



To: CentralCoast@Waterboards.ca.gov
& Tamara.Anderson@Waterboards.ca.gov

03/08/2020

Re: Cayucos Sanitary District Ocean Outfall Draft Order NO. R3-2020-0004

Good day,

Surfrider Foundation's is dedicated to the protection and enjoyment of oceans, waves, and beaches through a powerful activist network. Our San Luis Obispo chapter has opposed the Cayucos Sanitary District's ocean outfall, preferring the presently-shared outfall with Morro Bay until the two communities could work together toward a future of "No Ocean Outfall". However, as they say, "That ship has sailed". So, the chapter has reviewed the Draft Order and we have the following comments.

Per the DRAFT ORDER NO. R3-2020-0004:

"Comprehensive Response to Climate Change requires a proactive response to climate change in all California Water Board actions, with the intent to embed climate change consideration into all programs and activities. Aligning with Resolution No. 2017-0012, this Order requires beneficial reuse of the Facility's treated effluent to augment local water supply, increasing water supply reliability as a climate adaptation strategy, in addition to decreasing ocean discharges. The Discharger's wastewater was previously treated and discharged from a facility in an area subject to coastal hazards and vulnerabilities. Aligning with Resolution No. 2017-0012, the Discharger sited this new Facility away from coastal hazards and vulnerabilities. To **proactively plan for the future**, this Order requires the Discharger to continue to identify and plan for hazards and vulnerabilities at this new Facility related to flooding, temperature, and influent fluctuations exacerbated by climate changes."

Further, *"With the state of technology today, and environmental conditions which necessitate the reuse of treated wastewater, best practicable treatment or control means recycling treated wastewater where feasible. Recycling wastewater, as opposed to disposing this valuable*

resource to ocean waters, is critical to provide the maximum benefit to and to promote the health and welfare of the people of the state.”

Surfrider SLO supports the managed retreat of vital coastal infrastructure associated with Cayucos Sanitary District’s Sustainable Water Project (SWP). However, we weren’t concerned with the conveyance of advanced secondary or tertiary treated waters between Cayucos and the outfall in Morro Bay. A new outfall will bring new problems.

Draft Order R3-2020-0004 adds another active outfall to our county, may institutionalize ocean outfall in Cayucos, does not fully consider proactive response to climate change, and does not require planning for the maximum benefit of sustainable recycling of wastewater. Further, the availability of this ocean outfall could have compounding, negative effects on the Central Coast. Surfrider’s comment on Cayucos’ SWP Draft EIR (April 10, 2017) said:

... “The project as described in the DEIR does not provide a path to sustainability. On page I-18 of the report, the projected maximum ocean outfall from the new plant will be 350 AFY. When recycled water is distributed for tertiary irrigation (Phase 1), ocean outfall will be decreased to 270 AFY. Finally, if/when Direct Potable Reuse is authorized by California regulators and also favored and subsidized by Cayucos residents in Phase 2, 75 AFY will still be discharged to the ocean. Without Direct Potable Reuse, the water project described in the DEIR will still lose 77% to ocean outfall. **To be truly “Sustainable”, the project’s goal should be for no ocean outfall.”**

Neither Cayucos, nor the Draft Order, illustrate a clearly sustainable pathway for the last portion of effluent (calculated at 75 AFY) which may be used to convey brine discharge to the ocean. Also, since Cayucos SWP’s Phase 2 will take many years and additional substantial investment, Surfrider is concerned Cayucos Sanitary District will begin a Brine Discharge Program for others (such as Cambria’s desalination project) to utilize. Building dependence for a method of BRINE DISCHARGE through ocean outfall will, in fact, institutionalize ocean outfall while wasting valuable water to convey the brine discharge. Without further measures written into the Draft Order, we believe the Order falls short of the policy outlined above (i.e. “maximum benefit of recycling wastewater”) and in fact will institutionalize Cayucos’ ocean outfall through the dependence it creates.

Brine Discharge Programs through ocean outfall will have predictable consequences for our Central Coast communities. A lack of reliable fresh water resources has been the primary balancing factor in tempering growth. For example, short-sighted plans with Cambria’s Sustainable Water Facility did not prepare for many factors such as “What do we do with the waste?” and “Do we need this project at all?”

In the case of Cambria, during shortages from drought, many citizens chose to import non-potable water from a neighboring groundwater source. Though the Cambria CSD does not measure or monitor this amount of imported water, the practice is still clearly visible when you see large water tanks in the yards of Cambria residents. In our letter to Cambria CSD regarding

their Sustainable Water Facility Draft Subsequent EIR (10/13/2016), Surfrider SLO wrote: Our chapter does not support Cambria CSD's building and expanding its desalination plant without measurement of all other available water resources and without extensive environmental review.

If Draft Order NO. R3-2020-0004 does not prohibit it, short-sighted plans such as Cambria's SWP could simply plan to dump their brine waste into the ocean at Cayucos.

The California Coastal Commission agreed with Surfrider that growth-inducing effects (in places like Cambria) due to Cayucos' new ocean outfall could impact SLO County (CCC Application No. 3-19-0617, on 9/11/2019). During the meeting in 2019, the CCC requested and authorized Special Condition 14 to their Coastal Development Permit: "*Limitation on Outfall Use*. The outfall approved through this CDP shall only be used for the development approved in this CDP, and any other use is prohibited."

We request Central Coast Regional Water Quality Control Board (CCRWQCB) review the CCC's actions and adopt a similar approach. Again, as long as the Board continues to permit new outfalls, California will not move away from ocean outfall. Similarly, until districts like Cayucos Sanitary District (or desalination plants) find a different method for discharging brine waste, ocean outfalls will remain institutionalized throughout California.

So, Surfrider SLO requests the CCRWQCB support research and development for constructed wetland projects which will be built for brine discharge burial and provide the surrounding communities (and our climate) with many additional benefits. Planning for constructed wetlands complies with California's policy outlined above: **Recycling wastewater, as opposed to disposing this valuable resource to ocean waters, is critical to provide the maximum benefit to and to promote the health and welfare of the people of the state.** On the Central Coast, open space is still available for constructed wetlands which would offer natural balance (open and/or recreational space), carbon and salt burial, sustainability, and the reduction of Greenhouse Gas emissions associated with hauling brine waste from desalination plants or wastewater reclamation facilities to ocean outfalls.

Surfrider SLO also advocates for constructed wetlands as redundancy for potential Sanitary Sewer Overflows (SSO), such as the existing WWTP site in Morro Bay. Once Morro Bay's Water Recycling Facility is completed on South Bay Blvd, the wetland could be built down-grade from their main lift station near Highway 1 and Morro Rock. Such a wetland could help reduce tsunami run-up, could capture or "Slow the flow" during storm events (urban run-off) or during a SSO, and would provide valuable climate change reduction benefits in an open, recreational space.

We don't have many chances to design sustainability and climate change adaptability into the lives of citizens on the Central Coast. Please follow the Coastal Commission's lead and add a prohibition of a future Brine Discharge Program into Cayucos' Draft Order NO. R3-2020-0004.

Please also work toward sustainable and climate adaptable solutions, such as those provided by constructed wetlands. Surfrider believes these steps are consistent with existing policy, and we are hopeful the CCRWQCB will use them to “proactively plan for the future”.

Thank you,

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