



City of Morro Bay
Water Reclamation Facility Project

QUARTERLY PROGRESS STATUS REPORT TO FUNDING / REGULATORY AGENCIES (COMBINED REPORT)

REPORTING PERIOD
October 1, 2025 through December 31, 2025





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OCTOBER 1, 2025 THROUGH DECEMBER 31, 2025

Clean Water State Revolving Fund (CWSRF) Planning Loan Agreement No. D16-01016

Water Infrastructure Finance and Innovation Act (WIFIA)
Funding Agreement No. N17150CA (Water) / No. N17108CA (Wastewater)

CWSRF Funding Agreement No. (SWRCB000000000D2001033)



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Abbreviations

AOP	advanced oxidation process
APCD	Air Pollution Control District
BNR	biological nutrient removal
BR	brine
Caltrans	California Department of Transportation
Carollo	Carollo Engineers
CA-SLO	California-San Luis Obispo
CDFW	California Department of Fish and Wildlife
City	City of Morro Bay
COVID-19	Coronavirus Disease 2019
CWSRF	Clean Water State Revolving Fund
DDW	Division of Drinking Water
ESA	environmentally sensitive area
FBV	Filanc, Black & Veatch
FCA	flanged coupling adapter
FO	fiber optic
FPVC	fusible polyvinyl chloride
GMP	guaranteed maximum price
H ₂ O	water
HDPE	high-density polyethylene
IPR	indirect potable reuse
LF	linear feet
LOTO	lockout tagout
LS	lift station
MBR	membrane bioreactor
mgd	million gallons per day
MH	manhole
MTBM	microtunnel boring machine
N/A	not applicable
NEMA	National Electrical Manufacturers Association
NPDES	National Pollutant Discharge Elimination System
NTP	notice to proceed
OMMP	Operations, Maintenance, and Monitoring Plan
PCO	potential change order
PG&E	Pacific Gas and Electric
PLC	programmable logic controller

PS	pump station
R/W	right-of-way
RFP	request for proposals
RO	reverse osmosis
RWQCB	Regional Water Quality Control Board
SAFE	stormwater auxiliary filtration equipment
SCADA	supervisory control and data acquisition
SD	storm drain
SHPO	State Historical Preservation Officer
SHT	sludge holding tank
SLO	San Luis Obispo
SRF	State Revolving Fund
SWPPP	Stormwater Pollution Prevention Plan
TBD	to be determined
TCP	traffic control plan
TSO	Time Schedule Order
USEPA	United States Environmental Protection Agency
UV	ultraviolet
UVT	ultraviolet transmittance
Vdc	volts direct current
VFD	variable frequency drive
WIFIA	Water Infrastructure Finance and Innovation Act
WRC	Water Resource Center
WRF	Water Reclamation Facility
WWTP	wastewater treatment plant

Section 1

PROJECT OVERVIEW

1.1 General Project Status Update

Since 2013, the City of Morro Bay (City) has been developing a Water Reclamation Facility (WRF) project through the completion of several key planning milestones including completion of the Draft Water Reclamation Facility Master Plan and Draft Master Water Reclamation Plan. These planning documents along with City Council-adopted goals for the project have outlined a project that includes the following major components:

- On-site tertiary treatment facility with a capacity of approximately 1 million gallons per day (mgd). This facility was previously known as the WRF and the City recently renamed the facility the Water Resource Center (WRC). For the remainder of this document, the treatment facility will be referred to as the WRC.
- On-site full advanced treatment facilities capable of meeting the State Division of Drinking Water (DDW) requirements for potable reuse via groundwater augmentation.
- Off-site raw wastewater conveyance facilities including pipelines and two pump stations to convey raw wastewater, tertiary-treated wastewater, and brine between the existing wastewater treatment plant (WWTP) site and the City's WRC located at Highway 1 and South Bay Boulevard (Conveyance Facilities).
- Off-site recycled potable reuse facilities including pipelines and injection wells necessary for groundwater augmentation in the Morro groundwater basin (Recycled Water Facilities).

“Our Water” is the City's program to plan and build water and wastewater infrastructure for a sustainable future for the environment, economy, and the community. This report summarizes key accomplishments and challenges during the reporting period of October 1, 2024, through December 31, 2024.

1.2 Current Project Schedule

In June 2018, the City received a Time Schedule Order (TSO) from the Regional Water Quality Control Board (RWQCB) that requires the City to achieve full operation of new wastewater treatment facilities by February 28, 2023, encompassing the WRC project (by Design-Build) and the Conveyance Facilities project (by conventional Design-Bid-Build) including all off-site pipelines and pump stations. **The schedule for the Recycled Water component of the program is shown in Table 1 and Figure 1 below. The overall program schedule for previous project components is available in previous quarterly reports from CY Q1 2025 (Jan-Mar) and older. The final completion for both the WRC and the Conveyance were officially closed out in May 2024.**

While both the WRC and Conveyance Projects' final completion dates are to occur after the TSO deadline, the City has already achieved the milestone requirement of full operation of the wastewater treatment facilities in compliance with permits and regulatory requirements. The milestone goal was achieved during a phased start-up of the various facilities during October and November 2022.

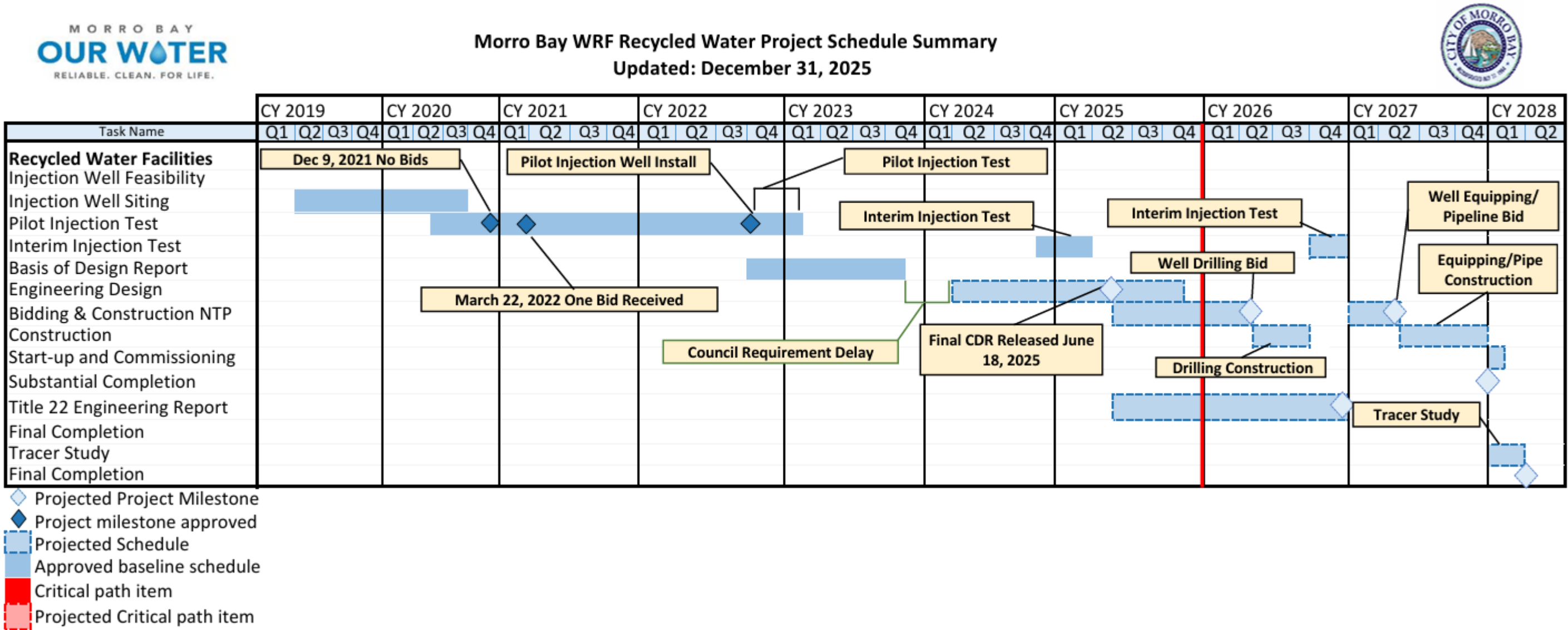
The Recycled Water Facilities component of the WRF Program, which includes construction of injection wells and recycled water pipelines, is not tied to the TSO compliance date and is currently proceeding

through the permitting and design process. The current estimated date for substantial completion of the Recycled Water Facilities is December 2027.

