



January 30, 2009

Mr. Mark Hutchinson
Environmental Programs Management
San Luis Obispo County Department of Public Works
County Government Center, Room 207
San Luis Obispo, CA 93408

President

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Dear Mr. Hutchinson:

The Board of Directors of the Los Osos Community Services District (District) has authorized the submission of the following comments on the Draft Environmental Impact Report (DEIR) for the proposed Los Osos Wastewater Project.

Comments 1 through 5 relate to overall water management issues within the entire groundwater basin, comment 6 pertains to construction impacts related to the District's role as a provider of water, solid waste, and emergency services, and comments 7 through 9 identify issues relate to the operation of the waste treatment facility and collection system.

Water Management Issues.

1. The co-equal alternatives analyzed in the DEIR contemplate a secondary level of treatment utilizing one of three technologies. However, because it is likely that tertiary treatment will be required, even in the initial years of operation to facilitate purveyor strategies such as agricultural and urban reuse, the DEIR should fully address the impacts, including chemical usage, air quality, traffic, etc. associated with tertiary treatment. An issue of particular importance that should be addressed is the impacts of emergent contaminants on our water supply. This would allow the County to include an option for tertiary treatment in its pending design/build process. Please clarify that all tertiary treatment impacts have been fully addressed in the DEIR.
2. The DEIR includes an analysis of the impacts of water conservation measures on basin water resources. This analysis raises a number of issues that must be addressed/clarified. Showerheads and toilets are mentioned as minimum conservation measures to be implemented. The full scope of the water conservation projects contemplated in the DEIR needs to be clarified. Additional measures such as water meters in the S&T Mutual service area should also be identified and analyzed to facilitate mitigation monitoring and winter period billing. **Please clarify if the calculation of potential water savings are based on current consumption data from the purveyors, which has indicated a substantial**



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reduction in water usage over the past three years. Once water conservation measures are in place, what will be done to ensure that the sea water intrusion benefit is actually realized, since the urban purveyors control the production volume pumped from the west side of the lower aquifer?

3. The Broderson effluent disposal site is analyzed in each of the co-equal alternatives. In various community meetings, the County has indicated that the use of the site would start at a minimum value and then ramp up over time to avoid impacts to down-gradient properties and to stay below recharge regulation thresholds. Please clarify how this would occur in the context of gradual community build-out, while still maintaining the project's seawater intrusion mitigation. In the event of a lower level of seawater benefit due to actual leach field performance, please identify other mitigations measures that would be imposed to reach the targeted goals.
4. Both the District and Golden State Water Company are pursuing water supply projects that utilize the upper aquifer. Please clarify how the DEIR addresses impacts to the yield of the upper aquifer caused by the removal of septic returns flows.
5. The projects identified in the DEIR are sized to accommodate the build out of the prohibition zone. What alternatives, including capacity charges and assessments, are being considered to fund that portion of the project designed to serve vacant and underdeveloped properties?

Construction Impacts.

6. The District currently provides water, drainage, solid waste, and emergency services to portions of the community within the proposed collection system area. During the issuance of the previous project's Coastal Development Permit, potential construction-related impacts to these services were identified and mitigated. These construction related impacts should be addressed in the DEIR.
 - a) *Traffic Impacts.* Because of the potential impact on the District's ability to provide essential services during construction, construction impacts on traffic need to be addressed in the DEIR. A traffic mitigation plan should be prepared prior to the commencement of construction which would include location of equipment and trenches to be used, sequencing/phasing of installation, the location of materials and equipment staging areas, and proposed detour routes. The traffic mitigation plan should also provide for adequate emergency access, measures to avoid creating safety hazards to school children and other pedestrians, and measures to require routing of construction-related vehicles to minimize impacts to sensitive land uses.
 - b) *Drainage Impacts.* Construction may affect a large volume of natural storm water drainage flows and groundwater. Treatment of storm water and groundwater may be required and analysis of those impacts should be a part of the DEIR, including possible

treatment required, treatment method and location, and maintenance/disposal method of collected contaminants.

- c) *Utility Impacts:* Because of the potential impact on the District's ability to provide water services during construction, construction impacts on waterlines and other District facilities need to be addressed in the DEIR.

Operational Impacts.

7. Because of concerns regarding the impact on the waste treatment facility caused by infiltration of water into the collection system, please clarify the amount of infiltration (and exfiltration) that can be expected if the pipe joints are of the bell and spigot type relative to the use of fusion welded high density polyethylene. Are additional measures being required in the design/build process to ensure long term water tightness of the pipe joints .
8. The electrical usage calculations included in the DEIR were derived from the Fine Screening Analysis and subsequent work efforts. Because of concerns regarding the cost of the operation of the wastewater facility and its impacts on greenhouse gases, the electrical usage calculations need to be accurate. Since the power consumption comparison for the STEP and gravity systems in the DEIR appears materially different when compared to previous reports, does the County intend to do further life cycle or energy cost analysis between these alternatives, or will such an analysis be included as part of the design/build process?
9. Potential impacts stemming from operational maintenance activities associated with the wastewater facilities and collection systems within road right-of-ways should be identified and analyzed in the DEIR with emphasis on traffic routing and local and residential access.

Thank you for addressing the above-referenced comments. If you have any questions, or if you need clarification, please contact our office at 528-9370.

Sincerely,


John B. Schempf
General Manager

Cc: LOCSB Board of Directors
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