



Central Coast Regional Water Quality Control Board

September 23, 2022

Guy Savage
General Manager
Los Olivos Community Services District
gm.locsd@gmail.com

Sent by electronic mail

Dear Mr. Savage:

RE: Los Olivos Community Wastewater Reclamation System Project

The implementation of community wastewater systems are a high priority for the Central Coast Water Board. As you know, California law requires the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) to regulate waste discharges (including those from septic systems) to ensure long-term water quality protection. Therefore, the Central Coast Water Board has direct regulatory authority over individual septic and community wastewater systems in the central coast region. Throughout the past several decades, the Central Coast Water Board has supported and continues to support Santa Barbara County and the Los Olivos Community Services District's (CSD) efforts to implement a community wastewater reclamation system for the Los Olivos Community to replace individual septic systems (also known as onsite wastewater treatment systems or OWTS).

In 1974, the Santa Barbara County Board of Supervisors designated Los Olivos as a Special Problem Area for septic systems and the county has since conducted several studies evaluating and supporting the implementation of a community wastewater system. The basis for the county's 1974 designation was combination of compounding factors in the community including small lot sizes and unfavorable soil conditions for septic system disposal, and nitrate impacts to shallow drinking water supply wells. The Central Coast Water Board's 1989 *Water Quality Control Plan for the Central Coastal Basin* (Basin Plan) also identified Los Olivos as an area needing wastewater management planning. The county's 2003 Septic System Survey¹ identify the Los Olivos area as high risk for OWTS contamination of groundwater and surface water due to the high density of systems associated with small lot sizes, shallow groundwater, unfavorable soil conditions, proximity to surface water bodies, age and condition of

¹ Hantzsche, N.N., Habal, J.A., Hopkins, W., McGregor, J., Eckman, N., Gonzales, M., Pettifor, G. (2003). Septic system sanitary survey for Santa Barbara County California. Questa Engineering Corporation Project #210029 prepared for Santa Barbara County Environmental Health Services.

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

systems, and the predominant septic system disposal method employed in the community. Some of these issues are described in more detail below to provide context regarding the necessity of the community wastewater system project.

Lot sizes are small in Los Olivos with approximately two thirds of the lots being less than half an acre and many of the lots less than a quarter acre. For reference, the State Water Resources Control Board's statewide OWTS Policy² limits parcel size for new subdivisions utilizing OWTS to a half-acre or greater based on average annual rainfall (Section 7.8, Table 1, OWTS Policy). The OWTS Policy dictates minimum lot sizes of two or two and one-half acres for Los Olivos based on an available range of average annual rainfall data for the Los Olivos area.

Soil conditions that are unfavorable to percolation and small lot sizes in the Los Olivos area preclude the use of conventional leachfields to spread out the septic system effluent discharge closer to the surface where it can percolate through the soil before reaching groundwater. The county's 2003 Septic System Survey found that approximately two thirds of the surveyed systems utilized drywells or seepage pits. Seepage pits are a high-risk disposal method for groundwater contamination because they concentrate septic system effluent disposal over a smaller area and reduce the level of wastewater contaminant treatment and attenuation that would occur in the unsaturated soil zone over a greater area and depth as compared to conventional leachfields.

The use of drywells and seepage pits coupled with shallow groundwater increases the risks of groundwater contamination from septic system discharges. According to the 2003 Septic System Survey, first encountered groundwater exists at 5-15 feet below ground surface (bgs) in Los Olivos and many of the seepage pits may discharge directly into the saturated portion of the aquifer, precluding unsaturated zone soil treatment and attenuation before the septic system effluent reaches groundwater. At the time the 2003 Septic System Survey was conducted, approximately one third of the systems were greater than 10 years old. Septic systems typically have a lifespan of approximately 40 years. Many of the systems in Los Olivos are approaching the end of their useful life and may result in a decrease in treatment and disposal performance.

Shallower drinking water supply wells in the Los Olivos community historically identified as being impacted with nitrate have been abandoned and replaced with deeper water supply wells. Nitrate concentrations in deeper water supply wells that now support the Los Olivos community contain fluctuating levels of nitrate with maximum levels of up to 4.3 milligrams per liter as nitrogen (mg/L - N; the public health drinking water maximum contaminant level is 10 mg/L - N). Although limited groundwater quality data are available for the Los Olivos area, these data and the above noted unfavorable septic system issues in the Los Olivos area support the Special Problem Area designation and need for a community wastewater system.

² https://www.waterboards.ca.gov/water_issues/programs/owts/docs/owts_policy.pdf

Increased groundwater regulation through the Sustainable Groundwater Management Act (SGMA) and an ever-worsening drought that limits statewide water supply and increases groundwater pumping requires communities to consider all sources of water as a critical resource and to develop long-term approaches to protect and manage our shared finite water supplies. A community wastewater reclamation system will provide both water quality and water supply benefits for the Los Olivos community by eliminating nitrate discharges from septic systems to the community's groundwater supply and by producing a drought resilient source of recycled water for beneficial reuse in the community. The county and CSD have invested significant staff and financial resources towards evaluating various community wastewater system alternatives and is on a critical path towards realizing a project that will benefit the Los Olivos community well into the future.

Ongoing wastewater management in Los Olivos via OWTS will be subject to Santa Barbara County oversight via ordinances in accordance with the county's Local Agency Management Plan (LAMP)³ approved by the Central Coast Water Board pursuant to the OWTS Policy. The LAMP and associated ordinances include OWTS related requirements and restrictions for Los Olivos in addition to other problem areas in the county. The ongoing operation and maintenance of OWTS, particularly for high-risk constrained site conditions and systems like those in Los Olivos, will be burdensome and costly to individual property owners and the community. A community wastewater facility owned and operated by the Los Olivos Community Services District will facilitate local control of wastewater services versus control by the county or Central Coast Water Board as may be necessary in the future if a community wastewater system is not implemented and the area is subject to ongoing OWTS failures or continued water quality degradation.

It is the Central Coast Water Board's longstanding position that a community wastewater solution is necessary for Los Olivos' benefit and viability. Continued use of individual septic systems is not feasible in the long term for the reasons outlined above and will result in ongoing potential system failures, groundwater degradation, and financial and intrinsic societal costs to the community associated with a substandard wastewater management approach subject to county and state level requirements and restrictions. A community-based approach will also enable Los Olivos to better manage its water supply via the potential beneficial reuse of recycled water and/or the discharge of highly treated wastewater into the Santa Ynez River Valley Groundwater Basin the Los Olivos community relies on for its drinking water supply. Wastewater and water supply infrastructure funding is currently available through various state and federal programs that could be pursued in support of implementing a community wastewater reclamation system project. The cost of a community wastewater project will increase and the availability of funding will decrease with each passing month, so time is of the essence to finally act on this warranted project that has been discussed and studied for nearly five decades.

³ <https://content.civicplus.com/api/assets/6aa4e5d0-3d64-4521-99e9-b37e89eaa7b0?cache=1800>

The Central Coast Water Board is committed to working in partnership with the Los Olivos community and Santa Barbara County to facilitate this very important and necessary project for the community and for the future of our shared water resources.

Sincerely,

Matthew T. Keeling
Executive Officer

cc:

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