Technical Memorandum Name: **Disposal, April 2008**
Commenter: **Gail McPherson**
Comments Date: **June 9, 2008**
Responses Date: **July 2, 2008**

The following comments were submitted in response to the above listed Technical Memorandum (TM). The TM was developed as part of the EIR process for the project, in order to help facilitate and broaden the discussion of project issues important to the community. The responses should be considered preliminary because the EIR process is not complete, and the information necessary to fully respond has not yet been developed. The project team is grateful to those citizens who took the time to review the TM and provide comments at this early stage in the process. The project team will endeavor to fully address the comments and concerns through the on-going project development process.

	Comment	Response
1	RE: Response to Technical Memoranda- Septic Receiving Stations, Biosolids handling, and general comments on Broderson (nitrogen management) and related disposal issues awaiting responses: The Citizens for Clean Water respectfully submits the following comments orally and in writing to the County Wastewater Project consultants, including EIR consultant Michael Brandon Associates. Abbreviated oral comments were provided at the June 9, 2008 Technical Advisory Committee based on time allowances.	
2	**General Comments:** Disposal at Broderson Nitrogen Management and the Nitrogen cycle. It is disappointing that much of the current engineering reports have not worked toward a shift from the "nitrogen removal" mindset to a "nitrogen management" mindset for Los Osos. The Attached Ag Alert clearly indicates how nitrogen fertilizer costs for farmers are increasing lockstep with energy prices. Note the statement from Imperial County farmer indicating that his 11-52-0 ammonia fertilizer has increased from *$240/ton* to *$1,200/ton* in three years. It is certainly foolhardy for LO farmers to be importing nitrogen from China and other world producers when a substantial portion would be available in the tertiary effluent (that would otherwise consume a large energy demand if denitrification was necessary). Aside from the flawed design criteria for loading, the uncertainty of the capacity and value, and perhaps even the larger barrier of the tangled political and district financial issues clouding the	Agricultural reuse and exchange are options for the Los Osos project that are discussed and considered in this tech memo and the project Fine Screening Report. Section 5.2 of this tech memo present several reuse and disposal configurations that include agricultural reuse in conjunction with other effluent disposal options. Ultimately, the decision for agricultural reuse and exchange depends on several factors, some of which are beyond the control of the wastewater project. Farmers must be willing to take treated wastewater for crop irrigation, nitrogen must be removed from the effluent to a certain degree so that it is applied at agronomic rates, farmers must be willing to give up their groundwater sources to the community water purveyors for agricultural exchange, and community water purveyors must develop the infrastructure to pump and convey

	use of Broderson, is that Broderson triggers nitrogen removal, where in-lieu ag exchange triggers nitrogen management. Citizens for Clean Water and many others hope to ensure that County consultants and staff understand the full life cycle costs and consequences this basic premise.	water to their service area. The development of a basin management plan by the community water purveyors, in cooperation with the County, will drive decisions on the most cost effective methods for reuse of treated wastewater effluent and development of future water supply enhancements.