

Utilities Advisory Committee - Water Offset Program Comments – 12/6/2023

1. Request a time extension for public comments given the timing of the release of the document.
2. Minor comment: 8.91.020 (4)d. - Aerator definition 1.0 gpm; 19.07.042 (8)a.3. and 19.07.042 (8)c.2. – 1.2 gpm
3. 19.07.042 (8)b. with the deletion of the text “outside the of the Prohibition Zone”, this opens up the retrofit opportunities to existing structures in the Prohibition Zone but it is not clear in the ordinance if new building permit will be issued within the Prohibition Zone using the Water Offset Program. Will the Coastal Commission need to approve the ordinance?
4. 19.07.042 (8)b.4. – Please elaborate on the meaning of and process associated with the text “or through other projects as authorized by the Department director”.
5. 19.07.042 (8)b.5. – Assuming that County staff is including this text so they don’t have to go through an ordinance amendment to make changes, which is understandable, is there going to be a process where the water purveyors or the public can review and comment on those changes prior to implementation.
6. On page 3 of 11 in the table for the LO Groundwater Basin Retrofit-to-Build Requirements for single-family self-sourced development, it appears that using the parcel size as the denominator in the equation reduces the offset requirement substantially as the size of the parcel increases; the larger the parcel, the less the offset requirement. Was this the intent of the equation?
7. The water savings verification process to ensure the savings are being realized is not adequately addressed in the update. In the study, Maddaus recommended more actions and provided examples in Section 6.3 (pages 27-29) of the study to assist in the verification process. Mechanisms to evaluate community-wide water use on a periodic basis need to be included to verify that the groundwater basin is not being negatively impacted by new development.
8. The CSD is opposed to including outdoor measures until a time that the County can explicitly demonstrate the verifiable, reliable and long-term water savings of any measure being considered are accurate. The analysis in Section 5.1 of the study (page 18) is vague and lacks data to support the three suggested programs to achieve the outdoor water savings suggested.
9. Retrofits (offsets) need to be within the water purveyor boundary based on where the new development is being considered. To allow for flexibility, at a time when the retrofit opportunities within a water purveyor’s services area have been determined to be exhausted or retrofits are no longer available, the offset requirement can then be achieved elsewhere in the community.