1-29-09

MR. HUTCHINSON,

I DON'T TYPE SO PLEASE EXCUSE MY HANDWRITING.

FIND ENCLOSED A COPY OF A 10 PAGE TAC REPORT GIVEN TO ME BY DR. TOM RUEHR BEFORE HIS DEATH LAST YEAR.

DR RUEHR WAS A WORLD-WIDE EXPERT ON WASTEWATER SYSTEMS + SOIL ISSUES CONNECTED WITH THEM. MANY OF HIS COMMENTS + OBSERVATIONS PERTAIN TO THE CURRENT LOWWPDEIR NOW GOING THROUGH PROCESS. I CAN THINK OF NO OTHER DOCUMENT THAT CONTAINS MORE USEFULL INFORMATION IN A CONDENSED, READABLE VERSION THAN THIS ONE.

THANK YOU FOR YOUR CONSIDERATION -

Christopher D. Allebe

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LOCAC

Los Osos Community Advisory Council

January 30, 2009

Mark Hutchinson
Environmental Programs Manager
San Luis Obispo County Dept of Public Works
County Government Center, Room 207
San Luis Obispo, CA 93408

RECEIVED
JAN 30 2009
COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PUBLIC WORKS

Re: LOCAC Comments on LOWWP DEIR

Dear Mark:

Members of the Los Osos Community Advisory Council (LOCAC) and the people of Los Osos who have participated in the LOCAC review of the draft environmental impact report (DEIR) for the Los Osos Wastewater Project (LOWWP) thank you for the opportunity to comment on the sufficiency of this document as we and the County prepare to select the best and affordable wastewater project for Los Osos.

Even though LOCAC had not formally reviewed the previous wastewater projects because they were not officially county land use projects, the members of LOCAC back in 1995 felt so strongly about the sustainability of the Los Osos water basin that they devoted a complete section of the 1995 LOCAC vision statement to the holistic management of water including (but not limited to):

- ***waste water treatment facility(s) based on a natural biological process rather than mechanical system approach to the highest extent possible,***
- ***graywater reclamation, management and recycling, and***
- ***development of a water supply for agricultural or irrigation purposes.***

Now that the LOWWP is a county project, and since LOCAC is the forum for public review of all discretionary and county land use projects, ~~now that the LOWWP is a county project~~, it is appropriate that LOCAC be involved in the review process at each step. We heard from the County many times during the technical review process to wait for the EIR before jumping to conclusions about which technology and project would be best for Los Osos. The people of Los Osos were promised that the EIR document would provide the answers to the recurring questions of how the various alternatives would meet the objectives of the project. Therefore, LOCAC undertook the formation of a special committee to review the draft LOWWP EIR and assist the public in reviewing and responding to this document, keeping in mind the 1995 LOCAC vision and the realities of the events of the last 13 years, ~~including~~ the failed sewer project in 2005 and the declaration of a Water Severity Level III situation in Los Osos due to seawater intrusion in the lower aquifer,

The LOCAC DEIR committee, chaired by LOCAC member Mimi Whitney and consisting of 15 or more members at times, met weekly, even through the busy holiday periods, to read and review the DEIR. This was a tremendously difficult and laborious task for the citizen members, most of whom have little or no experience in reviewing and commenting on a DEIR. Fortunately, a few committee members who have credentials in soil sc

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Los Osos TAC Report Comments by Tom Ruehr March 30 through April 8, 2007

Major concern for not recharging the lower aquifer. Probably no sewer system will be able to do this. We will continue to lose water to Morro Bay. This remains a serious deficiency in terms of water management. We must insure we do not connect to the state water. We must prevent connecting to Lake Naciamiento water. This water contains sufficient mercury (even when it is below the mercury detection limit) to contain millions to billions of atoms of mercury in each gallon of water.

Using the recycled water through ag exchange will help to reduce the total water pumped from the lower aquifer. Water management in terms of deep aquifer recharge is critical and can not be solved by this sewer. However, we need to insure any results of the sewer will not make the potential for deep water recharge any worse.

