

Los Osos Basin Management Committee Board Meeting June 17, 2026

Item 9A

Comment by Lynette Brooks, Los Osos resident

The Annual Report is Wrong

If the LOBMC approves the 2025 Annual Report, they are guilty of knowingly using false data to report the Water Level Metric to the public and to the court. The methodology of holding well LA16 fixed at its 2024 water level (8.32 feet) to calculate the 2025 Water Level Metric is completely invalid. For 2025, this practice may underreport the actual decline in the aquifer. The answer to my previous comment about this is provided in the Final Annual Report (p. M-2) as "Holding LA16 fixed at the unmodified elevation in the Water Level Metric preserves comparability with the historical record and the 8-foot target, all of which are defined using the same five wells." Using fake data does not preserve comparability with previous data, especially since LA16 may have always had Upper Aquifer influence and been corrupt data from the beginning. By removing LA16 from both the historical baseline and the future metric, the BMC can correct the metric and the target using the 4 remaining wells.

The Mathematical Flaw: One Fake Number Overrules Four Real Wells

In 2024, the Water Level Metric used water levels collected in all 5 wells, yielding a 5-well average of 4.23 feet. Between 2024 and 2025, the four remaining active monitoring wells dropped by an average of 0.94 feet. This is a reduction of 29.4 percent. By inserting the fake data of 8.32 feet into the 2025 calculation, the report claims a 5-well average of 3.47 feet (a reported drop of only 0.75 feet, or only 17.8 percent). This fake data hides 20% of the measured metric decline, meaning the real decline could be 25% more severe than what is being reported to the public and the court.

The critical deception lies in the sheer mathematical leverage of LA16. In 2025, the four other wells total only 9.05 feet combined and contributed $9.05/5$ to the average. Injecting the fake 8.32-foot value means a single artificial data point makes up $8.32/5$ of the average, nearly half (48%) of the metric's entire calculation. If a minor well with negligible weight were locked, it would be bad science but a small error. Locking a well that carries almost as much weight as all four real-data wells combined ensures the metric will never truly register basin health or if levels are high enough to prevent saltwater intrusion. Furthermore, this 8.32-foot placeholder represents the highest measurement ever recorded at LA16 as part of the Water Level Metric. The 2025 Annual Report intentionally uses a best-case historical record to artificially calculate the Water Level Metric.

Statistical Invalidity: Freezing an Uncorrelated Outlier

Not only is the highest level being set for the well with the most influence on the Water Level Metric, but a 10-year regression analysis reveals that well LA16 has zero meaningful correlation with the rest of the tracking network, yielding an R-squared value of only 0.38 against the independent average of the other 4 wells. Sixty-two percent of LA16 historical water-level changes may be completely independent of aquifer trends, possibly because of upper aquifer leakage. The July 28, 2022 Agenda Packet states: "LA16 was sampled in 2005 but borehole leakage (Upper Aquifer influence) currently prevents obtaining a representative sample." It has always been known by the geologist and the LOBMC that LA16 was not a good well for the Water Level Metric.

The 2026 Annual Report (Final, p. 55) states: "LA16 was modified to isolate Zone E beginning in 2025, which resulted in sudden drop in water level of approximately 7 feet." This wasn't just because it now measures only Zone E instead of Zone D and Zone E. This was because the measured water levels were always influenced by the Upper Aquifer. If the report writer and the LOBMC was truly concerned about the difference between Zone D and Zone E, then LA14 also could not be used in the metric.

Resolution: Re-Scaling the Target for a 4-Well Network

The original 8.0-foot Water Level Metric target was calculated from the 2015 Basin Plan baseline, which established that the Water Level Metric needed an increase of 7.4 feet to successfully combat seawater intrusion. Utilizing the original 2015 data, the BMC can seamlessly transition to a 4-well metric without losing comparability or changing the physical target for basin safety. Two methods could be examined.

1. From 2015 to 2024, the difference between the average of all 5 wells and the 4 remaining wells ranged from 1.0 to 1.6 feet, with an average difference of 1.2 feet. This could be used to say that, in general, the metric without LA16 would be 1.2 feet lower, or 6.8 feet.
2. The Spring 2015 Water Level Metric was 0.6 feet. The goal of 8 feet is 7.4 feet above that. The Spring 2015 average of the four remaining wells was -0.4 ft. Assuming the average still needs to increase by 7.4 feet, the new metric would be 7.0 feet.

Changing the Basin Plan

If the LOBMC is worried about changing the metric because it is in the Basin Plan as approved by the Stipulated Judgment, I offer the following quotes from the Stipulated Judgment:

1. Section 3.1 "Material, substantive changes to the Basin Plan shall require unanimous approval of the parties." This is probably what you use to change the sustainable yield.