Table 1 Summary Recycled Water Program Implementation Schedule

Summary Recycled Water Program Implementation Schedule		
#	Task	Actual/Anticipated Completion Date
Injection Well 1		
1	Drill Injection Well 1 (Oct 2022) & perform pilot injection test (Jan 2023)	January 2023
2	Perform an interim tracer study on Injection Well 1	March 2025
Planning		
3	Land Use/Environmental Permitting	Ongoing
4	Land Acquisition/Easements	Ongoing
5	Hydrogeology/Basin Mapping and Modeling	Ongoing
6	IPR/Recycled Water Permitting	Ongoing
7	Final Conceptual Design Report	July 2025
Injection Well (2 or 3 additional wells) and Monitoring Well Construction		
8	Well Design, Drilling, and Construction Documents	February 2026
9	Advertise Bid, Award Well Drilling and Construction Docs	April 2026
10	Well Drilling and Construction	August 2026
11	Injection Test/Tracer Study	December 2026
Injection Well (pilot well + 2 or 3 additional wells) Equipping Construction		
12	Well Equipping and Design Construction/Bid Documents	June 2026
13	Advertise, Bid, Award, Well Equipping Construction Docs	April 2027
14	Well Equipping Construction	December 2027
IPR Recycled Water Distribution Pipelines		
15	IPR Branch Pipelines and Misc. Design and Construction Documents	June 2026
16	Advertise Bid, Award Distribution Pipelines and Retrofits	April 2027
17	Distribution Pipeline and Retrofits Construction	December 2027
18	IPR Recycled Water Facilities Construction Complete (Substantial Completion)	December 2027
Post-Construction Activities		
19	Complete DDW required tracer study	March 2028

Figure 1 Program Schedule



Section 2

WATER RESOURCES CENTER (PHASE 1)

2.1 Project Summary – Reporting Period: October 1 to December 31, 2025

This quarterly progress report summarizes the project construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

Table 2 WRC Project Summary

Item	Description
Public Agency Owner	City of Morro Bay
Design-Build Joint Venture Entity	Overland Contracting, Inc.
Design-Build General Contractor	J.R. Filanc Construction Company, Inc.
Design-Build Engineer of Record	Black & Veatch Corporation
City's Program Management	Carollo
City's Construction Manager	Carollo – Mimiaga Engineering Group Inc.
Design-Build Contract Award	October 23 2018
Design Phase NTP	November 5, 2018
Original Anticipated Construction NTP	April 29, 2019
Original Substantial Completion Date	August 5, 2021
Original Final Completion Date	October 1, 2021
Actual Executed Construction NTP	March 20, 2020
Original Construction Phase Duration	886 Calendar Days (Construction NTP to Final Completion)
Construction Phase Time Extensions Approved	374 Calendar Days (through Amendment No. 9)
Revised Construction Phase Duration	1,449 Calendar Days (Construction NTP to Final Completion)
Original / Current Substantial Completion	June 27, 2022 / February 6, 2023
Original / Current Final Completion Date	August 23, 2022 / March 8, 2024
Original GMP	\$67,234,512.00
Current Approved Amendments to Date	\$11,765,488.00 (through Amendment No. 10)
Current Approved GMP	\$79,000,000.00 (through Amendment No. 10)
Approved Progress Payments to Date	\$79,000,000 (through June 30, 2023, Payments 1 – 62)
Percent Complete – Cost (Contractor Invoiced)	100% (\$79,000,000 / 79,000,000)
Construction Calendar Days Elapsed	1,448 Calendar Days (March 20, 2020 to March 8, 2024)
Percent Complete - Time (Schedule Elapsed)	133% (1471 days / 1,088 days)
Percent Construction Complete (Overall)	117% (average of cost and time percent complete)

Abbreviations:

Carollo – Carollo Engineers; GMP – guaranteed maximum price; NTP – Notice to Proceed.

2.2 Project Scope of Work

- 0.85/0.97 mgd WRC Average Annual.
- Influent Course Screens.
- Vortex Grit Removal Basins.
- Stormwater Auxiliary Filtration Equipment (SAFE) System (for high flow Equalization and Filtration).
- Fine Screens.
- Odor Control.
- Biological Nutrient Removal (BNR).
- Membrane Bioreactor (MBR).
- Sludge Holding Tank (SHT).
- Sludge Dewatering.
- Reverse Osmosis (RO) Filtration.
- Ultraviolet (UV)-Advanced Oxidation Process (AOP).
- Outfall Pump Station.
- Product Water Storage Tank.
- Indirect Potable Reuse (IPR) Pump Station.
- Operations Building.
- Maintenance Building.
- RO/UV-AOP Building.
- Electrical Building.
- City Vehicle Parking Canopy.
- Covered Outdoor Storage Aisles.
- Water/Collections Storage Shed.
- Water/Collections Equip. Canopy.
- Access Road and Site Improvements.
- Yard Piping and Site Work.
- Electrical Distribution Facilities.
- Emergency Standby Generator.
- Instrumentation and Controls.
- Utility Extensions into Site.

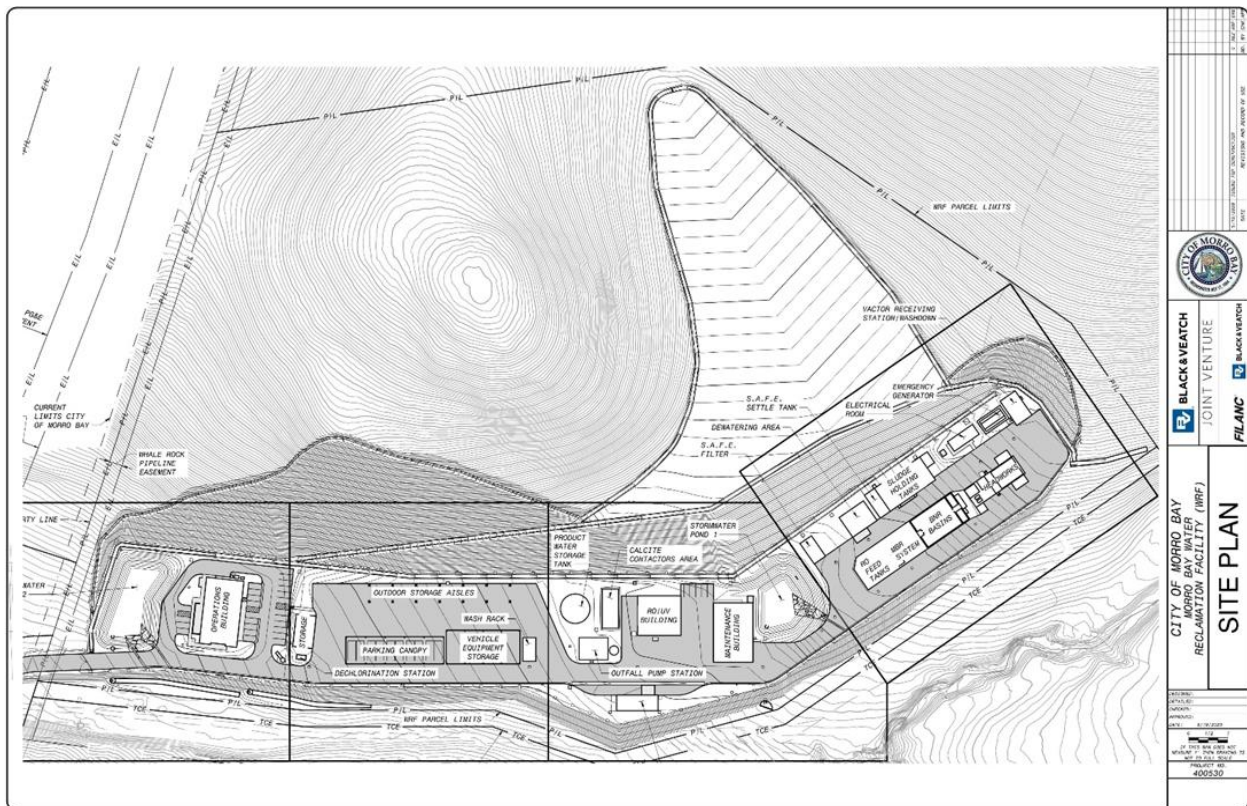


Figure 2 Morro Bay WRF Site Plan

2.3 Construction Progress: October 1 to December 31, 2025

- The City has completed the TSO milestone requirement of full operation of wastewater treatment facilities in compliance with the State National Pollutant Discharge Elimination System (NPDES) permit and other regulatory requirements.
- The final contract closeout negotiation resulted in a final GMP amount of \$79,000,000 (see Amendment No. 10, which was approved by City Council on April 9, 2024).
- **As of March 2024, final completion for this project has been achieved. See previous Quarterly Reports for additional detail on the Water Resources Center construction.**

2.4 Project Photographs

There are no construction photographs to include since the plant construction is complete and operational.

Section 3

CONVEYANCE FACILITIES (PHASE 2)

3.1 Construction Progress Report – Reporting Period: October 1 to December 31, 2025

This quarterly progress report summarizes the project construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

3.2 Project Summary

Table 3 Conveyance Facilities Project Summary

Item	Description
Public Agency Owner	City of Morro Bay
General Contractor	Anvil Builders Inc.
Design Engineer of Record	Waterworks Engineers, LLC.
City's Program Management	Carollo
City's Construction Management	Carollo / Mimiaga Engineering Group Inc.
Advertisement for Bids Date	June 16, 2020
Prebid Conference Date	July 7, 2020
Number of Bidding Amendments Issued	5 Amendments (issued between June 18, 2020, and August 5, 2020)
Bid Opening Date	August 12, 2020
Contract Award by City Council	November 10, 2020
Executed Construction NTP	December 14, 2020
Original Construction Phase Duration	390 Calendar Days (to Substantial Completion)
Original Construction and Closeout Duration	435 Calendar Days (to Final Acceptance)
Construction Phase Time Extensions Approved	282 Calendar Days (through Amendment No. 6)
Revised Construction Phase Durations	672 Days to Substantial Completion - 717 Days to Final Acceptance
Original Substantial Completion Date	January 8, 2022 (NTP+390 Calendar Days)
Current Substantial Completion Date	October 17, 2022 (NTP+672 Calendar Days)
Original Final Acceptance Date	February 22, 2022 (NTP+435 Calendar Days)
Current Final Acceptance Date	December 1, 2022 (NTP+717 Calendar Days)
Original Contract Amount	\$31,493,675.00
Current Approved Change Orders	\$5,770,931.00 (through Amendment No. 9)
Current Approved Contract Amount	\$37,264,606.00 (through Amendment No. 8)
Approved Progress Payments to Date	\$37,264,606 (through June 30, 2023 – Pay Estimate No. 27)
Percent Complete – Cost (Contractor Invoiced)	99.4% (\$37,064,606 / \$37,264,606)
Construction Calendar Days Elapsed	1,294 Calendar Days (12/14/2020 to 3/26/2024)
Percent Complete - Time (Schedule Elapsed)	167% (1,198 days / 717 days)
Percent Construction Complete (Overall)	134% +/- (average of cost & time percent completes)

3.3 Project Scope of Work

- New Sewer Pump Station A.
- New Sewer Pump Station B.
- Connection to Existing Lift Station 2.
- Connection to Existing Lift Station 3.
- Dual Sewer Force Main (< 3 miles).
- Brine (Outfall) Pipeline (< 3 miles).
- IPR Pipeline (> 2 miles).
- Fiber Optic (FO) Conduit and Cable (> 3 miles).
- 60-inch Microtunnel Trenchless Crossing (310 linear feet [LF]).
- 60-inch Auger Bore and Jack Trenchless Crossing (145 LF).
- Utility Pipe Bridge and Abutments (115 LF).
- Electrical Distribution Facilities.
- Emergency Standby Generators.
- Instrumentation and Controls.