Ironically, the RWQCB is so concerned about nitrate and potential "pollution" eventually no water will exist to become polluted unless they change their focus from contamination to recycling and retention of useful water.

I am pleased they have finally started looking down at the end of the process first (disposal and recharge) and working backward to how to collect the sewage. This is one reason previous studies have missed the major problems. They looked too closely only on collection.

I believe we must try as much as possible to prevent any use of the State Revolving Fund monies. I believe we can have access to private funding. It will cost not much more than the state funding. Most importantly, we will be able to insure we can have a sewer with the least amount of cost overrides if we reject using the SRF. With the SRF and an early 218 vote, we will very likely end with buying a pig in a poke. By this I mean the sewer installation companies will continually increase the costs and the total cost will be a continuously changing number, mainly because they have ignored the problems encountered with water recharge and biosolids processing.

The RWQCB has continuously changed their criteria. The major past problem has been their absolute stupidity of rejecting all science and technology developed within the past 25 years. They have been excessively wedded only to multinational sewer companies providing sewer systems for cities of 2 million people. These processes are not appropriate for small communities of 20,000 people.

Many amazing technologies have recently been developed with much superior and effective water processing in the past few years. Within the past decade a major mindset change has occurred. This new mindset essentially argues previous massive sewer installations should be avoided because of the serious problems (long term they create) and the realization smaller is more efficient, effective with lower long term maintenance and providing better water quality at a much lower treatment cost.

Be aware of the previous bait and switch process. They allow the TAC to develop many useful ideas. Then at the very last minute, all previous work is negated by claiming many "fatal

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flaws" resulting in all previous work having no value. Consequently, only the new ideas with no opportunity to evaluate their impacts publically are forced upon the community. This has occurred several times in the past in Los Osos.

The County and the RWQCB has ignored the nature of the people in Los Osos. For many years they assumed the community was full of dissidents only interested in trying to prevent having a sewer. Los Osos contains the most highly educated people per 1000 individuals between Monterey and Ventura. The reality is they do not want to pay for a non-functioning sewer rat hole with the obvious escalating costs associated with problems poorly examined (as was the recharge at the Broderson site for example).

The recharge site proposal for the Broderson site and Tri W was about 100 to 1000 times the actual water application rate which could be allowed. The County engineering and the RWQCB signed off indicating they accepted these rates. This was a major professional mistake. This is a fatal flaw regarding the recharge process. Because the County engineering and the RWQCCB signed off and approved this improper rate, we can not trust them fully to look out for the welfare the Los Osos residents. They are not considering all of the factors, only those which will make the sewer cost the most.

The RWQCB will be making more money in the form of monitoring the Los Osos wastewater situation in the future. The larger the plant, the more money will be coming to the RWQQCB. Consequently, they have a vested interest in forcing Los Osos to have the most expensive sewer possible. This helps to explain their zeal for approving anything in Los Osos regardless of whether it works or protects the overall water quality.

What is needed is not slick covered fancy multiple color brochures. They need to provide a clearly reasoned comparison step wide of why each option was chosen and why each other alternative was rejected. The people of Los Osos do not want to spend more money on glitz. they want more solid clearly argued thinking with more effective and assured results for these steps in the sewer process.

Page TS-3 estimate of 65 gallons per capita per day seems low, previous values were closer to 75 to 80. I hope they are correct with this new value.

Table TS 1 is critical to understand. The BOD loading with the conventional system is the reason for the excessive cost for grinding pumps and water flow compared to using the septic tank as a distinct part of the total treatment process. The BOD with STEP can be reduced nearly 3 fold. This means the treatment plant has a much better chance to process the waste water.

The conventional sewer processes this high BOD sewage so fast it results in a much greater mass of biosolids than will be generated with the STEP system even when the septic tank pumping added to the total process. In general, the faster sewage is processed at any central processing plant, the more total tons of biosolids which will be produced.

