



Draft WRAC letter on sewage sludge scoping process

elquadrillo

to:

'mbandov@co.slo.ca.us'

11/22/2015 06:47 AM

Cc:

"lindachipping@yahoo.com"

Hide Details

From: elquadrillo@charter.net

To: "mbandov@co.slo.ca.us" <mbandov@co.slo.ca.us>,

Cc: "lindachipping@yahoo.com" <lindachipping@yahoo.com>

November 22nd, 2015

Dear Supervisors,

The Water Resources Advisory Committee has reviewed the proposed Draft Ordinance for regulating the land application of biosolids/sewage sludge, the scoping document, and the other materials submitted into the WRAC record, and has come to the conclusion that the present process should be suspended and a process consistent with the direction of your Board, past and present, be mobilized to replace it.

Given that:

1. The Draft Ordinance currently before us departs from the direction of a previous board in at least eight particulars, as carefully documented in the attachment (D. Broadwater, 11/19/15, 11:00 am), which speaks both to content of the ordinance and to the process that should precede the drafting of an ordinance, and
2. Your present Board, on October 13th of this year, in reviewing Planning Department priorities, and in giving direction recognizing the best use of limited resources within the department in addressing the backlog of long-range planning efforts waiting to be tackled, made no mention whatever of any priority for moving forward with an ordinance regulating land application of biosolids/sewage sludge, instead giving direction to move forward with other priorities whose urgency and importance you recognized, and
3. The present Partial Interim Moratorium will not expire for several years, can easily be extended if needed, and has drawn no complaints, and
4. There has not been conducted any analysis of feasible alternatives to land application as a method of disposing of sewage sludge, and
5. Our County's Conservation Element, in Policy E-1.1 b and Policy E-1.5, calls for the use, if safe and feasible, of locally generated biomass in power production, while the safety and feasibility of using sewage sludge in this way has not yet been evaluated, and
6. The WRAC, recognizing that water is a fundamental need, and that major efforts to maintain a safe and reliable supply should be a very high priority for use of the time and expertise of County staff, would prefer not to see those resources diverted to an unnecessary and out-of-sequence pursuit that could potentially threaten the quality of that supply,

Given all of the above considerations, the WRAC hereby requests the County to:

1. Direct that the current scoping process and all activities relative to the draft ordinance currently before us be halted,
2. Direct that no ordinance permitting or regulating land application of biosolids/sewage sludge be prepared until your present Board has a chance to reaffirm or modify the direction clearly given by a previous board relative to the handling of biosolids/sewage sludge,
3. Agendize a Board hearing at which the action described under #2 could be taken, and at which direction could be given to move forward with a full alternatives analysis, not tied to the CEQA process for any particular choice in handling biosolids/sewage sludge, be it land application or otherwise, and
4. Give direction on any ordinances or policies relating to biosolids/sewage sludge only after the alternatives analysis has been completed and reviewed, keeping the current Interim Partial Moratorium in effect until that time.

Sincerely,

the WRAC