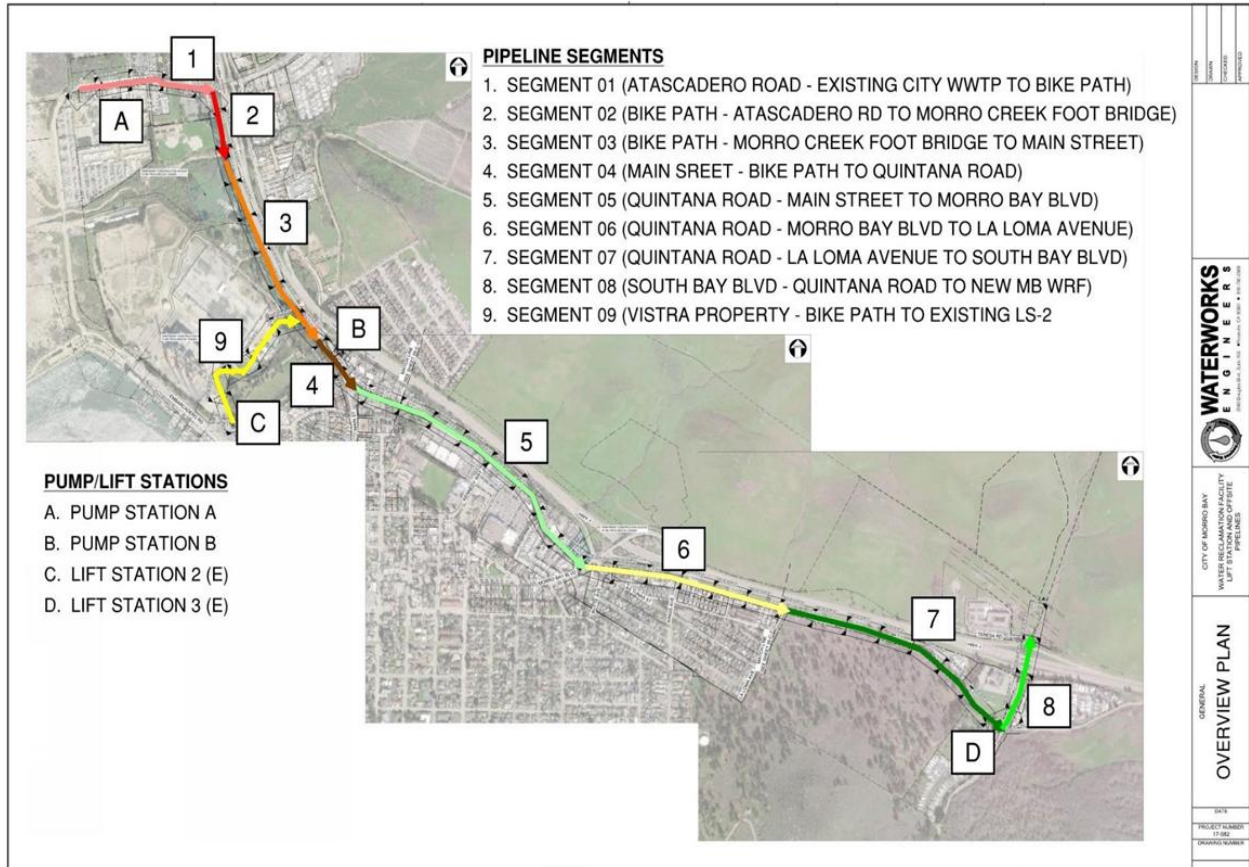


Figure 3 Morro Bay Conveyance Facilities Overview Plan

3.4 Construction Progress: October 1 to December 31, 2025

- The City has completed the TSO milestone requirement of full operation of the wastewater treatment facilities in compliance with the State NPDES permit and other regulatory requirements.

- Contractor and design engineer are currently working together to resolve the outfall pipeline capacity deficiency issue and are expected to present a path forward to determine a resolution to the Program Team and City in 2025.
- **As of August 2023, final completion for this project has been achieved. See previous Quarterly Reports for additional detail on the Conveyance Facilities construction.**

3.5 Project Photographs

There are no construction photographs to include since the plant construction is complete and operational.

Section 4

RECYCLED WATER FACILITIES PROJECT (PHASE 3)

4.1 Pre-Construction Progress Report – Reporting Period: October 1 to December 31, 2025

This quarterly progress report summarizes the project planning and construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

4.2 Pre-Construction Project Summary

Table 4 Recycled Water Facilities Project Summary

Item	Description
Public Agency Owner	City of Morro Bay
General Contractor	Not known
Pre-Design Hydrogeological Consultant	GSI Water Solution, Inc.
Design Engineer of Record	TBD
City's Program Management	Confluence Engineering Solutions
City's Construction Management	TBD
Design Percent Complete	30%
Pilot Injection Well Construction Bid Date	March 22, 2022
Pilot Injection Well Construction Contract Amount	\$356,625
Pilot Injection Well Construction Final Contract Amount	\$356,585
Pilot Injection Well Construction Completion Date	January 3, 2023
Advertisement for Bids Date	Estimated early 2026
Prebid Conference Date	Estimated early 2026
Number of Amendments Issued	3
Bid Opening Date	Estimated early 2026
Engineer's Estimate of Cost	Estimated May 2025
Executed Construction NTP	Estimated Mid 2026
Original Substantial Completion Date	November 1, 2023
Original Final Completion Date	N/A
Original Construction Phase Duration	14 months, June 2025 – August 2026
Construction Phase Time Extensions	TBD
Revised Construction Phase Duration	TBD
Current Substantial Completion Date	December 2027
Current Final Completion Date	TBD
Original Contract Amount	\$4,400,000

Item	Description
Current Executed Change Orders	-\$40
Current Contract Amount	\$6,395,524
Approved Progress Payment to Date	\$366,975
Percent Complete – Cost (Contractor Invoiced)	5.7%
Construction Calendar Days Elapsed	0 Calendar Days
Percent Complete – Time (Schedule Elapsed)	0%
Percent Construction Complete (Overall)	5.7%

Abbreviations:

N/A – not applicable; TBD – to be determined.

4.3 Planned Project Scope of Work

- Off-site recycled potable reuse facilities including pipelines, injection wells, monitoring well, etc.
- Implementation of groundwater augmentation in the Morro Groundwater Basin.

4.4 Pre-Construction Progress: October 1 to December 31, 2025

- On October 6, 2025, the Project Team received feedback from the Division of Drinking Water (DDW) on the Draft Title 22 Engineering Report. The City began preparing responses to DDW’s feedback and revisions to the Engineering Report. The City is anticipating providing responses to DDW in the next quarter.
- On October 16, 2025, the City completed Cone-Penetration (CPT) corings as part of the hydrogeological investigations in the Fisherman’s storage area/Harbor area on Vistra property for the injection well siting.
- On November 24, 2025 the City met with SRF to provide a project timeline update and discussed how to move forward with the schedule change.
- During this quarter, the City continued to work towards selecting the sites for the additional two or three injection wells to be included in the initial phase of the project.
- During this quarter, the project hydrogeologist proposed recycled water monitoring well sites to DDW for their consideration. DDW has provided preliminary approval of these sites and stated DDW will provide additional review and comment upon receipt of the final, confirmed locations and screen intervals of all injection, monitoring, and extraction wells.
- During this quarter, the City received a draft appraisal for the easement values for the proposed injection and monitoring wells. The Project Team is in the process of finalizing the appraisal documentation and preparing an offer for the property owner.
- During this quarter, the City continued to coordinate with the property owner of the potential injection well sites.
- During this quarter, the combined quarterly/annual reports required under the City’s Aquifer Storage and Recovery (ASR) permit were submitted (available on [GeoTracker](#)).
- During this quarter, the City continued to coordinate with the Environmental Protection Agency (EPA) regarding the expanded project area that was not previously included in the original BO.
- During this quarter, the City coordinated with the United States Bureau of Reclamation (USBR) the EPA to add USBR as a signatory to the City’s existing Programmatic Agreement (PA) with the EPA. Becoming an added signatory to this agreement will allow USBR to utilize the Environmental Assessment (EA) and Biological Opinion (BO) prepared under the PA to fulfil Morro Bay’s National

Environmental Policy Act (NEPA) requirements for their organization.

- During this quarter, the City continued to coordinate with the Coastal San Luis Resource Conservation District (CSLRCD) and California Coastal Commission (CCC) on the Chorro Levee Project and on the Agricultural Mitigation Program update.
- During this quarter, the project design engineer and hydrogeologist progressed toward completion of design plans for injection well drilling and well construction.
- During this quarter, the project design engineer progressed toward completion of design plans for injection well equipping and recycled water pipelines.