The County refuses to see all aspects of water for Los Osos (as the Blue Ribbon Comm.)

was charged to do a decade and a half ago. We must drastically reduce the total mass of rain water runoff by installing holding basins (possibly underground) and provide for carbon filtration to remove oils from highway surface interactions of this runoff water and reuse of this water currently lost. We must harvest the water from the upper aquifer and use this wherever possible. This will greatly reduce the total water lost from the community into Morro Bay.

We must be much more serious about sea water intrusion. This is what I mean by looking at the end of the process first. Again, this report seems to have ignored how to prevent the sea water intrusion. Without addressing these points, the total value of the sewer is completely negated.

It is absolutely critical to establish an on site treatment process for biosolids treatment. We must have an effective means for aerobic composting and total biosolids biomass reduction on site. It will be essential to provide some clear process of utilization and beneficial processing of the biosolids. The metals content should be quite low and fortunately additional toxic chemicals are usually quite low in Los Osos.

A serious consideration is the presence of pharmaceutical and personal care products. These are not being processed during the conventional sewage treatment process. Releasing these products in the treated water will have very adverse conditions. For example, birth control medications will pass through the water and will eventually place all residence on birth control when they drink this recycled water. It is not certain whether soil filtration of these products will result in the elimination of these products.

In addition to birth control products, other serious considerations are the possible body elimination of major anti-cancer medications. Fragrances and antibiotics will present major problems. If we begin drinking treated waste water even after passage through soil will probably result in converting the citizens of Los Osos into a huge guinea pig experiment where they will be exposed to the potential transfer of the antibiotic resistance genes being transferred to people. If this occurs, the health of all individuals in the community will be seriously threatened because physicians will have no alternative during the critical process of administering life saving medications when the current antibiotics are no longer effective due to the people possessing these antibiotic resistance genes.

Table TS 2 These considerations suggest we must use disinfected tertiary treated waste water plus a much more intense treatment with Ultra Violet light and possibly hydrogen peroxide. Chlorine should be avoided because the addition of chlorine gas results in uncontrolled organic chemical reactions creating organic chlorine compounds which increasingly are seen as suspected cancer causing agents.

A consideration for ag exchange is what the RWQCB considers being inside the basin. In the past, this has created problems. The Los Osos valley for about 6 miles to the east is part of this basin. Don Asquith has helped to continue to confuse people about this problem.

Percolation ponds should be avoided. Maintaining constant saturated water over the soil results in microbes forming slimes which eventually clog the soil pores and greatly reduce the

total rate of water infiltration and percolation over time. This is under appreciated. This problem will magnify if only secondary water is used for the infiltration percolation ponds. Only the highest level of water treatment should be used for this purpose. Loading rates should allow at least one full day of complete drainage before adding more water.

Leach fields should not be used for disposal of any other than the highest quality of treated waste water. Secondary waste water will eventually clog due to the many lamellae in the sand dunes. This eventually will plug up the soil pores.

Creek discharge must be prevented. A constructed terminal wetland might work. However, the proximity to the sea level and the fog will mean this system will not be able to work optimally.

Table TS 3 Energy use has been played down by past proposals. Most of the conventional sewage treatment processes are extremely energy intensive, especially for electricity to move the water around. Other systems are much less energy intensive. Past considerations suggested we would have to have a complete dedicated electrical line directly to the treatment plant and this may not be enough for a conventional sewer. An excessive energy cost should be considered as a fatal flaw for any high energy proposal. This is especially true for future increases in energy costs.

The treatment site location must consider what I consider a fatal flaw from the human health perspective. Because of the persistent fog, any viruses entrapped in the air due to movement of the sewage and wastewater will result in a major down wind direction effect of contaminating residents close to the treatment facility. This effect is well know in the wastewater community where sewage treatment personnel are often fairly sick for the first several years until they become immune through previous exposure to these various viruses and microbes. However, the problem is much more serious for susceptible individuals (infants, elderly and those with a compromised immune system). Ideally, the treatment facility should be completely inclosed and all air leaving the facility should be treated with UV radiation to reduce the possibility of this happening in Los Osos.

