

Comments on the DEIR
from :Linde Owen

Overall comments

This draft EIR provides little if any clarity on what an overall sewer treatment system might entail or provide as an environmental impact, while completely ignoring what the cost differences are.

This DEIR Alternative analysis has cost the taxpayers of the Los Osos PZ \$2 million and appears to hide the alternatives rather than compare them. The County has spent over \$5 million preparing for this DEIR.

Why was the community-rejected MWH hired by Carollo to assist with this EIR? And is it coincidental that both corporations build Gravity collection systems. Obviously that is why most of this DEIR's prior project info that no longer relates to community desires, appears to be current. Obviously 'cut and paste' drove this EIR's production. Re-using the prior EIR may have seriously led this one away from a fair analysis.

Reviewing the TAC analysis, one notes that much that showed validity from this group's analysis and review was dropped, ignored, or exaggerated.

Paavo Ogren's recent decision to support the rejected MWH Collection plan as superior and also 'shovel ready' ignores the bigger question: Is the County ready to vet a collection system without adequate and fair analysis, just to grovel for Obama infrastructure money?

Paavo's affordability plan seems to be about choosing the most expensive, energy inefficient, corporate/County Admin-friendly project with the savings being made up in grants, loans and the Obama Infrastructure funds.

The more ethical approach would be for the County team to have honestly reviewed options that would be sustainable and less costly.

Because we have accessed ourselves \$128 for a project, we DO NOT APPEAR ELIGIBLE for the Obama infrastructure money. Like the old \$35 million Federal carrot, it's not happening. For the County to bypass the fair evaluation through this Gravity-leaning DEIR is unethical, political, and fails to meet Obama's criteria for Green & Sustainable infrastructure improvements.

Also. Where did the STEP information come from if not the \$1/2 Million design description that Ripley Design presented with his engineers stamp? Neither TriW or Broderson are needed by any of the other alternatives presented. Why? Because they have smaller footprints and have safer plans for disposal. Mr. Ogren admitted that if Broderson disposal plan didn't work, they'd have to find

something else. He also stated that the County will be responsible for any damage caused by the potential liquifaction should the hill destabilize.

The Tonini site is in a separate aquifer, crosses two creeks, and destroys prime ag land, currently in crops & grazing. It has farm buildings of importance in the criteria of anything older than 50 yrs will be considered 'historic' significance, the Tonini Ranch is over 100 yrs old. Using sprayfields to evaporate over half of our 'treated effluent' water overtook 'Due Diligence' and the far more water re-use friendly AG Exchange potential was dropped. Tonini is 600 acres MORE THAN IS NEEDED. How will the County cover the extra cost that is truly unneeded and far too distant. Choosing a technology that produces daily sludge when integrated pond technology produces NONE for approx 20 years, is a questionable reason to even suggest that this site could become a sludge treatment facility. More disclosure needed.

Collection. 70% of the project cost. Potential of high pumping cost, costly maintenance, and system failure (inflow/outflow, spillage, and extensive maintenance). Installation can also differ ie. impact to community: installation impacts have huge differences. Cultural sites discovery, Dewatering in high ground water areas (30% of project area), 42 miles of street impact (includes hauling away & new fill), Earthquake preferable, Lawsuit safe, Agency By-in, and Financing all have major roles ahead in choosing a low impact, sustainable alternative.

Safety (pipe failure, potential spills & fines, sewage back-ups,, system longevity, lower installation impact, lower monthly overhead ~ simple/best performance maintenance, lower energy draw, less social impact, best water re-use, best salt water control through basin balance, and most long term affordable are my EXPECTATIONS.]

Treatment. Location. Choice of Treatment. Equals community support, Basin future depends on current actions oncoming from the County team. Our community relies on an informed process not this sped up Project 4 support. Nacimiento Water is NOT an option for LosOsos, Water Re-use potential begins here. Treatment is tied into the final disposal desire and potential re-use. Stopping salt water intrusion and impending basin failure are intimately tied into the disposal option and more important than the .5 mg nitrate that we currently have in our aquifer. .

Nacimiento Water would be expensive and coming from a lake that is at 26% capacity in Winter 2009. Broderson disposal to get 20 % INTO THE LOWER AQUIFER. This is a total experiment and could fail. The DEIR fails to evaluate other options such as reduced aquifer pumping through purple pipe disposal, (the preferable form of re-use), AG Re-use (the 2nd best re-use) and any discussion

of Recreated wetlands, a financially/environmentally viable possibility at Warden Lake.

Several other questions that deserve answers:

1. Impacts to wetlands and vegetation due to changes in groundwater regime - doesn't appear to be evaluated or mitigated in the DEIR
2. Staging areas - have they been identified or evaluated - they also require environmental review and mitigation if appropriate
3. Water quality and disposal of deep trenching activities - bio and public health
4. Cultural impacts due to trenching activities - are they being evaluated for both mainline and laterals?
5. Air quality in light of new legislation on greenhouse gases etc

Here's just a little view of what the County team didn't want to consider...

Advantages: (From http://en.wikipedia.org/wiki/Vacuum_sewer)

Vacuum Collection (NOT EVALUATED BY THE COUNTY)

- Closed, pneumatically controlled system with a central vacuum station. Electrical energy is only needed at this central station
- No sedimentation due to self-cleansing high velocities
- Spooling and maintenance of the sewer lines is not necessary
- Manholes are not required
- Usually only a single vacuum pump station is required rather than multiple stations found in gravity and low pressure networks. This frees up land, reduces energy costs and reduces operational costs.
- Investment costs can be reduced up to 50 % due to simple trenching at shallow depths, close to surface
- Flexibility of piping, obstacles (as open channels) can be over- or underpassed reduced installation time
- Small diameter sewer pipes of HDPE, PVC materials; savings of material costs aeration of sewage, less development of H₂S, with its dangers for workers, inhabitants, as well as corrosion of the pipes may be avoided; sewage is kept fresh
- No odours along the closed vacuum sewers
- No infiltration, less hydraulic load at treatment station and discharge sewers absolutely no leakages (vacuum avoids exfiltration)
- Sewers may be laid in the same trench with other mains, also with potable water or storm-water, as well as in water protection areas
- Lower cost to maintain in the long term due to shallow trenching and easy identification of problems

Please understand that the weight and volume of this DEIR has NOTHING to do with Quality. Most of it was produced by MWH for a pleasant profit on the prior project.

This community deserves a fair review of our options and this draft bypasses the TAC work, The NWRI comments (Problem: by the second NWRI review, MWH, Corollo & Assoc, and Kennedy-Jenks all are shown as executive donors and the tone changes radically). It's a very questionable sell for bad technology at too high a cost and is no where close to Green or Energy-conscious. Please review Ripley, Air Vac, and Low Pressure Collection.

Thankyou,

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