Technical Memorandum Name: **Out of Town Conveyance, March 2008**
Commenter: **TAC – Environmental Committee**
Comments Date: **April 28, 2008**
Responses Date: **June 18, 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	Question: Is there a significant difference in energy demands between the pumping of sewage and the pumping of treated effluent? If there is an out of town site with ag exchange, would three conveyance lines be required? One to carry septage to the treatment works; one to return treated wastewater for disposal and recharge, and another to carry the water being imported from the agricultural wells for residential use.	In relation to the overall energy use for the project, the difference between pumping sewage versus treated effluent is not expected to be significant. Potential effluent reuse lines are identified in the Effluent Reuse and Disposal Technical Memo. The reuse and disposal options could result in several pipelines discharging treated effluent from the treatment plant to various reuse and disposal sites.
2	Minimizing disturbance of sensitive habitats and resources during construction, and minimizing the risk of spills and their impact if they do occur, are important factors in selecting a conveyance route. The EIR will need to address these issues in detail. The proposed routes using Hollister Lane and Nipomo Ave would impact sensitive habitats and resources in currently undeveloped areas. The route to the Turri Rd site raises similar issues with additional water quality and wetland habitat concerns. Both the Turri Rd and Gorby routes run alongside sensitive watercourses for a significant distance. The conveyance routes along/under LOVR (1a, 2c,) appear to require much less disturbance of sensitive habitats.	Comment noted. This technical memo identifies potential pipeline routes for further evaluation in the EIR. This evaluation is expected to include biological and cultural resources as well as other resources.
3	The location of existing subsurface infrastructure, including fiber optic cables and water lines, may have substantial effects on the exact location, impacts and costs of the proposed conveyance system routes. Existing infrastructure locations and implications for conveyance routes need to be identified and considered as part of the EIR analysis.	Comment noted. However, because the exact location(s) of existing utilities is typically not known until well into the design effort, EIRs typically do not address this level of detail, unless the particular infrastructure has its own environmental issues (Leaking petroleum lines, etc.) The approach taken is to identify sensitive resources along the route so that highly constrained areas can be focused on. The costs of dealing with existing utilities is factored in to the cost estimates for building that particular section of pipe.

4	Another option to consider for the creek crossing is an independent aerial span.	Comment noted. Ongoing visual impacts are another consideration for this option in addition to the impacts noted above.
5	Table 5 would be more helpful in comparing the proposed routes if it included distance (length) of each route, an estimate of soil disturbance, and to the extent it affects the design and energy demand, some comparison of differences in elevation change along each route.	At this level of analysis, length and soil disturbance of each route are difficult to establish because the in-town starting points are not known. However, the fully developed alternatives in the EIR would include this type of analysis. The comparison of electrical power requirements in this table is a function of pumping pressure, of which elevation difference is a main factor.
6	The sentence regarding O&M cost offsets for conveyance of sewage out of town vs return of treated effluent to town (p 12) is a bit unclear. This should either get more thorough treatment, or be left to another TM or the full EIR analysis.	Energy savings from pumping sewage to a downhill treatment plant may be offset by the energy required to pump treated effluent back uphill for return to the community, and vice versa. The balance of energy demand will be based on the amount of treated effluent required to be returned to the community.
7	As a stand alone document, this TM as written could confuse readers into thinking that the location of the plant 'out of town' has already been determined. The introduction and conclusion to this TM should include the important context that an 'out of town' site is not a foregone conclusion, and the final site has not been determined.	This technical memo is not a stand alone document, but was developed as a part of the larger project development efforts to further explore one potential element of the project. This tech memo considered pipeline routes to potential out of town treatment sites only, as the piping to the mid-town site has previously been designed and permitted. It should be considered in light of both previous and future analysis.