March 21, 2013

Morro Bay City Council City Hall 595 Harbor St. Morro Bay, CA 93442

Cayucos Sanitary District, Governing Board 200 Ash Ave., P. O. Box 333 Cayucos, CA 93430-0333

Dear Council members and District Board members,

We commend you for moving ahead with plans for a new wastewater reclamation plant and the welcome change of course following the general disregard for public input and the California Coastal Act that marked the history of the previous project during the period 2007-2012. We are confident that a project designed in cooperation with Coastal Commission staff will result in a project for which a Coastal Development Permit can be issued.

To that end, we remind you of Coastal staff's comments on the previous project's Draft EIR from November 2010:

"We respectfully request that the project be re-envisioned in terms of alternative siting and design.... [The] updated DEIR should present, and coequally evaluate against the same evaluation criteria...alternative designs that incorporate the technology and infrastructure necessary to accommodate both wastewater flows at buildout as well as reuse of reclaimed water.... [It is important] to provide decisionmakers, including the Commission, with the best possible information with which to make such an important decision, including with respect to alternative siting and design options that can achieve project objectives...." [emphasis added].

Previously, the choice of a project site that could not be permitted under the LCP and the lack of adequate alternative site analysis became the focus of the project's regulatory issues, hence there was little attention paid to the lack of alternative technology and design analysis. With the issue of the necessity for selection of a site that conforms to the requirements of the Coastal Act now presumably settled, technology and design is likely to get more attention in future hearings in the context of protection afforded to coastal resources.

In light of this, we suggest that you consider alternative technologies and designs that would produce cleaner water, in a smaller footprint, with less impact on coastal resources than the technology and design chosen for the previous project.

We hope to see a project proposal that meets Coastal staff's request for a "re-envisioned" project that fully analyzes and incorporates such design alternatives.

Sincerely,

Andrew Christie Chapter Director