



Central Coast Regional Water Quality Control Board

July 11, 2017

Mayor Jamie Irons and City Council
Interim City Manager Martin Lomeli
City of Morro Bay
jirons@morrobayca.gov
mrlomeli@morrobayca.gov

Dear Mayor Irons and Mr. Lomeli:

COMMENTS ON STAFF REPORT DATED JULY 6, 2017, REGARDING COST REVIEW WORKSHOP FOR THE WATER RECLAMATION FACILITY, CITY OF MORRO BAY

Central Coast Water Board staff has reviewed the staff report prepared by city staff for tonight's city council discussion about timing and costs associated with building a new water reclamation facility (WRF). City staff is recommending that the council approve taking up to "two months to prepare a preliminary site plan and cost estimate for building the new WRF that meets community goals at or near the existing WWTP site and meet with Coastal Commission and Regional Board Staff to determine if that is a feasible option."

While the Water Board shares the city's concerns regarding the high costs of building a new treatment facility, we are also very concerned about timing and the delays associated with this project. In 2008, the city and the Water Board entered into a binding legal agreement in which the city agreed to build a new wastewater treatment facility to achieve full secondary treatment by March 31, 2014. In 2012, the city abandoned its plan to replace the facility at the existing site in favor of a new site not subject to sea level rise and tsunami hazards. As we reminded the city in a letter dated February 19, 2015, upon adoption of the next NPDES permit, the city will be under a timeline of no more than five years to have a new facility operational. The Water Board expects to consider adoption of the new NPDES permit in December 2017.

These delays have water-quality implications. The current facility does not reliably meet secondary effluent standards. It is beyond its design lifespan, requires extensive, expensive maintenance, and lacks redundancy in its treatment processes. Failure of facility components could result in serious spills, creating potential public health issues and significant associated financial liabilities.

The Water Board was supportive of the city's previous plans to treat wastewater to a high level for groundwater recharge. Backing away from that commitment would be a mistake. Building the reclamation plant will be less expensive in the long term if done now, will significantly enhance the city's water supply security, and will improve water quality. The recent drought exposed the city's water supply vulnerabilities to decreased groundwater storage and the unreliability of

DR. JEAN-PIERRE WOLFF, CHAIR | JOHN M. ROBERTSON, EXECUTIVE OFFICER

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delivery of state water. It would be irresponsible of the city to continue to discharge a potential source of groundwater recharge to the ocean through its wastewater outfall.

Having said all that, the Water Board supports the city's desire to find an appropriate and cost-effective location for the new facility. The Water Board concurs with your staff's recommendation to evaluate the option of building the facility at or near the existing site. The Water Board is committed to working with city staff and the Coastal Commission in this review.

The Water Board looks forward to a positive and cooperative relationship with the city as we move forward. The Water Board is committed to supporting the city's funding and permitting efforts to build a project with full reclamation. However, if the city decides not to pursue full reclamation at this time, the Water Board will have to be less supportive. This may result in a more expensive project through decreased support for Clean Water State Revolving Fund grants and loans.

Water Board staff appreciates the good communication with both you and your staff and we look forward to working with the city and its staff going forward in this process to improve water quality and water security for the city. If you have questions, please contact Harvey Packard at (805) 542-4639 or at Harvey.Packard@waterboards.ca.gov or myself at (805) 549-3140.

Sincerely,

John M. Robertson

Digitally signed by John M.
Robertson

Date: 2017.07.11 13:01:05 -07'00'

John M. Robertson
Executive Officer

cc:

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