



To: Cayucos Sanitary District

cc Firma, Attn: David Foote ASLA

Dt: April 10, 2017

Re: *Draft EIR for the Cayucos Sustainable Water Project (SCH#2016041078)*

Honorable Directors,

The Surfrider Foundation is dedicated to the protection of our ocean, waves, and beaches. The San Luis Obispo chapter of Surfrider would like to share our observations and concerns regarding the Draft Environmental Impact Report titled "Cayucos Sustainable Water Project" dated January, 2017. We hope our observations and concerns will be received and utilized to make the upcoming Final EIR, and the project, better for the coastal environment and for the community of Cayucos.

The project as described in the DEIR is a "step in the right" direction for the protection of our ocean, waves, and beaches. The coastal environment will be placed at decreased risk of sewage spills because of the new project's decreased distance of conveyance of influent to the proposed site on Toro Creek Road. Also, the tertiary treatment of the plant's effluent (though designed to be discharged through ocean outfall) will be another improvement to present ocean water quality.

However, our chapter has concerns regarding the project's title and use of the term "Sustainable". 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.**

Irrigation provided to agriculture provides water conservation only in the case of greater than 1:1 offset of acreage removed from production to acreage added. **Continuing to add water users, through agriculture or any other means, without an offset is not "sustainable" in times of water shortage.**

Also, the project does not recognize that cultural resources are compromised in areas where land has not been previously in active farming. **It is not "sustainable" to continue interference with native lands.**

Granted, there can be significant challenges as we seek to respect cultural resources, reduce ocean outfall, and seek sustainability. In the case of outfall, communities must be willing to embrace a multi-

faceted approach for treating the water to a very high standard, “finding a home” for reclaimed water, and for burying waste from the tertiary treatment process without dumping it in the ocean. However, in the project’s draft EIR, there is no alternative explored for ocean outfall. **We urge consideration of a constructed wetland as an alternative to the project’s long-term plan for ocean outfall.**

Wetlands are efficient in the burial of salts, provide wildlife habitat, and help recharge groundwater supplies. A portion of the 221 acres purchased for the Sustainable Water Project’s site should provide a location for a thriving, functional wetland and would better serve the cause of sustainability. Also, as Cayucos utilizes ocean outfall in Phase 1 (while awaiting authorization to pursue Direct Potable Reuse), surplus, high-quality, tertiary treated water will be available. With surplus treated water available, the salinity of discharge to the constructed wetland could be adjusted and studied, optimum capacity could be tested, and the wetland could be certified by regulators as an effective component and potential replacement for ocean outfall in Phase 2.

In the Final EIR, our chapter requests a comparison of the impact of continued ocean outfall compared to the possible benefits of a constructed wetland. The wetland should be capable of natural burial of the salts from 75 AFY of treated wastewater otherwise designated for ocean outfall while accounting for the potential recharge of groundwater resources, costs of maintaining ocean outfall, potential grant funding from other agencies, etc. In other areas of California, constructed wetlands have been studied and have been shown to be effective. For example, please see: http://www.kestrel-inc.com/wp-content/uploads/2013/04/Oxnard-Pilot-Wetlands.FINAL_.2.bak_.pdf

Thank you for your consideration,

Brad Snook

Chair, Surfrider Foundation San Luis Obispo

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