



GRANADA SANITARY DISTRICT
OF SAN MATEO COUNTY

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October 25, 2010

Ms. Camille Leung
Planning and Building Department
County of San Mateo
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Big Wave FEIR and Project Permitting

Dear Ms. Leung,

The Granada Sanitary District is in receipt of the revised FEIR for the Big Wave project. Due to the massive size of the EIR and its related documents, the District believes additional time should be allowed beyond the 10 days allotted for responses to be able to adequately analyze the impacts the project will have on our wastewater system. The short response time is especially problematical since several tables critical to GSD's review related to the sources and uses of water were not made available to GSD until seven (7) days before the Planning Commission's Public Hearing. Their absence from the FEIR as released has deprived GSD, as the wastewater agency with jurisdiction over the sewer system for the project, of sufficient time to review and respond to the FEIR.

Overall, the District's abbreviated review of the FEIR reveals a document so materially flawed and lacking in basic project definition and environmental analysis that it makes a mockery of the CEQA review process. Without a clear project definition, the District cannot delineate adequate mitigation measures for the impacts the project's wastewater generation will have on our sewer system and the environment. At this time, we have, at a minimum, the following critiques of the Big Wave FEIR.

The District has not been afforded status as a Responsible Agency in the CEQA process, which is required because the project now unquestionably includes connection to the GSD sewer system, which requires the Applicant to obtain a Sewer Connection Permit from GSD.

The volume of wastewater which will enter the sewer system is still undefined by the FEIR, and therefore, GSD cannot adequately analyze the impacts to our system, including the empirically established potential for wet weather sewage overflows.

The FEIR states that the project will send wastewater to the District sewer system during times of wet weather. However, the downstream impacts on the District's and SAM's sewer system during these rain events, including pipe sizing, impacts on pump stations, and impacts on flow volume, have not been analyzed by any type of engineering report or model. This is an especially important issue due to the District's problems with high flows during wet weather. Because this analysis has not been provided as required by CEQA, the District is unable to develop adequate mitigation measures to plan for the increased wastewater flow which will result from the project.

The report contains multiple sections in the FEIR where it states that because the project is not yet defined, additional CEQA analysis will be required. This lack of project definition and deferred CEQA analysis is not allowable under the CEQA statutes. There are numerous instances throughout the report which state that "a total of 8 ERU's will be purchased for emergency and excess (wastewater) discharge into the Granada Sanitary District (GSD) system." Contrary to that statement, the District has not made any assessment of the number of ERU's which will be assessed to the project. If the Project generates 10,000 GPD of wastewater flow, which is the applicant's lowest estimate of wastewater flow, the project will generate wastewater requiring at least 45 ERU's of capacity.

The general lack of interaction the applicant has had with the District speaks volumes to the inadequacies of the EIR. Prior to the document's publication, the District's sum total of interaction with the applicant consisted of an hour-long meeting between the District General Manager and applicant Scott Holmes, and a phone conversation with the District Engineer. I have had greater interaction discussing the connection of a single family home to the sewer system, much less a project which could generate 26,000 gallons per day of sewage. The applicant has conducted no engineering study of the impacts this project will have on the District's sewer system, and indeed could not, since he has not requested any of the pertinent pipe size and pump station specifications necessary to conduct such a study.

GSD also incorporates its prior comment letters by reference because they have not been adequately addressed in the FEIR. The flaws in the FEIR need to be corrected and the document recirculated as a Revised Draft EIR for public comment, in accordance with 14 CCR §15088.5. Only then can GSD and its decision makers have adequate information to make a responsible evaluation of the project and attempt to develop adequate mitigation measures.

Sincerely,

The Granada Sanitary District



Chuck Duffy, General Manager