

**TO: Hillary Hauser, Heal the Ocean**  
**From: Rick Merrifield**  
**Sent: Monday, April 29, 2019 11:12 PM**

**Subject: LOCSD UPDATE LETTER/PACKET SUBMITTAL TO LAFCO 5/2/2019**

Hillary,

I looked over the attached letter and packet and offer the following comments:

- As you know, the original compliance period ended this month and it appears that not much has happened so far except for a one year time extension. The "administrative accomplishments" to date seem almost embarrassing in their lack of substance. Working with District citizens on a variety of septic questions and issues." Really?
- The good news is that they do have short-term and long-term plans. The downside is that they both appear to be not much more than a rehash of the same old generic stuff that's been known for years. I noted that the acting General Manager is Doug Pike, the engineer who wrote the original wastewater study funded with "HBJ funds." As I recall, that study was not well received because it was very generic and was followed up with a second, more focused study. Again, I don't see anything new or substantive here.
- The Technical Committee briefing document lists pretty much every possible variation for wastewater treatment and disposal (even "No Project") which, again, have already been studied, discussed and even estimated. I suppose it might be useful as an outline for a discussion but there is no new information here.
- Regional solutions have been proposed but have gone nowhere due to lack of interest or motivation from the Los Olivos community. I know that Santa Ynez CSD has offered to work with LOCSD and I personally think that could be very beneficial for the people of Los Olivos. This document appears to continue that deafness with its emphasis on individual advanced treatment systems (ATS).
- A phased approach could make sense as long as the phases are specific, timely and mandatory. Otherwise, it's most likely just a way to delay things even further. All lots smaller than 1/2 acre should be required to abandon their existing individual systems as soon as possible. The data is clear that they pollute the groundwater. All lots smaller than one acre should also be required to connect to a public system or install ATS.
- On the subject of ATS, they really make no sense at all on individual small lots or any commercial lot. Los Olivos is full of tiny to small lots. It is a dense village that has been almost entirely paved over. Individual ATS on lots of less than an acre should really not be included as an option for both technical and cost reasons. They are very expensive and require significant maintenance. And they still discharge wastewater that needs to be carefully disposed. They are not magical.

- It might be helpful to recall the experience of Los Alamos which faced similar issues back in the 80's: old septic systems, small lots, shallow groundwater. They set up a district, built a plant, and set up a field to accept the treated effluent via spray irrigation. It worked and it seems that the money was used pretty efficiently. It's pretty much exactly what Los Olivos needs to do. They don't need to reinvent the wheel or discuss every possible option to death.
- In summary, I think they're wasting time and money they don't really have. The options are clear; the studies have been completed; it's time to make a decision and get on with it. In my view the only viable options are either a package treatment plant and disposal area adjacent to Los Olivos (they don't really have any spare land to speak of) or connection to Santa Ynez CSD for collection and treatment by the Solvang regional plant.

I hope you find these comment helpful. Let me know if I can be of further assistance.

Rick Merrifield, REHS (retired)