4.5 Project Photographs

Photos for the hydrogeological investigations (CPT corings) are provided below.





Figure 4 Hydrogeological Investigations (CPT Corings) for Injection Well Siting

4.6 Change Order Summary

- N/A (main project work has not commenced).

4.7 Problems Encountered/Solutions/Status

- N/A (main project work has not commenced).

Section 5

WASTEWATER TREATMENT PLANT DECOMMISSIONING AND DEMOLITION (PHASE 4)

5.1 Pre-Construction Progress Report – Reporting Period: October 1 to December 31, 2025

This quarterly progress report summarizes the project planning and construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

5.2 Pre-Construction Project Summary

Table 5 Wastewater Treatment Plant Decommissioning and Demolition

Item	Description
Public Agency Owner	City of Morro Bay
General Contractor	TBD
Demolition Design Consultant RFP Release Date	January 23, 2025
Demolition Design Consultant Contract Date	June 24, 2025
Demolition Design Consultant	Anchor QEA
City's Program Management	City's Engineering Division
City's Construction Management	TBD
Archeological Investigations	TBD
Design Percent Complete	5%
Final Design Report and Recommendations	April 2026
Demolition Construction Bid Date	April 2026
Demolition Construction Contract Amount	TBD
Advertisement for Bids Date	May 2026
Prebid Conference Date	June 2026
Bid Opening Date	July 2026
Engineer's Estimate of Cost	TBD
Executed Construction NTP	TBD
Anticipated Construction Start Date	September 2026
Original Final Completion Date	February 2025
Current Final Completion Date	April 2027
Anticipated Construction Phase Duration	6 Months
Construction Calendar Days Elapsed	0 Calendar Days
Percent Complete – Time (Schedule Elapsed)	0%
Percent Construction Complete (Overall)	0%

Abbreviations:

N/A – not applicable; TBD – to be determined.

5.3 Planned Project Scope of Work

- As required by the Coastal Development Permit (CDP) for the WRF Program, and on behalf of the JPA, the City needs to decommission and demolish the WWTP including a thorough removal of all plant components (e.g., building, fences, storage tanks, etc.).

5.4 Pre-Construction Progress: October 1 to December 31, 2025

- The City had intended to complete the Phase 4 (WWTP Decommissioning) archeological investigations at the same time as the Phase 3 (Recycled Water Facilities) investigations to save on mobilization costs. However, the City was not able to conduct the Phase 4 investigations because consent from Cayucos Sanitary District was required on the jointly-owned property and permission was not granted as negotiations regarding the other aspects of dissolution of the Joint Powers Authority Agreement are still ongoing.
- The City is in negotiations with Cayucos Sanitary District, co-owner of the facilities and property, to either fully purchase the property or obtain permission from Cayucos Sanitary District to move forward with the demolition of the plant.
- The new timeline for the Phase 4 archeological investigation is to be determined but is anticipated to be completed prior to March 2026. The City is currently coordinating with Cayucos Sanitary District and the project archeologist to reschedule these investigations.

5.5 Project Photographs

- N/A (main project work has not commenced).

5.6 Change Order Summary

- N/A (main project work has not commenced).

5.7 Problems Encountered/Solutions/Status

- N/A (main project work has not commenced).

Section 6

ENVIRONMENTAL/REGULATORY COMPLIANCE

This quarterly progress report section summarizes the City's environmental and regulatory compliance pursuant to oversight by the following regulatory agencies: State Water Resources Control Board, CDFW, United States Fish and Wildlife Service, USEPA, California Coastal Commission, SLO County APCD, SHPO, Central Coast RWQCB, and the City. Specific activities are summarized in Appendix A. Copies of supporting compliance documentation are available upon request.

Appendix A

ENVIRONMENTAL/REGULATORY COMPLIANCE SUMMARY



WATER RECLAMATION FACILITY ENVIRONMENTAL/REGULATORY COMPLIANCE SUMMARY

UPDATED: December 31, 2025



Agency	Reference Document	Document Reference	Measure Focus	Measure	Phase 1 Water Reclamation Facility (WRF) Compliance Activities (10/1/25 through 12/31/2025)	Phase 2 Conveyance Facilities Compliance Activities (10/1/2025 through 12/31/2025)	Phase 3 Recycled Water Facilities Compliance Activities (10/1/2025 through 12/31/2025)
United States Fish and Wildlife Service	Biological Opinion	Biological Opinion	Tidewater Goby Item 1	The applicant will implement erosion and sedimentation control measures (e.g., silt fences, straw bales or wattles) in all areas where disturbed substrate may potentially wash into waters via rainfall or runoff, particularly around stockpiled material and at the downstream end of each project reach. Such measures should remain in place and be inspected periodically until the project is complete and exposed soils are stabilized. Diversion structures, sediment traps/basins and associated equipment (e.g., pumps, lines) will be maintained in optimal working condition for the entire duration of the preparation and construction periods.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 2	Prior to the start of work, the contractor will prepare a spill prevention plan to ensure prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All project-related hazardous materials spills within the project site will be cleaned up immediately. Spill prevention and cleanup materials will be on-site at all times during the course of the project.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 3	All refueling, maintenance, and washing of equipment and vehicles will occur on paved areas in a location where a spill would not travel into a drainage feature or storm drain inlet. This fueling/staging area will conform to Best Management Practices applicable to attaining zero discharge of stormwater runoff into waters of the U.S. and State of California. At a minimum, all equipment and vehicles must be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills. Washing of equipment will occur only in a location where polluted water and materials can be contained for subsequent removal from the site.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 4	A designated concrete washout location will be established onsite, in an area at least 50 feet from any drainage feature or storm drain inlet. The washout will be maintained and inspected weekly, and will be covered prior to and during any rain event. If a container is used, concrete debris will be removed whenever the washout container reaches the half full mark.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 5	Best Management Practices for dust abatement will be a component of the project's construction documents. Dust control requirements will be carefully implemented to prevent water used for dust abatement from transporting pollutants to storm drains leading to the creek channel.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 6	The applicant will prepare a frac-out contingency plan prior to initiation of construction activities that involve horizontal direction drilling activities. The applicant will implement the frac-out contingency plan during horizontal directional drilling construction activities. At a minimum, the plan will include the following: (a) Measures to minimize the potential for a frac-out associated with horizontal directional drilling activities; (b) Provide for the timely detection of frac-outs; (c) Protect areas that are considered environmentally sensitive (streams, wetlands, other biological resources, cultural resources); (d) Ensure an organized, timely, and "minimum-impact" response in the event a frac-out and the release of drilling mud occurs; and (e) Ensure that all appropriate notifications are made to the appropriate environmental specialists immediately (e.g., qualified biological monitor), and to appropriate regulatory agencies within 24 hours and that documentation is completed.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Morro Shoulderband Snail Item 1	A Service-approved biologist will survey for Morro Bay Shoulderband snails no more than 48 hours before initial ground-disturbing and vegetation-clearing activities that occur on dune land or Baywood fine sand. The Service-approved biologist will monitor all construction activities occurring on dune land or Baywood fine sand. If the species is located during any of these pre-activity surveys or during subsequent project activities, the Service will be contacted immediately and activities will halt in that particular area until it is determined what actions may be necessary to avoid take of the snail.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Morro Shoulderband Snail Item 2	Any equipment use, materials stockpiling, lift station construction, or any other uses proposed on the north side of Atascadero Road opposite the existing treatment plant will be setback from any potentially suitable habitat. If construction adjacent to potentially suitable Morro Shoulderband snail habitat occurs during the winter rain season, a Service-approved biologist will survey the work area immediately following rain events or dense fog conditions to ensure that no Morro Shoulderband snails have entered the site.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Morro Shoulderband Snail Item 3	Silt fence will not be used to exclude Morro Shoulderband snails from work areas where suitable sandy soils and habitat may be present. Work areas in sandy soils near potential Morro Shoulderband snail habitat will be clearly delineated with flagging and/or stakes to limit the boundaries of work areas and confine them to developed and paved areas. If silt fencing must be used for other reasons in areas near potential Morro Shoulderband snail habitat, additional measured developed by a Service-approved biologist will be implemented to avoid harm to the Morro Shoulderband snail.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.