Oxidation ditch, trickling filters and ponds have the same problem as identified in the previous paragraph. However, ponds may be a great idea for the purpose of removing phosphate by encouraging algal growth to remove both phosphate and some nitrate. I do not see any other treatment consideration which can assist in removing the phosphate. Phosphate contamination of Morro Bay is one of the primary reasons for the decrease in water quality to Morro Bay. Once the local sand dunes become saturated with phosphate, any additional phosphate from waste water treatment will move directly into Morro Bay regardless of whatever treatment process is used, unless algal treatment is added to the process.

Class A biosolids must be generated. Then these biosolids must be further composted aerobically ideally for over 6 months to a year on sight. This might most effectively be achieved by mixing the biosolids with green waste. This will greatly enhance degradation by providing more nutrients, more water holding ability, more aeration and more rapid degradation. The

resulting composted material could be used for erosion control and other purposes, including crops harvested with a protective cover (corn, wheat, etc.) but can not be used for root crop production.

Biosolids composting must emphasize vertical processing to enhance aeration and improved microbial degradation rather than the traditional horizontal processing only. Soil inoculation should be considered to insure these systems work optimally. Inclusion of rice hulls and straw will most likely greatly enhance the rate and quality of composting.

My suggested best location is the land just south of Los Osos Valley Road across from Turri Road and to the east for until the next home is encountered. This land has a slight elevation, has higher clay content for water filtration, allows for wells down hill being able to obtain the ground water for reuse. The closer the site is to Morro Bay water, the less effective it will be overall. Any site north of Los Osos Valley Road east of Turri Road has a problem of being dominated by serpentine soils and this will greatly reduce the effectiveness for waste water remediation (clean up).

I appreciate the emphasis upon using less productive soil sites. This is fine for the treatment plant site, but the waste water application soils should have an adequate amount of silt and clay to allow for both adsorption of phosphate and metals, plus the microbial soil community allowing the microbes to decompose the organic components in the waste water including potentially decomposing the pharmaceutical and personal care products.

It might be good to explore John Alexander's electrical agglomeration process. This will reduce metals and potentially may enhance the water quality prior to the water entering into the treatment process. John is a recognized engineer who has been ignored by most of these sewer people. He is a local resident (Cayucos) and has a patented process we should at least consider for the potential benefit to residents of Los Osos.

The best site location for the treatment facility is north of the cemetery where the plant can be primarily hidden by the topography. This will reduce virus spreading to the eastward (down wind and has much less fog).

The best site for application of the waste water is on locations with more clay than in most of the sand dunes area. The land south of Los Osos Valley Road between the creek valley to the land south of Turri Road is mostly sandy loam soil which is only moderately effective for potential microbial decomposition. Application of the waste water onto the sand dunes should be avoided because of the presence of the lamellae which prevent the effective water treatment and prevent an adequate rate of water infiltration and percolation with a maximum rate of microbial decomposition (which is low in sand dunes and sandy loam soils).

Conventional gravity collection will cause several major problems. First, the large diameter pipes will leak sewage downward into the soil below each leak. This will result in many uncontrolled leaks. This will provide non-treated nitrate, phosphate, and pathogens to the soil and enhance contamination within the collection zone. Second, these large diameter pipes

will leak inward meaning in zones closes to the sea level, sea water will move into these pipes. Any sea water leakage into these large diameter pipes will have two effects. The sea salts will strongly inhibit the microbial decomposition in the treatment plant. More importantly, these sea salts will prevent this water from being used as a water source for humans. This is absolutely to be prevented under all circumstances. This is a fatal flaw for the collection system. Ironically, the RWQCB approved of the Tri W collection process because it does not care about this problem of sea water quality deterioration of the collected waste water because of its excessive zeal for the most expensive sewer being installed in Los Osos. So much for the RWQCB's true concerns over water quality for Los Osos.

