Technical Memorandum Name: **Low Pressure Collection System, January 2008**
Commenter: **TAC – Environmental Committee**
Comments Date: **January 31, 2008**
Responses Date: **March 31, 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	What requirements might be developed by the RWQCB or the Coastal Commission in regards to additional storage in the event of power failure?	The Coastal Act limits the Coastal Commission's review of wastewater treatment works located in the Coastal Zone to: (1) The siting and visual appearance of treatment works within the coastal zone. (2) The geographic limits of service areas within the coastal zone which are to be served by particular treatment works and the timing of the use of capacity of treatment works for those service areas to allow for phasing of development and use of facilities consistent with this division, and (3) Development projections which determine the sizing of treatment works for providing service within the coastal zone. Consequently, measures to mitigate potential impacts related to storage are likely to be approved or modified by the RWQCB, after the review of the plans, specifications, and environmental analysis provided by the County.
2	Would it be necessary to have a battery back up power supply to support the alarm system?	Battery backup may be required by permitting agencies if approximately 8 hours of storage was not found to be adequate.
3	Additional attention needs to be given to the issue of maintaining the system in the event of a power failure. Including, an emergency maintenance plan that would need to be implemented in response to the local alarm system if large portions of the community lost power for a period of time extending beyond the 8 hours of capacity.	An emergency plan for power failures would be necessary and would likely be reviewed and approved by the permitting agencies.
4	The TM estimates the volume of on lot disturbance as ½ of that for STEP, but calculations based on the dimensions provided in the TM suggest the disturbance volume is closer to 1/5th that of STEP. A more detailed analysis is warranted, as reducing	A low pressure tank is less than half the size of a STEP tank. The EIR will provide the analysis of environmental impacts related to soil and homeowner disturbance and the design-build proposals will provide contractual commitments related to the potential cost savings.

	soil disturbance saves money as well as reducing a variety of environmental impacts.	
5	Additionally, the on site costs of a low pressure system are identified as being the same as STEP, even though the soil disturbance is ½ or less.	Costs related to soil disturbance are a small portion of the on lot costs. Nonetheless, the design-build proposals will provide contractual commitments related to the potential cost savings.
6	Low Pressure has the benefits of the possibility of directional boring with installation, potentially reducing soil disturbance and therefore impacts to biological, archeological, and cultural resources. Even if open trenching is used, the shallower depth of installation relative to gravity would appear to reduce these impacts, as well as to reduce project costs.	It is important to note that various collection systems under consideration (STEP, gravity, low pressure) all appear to have applications in Los Osos where that particular system is well suited. However, it also appears that no system is best suited for every individual situation in the community. There are low lying areas where pressure systems seem to have an advantage; on the other hand, there are areas where simple gravity systems appear more appropriate. The goal of the current process is to sort through these issues to generate the best overall system, given a multitude of issues.
7	There are equity issues and concerns raised in regards to the costs of installation and maintenance of backyard installations. ・Easement requirements need to be identified and considered as an option. ・The project should pay for all grinder pumps regardless of location of installation, as opposed to the TM Figures which indicate that some grinder pumps would be homeowner costs, and others project costs based on location.	The homeowner vs. project cost examples in Figure 2 are consistent with what was presented in the Fine Screening Report for the limited use of grinder pumps with a gravity system. If grinder pumps are used more extensively, the responsibility for costs will have to be reevaluated.