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United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 6	The permanent fencing will include a concrete exclusion barrier along the eastern boundary of the site that extends 24 inches above grade. The top of the concrete exclusion barrier will include a six-inch lip that will serve as a climbing barrier for the California red-legged frog (CRLF). Affixed to the top of the concrete exclusion barrier will be a six-foot chain link fence with privacy slats. The remaining perimeter of the site will include a six-foot chain link fence with privacy slats.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Biological Opinion Amendment	California Red Legged Frog Biological Opinion Amendment dated 1/6/2021	The proposed changes include using a high density polyethylene (HDPE) exclusion barrier along the facility's eastern edge as it interfaces with the Drainage 3 corridor, in place of the concrete barrier described in the biological opinion. The concrete barrier would still be used in the southeastern part of the site along the access road. The HDPE exclusion barrier would be installed 36 inches below grade and extend 24 inches above grade. It has a 15 to 30 year life expectancy, compared to the 50 to 100 year life expectancy of the concrete barrier. The HDPE barrier would have a 4-inch overhanging lip at the top of the fence to deter climbing California red-legged frogs, while the concrete barrier would have a 6-inch lip. The City of Morro Bay (applicant) will conduct quarterly inspections of the barrier for signs of wear or damage and provide immediate repairs as needed. The applicant expects that only the above-ground portion of the barrier will need to be replaced in the future, because the below-ground barrier will be protected from sunlight, weather, and other potential damage. In the event that a complete barrier replacement is required, the applicant will contact the U.S. Fish and Wildlife Service (Service) for guidance prior to completing replacement. The applicant will document instructions to contact the Service in the event of a complete barrier replacement in their written protocols for fence maintenance.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Biological Opinion Amendment	California Red Legged Frog Biological Opinion Amendment (issue dated pending)	This second amendment covers the additional surface disturbance to grassland areas associated with the west cut-slope landslide and subsequent remediation. The coordination and correspondence between the City and USEPA/USFWS documents the extent of area disturbed by the landslide, field investigations and repair design, major earthwork remediation activities, and grasslands restoration.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 6	Permanent night lighting will be minimal with low intensity and will follow current City of Morro Bay and County of San Luis Obispo policies to prevent spillover into open space areas.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 7	The applicant proposes to mitigate for the loss of California red-legged frog critical habitat through the on-site conservation of 19.5 acres of dispersal habitat, on the same parcel where the Water Reclamation Facility would be located. The applicant will achieve protection through a conservation easement or another appropriate and feasible mechanism. The applicant will develop the protection in coordination with the Service and complete protection within 12 months of initiating project activities. The construction process will disturb nine acres of the proposed mitigation area by grading and installing fourteen drainage swales. The drainage swales would be concrete-lined with sides at a 1:1 slope. The applicant will revegetate the disturbed areas and return them to grassland.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 7	The applicant's Coastal Development Permit, issued by the Coastal Commission of California, obligates the applicant to restore and enhance 1.5 acres of riparian zone. These acres are located between the Water Reclamation Facility's eastern fence line and the property boundary parallel to Drainage 3. The applicant will plant native trees, shrubs, and grasses to enhance the riparian area. A restoration ecologist will monitor the riparian restoration zone for five years or until restored areas have met success criteria. The proposed riparian restoration zone connects with the proposed compensatory mitigation acres at the north end of the facility.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 1	Only Service-approved biologists will participate in activities associated with the capture, handling, and relocation of California red-legged frogs.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 2	The applicant will submit the names and resumes of a qualified biologist and qualified biological monitor for approval by the Service at least 14 days prior to the start of work. Ground disturbance will not begin until written approval is received from the Service that project biologist(s) are qualified to conduct the work.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 3	A Service-approved biologist will survey the project site no more than 48 hours before the onset of work activities. The Service-approved biologist will survey a 500-foot buffer zone upstream and downstream of the construction area for California red-legged frogs, as feasible, in consideration of the private property in the area. The Pre-Construction Survey will include a description of any standing or flowing water present in the drainage feature in proximity to the WRF construction area. If any life stage of the California red-legged frog is found and these individuals are likely to be killed or injured by work activities, the approved biologist will be allowed sufficient time to move them from the site before work begins. The Service-approved biologist will relocate the California red-legged frogs the shortest distance possible to a location that contains suitable habitat and that will not be affected by activities associated with the project. The relocation site will be in the same drainage to the extent practicable. The Service-approved biologist will coordinate with the Service on the relocation site prior to the capture of any California red-legged frogs.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.



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United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 4	A Service-approved biologist will be present at the work site until all California red-legged frogs have been relocated out of harm's way, workers have been instructed, and disturbance of habitat has been completed. After this time, the Service-approved biological monitor will ensure and document on-site compliance with all minimization measures. Biological monitoring will occur for all initial disturbance activities, and then will be scaled back to an as-needed basis once all habitat was removed for any activity occurring near a drainage feature or other environmentally sensitive habitat area. Biological monitoring will occur on a daily basis during the rainy season for any construction related activities at the WRF site. The Service-approved biologist will ensure that this monitor receives training on the minimization measures. If the Service-approved biological monitor or the Service-approved biologist recommends that work be stopped because California red-legged frogs would be affected in a manner not anticipated by the EPA and the Service during review of the proposed action, they will notify the project manager (the manager that is directly overseeing and in command of construction activities) immediately. The project manager will either resolve the situation by eliminating the adverse effect immediately or require that all actions causing these effects be halted. At this time, the Service-approved biologist may be called to relocate the California red-legged frog(s) out of harm's way.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 5	Before the start of any construction activities at the Water Reclamation Facility, the applicant will erect a combination silt, safety, and wildlife exclusion fence around the entire site. The entire site will include all disturbed areas and areas utilized by the applicant and its contractors for temporary construction laydown and stockpiling. The fence will have a minimum height of 36 inches above ground, a trench depth of at least six inches, and a minimum five-inch overhang that will serve as a climbing barrier for California red-legged frogs. To allow for site access, a temporary chain link fence gate will be erected at the head of the access road at Teresa Road. The exclusion fencing material will be affixed to the chain link fence gate and will be equipped with ground sweeps. The temporary construction fence will be monitored on a daily basis during the winter rain season (October 15 through April 15) and will remain in place until after substantial completion of the Water Reclamation Facility following the completion of the permanent exclusion fencing system.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 6	Prior to the commencement of construction-related activities, and for the duration of proposed construction activities, all construction workers will attend an Environmental Awareness Training and Education Program, developed and presented by the Service-approved biologist. The program will include information such as identification, habitat description, and protection under the Federal Endangered Species Act. The training will include detailed information about California red-legged frog and its habitat, the specific measures that are being implemented to conserve the California red-legged frog for the project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session as determined by the Service-approved biologist. Workers will be required to sign an acknowledgement form and will receive a hard hat sticker documenting their completion of the environmental awareness training.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 7	Before ground disturbing work activities begin each day, the Service-approved biological monitor will conduct a pre-construction survey and inspect under construction equipment and materials to look for California red-legged frogs. If a California red-legged frog is found during these checks or during construction, the Service-approved biological monitor will halt work that may affect the animal until the Service-approved biologist can move it out of harm's way.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 8	The Service-approved biologist will be present at the work site during initial site disturbance activities, including installation of exclusion fencing, erosion and sediment controls, and until the applicant has completed all surface disturbance. For work during the rainy season when California red-legged frogs may be moving through the project area, the biological monitor will conduct daily clearance surveys each morning prior to the start of work to ensure California red-legged frogs have not moved into the area and the wildlife exclusion fence is in good condition. If a California red-legged frog is observed within the biological monitoring area, the biological monitor will immediately contact the construction superintendent and evaluate the location of the frog in relation to ongoing work. If the frog is located within the work area, all work within 200 feet of the individual will be halted, and the individual will be allowed to leave the area under its own volition, or the Service-approved biologist may be called to capture and relocate the individual. The biological monitor will also provide additional training to the project's key construction management personnel on all environmental requirements associated with the project, so they can ensure all avoidance and minimization measures for biological resources are followed when the biological monitor is not present.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9	Prior to the start of work, the contractor will prepare a Spill Prevention Plan to ensure prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All project-related hazardous materials spills within the project site will be cleaned up immediately. Spill prevention and cleanup materials will be on-site at all times during the course of the project. During construction/ground disturbing activities, all refueling, maintenance, and staging of equipment and vehicles will be located at least 100 feet from a drainage feature in a protected location where any potential spill would be contained and not drain directly toward aquatic habitat. The construction superintendent with support from the biological monitor will ensure contamination of habitat does not occur during such operations.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9a	All refueling, maintenance, and washing of equipment and vehicles will be located on paved areas in a location where a spill will not travel into a drainage feature or storm drain inlet. This fueling/staging area will conform to Best Management Practices (BMPs) applicable to attaining zero discharge of stormwater runoff into waters of the U.S. and State of California. At a minimum, all equipment and vehicles must be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills. Washing of equipment will occur only in a location where polluted water and materials can be contained for subsequent removal from the site.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9b	A designated concrete washout location will be established onsite, in an area at least 50 feet from any drainage feature or storm drain inlet. The washout will be maintained and inspected weekly, and will be covered prior to and during any rain event. If a container is used, concrete debris will be removed whenever the washout container reaches the 1/2 full mark.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9c	BMPs for dust abatement will be a component of the project's construction documents. Dust control requirements will be carefully implemented to prevent water used for dust abatement from transporting pollutants to storm drains leading to the creek channel.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.



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United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 10	To prevent inadvertent entrapment during construction, all excavated, steep-walled holes or trenches will be covered with plywood or similar materials at the close of each work day, or provided with one or more escape ramps constructed of earth fill or wooden planks. If trapped California red-legged frogs are observed, the Service-approved biologist will relocate the California red-legged frog.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 11	During project activities, all trash that may attract predators will be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 12	Spoils will be stockpiled in disturbed areas that lack native vegetation. BMPs will be employed to prevent erosion in accordance with the project's approved Stormwater Pollution Prevention Plan.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 13	Vehicular traffic to and from the WRF construction site will use existing routes of travel. Cross-country vehicle and equipment use outside designated work areas will be prohibited.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 14	Areas of disturbance will be minimized to the maximum extent practicable. Parking areas, new roads, staging, storage, excavation access routes, and disposal or temporary placement of spoils will be confined to the smallest areas possible. These areas will be flagged and disturbance activities, vehicles, and equipment will be confined to these flagged areas. Construction-related activities outside of the impact zone will be avoided.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 15	Nighttime lighting during construction of the WRF will be minimized to the maximum extent practicable. While regular nighttime work is not anticipated, nighttime lighting may be required during construction, but mitigation measures are required to ensure the lighting is shielded and pointed away from sensitive receptors such as the surrounding open space areas.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 16	Workers will be prohibited from bringing pets and firearms to the project site and from feeding wildlife.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 17	To ensure that diseases are not conveyed between work sites by the Service-approved biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force will be followed at all times.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 18	The project proponent will conduct regular inspections and maintenance of the slatted chain link fence in order to ensure slats are in good condition to prevent entry of California red-legged frogs. This will occur at least twice yearly, with one inspection occurring within one month of the onset of the rainy season. The rainy season is defined as between October 15 and April 15.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.