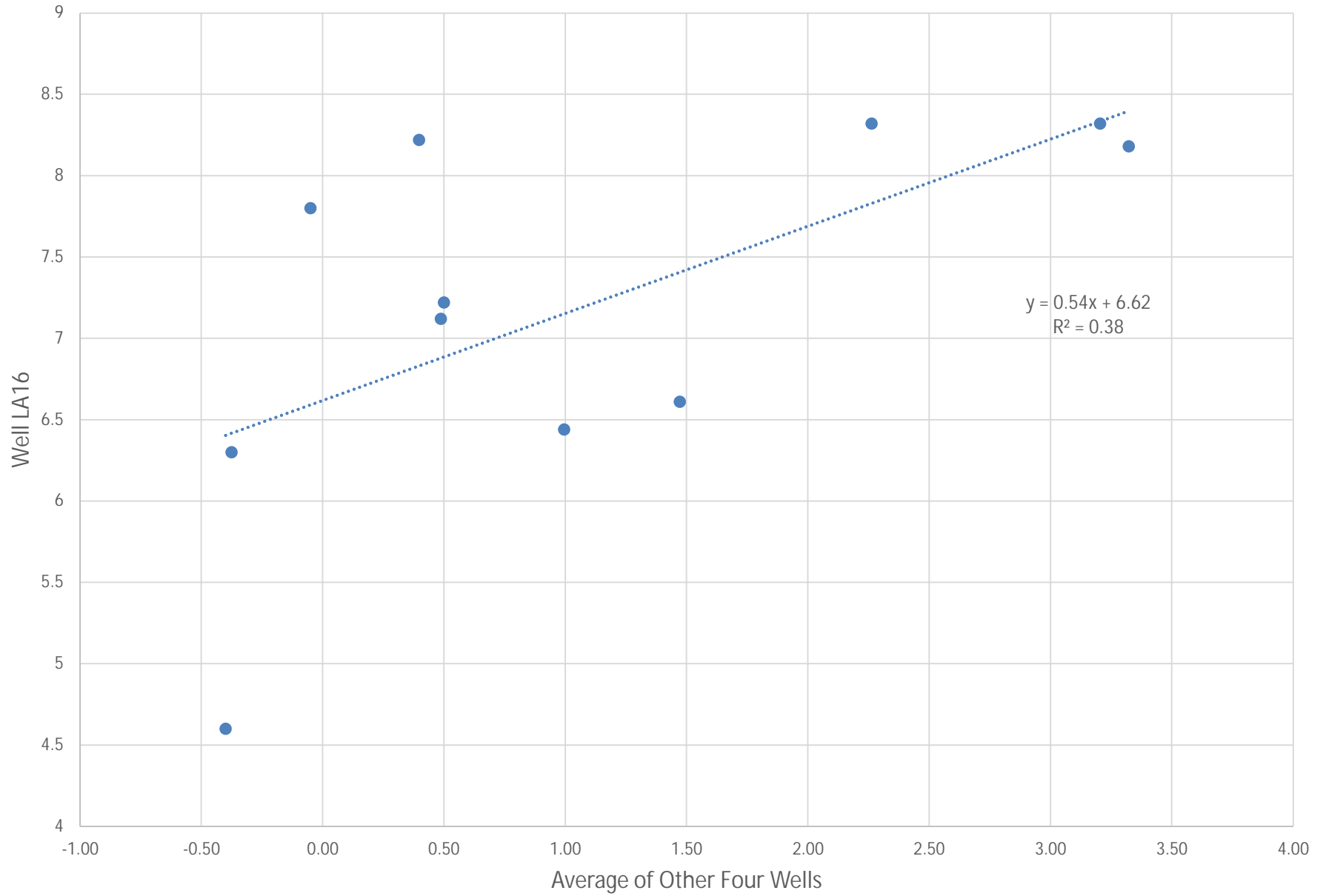
2. Section 5.3.3 “Produce and distribute annual written reports assessing the hydrologic balance in the Basin as further provided in Section 5.8.3 and use and consider the information provided in the reports when modifying or updating the Basin Plan and setting the Sustainable Yield_x.” Please note that this section of the Stipulated Judgment requires the annual report to assess the hydrologic balance in the basin. Using fake data in the Water Level Metric violates this requirement.

Conclusion

I urge you to correct the Annual Report to use a new metric. Approving the Annual Report with the current presentation of the Water Level Metric implicates all of you in the use of incorrect data and bad science being presented to the public and the court.

Water-Level Metric (Prepared by Lynette Brooks using data from annual reports)													
Well	Spring 2015	Spring 2016	Spring 2017	Spring 2018	Spring 2019	Spring 2020	Spring 2021	Spring 2022	Spring 2023	Spring 2024	Spring 2025	Decline from Spring 2024 to Spring 2025	
												(feet)	(Percent)
	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025		
LA2	1.6	2.3	1.8	1.97	1.57	1.47	1.47	2.44	2.7	2.3	2.39		
LA3	0.2	-0.7	-0.9	-0.78	-0.81	-0.51	-0.51	-0.4	0.28	0.44	0.19		
LA11	-0.7	-0.1	0.4	1.18	0.63	0.83	1	2.11	4.67	4.44	2.49		
LA14	-2.7	-3	-1.5	-0.78	0.61	0.16	2.02	1.74	5.64	5.64	3.98		
LA16	4.6	6.3	7.8	8.22	7.22	7.12	6.44	6.61	8.18	8.32	8.32		
Average	0.60	0.96	1.52	1.96	1.84	1.81	2.08	2.50	4.29	4.23	3.47	0.75	-17.83%
Average without LA16	-0.40	-0.38	-0.05	0.40	0.50	0.49	1.00	1.47	3.32	3.21	2.26	0.94	-29.41%
Difference between metric and average of four wells	1.0	1.3	1.6	1.6	1.3	1.3	1.1	1.0	1.0	1.0			

Lack of Correlation of LA16 and Other Wells



Wells Used for Water-Level Metric