Another fatal flow is the major deep soil disturbance due to installation of the large diameter pipes. This process will cause disturbance at several major locations going from high on the hillside on the south downward towards the bay to the north. The problem is this will greatly increase the problems of soil erosion when water concentrates moving down the streets oriented north to south. If any of these streets leaks water, it will result in major outwash of the soil along the route of the sewer lines. In addition, in the event of an earthquake, this may greatly increase the probability of structural damage in homes because the stability of soil can never be returned to the original stability after such a deep soil disturbance. This situation will decrease over time after the sewer is installed, but it will never go away with the number and degree of deep digging actions in this vicinity.

STEP, vacuum and low pressure allow much faster response to leakage problems and other difficulties because it has much better monitoring. The greatly improved methods of installing small diameter pipe with minimal soil disturbance avoids much of the problems identified in the previous paragraph.

Although concerns about access to private property is a concern with septic tanks in place, all home owners need to understand what the trade off is in costs. The costs for not having a septic tank and not having access to inspect these tanks results in more than double the overall cost of the sewer. Some very wealthy people will not feel this is justified, but most people will realize this is a much better trade off if the system costs one half as much and it has a much less invasive soil treatment below ground. The community has to accommodate in various was and this is one of the realizations for having the sewer imposed upon the community. Maybe the cost would have to include buying a region near the street where new septic tanks would be installed. This would allow public control especially if community septic tanks were used instead of individual septic tanks.

A STEP collection system with a lower BOD treatment plant and effective Ag water exchange can be installed and working within about 2.5 years, whereas a conventional gravity sewer with the high BOD treatment plant will require about 4 to 5 years to complete. If speed is urgent, then we should consider these trade offs.

The 218 vote must clearly define all of the benefits to be gained from adopting the completed proposal to install the sewer. The vote should only be taken once the full costs are disclosed. The final cost must not be exceeded under any circumstances. Proper contingency

expenses are included in any engineering project. We must insure the creeping costs do not exist. Note, the Tri W site and Broderson site are examples of previously approved systems with now obvious engineering fatal flaws which would have necessitated millions of dollars of creeping costs increases over time. These provisions for a definite cost maximum, assurance of no creeping costs, a clearly articulated design for collection, treatment, an water reuse, and a firm deadline for completion must be spelled out before the citizens of Los Osos can be expected to approve a 218 vote.

Since the Tri W site is very much on the table, it is extremely important to point out at every opportunity how the County engineering and the RWQCB have adopted and approved of a fatally flawed system. This is a good example of the ethics violations of the process. They hide under the CEQA regulations as if this absolves the County engineering and RWQCB of criminal action for approving of significant errors in approving of the Tri W site as would have occurred if this process had not been stopped. Even now, many want to ignore these fatal flaws in their zeal to move forward in a speedy fashion.

The Supplemental EIR and additional CEQA review should be done prior to any 218 vote, not afterward. All community and regional considerations must be made prior to the 218 vote. This is again the reason so many problems have arisen in the past. All the facts must be known to the residents before they are willing to vote to support the sewer project. Again, we can not afford to have another debacle with unknown problems occurring and tremendous cost overrides after the 218 vote. We must never buy a pig in a poke regarding the Los Osos sewer.

Nacimiento water has the fatal flaw of containing mercury. Mercury is an accumulative poison. Thus, any mercury is too much mercury to allow its use by Los Osos. Water from Morro Bay and Cayucos is state water. This appears to be an effort to force state water upon the citizens of Los Osos. This was the original intent of bringing the old County engineer to San Luis Obispo, to force Los Osos to have to buy into state water. Now it rears its ugly head again, this time in disguise. Cayucos and Morro Bay are underlain by serpentine rock and soils. Any water mixed with the state water has a disproportionately higher level of magnesium. This creates a variety of problems including water infiltration. High magnesium in water makes people more "regular" than they may care to become.

State water is dangerous and potentially fatally flawed. The state water brought into the Metropolitan Water District of Los Angeles is loaded with natural organic compounds picked up when the water flows through the San Joaquin Delta histosols (organic muck and peat soils). These organic compounds react with the chlorine treatment to form a wide variety of organo-chlorine compounds many of which are known or suspected of being cancer causing agents (carcinogens). Why should we expose our citizens to this problem. It makes no difference whether other communities continue to do the wrong thing, it is not appropriate to allow Los Osos to expose our residents intentionally to this very serious potential health threat. State water flows through the San Joaquin Delta and has this problem.