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United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 19	The applicant will develop and implement a revegetation plan that includes: location of the restoration, plant species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved. All areas of temporary disturbance will be revegetated with an assemblage of native species, and locally collected plant materials will be used to the extent practical. All areas revegetated due to temporary disturbance will be monitored by a qualified biologist/restoration ecologist for five years following seeding and planting activities or until the final success criteria have been met.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 20	Any use of herbicides during the routine maintenance landscaping and revegetated areas which occurs outside Water Reclamation Facility fence will be minimized.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Reporting Requirements	California Red Legged Frog REPORTING REQUIREMENTS Biological Opinion p. 31	Pursuant to 50 CFR 402.14(i)(3), EPA must report the progress of the action and its impact on the species to the Service as specified in this incidental take statement. The applicant, through a qualified botanist, will monitor the success of revegetation actions on areas of temporary disturbance for a period of 5 years after revegetation takes place. The EPA or applicant will provide yearly reports to the Service by January 31 of each year during the construction phase of the project. These reports will include the number and age class of California red-legged frogs that have been captured and relocated, and that have been found injured or dead. These reports will also include the dates and results of inspections of the chain link fence, as well as any repairs that were made to the fence, an analysis of whether the chain link fence is successful in excluding California red-legged frogs, and any suggestions for improvement.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project at this point.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	WRF Development Envelope Special Condition 1(a)	All WRF development shall be located within the development envelope as shown in CDP Exhibit 1.	Project Complete	Project Complete	City is working with Coastal Commission to modify the development envelope for the project to accommodate the Recycled Water Facilities construction footprint.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Rural Agricultural Theme Special Condition 1(b)	The design and appearance of all WRF development shall reflect a rural agricultural theme (i.e., simple and utilitarian lines and materials, including use of board-and-batten siding, corrugated metal, muted earth tone colors, etc.).	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Pump Stations and Related Development Design Special Condition 1(c)	All pump stations and related development design shall be sited and designed to limit impacts on public views as much as possible, including landscaping.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Landscaping Special Condition 1(d)	Landscaping shall consist of native, non-invasive, and drought tolerant species that provide appropriate screening and softening of development features in public views as much as possible.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Lighting Minimization Special Condition 1(e)	Exterior lighting shall be wildlife-friendly, shall use lamps that minimize the blue end of the spectrum, and shall be limited to the minimum lighting necessary for pedestrian and vehicular safety purposes. All lighting (exterior and interior) shall be sited and designed so that it limits the amount of light or glare visible from Highway 1 to the maximum extent feasible (including through uses of lowest luminosity possible, directing lighting downward, etc.).	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Windows and Other Surfaces Special Condition 1(f)	All windows shall be non-glare glass, and all other surfaces shall be similarly treated to avoid reflecting light, and all windows shall be bird-safe (i.e., windows shall be frosted, partially frosted, or otherwise treated with visually permeable barriers that are designed to prevent bird strikes).	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.



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California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Utilities Special Condition 1(g)	Revised Final Plans shall clearly identify all utilities.	Project Complete	Project Complete	NA - Project is in design phase. This condition is being incorporated into the design for the Recycled Water Facilities.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Stormwater and Drainage Special Condition 1(h)	...all project area stormwater and drainage is filtered and treated to remove expected pollutants prior to discharge and directed to existing stormwater inlets/outfalls as much as possible. Infrastructure and water quality measures shall retain runoff from the project onsite to the maximum extent feasible, including through the use of pervious areas, percolation pits and engineered storm drain systems. Infrastructure and water quality measures shall be sized and designed to accommodate runoff from the site produced from each and every storm event up to and including the 85th percentile 24-hour runoff event. In extreme storm situations (i.e., greater than the 85th percentile 24-hour runoff event storm) where such runoff cannot be adequately accommodated onsite through the project's stormwater and drainage infrastructure, any excess runoff shall be conveyed inland offsite in a non-erosive manner.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plan	Construction Plans Special Condition 2 (a, b, c, d, e, f, and j)	The Construction Plan shall, at a minimum, include the following: (a) Grading, (b) Construction Areas, (c) Construction Methods and Timing, (d) Traffic Control Plans, (e) Property Owner Consent, (f) Best Management Practices, and (j) Construction Specifications.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Post Construction Special Condition 2(g)	All construction areas shall be restored to their pre-construction state or better upon completion of work. Where appropriate and feasible, roads/sidewalks impacted by construction shall employ stormwater management infrastructure BMPs, including bioswales, pervious pavers, garbage traps, and vegetative strips.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Construction Site Documents Special Condition 2(h)	The Construction Plan shall provide that a copy of the signed CDP and the approved Construction Plan be maintained in a conspicuous location at each construction job site at all times, and that such copies shall be available for public review on request.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Construction Manager Special Condition 2(i)	The Construction Plan shall provide that a construction manager be designated to be contacted during construction should questions arise regarding the construction (in case of both regular inquiries and emergencies), and that his/her contact information (i.e., address, phone numbers, email address, etc.) including, at a minimum, a telephone number (with message capabilities) and an email that will be made available 24 hours a day for the duration of construction, is conspicuously posted at the job site where such contact information is readily visible from public viewing areas while still protecting public views as much as possible, along with indication that the construction manager should be contacted in the case of questions regarding the construction (in case of both regular inquiries and emergencies). The construction manager shall record the contact information (name, phone number, email, etc.) and nature of all complaints received regarding the construction, and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry. Any critical and/or significant complaints and related responses shall be reported to the Executive Director as soon as possible, and all complaints and all actions taken in response shall be summarized and provided to the Executive Director on a weekly basis.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Notification Special Condition 2(k)	The Permittee shall notify planning staff of the Coastal Commission's Central Coast District Office at least 3 working days in advance of commencement of construction, and immediately upon completion of construction.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Riparian Enhancement Plan	Riparian Enhancement Plan Special Condition 3	Prior to the operation of the WRF, the Permittee shall submit two copies of a Riparian Enhancement Plan (REP) to the Executive Director for review and approval. The REP shall provide for riparian enhancement within the unnamed creek and riparian area adjacent to the water reclamation facility site...	Project Complete - REP is under development.	Project Complete	Complete
California Coastal Commission	Coastal Development Permit 3-19-0463	Archeological Protection	Archeological Monitoring Special Condition 4	An archaeological monitor qualified by the Native American Heritage Commission shall be present during all ground disturbance (including grading activities), and shall be consulted to provide recommendations for subsequent measures for the protection and disposition of artifacts of historical or cultural significance in the event such artifacts are discovered.	Project Complete	Project Complete	Archeological monitors will be present during ground disturbing activities.



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California Coastal Commission	Coastal Development Permit 3-19-0463	Agricultural Mitigation Program	Agricultural Mitigation Program Special Condition 5	Prior to the operation of the WRF, the Permittee shall submit an Agricultural Mitigation Program to the Executive Director for review and approval. The Program shall specify the measures to be taken to mitigate for project agricultural impacts by providing an agricultural conservation easement over agricultural property of a similar quality as the project site, and of a type that is potentially threatened by urban development, at a ratio of at least 2:1 for the loss of agricultural land associated with the approved project (i.e., the easement must cover at least 30 acres of such agricultural land).	Project Complete - Coordination for the Agricultural Mitigation Plan is in progress.	Project Complete	City has prepared and received approval from the Coastal Commission for its Agricultural Mitigation Program Plan.
California Coastal Commission	Coastal Development Permit 3-19-0463	Recycled Water Management Plan	Recycled Water Management Plan Special Condition 6	Permittee shall submit Recycled Water Management Plan (RWMP). The objective of the RWMP shall be to ensure that the maximum amount of tertiary-treated recycled water is produced, and the maximum amount of such water is used for beneficial reuse purposes, including injected underground in locations that will maximize its ability for groundwater replenishment....	Project Complete	Project Complete	Complete
California Coastal Commission	Coastal Development Permit 3-19-0463	Wastewater Treatment Plant Removal and Restoration Plan	Wastewater Treatment Plant Removal/Restoration Plan Special Condition 7	Prior to operation of the WRF, the Permittee shall submit two copies of a Wastewater Treatment Plant Removal and Restoration Plan to the Executive Director for review and approval. The Plan shall indicate how the existing wastewater treatment plant located at 160 Atascadero Road will be decommissioned and demolished, including through removal of all plant components (e.g., buildings, fences, storage tanks, etc.), and the site restored to a safe and level configuration roughly matching the surrounding areas. The WWTP site shall be restored within one year of WRF and Cayucos CSD operation.	Project Complete	Project Complete	City has prepared and received approval from the Coastal Commission for its Wastewater Treatment Plant Removal and Restoration Plan.
California Coastal Commission	Coastal Development Permit 3-19-0463	Outfall Assessment Plan	Outfall Assessment Plan Special Condition 8	Prior to the commencement of any marine development, including off-shore development on the Ocean Outfall, the permittee shall submit NOT APPLICABLE TO ANY CURRENT PROJECTS	Project Complete	Project Complete	NA - Not applicable to the Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Wastewater Service Boundary	Wastewater Service Boundary Special Condition 9	Wastewater service to properties outside of the City's current wastewater service area, per Exhibit 3, shall be prohibited without an amendment to this CDP.	Project Complete	Project Complete	NA - Not applicable to the Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Coastal Hazard Risk	Coastal Hazard Risk Special Condition 10	The Permittee acknowledges coastal hazards including pump stations and pipelines in low-lying elevations. The Permittee assumes said risks such that the Coastal Commission is indemnified.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Coastal Hazard Response	Coastal Hazard Response Special Condition 11	The Permittee acknowledges and agrees that the project will be constructed and used consistent with the terms and conditions of the CDP for only as long as the project components remain safe for use without additional measures beyond ordinary repair and maintenance as that term is defined in Section 30610(d) of the Coastal Act.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Public Rights	Public Rights Special Condition 12	The Permittee acknowledges and agrees that the Coastal Commission's approval of this CDP shall not constitute a waiver of any public rights that may exist on the properties involved.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Other Authorizations	Other Authorizations Special Condition 13	The Permittee shall provide documentation of authorizations from the RWQCB, SWRCB, CDFW, CSLC, NMFS, USACE, or provide documentation that such authorization is not required.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.



