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October 23, 2005

Ocean Outfall Group Position Paper on Los Osos Sewer

Honorable State Water Resource Control Board, Los Osos Community Services District, and Assemblyman Sam Blakeslee,

Thank you for this opportunity to participate in what is certain to be both a successful and historic agreement on the building of a Wastewater Treatment Facility for Los Osos; many thanks to the SWRCB for your leadership in bringing these parties and the community together in this unprecedented spirit of cooperation.

For reasons not altogether clear, siting a Wastewater Treatment Plant for Los Osos on the environmentally sensitive habitat area known as 'Tri-W' has in the past been portrayed as good for water quality. This is a falsehood.

For the following reasons, the Ocean Outfall Group is opposed to siting the Wastewater Treatment Plant at 'Tri-W':

1. "Tri-W" is immediately upstream of the Morro Bay National Estuary, and serves as a natural drainage basin to the estuary. Siting the Wastewater Treatment Plant there would expose the estuary to sewage spills when the plant 'surcharges' during rain events (when volume would increase dramatically) and during holidays, (when concentration of solids would increase). Simply stated, siting a sewer next to an estuary is not at all protective of that estuary.
2. The Wastewater Treatment Plant as was formerly proposed at 'Tri-W' does not adequately address the problem of salt water intrusion, which now extends up to Palisades Ave. and has been shown to be moving inland at 60' per year, threatening the lower (drinking water) aquifer.

3. 'Tri-W' is/was a vibrant ESHA (Environmentally Sensitive Habitat Area) and will come right back. The bond money must be used to re-contour, replant and replace this natural water-filtration system.

4. The Central Coast Regional Water Quality Control Board's time schedule order for building a Wastewater Treatment Plant in Los Osos mentions and misrepresents the results of the 'Kitt Shellfish' study.

The 'Tetra-Tech' study, embedded within the 'Kitt Shellfish' study, concluded that only 1/10 of one percent of nitrate loading in the estuary was originating from the seeps of Los Osos. It also identified the source of estuary contaminants as 'under human control', meaning cattle, dogs, cats and birds. The Duke Power Plant emissions have also been identified as another source.

The Central Coast Regional Water Quality Control Board's time schedule order misrepresents that conclusion, erroneously identifying the source of contaminants instead as 'of human origin', which would mean something completely different.

5. The size and location of the plant formerly proposed for the 'Tri-W' site in Los Osos would not allow hookup for some 700 additional residents now living in homes demonstrated by recent studies to be contributing nitrates and pollutants to the same water basin. Their water treatment would remain in septic tanks, and they will not be allowed to "hook-up"- a real problem with AB 885 coming soon.

6. The close proximity to homes and public gathering places is a health and safety concern.

7. The plant and project are not sustainable, as all sludge would be transported in an untreated, unclassified state, so-called 'no-name' sludge, with 80% water, out through town in tarped trucks to Santa Maria. This is not sustainable or responsible as recent sludge ordinances in other counties make this arrangement uncertain for the future.

8. Finally, the idea of using the unstable hillside at Broderson as a leach field is a recipe for disaster, as it would have to absorb the wastewater equivalent of 7" of rain on a daily basis. This unnatural water regime would also threaten the sensitive plant communities, exacerbating the problem by defoliating an ever-growing portion of the hillside.

For these reasons, the Ocean Outfall Group strongly opposes the Tri-W area for siting a WWTP and urges the Los Osos Community Services District and the regulatory agencies to move ahead with an alternate site for advanced alternative treatment, with the emphasis on a regional, full tertiary system, such as the A-B-C Plan, and in keeping with the watershed-wide waste discharge requirement.

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