This is the major reason we must insure all aspects of the sewer do keep all of our water locally. We must be able to reduce our water loss to Morro Bay to a minimum of about one inch

of water per year. The rest must be effectively reused and must not be wasted by allowing it to enter the bay by seepage from surrounding soils from the upper aquifer.

The Community advisory survey should be made a long time prior to any 218 vote. The citizens must know clearly what they are paying for instead of continually changing the system after the 218 vote.

It appears a vast waste of time and effort to do the process of comparing several cost estimates after the 218 vote. This means we will have no idea of the cost prior to voting on what it will cost. This is an totally asinine approach. Again, it treats the citizens of Los Osos in a totally paternalistic fashion trying to tell them what to do instead of reasoning with them about what will be done and exactly why these things will be done and the exact cost of doing these things. We must stop this paternalistic action in Los Osos.

Another paternalistic action was the process Blakesley used to become the white knight. How often has the state government imposed its will upon the properly elected citizens of Los Angeles or San Francisco in a similar manner? Those who would lose from a major very expensive conventional sewer installation wanted to insure a major sewer project would continue in Los Osos. This state intervention was the major reason for the state intervention. It had nothing to do with local politics or the capabilities of the CSD members to provide direction to the community process. It is all about insuring multinational sewer corporations can win in Los Osos, because if they can then they can impose their own very expensive wills in every other small community in the nation. Los Osos is recognized worldwide as a test case of gigantic multinational sewer corporations versus reasonable community wide small to medium size sewer projects to use the most modern technology at ecologically applicable means and least costs.

All viable alternatives must be known and the single best one must be selected and clearly explained to the residents prior to any 218 vote. Again, we can not afford to have a repeat of the sewer debacle. Placing the 218 vote prior to all of these considerations is a pure invitation for stupidity by the County and will insure a no vote on the 218 resolution.

I am deeply troubled by the assumption only SRF funds with major government strings will be the only way to go in Los Osos. I firmly believe various firms will be able to provide private lending because they realize the ecologically friendly small and medium size sewer companies are also fighting for their existence. If any community can obtain private funding for their sewer process, I can affirm it will certainly be Los Osos because of this world wide attention and understanding of these problems.

Figure 1.1 is a classic example of the problem. It says "Proposition 218 assessment to match final project selected". Again, we see the paternalistic and blank check approach the County engineering believes is the way. Certainly, the County engineering wants to run up the total costs as much as possible. We must do everything possible to turn this around allowing the citizens of Los Osos to be in control of what they will have to pay by knowing up front the true costs of this project. It is time to treat the citizens of Los Osos with respect and mature reasoning from facts and fiscal responsibility rather than continue the paternalistic dictatorial approach

used in the past.

The bait and switch tactics consisted of the first TAC exploring the various waste water alternatives (over 20 were examined) had reached a consensus to move ahead with the sewer. After we made our presentation to the County Board of Supervisors, the engineer presumably working with us (but who had refused to meet with us or share any information) made the voodoo economics presentation charging the cost of the conventional sewer against all of the other proposals we knew were much less in cost. This was the first example

The bait and switch tactics continued with the vote to approve the creation of the CSD. The citizens were under the impression the Solutions Group's proposal for a ponding system would he used. All of a sudden from nowhere, the full blown sewer at the Tri W site with the Broderson recharge was adopted. Many citizens were waiting to learn when they would be voting on the approval of this indebtedness. The legal counsel explained they could circumvent the law in this case. Clearly, this was a form of taxation without representation of the full electorate on a bond issue as occurs in nearly every California State election on bond issues. These bonds are voted on with a clearly indicated cost and the implications of the resulting passage or failure of the vote.

