



To: Frank Mecham <fmecham@co.slo.ca.us>, Bruce Gibson <bgibson@co.slo.ca.us>, Adam Hill <ahill@co.slo.ca.us>, "lcompton@co.slo.ca.us" <lcompton@co.slo.ca.us>, "darnold@co.slo.ca.us" <darnold@co.slo.ca.us>, "cr_board_clerk@co.slo.ca.us"
Cc:
Bcc:
Subject: re: 1/12/16 BOS > sewage sludge agenda item #15
From: Abe Perlstein <ap3dguy@hotmail.com> - Friday 01/08/2016 07:05 PM

Dear San Luis Obispo Board of Supervisors,

I value our county's clean air, water, land, and food:

That said, during your 1/12/16 meeting, I ask your vote to:

1. place a stop to the CEQA/EIR process on the proposed draft sewage sludge land application ordinance;

* 2. place a comprehensive evaluation of feasible sewage sludge management technologies other than land application prior to any CEQA review of a land application ordinance; ...or...

** 3. enact a stop to the CEQA/EIR process on the proposed draft ordinance until one conforming with BofS directions is drafted.

Ordinance is Premature - No Assessment of Options Other Than Land Application

* Ordinance is Premature - No Assessment of Options Other Than Land Application.

While the County has convened two year-long multidisciplinary task forces to recommend policy on sewage sludge land application, it has never exerted such an effort to examine other methods of sewage sludge management, as directed by the BofS. While others are implementing and investigating technologies converting sewage sludge into electricity, renewable energy and transportation fuel using gasification, pyrolysis, hydro-thermal oxidation, super-critical wet oxidation, steam reformation, fluidized-bed reactors and plasma-arc technology (e.g., BAB2E - <http://www.bayareabiosolids.com/>), the 1-12-16 Staff Report ignores these developments.

The Staff Report mentions only grossly polluting incineration and landfilling as viable options other than land application, an extremely

obsolete and false opinion. During public and private sessions, BofS members have been informed of the innovative and existing developments cited above, so emphasis on examining them prior to forging ahead with spreading sewage sludge on farms and ranches may be persuasive. See pages 8 - 12 of the attached letter for more detailed information.

** Ordinance Conflicts with BofS Directions

1. This draft ordinance does not set "more stringent requirements for quality of acceptable biosolids" than state & federal regulations as required by BofS direction, and allows excessively contaminated sewage sludge to be applied to land.

2. This draft ordinance does not set soil contaminant limits "considering local soil pollutant levels", as required by BofS direction, allowing excessive contamination of local agricultural soil.

3. This draft ordinance does not set limits on sewage sludge and soil contamination using a wider range of pollutants than used in state & federal regulations, as required by BofS direction, allowing the unregulated dispersion of numerous pollutants.

4. This draft ordinance does not provide the public with any opportunity to comment on land application projects, as required by BofS direction.

5. This draft ordinance does not provide landowners with information about the consequences of sewage sludge land application, require their prior informed & formal consent, or provide them liability protection, as required by BofS direction.

6. This draft ordinance does not require that County property records reflect sewage sludge deposition, to alert land buyers of that history, as required by BofS direction.

Yours Truly,

Abram Perlstein

15 year resident, Los Osos



Fw: Agenda Item #15 on January 12th agenda
Lynn Compton to: cr_board_clerk Clerk Recorder
Sent by: **Jocelyn Brennan**

01/09/2016 02:48 PM

----- Forwarded by Jocelyn Brennan/BOS/COSLO on 01/09/2016 02:48 PM -----

From: Jan Surbey <jansurbey@earthlink.net>
To: fmecham@co.slo.ca.us, Bruce Gibson <bgibson@co.slo.ca.us>, ahill@co.slo.ca.us,
lcompton@co.slo.ca.us, darnold@co.slo.ca.us, cr_board_clerk@co.slo.ca.us
Date: 01/08/2016 03:59 PM
Subject: Agenda Item #15 on January 12th agenda

Thank you for placing this item (regarding the proposed draft ordinance permitting sewage sludge land application) on your agenda. My comments are attached. Thanks, Jan Surbey



January 8.docx

January 8, 2016

Dear San Luis Obispo County Board of Supervisors,

Thank you for placing the cessation of the CEQA/EIR review of the proposed draft ordinance permitting sewage sludge land application on your agenda!

