

---

## Central Coast Regional Water Quality Control Board

April 3, 2025

Guy Savage, General Manager  
Los Olivos Community Services District  
P.O. Box 345  
Los Olivos, CA 93441  
Email: gm.locsd@gmail.com

**Sent Via Electronic Mail**

Dear Guy Savage:

### **LOS OLIVOS COMMUNITY SERVICES DISTRICT (CSD); ACTIONS THE CENTRAL COAST WATER BOARD COULD TAKE IN RESPONSE TO A 'NO PROJECT' SEWER PROJECT DECISION BY THE CSD**

California law requires the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) to regulate waste discharges (including those from onsite wastewater treatment systems or OWTS) to ensure long-term water quality protection. The Central Coast Water Board has direct regulatory authority over individual septic systems 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's and the Los Olivos Community Services District's efforts to replace OWTS with some form of a community wastewater treatment and disposal system or connection to an existing collection and treatment system for the Los Olivos community. The Central Coast Water Board has worked with similar communities where the size and density of individual septic systems, also known as OWTS, can no longer handle the load of increasing wastewater demands. In these cases, helping communities transition to community wastewater systems is a high priority for the Central Coast Water Board.

You posed a question to the Central Coast Water Board in an email dated February 13, 2025, asking how the Central Coast Water Board would respond to a 'No Project' decision made by the Los Olivos CSD for a Los Olivos community sewer system or connection to an existing collection and treatment system. The Central Coast Water Board encourages the CSD to be proactive and not take a 'No Project' path. As explained most recently in letters to the CSD on February 14, 2017,<sup>1</sup> and September 23, 2022,<sup>2</sup> it is the Central Coast Water Board's position that OWTS must be phased out in Los Olivos and that a community collection, treatment, and disposal system or

---

<sup>1</sup> <https://geotracker.waterboards.ca.gov/?surl=kq3v5>

<sup>2</sup> <https://geotracker.waterboards.ca.gov/?surl=cbbpds>

connection to an existing collection and treatment system is required for water quality protection.

In response to your February 13, 2025 email, this letter presents regulatory options that the Central Coast Water Board could impose if a 'No Project' decision was to be made. We have identified a variety of possible regulatory options. Continued use of individual OWTS is not protective of water quality and must be discontinued. If the Los Olivos CSD pursues a 'No Project' option, the Central Coast Water Board could:

- 1) Designate groundwater in the Los Olivos area as impaired by OWTS and require that San Barbara County develop and implement an advanced groundwater management plan, as described by the county's Local Agency Management Program (LAMP). This would shift responsibility to the county to develop a plan to replace OWTS with another type of wastewater service.
- 2) Develop, implement, and enforce a prohibition on discharges of waste from individual OWTS. This could prompt actions by a government agency, such as the county or the CSD, to develop a plan to replace OWTS with another type of wastewater service. A prohibition could also provide the Central Coast Water Board with the option to hold individual property owners responsible to comply with the prohibition if a government agency does not successfully implement an alternative. Follow-up enforcement actions that the Central Coast Water Board could take for failure to comply with the prohibition include:
  - a. Issuance of cease and desist orders to each property owner.
  - b. Issuance of cleanup and abatement orders to each property owner.
  - c. Imposition of monetary penalties on each property owner.
- 3) Designate all OWTS within the Los Olivos community as Tier 4 as described in the state's OWTS policy.<sup>3</sup> This would trigger requirements that OWTS owners upgrade their systems.

Please note that this is just a list of regulatory tools available to the Central Coast Water Board to address the water quality issues in the Los Olivos CSD area. By identifying the regulatory options set forth above, the Central Coast Water Board is not committing to implementing any one or all of those options.

In conclusion, continued use of OWTS in Los Olivos will lead to increasingly degraded water quality. A community alternative is required by existing laws and regulations. The CSD must push an alternative forward. The Central Coast Water Board is ready to assist the community and the CSD, preferably with grant funding and technical assistance. If there is no change, and the CSD does nothing to correct the threat to water quality, the Central Coast Water Board may use its regulatory authority against

---

<sup>3</sup> [https://www.waterboards.ca.gov/water\\_issues/programs/owts/](https://www.waterboards.ca.gov/water_issues/programs/owts/)

the CSD, the county, and even individuals as a last resort to protect water quality within its jurisdiction.

If you have any questions regarding this letter, please contact Harvey Packard at (805) 542-4639 or by email at [harvey.packard@waterboards.ca.gov](mailto:harvey.packard@waterboards.ca.gov) or Jennifer Epp at [jennifer.epp@waterboards.ca.gov](mailto:jennifer.epp@waterboards.ca.gov).

Sincerely,

Ryan E. Lodge  
Executive Officer

cc:

Julie Kennedy, Los Olivos CSD President,  
[julie.kennedy.locsd@gmail.com](mailto:julie.kennedy.locsd@gmail.com)

Lars Seifert, Santa Barbara County, Deputy Director of Operations,  
[lars.seifert@sbcphd.org](mailto:lars.seifert@sbcphd.org)

Jason Johnston, Santa Barbara County, Environmental Health Services Director,  
[jjohnston@sbcphd.org](mailto:jjohnston@sbcphd.org)

Supervisor Joan Hartmann, Third District, Santa Barbara County Board of Supervisors,  
[jHartmann@countyofsb.org](mailto:jHartmann@countyofsb.org)

Mike Prater, Executive Officer, Santa Barbara County Local Agency Formation  
Commission, [lafco@sblafco.org](mailto:lafco@sblafco.org)

WDR Program, [RB3-WDR@Waterboards.ca.gov](mailto:RB3-WDR@Waterboards.ca.gov) GeoTracker