The threat letter sent to all Los Osos residents will in all probability assure a no vote on the 218 vote. The threat letter in effect is saying if the community votes no, then the RWQCB will proceed with condemnation of property by declaring the entire community a toxic waste site. This will have the effect of making the residences useless and the property value will be zero. This is clearly a taking under the law. This will constitute the largest taking in U.S. history for trivial reasons. The process will be declared unconstitutional based upon related taking cases. However, it can potentially destroy the entire community of Los Osos before the Supreme Court rules on this issue. In addition, because the RWQCB has continually argued the problem is nitrates in Los Osos, they have created a problem for themselves.

The various geologic and hydrologic models clearly indicate the nitrates under Los Osos will not clear up even with a sewer for at least 40 years and in all probability it will be much longer. It the community is classified as a toxic waste dump, then the RWQCB will be required to clean it up because the took responsibility for it when they issued the letters of condemnation. Obviously, by evicting all homc owners and rendering their property worthless, the property can not be sold to pay for the nitrate clean up. Where will the funds come from to be able to declare Los Osos an non-toxic waste site. All of these constitute unprecedented actions. They clearly indicatc acts of desperation by the RWQCB and have not been processed to their logical conclusions.

The current TAC proposal smells all over of the same bait and switch tactics. The TAC members will be led along just as with the first waste water TAC. At the last minute I fully expect some white knight (as occurred with Sam Blakeslee) will step in and turn the whole project on its ear. This is why we must not have a 218 vote before the full cost and the consequences are known.

The community must have an Economic Impact Analysis prior to any vote. We need to know the full impact on this community, especially because of the large number of retired people living on fixed incomes. Two economic Impact Analyses are needed. One including only the residents within the prohibition zone and one including all those potentially benefitting from the proposed sewer and potential hooking up in to the future.

The fatal flaw from the last two EIRs have been allowing the community to develop to full build out of the community as projected by the County. The fact is we are well beyond our current sustainable yield. We continue to lose water from the upper aquifer into Morro Bay at an unacceptable rate. Both the over drafting of the ground water causing sea water intrusion and the current failure to capture the water from septic tank recharge flowing into the bay are serious problems. They should never be allowed to occur. Much of the sewer is being driven by this development potential. However, the fact we are currently beyond the allowable sustainable yield tells us we can not allow further development to occur on undeveloped lots in Los Osos.

The Environmental Impact Reports (EIR) have been highly flawed. For example, it failed to assess the potential impact on wetlands in Los Osos. It has continually failed to assess properly the impact of the Broderson site for waste water recharge. The presence of Don Asquith on this current TAC appears to be a conflict of interest because the firm he works for has done the previous EIRs. Continuing to use this same firm will insure the same fatal flaws will be passed on the citizens to have to pay through the nose to correct problems the EIRs should have flagged.

Both the new Economic Impact Report and the Environmental Impact Reports should be done by people completely dissociated with any investments or interest in the sewer industry or in Los Osos or in San Luis Obispo County.

I have stopped processing this document. I reached section 1.3 on page 1-7. It is highly depressing to read how the County intends to force the conventional gravity sewer onto the community of Los Osos with bait and switch tactics and a blank check mentality. All parts of the sewer as currently conceived will contain fatal flaws which should have been eliminated, but they continue to reappear time and again in report after report without correction.

Somewhere an Engineering firm will have to bite the bullet and say these are fatal flaws and they can not install this sewer. Maybe County Engineer George Gibson many times reminded the waste water alternatives TAC, the many problems in Los Osos may very likely prevent the proper functioning of any installed sewer in this community.

I recognize a sewer is needed. I only ask for a true, open and honest assessment of every single facet of the myriad of problems related to this sewer. We owe the citizens to know all of the facts and the full costs before we approve of any legislation to contract bonds for the construction of a sewer in Los Osos. We must have some guarantee the various fatal flaws will not occur. Sufficient small businesses are in the sewer game, they probably will willing step forward to provide these guarantees and do this for much less cost, with less adverse environmental impact and with much less social disruption for this community than will occur by approving the Tri W site with the Broderson recharge and the failure to treat the biosolids problem or the initial hookups from each home to the sewer pipes.