



April 17, 2017

Board of Directors
c/o Rick Koon, General Manager
Cayucos Sanitary District
Sent via email

RE: CSWP EIR Response to Surfrider Foundation Comment Letter

Honorable Board,

On April 11, 2017 Surfrider Foundation transmitted the comment letter on the Draft EIR attached to your agenda packet. The formal comment period for the Draft EIR established by the State Clearinghouse ended on March 29, 2017. The CEQA Guidelines section 15088(a) indicates that the Lead Agency (CSD) may elect to respond to late comments.

In this spirit, we offer the following responses:

1. Surfrider acknowledges the Proposed Project is a step in the right direction for protection of coastal resources, however, they would prefer no ocean discharge of treated effluent. As noted in the comment letter, the Proposed Project would serve to reduce the amount of treated water discharged to the ocean outfall, but it would also improve the quality of the water over the existing condition by reducing total suspended solids by 90%.
2. Eliminating the ocean outfall from the Project and pursuing a constructed wetland does not meet the Project Objectives as defined in the Project Charter and the DEIR. The use of the outfall is necessary until such time as treated water can be conveyed to agricultural users and, potentially, under phase 2 of the Project to CSA 10 for direct potable reuse. These aspects of the Project both meet Project Charter goal for sustainability.
3. The use of a constructed wetland to dispose of wastewater would likely not reduce the salt and nutrient load to a level acceptable for discharge into Toro Creek.
4. The CSD does not own land suitable for a constructed wetland because the land adjoining the proposed facility is encumbered by the 100 year flood plan and sensitive resources, and adjoining upland lands are too steep to feasibly construct a wetland.

Sincerely,

David Foote ASLA

Firma Consultants Incorporated

David W. Foote ASLA

187 Tank Farm Road Suite 230

San Luis Obispo, CA 93401

(805) 781-9800 • www.firmaconsultants.com