

Technical Memorandum Name: Flows and Loads, March 2008
Commenter: TAC – Environmental Committee
Comments Date: March 21, 2008
Responses Date: July 7, 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	Both exfiltration and infiltration and inflow (I/I) have the potential to pollute surface and ground water, threaten public health, and increase the financial cost of the project via fines, remediation, and repair work. Identifying and minimizing the risks posed by I/I and exfiltration should be a priority throughout the project, and these issue should be addressed directly in the EIR, as well as in planning for the ongoing maintenance of the Wastewater Project.	The potential environmental effects of various modes of spills, leaks, and overflows is a component of the EIR analysis. A key component of the role that maintenance plays in these issues is the recent State requirement to prepare and implement a Sewer System Management Plan (SSMP). The goal of the SSMP is to ensure that maintenance efforts are conducted in a way that reduces the potential for overflows; designing and implementing a SSMP will be a key operational component of the project.
2	The following issues surrounding exfiltration should be addressed in the EIR and subsequent "Sewer Management Plan" a) The potential for spills from the pumping of over 1,200 tanks annually b) Volume that could potentially be spilled c) Potential for groundwater contamination from spills d) Implication of AB 32 from pumping e) System failures	Pursuant to the requirements of the CA Water Code, the SSMP will address: 1. Goals 2. Organization 3. Overflow Emergency Response Plan 4. Fats, Oils, and Grease (FOG) Control Program 5. Legal Authority 6. Measures and Activities 7. Design and Construction Standards 8. Capacity Management 9. Monitoring, Measurement, and Program Modifications 10. SSMP Audits
3	Infiltration: a) The decrease of fresh water flows into the upper aquifer from leach fields/pits needs to be addressed and would that result in an increase of salt water infiltration b) The impact of salt water from water softeners and effects on the project needs to be addressed. c) Quality of Installation: The quality of the collection system installation may be more significant than the type of collection system selected in determining actual I/I and exfiltration	The decrease in septic tank discharges to the upper aquifer will be a benefit to the groundwater basin. Sea water intrusion is not expected to occur in the upper aquifer as a result of ceasing septic tank discharges. There is sufficient hydraulic pressure to maintain a fresh water balance in the upper aquifer. Sea water intrusion is occurring in the lower aquifer. Water softener brine can be a problem in some wastewater treatment plants. Public education or requirement for their removal can be pursued if they are affecting the treated effluent.

	<p>rates. A piecemeal installation of subsequent lateral connections for currently undeveloped properties reduces our ability to have uniform quality and construction oversight of this critical work. Therefore we suggest that sewer laterals should be installed from the main to all the property lines for the undeveloped lots as part of the initial project, and that the project take all steps to ensure high quality installation work throughout the process, including specific construction management efforts focused on ensuring the integrity of the collection system. Later piecemeal installation of laterals also raises related concerns (in addition to exfiltration and I/I):</p> <ul style="list-style-type: none"> i. Impacts on Cultural resources ii. Community impacts iii. Noise iv. Traffic disruption v. Dust vi. AB 32 	<p>Construction inspection will be a significant aspect of the project. The Fine Screening Report estimates include up to \$8 million for construction administration.</p> <p>Installation of laterals to the property line of vacant parcels is planned for initial construction phase of the project. When the lots are developed they will be responsible for on-lot construction on laterals or STEP tanks. This new construction will require permits and inspections. The impacts of the on-lot wastewater components will be a minor part of the overall impacts of the construction of a new home or business.</p>
4	<p>Saltwater infiltration into tanks and collection systems was raised as an issue since it lessens the prospects for agricultural exchange and use for purple pipe applications. The EIR should determine if this is an issue. It might not be a problem to the collection system if freshwater in the upper aquifer overlays intrusions of saltwater at lower levels. If saltwater infiltration is an issue, where might this occur and how might it be mitigated?</p>	<p>Sea water intrusion is not expected to occur in the upper aquifer as a result of ceasing septic tank discharges. There is sufficient hydraulic pressure to maintain a fresh water balance in the upper aquifer. Sea water intrusion is occurring in the lower aquifer.</p>
5	<p>No written comments on Flows and Loads were received from the public from the public at this time.</p>	<p>Comment noted.</p>