

**Technical Memorandum Name: Flow and Loads, March 2008**  
**Commenter: Gordon Taylor**  
**Comments Date: March 05, 2008**  
**Responses Date: April 30, 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.

	<b>Comment</b>	<b>Response</b>
1	I have been following the LOWWP for many years. Some of the comments made in the "Flows and Loading" report differ from what my admittedly fallible memory recalls. There is no question that the usage per person per day was overstated in the 2001 Report. Even with the current adjustments, this figure is probably still safely on the high side. However, the build-out population figure is also high. Let me recite, in chronological order the way I recall this.	Comment noted.
2	<b>Solution Group</b> – Rob Miller's comments were right. Jerry Gregory and Frank Freiler went through the incredibly boring work of counting lots. They used the 2.5 persons per DUE to come up with a population estimate. These figures were used very early in the process.	Comment noted.
3	<b>Montgomery Watson (2001) Report</b> – The current report states, "...Assuming a buildout population of 18,428 (estimated by the LOCS D and used in previous reports)" ... This is a bit of a reach. The figures came from the County GIS system and there was one modification to these made by the LOCS D WWAC. Please see Table 2-1 in the MW Report. This is a population estimate by major subdivision. The first column is headed County Population Estimate. The second column is headed Wastewater Committee Adjustment. One of the major subdivisions included in the County estimate was Morro Palisades at 1,325 people. About the time these figures came from the County, this land (completely undeveloped) was placed in a permanent conservation easement. The Committee was aware that this was going on (Bob Semenson was on the Committee) so	Comment noted. The LOCS D wastewater committee based their build-out estimate of 18,428 on a modification to a County Planning Department population estimate.

	<p>they subtracted the population from the County total of 19,753 and came up with 18,428.</p>	
4	<p><b>Antiquated Subdivisions</b> – I can't be sure, but I believe that both of the above efforts were incorrect because most of Baywood Park and Cuesta by the Sea were originally platted with 25' lots. The Solution Group count assumed each lot was buildable, but zoning laws were changed many years ago to require a 40 foot frontage. To make an estimate of full build-out more than just the plat map is required. Two examples: If a house is built in the center of a 100' piece of land, it represents only 1 DUE, since there would be no 40' second lot available. But this can not be told from the plat map. Second, if a parcel is undeveloped, it may have many 25' lots shown on the plat. But there is no way to know how many DUE's are involved without knowing who owns each lot. I think both of the methods mentioned suffered from this problem.</p>	<p>Property data from the County Assessor's office shows the individual parcels, and generally not the subdivision lots. The example of a 100' wide parcel that is made up of 4 original lots would be shown as only one parcel. A review of the parcel maps show that there are a few 25' wide parcels that are comprised of the original subdivision lots, but they make up a small fraction of the total parcels.</p>
5	<p><b>Assessment Engineer</b> – There have now been 2 reports by an Assessment Engineer, in 2001 and 2007. The Engineer had to work with full assessor's file date identifying ownership of each lot and whether an existing house on a larger lot was centered or built such that there was at least a 40' lot remaining. In 2001, they came up with a total of 6725 DUE's. This was reduced to about 6675 after the Protest Period. In 2007, the count was 6735. If any of these DUE numbers are used and multiplied by 2.5 (the same number the County used) the build-out population comes out around 16,800. I can see absolutely no reason why the Assessment Engineer's numbers are not correct. So, 16,800 is almost 9% below the 18,428. Or 18,428 is almost 10% higher than 16,800. This taken in conjunction with even the present overstated flow per person per day, created an overstatement that is probably 20% or more. This doesn't bother me, since we have to have a safety margin. And it does avoid questions about excess capacity that, according to the Coastal Commission, breeds more population somehow.</p>	<p>The assessment engineer's report calculates dwelling unit equivalents (DUE) to estimate an approximate benefit for each parcel. The parcels include multi family residences with many DUE's for one parcel and commercial property which is also assigned DUE's to account for their projected sewer use. Commercial property is an example of calculated DUE's that do not directly represent exist or future population. For this reason, there is not a direct correlation between population and the number of DUE's.</p>