

March 25, 2026

Clean Water State Revolving Fund
State Water Resources Control Board
Division of Financial Assistance
PO Box 944212
Sacramento, CA 94244-2102

RE: Opposition to Grant Funding for Planning and Design (\$1,485,000) for the Los Olivos Community Service District (LOCSD) “Septic to Sewer Project”, CWSRF Project Number 8881-110

Dear Members of the California State Water Board Resources and Control Board,

As a long-time Los Olivos community member and a resident in the designated Los Olivos “Special Problems Area”, I am writing to express my strong opposition to the requested allocation of \$1,485,000 in grant funding for planning and design activities associated with LOCSD, Project Number 8881-110, which would facilitate the collection and construction of a sewer pipeline from Los Olivos along the five-mile agricultural Alamo Pintado Corridor to Solvang.

The project raises significant concerns not only related to land use and environmental impacts, but also to the public process, transparency, and the integrity of the underlying data used to justify it. The current data does not demonstrate an active or widespread public health risk that would justify the project. Recent groundwater monitoring suggests that groundwater contamination is localized and associated primarily with the downtown commercial core, rather than district-wide.

Significant concerns include:

- 1. Impacts to Agricultural Land and Rural Character** - Alamo Pintado Road runs through a vital agricultural corridor central to the identity and economy of the Santa Ynez Valley. Extending sewer infrastructure into this area introduces long-term pressure for increased density and land use conversion, threatening agricultural viability and rural character. Such infrastructure serves as a catalyst for growth that conflicts with community expectations and the long-standing Santa Ynez Valley Community Plan.
- 2. Environmental Risks** - The proposed pipeline and associated future development may impact sensitive habitats, groundwater resources, and watershed

integrity. These risks warrant thorough evaluation before any public funding is committed, even in the planning stage.

- 3. Questionable Basis for Groundwater Justification** - A key justification for this project has been groundwater and public health concerns. However, the timeline and data underlying this claim raise serious questions. The Los Olivos Community Service District (LOCSD), formed in 2018, did not install groundwater monitoring wells until approximately five years later. These wells were installed only after significant public outcry requesting current, site-specific data rather than reliance on decades-old data (approximately 50-year-old studies). Available data from these monitoring wells indicates that the primary source of offending effluent impact is the downtown commercial core, which serves large numbers of tourists and visitors each weekend and throughout the week. This raises the fundamental concern. If the most significant wastewater impacts are concentrated in the commercial core, why is the proposed infrastructure expansion focused through an agricultural corridor rather than addressing the primary source directly and locally? The currently available data does not demonstrate an active or widespread public health risk that would justify this project. The evidence suggests localized conditions, not a district-wide public health issue requiring expansion of sewer infrastructure through agricultural lands.
- 4. Lack of Demonstrated Support** – There is substantial and ongoing community concern and opposition to this costly growth-inducing project. Advancing state funding in the absence of broad, demonstrated local support undermines public confidence and risks the failed support via the Prop 218 protest vote. There has been no formal, verifiable vote of parcel owners demonstrating support for this “Septic to Sewer Project”, Project Number 8881-110. The oft-cited town hall ‘vote’ is not a reliable indicator of community support, as it lacked voter verification, did not ensure adherence to a standard one-vote-per-parcel framework, and did not ensure that only property owners within the district participated. Without such safeguards, this raises serious concerns that multiple individuals associated with a single parcel may have voted while others without a direct financial or property interest, including potential developers, may have participated, rendering the results unreliable. As a result, the outcome cannot be considered an accurate or credible reflection of property owner support.
- 5. Serious Transparency Concerns** – There are also significant concerns regarding the transparency of the process. Restricted public access to key discussions including Ad Hoc Committee Meetings related to Proposition 218, have not been

accessible to the public. Potential violations of open meeting laws - these practices raise concerns regarding compliance with the California Brown Act. Lack of financial transparency - the failure to provide access to LOCSD legal invoices and related expenditures limits the public's ability to understand how public funds are being used. These issues erode public trust and call into question whether this project has been advanced in a manner consistent with California's open government requirements.

- 6. Use of Public Funds** – Allocation of nearly \$1.5 million in state funds to advance a controversial project with unresolved environmental, land-use, and governance concerns is not a prudent use of limited public resources.

For all these reasons, I respectfully urge the Board to deny funding for Project Number 8881-110. Protecting the Santa Ynez Valley's agricultural resources, environmental integrity, and public trust must remain a priority in all funding decisions.

Thank you for your consideration.

Sincerely,

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