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California Coastal Commission	Coastal Development Permit 3-19-0463	Minor Changes	Minor Changes Special Condition 14	The Permittee shall undertake development in conformance with the terms and conditions of this CDP, including with respect to all Executive Director-approved plans and other materials, which shall also be enforceable components of this CDP. Any proposed project changes, including in terms of changes to identified requirements in each condition, shall either (a) require a CDP amendment, or (b) if the Executive Director determines that no amendment is legally required, then such changes may be allowed by the Executive Director if such changes: (1) are deemed reasonable and necessary; and (2) do not adversely impact coastal resources.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Future Permitting	Future Permitting Special Condition 15	All future proposed development related to this CDP shall require a new CDP or a CDP amendment.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California Coastal Commission	Coastal Development Permit 3-19-0463	Indemnification	Indemnification Special Condition 16	The Permittee agrees to indemnify the Coastal Commission, including reimbursement of attorney fees.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
City of Morro Bay	Design-Build Agreement	Section 3.2.4.3 – Construction Phase Responsibilities	Archeological Discovery	If a discovery is made of items of archaeological interest on site during excavation activities, the Design/Build Entity shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Construction Manager. Design/Build Entity shall cooperate with and provide access to the City's Archaeologist and other monitoring services.	Project Complete	Project Complete	NA - Not applicab
City of Morro Bay	Design-Build Agreement	Section 5.2 – Disadvantaged Business Enterprise Requirements	Disadvantaged Business Enterprise Requirements	The WRF Project is partially funded through the California State Revolving Fund (CASRF) Program for Clean Water. Part of the requirements of CASRF funding is compliance with Disadvantaged Business Enterprise (DBE) Requirements. The requirements and applicable forms are described below and in Exhibit G.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
City of Morro Bay	Design-Build Agreement	Section 5.12.2 – Wages and Records	Davis-Bacon Wage Requirements	The Design/Build Entity and each subcontractor shall comply with the Davis-Bacon payrolls and basic records requirements as found in Exhibit H.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
City of Morro Bay	Design-Build Agreement	Section 5.14 – American Iron and Steel	American Iron and Steel	The Design/Build Entity and all of its subcontractors acknowledge to and for the benefit of the City and the State of California (the "State") it understands the goods and services under this Agreement are being funded with monies made available by the Clean Water State Revolving Fund and/or Drinking Water State Revolving Fund that have statutory requirements commonly known as "American Iron and Steel," that requires all of the iron and steel products used in the Project to be produced in the United States ("American Iron and Steel Requirement"), including iron and steel products provided by the Design/Build Entity and its subcontractors pursuant to this Agreement.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
City of Morro Bay	Design-Build Agreement	Section 3.2.4.2 – Construction Phase Responsibilities	Competitive Bidding (Work)	Competitively bid all work not performed by the Design/Build Entity or its members or the Designated Subcontractors for packages that exceed \$200,000 in anticipated value.	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.
City of Morro Bay	Design-Build Agreement	Section 3.2.4.5 – Construction Phase Responsibilities	Competitive Bidding (Equipment)	Competitively procure all process equipment packages from the preapproved vendors as identified in, and in accordance with the Scope of Work (Exhibit B).	Project Complete	Project Complete	NA - Not applicable to Recycled Water Facilities Project.



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AES-1: Nighttime Construction Lighting.	Lighting used during nighttime construction, including any associated 24-hour well drilling, shall be shielded and pointed away from surrounding light-sensitive land uses.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1a: Fugitive Dust Control Measures.	Construction projects shall implement dust control measures so as to reduce PM10 emissions in accordance with SLOAPCD requirements.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1b: Standard Control Measures for Construction Equipment.	Standard mitigation measures for reducing NOx, ROG, and DPM emissions from construction equipment are required.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1c: BACT for Construction Equipment.	BACT for diesel-fueled construction equipment shall be implemented during construction activities at the project site, where feasible.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1d: Architectural Coatings.	To reduce ROG and NOx emissions during the architectural coating phase, low or no VOC emission paints and finishes shall be used with levels of 50 g/L or less.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-1: Construction Worker Environmental Awareness Training and Education Program.	Prior to the commencement, and for the duration of proposed construction activities, all construction workers shall attend an Environmental Awareness Training and Education Program, developed and presented by the Lead Biologist.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-2: Avoidance and Protection of Biological Resources.	During proposed construction, operations and maintenance, and decommissioning the City and/or contractor shall implement general avoidance and protective measures.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-3: Morro Shoulderband Snail	The following mitigation measures shall be implemented to avoid or minimize impacts to Morro Shoulderband snail (MSS): (1) During project design, if project components would be located in areas with soils and vegetation that could support MSS, then a qualified biologist shall conduct a survey to delineate the extent of potential habitat. The following project components have either been mapped as Baywood fine sands or dunes, or are in areas adjacent to known populations (see Figure 3.4.7): Option 5A lift station; pipeline alignment adjacent to WWTP; portion of the pipeline at Drainage 1A; and the northwest corner of the IPR-West wellfield. (2) At areas adjacent to vegetated areas to support MSS, silt fencing shall be installed, to restrict project activities into these areas and to deter MSS movement. (3) If avoidance of MSS habitat is not feasible, then protocol levels surveys for MSS shall be conducted to determine presence/absence and distribution of MSS. (4) If survey results are negative and a concurrence authorization is granted, then vegetation shall be removed under supervision of the permitted biologist, and the site(s) shall be graded/grubbed down to bare mineral soil, and bordered with silt fence to preclude MSS from subsequently entering the area(s). (5) If live MSS are found within areas proposed for impact, then consultation with USFWS will be necessary. (6) If equipment use, materials stockpiling, lift station construction, or any other uses are proposed on the north side of Atascadero Road opposite the existing WWTP, then all such areas shall have silt fencing to create a barrier between potential MSS habitat. (7) Work crews will undergo an environmental training session conducted by a qualified biologist prior to start of construction activities in or adjacent to MSS habitat areas.	Project Complete	Project Complete	During the project design, a qualified biologist has conducted a survey to delineate the extent of potential habitat in project areas with soils and vegetation that could support MSS.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-4: American Badger.	A pre-construction survey for active badger dens will be conducted within the proposed construction impact footprint and surrounding accessible areas of the mapped annual grassland portions of the eastern pipeline alignment (between the WRF and Downing Street on the west; see Figures 3.4-3 through 3.4-5) and the WRF site at least two weeks prior to any ground disturbing activities. The survey will be conducted by a qualified biologist. In order to avoid potential direct impacts to adults and nursing young, no grading should occur within 50 feet of an active badger den as determined by the project biologist.	Project Complete	Project Complete	NA - Not applicable to the Recycled Water Facilities, the eastern pipeline alignment was not selected



