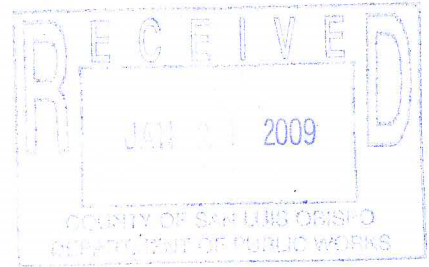


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Draft EIR Comments for the
Los Osos Wastewater Treatment Project
Submitted January 19, 2009

The Terra Foundation is a 501 c (3) non-profit corporation in the State of California established in 1990. Its mission is to promote, educate and create sustainable approaches to living within our local environment and economy.

We recognize the substantial effort that went into the creation of the LOWWP DEIR but find further evaluation necessary for a fair and balanced review of STEP/STEG collection system technology and recommend a full analysis of the *Statement of Key Environmental Issues for the Collection System of the Los Osos Wastewater Treatment Project (KEIS)* submitted to the SLO County Board of Supervisors September 9, 2008 by the San Luis Bay Chapter of the Surfrider Foundation, SLO Green Build, Santa Lucia Chapter of the Sierra Club, Terra Foundation, Los Osos Sustainability Group and Northern Chumash Tribal Council (see *LOWWP DEIR* Appendices H-1, I-1, M-1, and N-1). We ask for further analysis of the *KEIS* in relation to:

Infiltration and Inflow (I/I) – as documented in the *KEIS*, STEP/STEG collection technology greatly reduces I/I. The LOWWP DEIR conclusion that I/I within a gravity system does not rise to the level of potential significant environmental impacts is a fatally flawed conclusion. The Director of the Morro Bay National Estuary Program noted that I/I was a key factor contributing to the 20,000 gallon raw sewage spill into the Morro Bay Estuary, a Marine Protected Area (MPA), from the California Men's Colony's brand new gravity wastewater treatment plant. Additionally, the Director of the Central Coast Low Impact Development Center has noted that lower I/I yields higher concentration of the waste stream and therefore allows for higher quality treatment.

STEP/STEG septic tanks settle out greases and therefore prevent grease clogs from occurring in the collection pipes. This type of clog within a gravity system recently caused a 1,000 gallons raw sewage spill in Pismo Beach with the raw sewage flowing out of a sewer manhole January 7, 2009. STEP/STEG is a small-pipe sealed system and significantly reduces exfiltration and collection pipe spills thus reducing contamination of the land and State Marine Reserve.

A STEP/STEG collection system does not require any pump and pocket pump stations. The gravity collection system does. It is being designed with 8 pocket pump and 3 pump stations cradling the edge of the Marine Protected Area State Marine Reserve (This is only a partial list of the required pump stations for gravity. See LOWWP DEIR Exhibits 3-3, 3-4, 3-7, 3-8, 3-9.) These gravity pump stations are not being designed with back-up power but will be built with reserve capacity. How can a FEIR or gravity collection system design team determine what the necessary reserve capacity would be on a Marine Protected Area State Marine Reserve? The CMC spill occurred from a power outage followed by the failure of a

back-up generator. Placing 11 pump stations at the edge of the bay places the bay at risk and Los Osos residents at great risk of fines. Additionally, analysis of the aesthetic impacts must be determined because the future of Los Osos as a thriving community will most likely be based on eco-tourism as for the City of Morro Bay.

The California Department of Fish and Game stated April 13, 2007 in the *Master Plan for Marine Protected Areas* that "Take is not limited to fishing activities.... The high level of protection created by a SMR is based on the assumption that no other appreciable level of take or alteration of the ecosystem is allowed (e.g., sewage discharge...)" (p. 52.) The FEIR for the LOWWP must provide a full analysis of potential take from, for instance, installing gravity system pump stations at the edge of the SMR, especially in relation to construction and construction demand for dewatering for gravity system structures proposed at the edge of the bay.

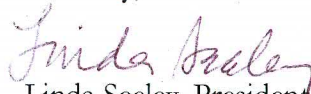
Sea rise and climate change need to be further addressed especially in relation to the gravity pump stations. The U.S. Geological Survey's new report predicts much greater sea level rise from global warming stating the rise could be as much as 4 feet by 2100. The LOWWP FEIR must analyze the LOWWP environmental impacts within this context.

The Terra Foundation promotes the practices of Low Impact Development and believes the LOWWP DEIR has not adequately analyzed the use of LIDs within the project's design. For instance, a Wallace Group Senior Environmental Resources Engineer noted the showcase potential for the LOWWP in relation to LIDs where treated wastewater could be returned to Los Osos for recharging the basin by way of greening the streets. Examples of this type of design can be found in *Rainwater Harvesting for Drylands, Volume 1*, by Brad Lancaster (Fig. I.1B), or, by reviewing the LID strategies the Central Coast Low Impact Development Center is establishing. The Terra Foundation does not support the use of spray fields, and, even more so, spray fields outside of the Los Osos water basin (Tonini site).

The Terra Foundation does not believe the Broderson site for disposal-recharge has been adequately evaluated. For instance, it has not been tested with secondary or tertiary treated effluent to establish if the site can ever receive 400,000 gallons/day of treated effluent. Furthermore, its review *must* go through the Department of Health. Broderson is not a disposal site; it is a recharge site with potential health risks to the aquifer, the town's water supply, and cannot bypass review by the Department of Health for purposes of safety.

As the Regional Water Quality Control Board has observed, the health of water quality requires a "paradigm shift" and we encourage the FEIR to "think outside the box" and to formulate an environmentally superior project that utilizes LIDs. Gravity technology is far from being a Low Impact Development Technology; STEP/STEG is one. The Terra Foundation does not support a gravity project with Tonini as the treatment site and Broderson for recharge as environmentally superior and recommends further evaluation of alternatives for the FEIR.

Sincerely,



Linda Seeley, President

Terra Foundation
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