As stated in my previous letter, the draft ordinance is premature in that SLO County has yet to conduct an assessment of feasible methods of sewage sludge management other than land application, as required by BofS direction.

The draft ordinance also fails to follow required Bof S direction concerning numerous other aspects of possible sewage sludge disposal.

Therefore, I am requesting that the Bof S stop the CEQA/EIR process on the proposed draft ordinance permitting sewage sludge land application for two reasons: (1) a comprehensive evaluation of feasible sewage sludge disposal technologies other than land application has not to date been completed, and (2) the draft ordinance does not conform to Bof S directions.

Review of any proposed draft is premature and a waste of taxpayer's monies until these two requirements have been accomplished.

Thanks for your time and consideration.

A handwritten signature in black ink on a light yellow background. The signature is cursive and reads "Jan Surbey".

Jan Surbey



Item 15 Sludge ordinance

Susan Harvey

to:

BoardOfSups, cr_board_clerk

01/10/2016 12:29 PM

Hide Details

From: "Susan Harvey" <ifsusan@tcsn.net>

To: <BoardOfSups@co.slo.ca.us>, <cr_board_clerk@co.slo.ca.us>

2 Attachments



image001.png NCW BoS Sludge ord 1-11-16.pdf

Dear Supervisors – Please find attached and copied below our comments on item 15 regarding direction to staff for the proposed sludge ordinance.

Regards,
Susan Harvey

Item No. 15
Meeting Date: January 12, 2016
Presented by: Susan Harvey
Rec'd prior to meeting & posted to web on: January 11, 2016



North County Watch

Looking Out Today For Tomorrow

Board of Supervisors
County of San Luis Obispo
San Luis Obispo, CA 93406
Via Email boardofsuprs@co.slo.ca.us or board_clerk@co.slo.ca.us
January 11, 2016

Re: Item 15 Proposed sludge ordinance

Dear Chairwoman Compton and Supervisors,

Thank you for placing a discussion of the proposed sludge ordinance on the agenda. Please give staff specific direction regarding the drafting of a permanent SLO County sewage/sludge ordinance. First and foremost an ordinance must prevent the land application of excessively contaminated sewage sludge. The current propose ordinance fails to fully protect county lands. The current ongoing CEQA process must be suspended until the language of the ordinance is refined to include your direction to fully protect county lands.

Please direct staff to:

- Draft an ordinance that establishes more stringent requirements for quality of acceptable biosolid materials than state and federal standards.
- Study of all feasible alternatives for managing treated sewage sludge/biosolids.
- Establish specific procedures to ensure property records document any land application activity and a database or other means to make that information readily available to the public and prospective land purchasers.
- Establish requirements that applicants secure sufficient bonding and insurance coverage to protect private land owners and the public from detrimental impacts of sludge application.
- Conduct a baseline survey of each proposed site for follow-up study and management of soil quality.

Thank you for your consideration of our comments.

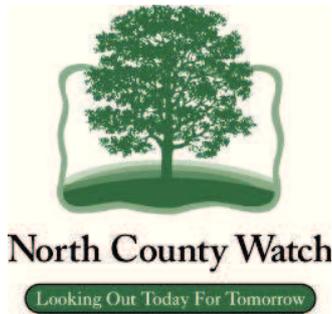
Sincerely,

A handwritten signature in black ink, appearing to read 'Susan Harvey', written over a white background.

Susan Harvey, President

Page 1 of 1

North County Watch
501(c)(3) nonprofit corporation (77-0576955)



Board of Supervisors
County of San Luis Obispo
San Luis Obispo, CA 93406
Via Email boardofsups@co.slo.ca.us or board_clerk@co.slo.ca.us
January 11, 2016

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Thank you for your consideration of our comments.

Sincerely,

President

Page 1 of 1

North County Watch
501(c)(3) nonpro

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