



**SIERRA
CLUB**
SANTA LUCIA
CHAPTER



**SURFRIDER
FOUNDATION**
San Luis Obispo
Chapter



05/18/2018

To: City of Morro Bay

Re: Comments on Draft EIR for Morro Bay Water Recycling Facility

Good day,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Morro Bay Water Recycling Facility. Please accept these comments on behalf of the Surfrider Foundation San Luis Obispo Chapter ("Surfrider"), San Luis Obispo Coastkeeper, and the Santa Lucia Chapter of the Sierra Club ("Sierra Club"), which have been vocal and active in efforts to upgrade the City's existing wastewater treatment plant for well over the past decade.

Surfrider Foundation's mission is the protection of our ocean, waves, and beaches through a powerful activist network. The San Luis Obispo Coastkeeper is the only environmental watchdog dedicated solely to enforcement of water quality, watershed protection, and coastal planning regulations in San Luis Obispo and northern Santa Barbara counties. The Sierra Club practices and promotes the responsible use of the Earth's ecosystems and resources, the protection and restoration of the quality of the natural and human environment and the use of all lawful means to carry out these objectives. We applaud the Morro Bay City Council and its citizens who support protections of Morro Bay's coastal resources. Managed retreat of the city's wastewater treatment plant, combined with tertiary treatment and groundwater recharge, is a sound investment which will benefit Morro Bay's citizens and businesses for many years.

Our chapters agree with the City Council's selection of the South Bay Blvd ("SBB") site for the Water Recycling Facility ("WRF"). The site has passed through multiple layers of public feedback and site alternative analysis, and we believe the SBB site will avoid

many obstacles presented by alternative sites. In construction of the SBB site, for aquifer recharge sites, and for pipelines, we note the report's recognition that *"the proposed project could result in significant and unavoidable impacts to cultural resources (historic and archaeological resources and human remains) that cannot be reduced to less than significant levels, even with mitigation measures"*. We ask that the City make every effort to reach out to our local tribal leaders to assure the cultural heritage and artifacts are protected to the greatest extent possible during construction.

We are also concerned with the WRF's infrastructure which will remain in the coastal zone south (and west) of Highway 1. Primarily, we are concerned with the sewage lift station pumps and pipelines to be built near the existing Corporation Yard located on Atascadero Road. We feel the project as proposed in the Draft EIR lacks redundancy for pump failure in this zone, and improvements can be made to the project which will reduce environmental impacts in this regard. Without addressing this deficiency and incorporating into the project back-up infrastructure which will provide redundancy for sewage pump failure, we believe that the potential future impacts to water quality are not less than significant, and thus that further analysis and project revision is necessary to mitigate impacts to less than significant levels.

We believe it would be beneficial to analyze an alternative which would include a constructed wetland to be located on the existing wastewater treatment plant ("WWTP"), downgrade from the pump station planned near the Corporate Yard. A constructed wetland project at the existing site of the Morro Bay WWTP would help mitigate some of the project's significant impacts. With brine re-directed from the ocean outfall to the wetland, the project could also decrease the impacts of brine discharge to the ocean ecosystem. Furthermore, a constructed wetland in this location would serve many beneficial functions: "slow the flow" during a sanitary sewer overflow; stormwater management; dedicated open space in the coastal zone; carbon sequestration (reduction in Greenhouse Gases); and aquifer recharge. Incorporation of a constructed wetland could make the project more attractive for grant funding opportunities.

Thank you for your consideration.



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