forward the comments developed by the Utilities Advisory Committee regarding the Maddaus Water Demand Analysis and Water Conservation Evaluation to the ISJ Working Group and the County.

DISCUSSION

The Maddaus Report was reviewed by a subcommittee of the Utilities Advisory Committee (UAC) and their comments were brought back to the UAC for discussion and a recommendation. The Committee voted unanimously to forward the comments to the LOCSD Board, with a recommendation that the Board provide the comments to the ISJ Working Group and the County.

The subcommittee of the UAC consisted of Richard Margetson and Ron Munds. Ron Munds is the Water Conservation Coordinator for the City of San Luis Obispo, and is recognized throughout the State of California as an expert on the subject of water conservation. Ron is also familiar with the work of Bill Maddaus, the author of the report that is the subject of this item. The comments developed by the subcommittee were well received by the UAC. We found the comments to be quite practical, and may help to refine and streamline the water conservation efforts of the District and the other ISJ partners, as well as the County during the development of the water conservation plan that is required as a condition of the wastewater project. For these reasons, it is recommended that the Board direct staff to forward the comments to the ISJ Working Group and the County.

FINANCIAL IMPACT

Providing comments on the Maddaus Water Demand Analysis and Water Conservation Evaluation to the ISJ and the County will have no appreciable cost to the District.

MEMORANDUM

DATE: August 29, 2011
TO: Utilities Advisory Committee
FROM: Water Conservation Sub-Committee
SUBJECT: 2011 Water Demand Analysis and Water Conservation Evaluation

The Water Conservation Sub-Committee (sub-committee) has reviewed the 2011 Water Demand Analysis and Water Conservation Evaluation administrative draft report prepared by Maddaus Water Management (Maddaus report) and has prepared the following comments for the Utility Advisory Committee's consideration. It was noted by the sub-committee that without the other information and reports being generated by the ISJ Working Group, it was difficult to analyze the effectiveness of the outlined water conservation programs in achieving the desired water balance within the Los Osos groundwater basin. One of the stated goals of the Maddaus report is to determine when and what combination of the proposed conservation measures would meet the indoor residential 50 gallons per person per day objective. Without knowing the other strategies in the basin plan to address sea water intrusion and overdraft, it is difficult to assess the effectiveness of the programs outlined in the report and to develop an implementation strategy that reduces water use in the most cost effective manner.

Sub-Committee's General Overview and Recommendations

The sub-committee review found no "fatal flaws" in the Maddaus report analysis for potential water savings but there are areas of concern with the assumptions made in Appendix A which tend to inflate the cost of program implementation and the demographic information in Table 6 which needs to be reconciled with the 2010 census data to accurately reflect current conditions and refine the water use reduction estimates. Based on the information at hand, the sub-committee recommends that the Utility Advisory Committee forwards the following recommendations to the LOCSB Board:

1. The Maddaus report be used as a guidance document in the development of the long term water conservation program but that more analysis be conducted on each measure being considered for implementation to ensure the water savings potential and cost effectiveness projections are accurate;
2. A phased approach is taken which focuses on the implementation of the indoor measures in the Maddaus report first;
3. The number one priority be a community wide indoor retrofitting program in each water purveyors service area and include well users within the Los Osos URL;
4. Public information, residential surveys and a media campaign be included in the first phase;
5. The general comments stated below are addressed in any final report.

General Comments

- Population and demographic information in Table 6 needs to be reconciled with the 2010 census to better refine the water reduction estimations.
- Cost/benefit ratio needs to be better defined in the report for the average person to understand.
- Use the conservative population growth figures, very important not to overestimate the water savings potential.

- In section 5.2 and supporting tables the cost information is assumptions appear high which inflates the cost to implement the various programs.
- Section 5.3, inflation and interest rate assumption are very high.
- Section 7.1 states that a significant amount of water is used outdoors; this is not a correct statement in the LOCSD service area and needs to be rectified.
- Need the supporting information in table form for the graphs in Appendix B in order to better formulate a program for each service area.
- Need to address retrofitting in the prohibition zone versus the rest of the community in the cost information and water saving assumptions.
- The report does not make a recommendation for an implementation strategy to fit with the other ISJ Working Group documents.
- New Development measures and estimated water savings should be handled separately from existing water reduction calculations.
- Though not part of the scope of work (or stated goals), private well users need to be factored into a final water conservation program.

Sub-committee specific comments on the individual water conservation measures outlined in the report:

Measure #	Name	Comment
1	HET Rebates	Applies only to area outside Prohibition Zone
2	New development landscape requirements	Existing requirement for new development; no immediate savings
3	Retrofit Kits	No toilet retro devices
4	Residential washer rebates	Not reliable water savings, washers can move out of area
5	Residential water surveys	Difficult to require; need some enforcement provision
6	New development graywater	Not much savings for cost
7	New development require dishwashers	Not much savings; difficult to enforce
8	New development HEW	Difficult to regulate and enforce; would have to create legal grounds
9	New development hot water on demand	Not much savings, accounted for in energy code requirements for new development
10	Multi-family sub-metering	Expensive to retrofit; good for new construction
11	Public Info	Good
12	Rains Sensors	Good
13	Outdoor Ed.	Good
14	Rotating sprinkler rebate	Questionable; not good to use in all irrigation situations; unreliable water savings
15	Restaurant spray nozzles	Good; low cost; not many in LO
16	New development efficient fixtures	New Green Building Codes requiring 20% reduction in new construction will drive this
17	School Retrofit	SLCUSD did all the schools with Measure A funds years ago.
18	Water Waste Prohibition	Good
19	Partial community retrofit	Good
20	Subsidized Community Retrofit washers	Not reliable water savings, washers can move out of area
21	Meters in S&T area	Install and charge according to volume of water used
22	Commercial HEW	Good
23	Media campaign	Good
24	Retrofit upon resale	Already in place; need better tracking
25	New development smart controllers	Should be part of county landscape ordinance
26	Turf removal	Not a lot of large residential turf area; high admin costs to water savings potential
27	Conservation pricing	Done
28	Rain catchment	Very low water savings potential
29	Graywater single family	Not cost effective
30	Commercial surveys	Good
31	Fixture replacement by deadline	Outside prohibition zone; SB 407 requires all residential toilets to be changed by 2017