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-5: Nesting Birds.	Mitigation measures are recommended to avoid or minimize impacts to nesting bird species, including special-status species and species protected by the Migratory Bird Treaty Act.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-6: Riparian Habitat Avoidance	During proposed project design, a qualified biologist shall identify the project boundaries adjacent to Morro Creek and the allowable limits of construction activities to avoid direct and indirect impacts to riparian habitat. Those limits shall be used during proposed project design to identify a pipeline alignment that avoids impacts to riparian habitat as well as areas to be avoided for siting injection and monitoring wells. During construction, the riparian boundaries and limits shall be clearly flagged or fenced so that contractors are aware of the limits of allowable site access and disturbance. Areas to be preserved should be clearly flagged as off-limits to avoid unnecessary damage and potential erosion.	Project Complete	Project Complete	The project biologist has identified the boundaries adjacent to Morro Creek and the allowable limits of construction impacts.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-7: Trenching Buffer for Jurisdictional Features	During construction of proposed project pipelines, trenching shall stop at least 50 feet away from jurisdictional features, such as the top of stream banks, riparian habitat and wetlands, and the remaining distance shall be installed using trenchless construction methods, such as horizontal directional drilling.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-8: Construction BMPs to Protect Jurisdictional Features and Aquatic Habitat.	Mitigation measures should be implemented prior to and during construction near Morro Creek and Little Morro Creek, as well as Drainages 1, 1A, 1B, 2, 2A, 2B, 3, 3A, and 3B, and wetlands.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-9: Preparation of a Frac-Out Contingency Plan	A Frac-Out Contingency Plan shall be prepared prior to initiation of construction activities that involve horizontal direction drilling activities. The Frac-Out Plan shall be implemented during HDD construction activities.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-10: Tree Protection	For public trees, protection will be established at a minimum distance of 1.5 times the dripline (i.e., the distance from the trunk to the outermost limits of leaves and branches). During development, orange construction fencing or sufficient staking to identify the protection area will surround each tree or clusters of trees.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-1: Retention of a Qualified Archaeologist.	Within 30 days after the City's approval of the final design plans and prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the City shall retain a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 1983) to carry out all mitigation related to archaeological resources.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-2: Pre-Construction Phase I Cultural Resources Survey.	Within 30 days after the City's approval of the final design plans and prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall conduct pre-construction Phase I Cultural Resources Survey of all areas that have not been previously surveyed within the last 5 years.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-3: Avoidance and Preservation in Place of Archaeological Resources.	The City shall avoid and preserve in place resources CA-SLO-16, -43, -165, -239, -2222, and -2845, and any other resources that are identified as potentially qualifying as historical resources or unique archaeological resources under CEQA, through proposed project re-design. Avoidance and preservation in place is the preferred manner of mitigating impacts to archaeological resources. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that avoidance and preservation in place of a resource is determined by the City to be infeasible in light of factors such as project design, costs, and other considerations, then CUL-4 shall be implemented for that resource. If avoidance and preservation in place of a resource is determined by the City to be feasible, then CUL-5 shall be implemented for that resource.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-4: Development of an Archaeological Resources Data Recovery and Treatment Plan.	The Qualified Archaeologist shall prepare an Archaeological Resources Data Recovery and Treatment Plan for all significant resources that will be impacted by the proposed project.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-5: Development of a Cultural Resources Monitoring and Mitigation Program (CRMMP).	Within 60 days of the award of the contractor's bid and prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall prepare a Cultural Resources Mitigation and Monitoring Program (CRMMP) based on the final City-approved project design plans.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-6: Construction Worker Cultural Resources Sensitivity Training.	Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist, or his/her designee, and a Native American representative shall conduct cultural resources sensitivity training for all construction personnel.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-7: Archaeological Resources Monitoring.	All project-related ground disturbance (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) shall be monitored by an archaeological monitor(s) familiar with the types of resources that could be encountered and shall work under the direct supervisor of the Qualified Archaeologist.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-8: Native American Monitoring.	The City shall retain a Native American monitor(s) from a Tribe that is culturally and geographically affiliated with the project site (according to the California Native American Heritage Commission). The Native American monitor shall monitor all project-related ground disturbance (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) and all ground disturbance related to subsurface investigation and data recovery efforts for discovered resources that are Native American in origin.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-9: Inadvertent Discovery.	In the event archaeological resources are encountered during construction of the proposed project, all activity in the vicinity of the find shall cease (within 100 feet), and the protocols and procedures for discoveries outlined in the CRMMP (see CUL-5) shall be implemented.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-10: Retention of a Qualified Paleontologist.	Within 60 days prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the City shall retain a paleontologist who meets the (SVP) Standards (SVP, 2010) (Qualified Paleontologist) to carry out all mitigation measures related to paleontological resources.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-11: Paleontological Resources Sensitivity Training.	The Qualified Paleontologist, or his/her designee, shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. The City shall ensure construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-12: Paleontological Resources Monitoring.	All ground disturbance in excess of 5 feet within areas that are mapped as younger alluvial gravel (Qa) and beach and dune sands (Qs) shall be monitored on a full-time basis during initial ground disturbance.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-13: Inadvertent Discovery of Fossils.	If construction or other proposed project personnel discover any potential fossils during construction, regardless of the depth of work or location, then work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-14: Inadvertent Discovery of Human Remains:	If human remains are encountered, then the City shall halt work in the vicinity (within 100 feet) of the discovery and contact the County Coroner in accordance with PRC section 5097.98 and Health and Safety Code section 7050.5.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	NOISE-1: Construction Noise Reduction Measures.	The City shall develop and submit a Construction Noise Reduction Plan to the building official prior to initiating construction activities during hours that are not included in the exemption under the Morro Bay Municipal Code. The City or its contractor shall implement the Construction Noise Reduction Plan.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	NOISE-2: Operational Noise Reduction Measures	Prior to final design of the proposed injection wells, the City shall prepare an Operational Noise Reduction Plan demonstrating that the proposed injection wells will not expose the nearest sensitive receptor to noise levels that would exceed the City's daytime and nighttime noise standards (see Table 3.11-4). The operational noise reduction plan shall be prepared by a qualified noise consultant. Once all noise reduction measures outlined in the Operational Noise Reduction Plan are implemented, the City shall measure noise at the nearest sensitive receptor property line to validate the effectiveness of the measures and to demonstrate that operational noise levels are below the City's noise standards.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	GEO-1: Geotechnical Investigation.	A geotechnical investigation shall be prepared by a certified engineer for all facilities involving substantial ground disturbance or excavation.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	GEO-2: Post-Construction Site Restoration.	After construction of project pipelines, disturbed areas shall be managed to control erosion, including without limitation: repaving areas within roadways, restoring vegetated areas, and regrading surfaces to minimize changes in drainage patterns.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	TRAF-1: Traffic Control Plan.	Prior to the start of construction of project components that would occur within a roadway right-of-way, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City's Public Works Director and Fire and Police Chiefs.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Dust Control Requirements	Dust Mitigation Plan	Because the project will disturb more than one acre, a project-specific Dust Mitigation Plan is required. Grading operations must follow the dust mitigation requirements contained in the NOA ATCM.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Section 5.0 – Air Monitoring Program	Asbestos Dust Air Monitoring	Because of the site's proximity to a sensitive receptor (an assisted-living facility on Teresa Drive), the APCD will require that an Asbestos Dust Air Monitoring Plan be submitted for approval prior to issue of a grading permit. The plan will specify procedures to be followed during construction and grading, including sampling locations/methods/frequency, analytical methods, and allowable thresholds.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.



**WATER RECLAMATION FACILITY
ENVIRONMENTAL/REGULATORY COMPLIANCE SUMMARY**

UPDATED: December 31, 2025



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San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Section 6.2 – Mitigation Measures	Dust Mitigation Plan	At all times during construction, the CP will be present to ensure that the mitigations measures described in this section are properly carried out. The CP will monitor the implementation of the measures to minimize dust complaints and prevent visible emissions crossing the Project Boundary. Construction will take place during daylight hours between 7:00 AM and 7:00 PM. Mitigation measures were developed to address dust control during construction activities, as well as for post-construction maintenance of disturbed areas. Throughout construction, the amount of area disturbed shall be minimized to the extent practical. Per the Asbestos ATCM, the following sections outline the required dust mitigation practices (CARB, 2015): - Track-Out Prevention and Control Measures - Active Storage Piles - Disturbed Surface Area and Stockpiles that will Remain Inactive for more than Seven Days - Traffic On-Site on Unpaved Roads, Parking Lots, and Staging Areas - Earthmoving Activities - Off-Site Transport - Post-Construction Stabilization of Disturbed Areas	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Decontamination	Dust Mitigation Plan	Equipment and trucks that come into contact with NOA-containing soil will be cleaned before leaving the Project site. Cleaning shall take within the Project boundaries, so that NOA soil remains on-site.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Signage/Notifications	Dust Mitigation Plan	Cal-OSHA and CARB regulations require signage and postings at job sites where NOA is, or may be, disturbed. Warning signs will be posted at the main entrances to the project for the duration of soil disturbance activities, and residents within the area will be notified by mail of the soil disturbance.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Documentation	Dust Mitigation Plan	Documentation of earthwork activities will be maintained by the Competent Person under the direct supervision of the Geotechnical Engineer of Record. Documentation records will be maintained by the Project Owner/Operator for a minimum of seven (7) years following the completion of the Project, and will be made available for inspection upon request by the SLOAPCD.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
San Luis Obispo County Air Pollution Control District	Emergency Standby Generator(s)	Permit to Construct and Permit to Operate	Permit to Construct and Permit to Operate	The City shall submit SLOAPCD Diesel Engine Permit Application for project Emergency Standby Generator(s). The City shall obtain required SLOAPCD Permit to Construct and Permit to Operate as required.	Project Complete	Project Complete	NA - Project is in design phase.
San Luis Obispo County Air Pollution Control District	General Permit incl. Odor Control Facilities	Permit to Construct and Permit to Operate	Permit to Construct and Permit to Operate	The City shall submit SLOAPCD General Facility Permit Application for project site (et-al) including odor control facilities. The City shall obtain required SLOAPCD Permit to Construct and Permit to Operate as required.	Project Complete	Project Complete	NA - Project is in design phase.
California State Historic Preservation Office	Phase 1 Monitoring Plan	Determining Activities Requiring Monitoring	PHASE 1 - WRF PROJECT Extent of Monitoring Only the initial three feet of topsoil removal in these areas will need to be monitored archaeologically. Once grading is complete, all subsequent construction work on site will either be within artificial fill or truncated bedrock and therefore archaeological and Native American monitoring will not be warranted. The archaeological monitor, in consultation with the archaeological Principal Investigator, the City's Project Manager, and the Construction Manager, will determine when monitoring is no longer necessary.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
California State Historic Preservation Office	Phase 2 Monitoring Plan	Determining Activities Requiring Monitoring	PHASE 2 - PIPELINE AND PUMP STATION PROJECT Extent of Monitoring	- Pipeline Station 27 to 37 ... CA SLO-16 ... HA1-6, C20-21, C45-50 ... Intact site deposit in HA1-3, C21, C47-48 and C50; disturbed site deposit in C46 and C49 ... Eligible for National Register - Pipeline Station 22 to 24 ... CA SLO-16 ... C5-C7 ... Thin layer of dense redeposited shell midden in C5 and C7 ... Not eligible for National Register due to lack of integrity. - Pipeline Station 53 to 61 ... CA SLO-239 ... C26-27, S1-54 ... Disturbed site deposit in C26-27, likely originating from SLO-239 ... Not eligible for National Register due to lack of integrity. - Replacement Portion of LS2 Force Main ... CA SLO-239 ... No, due to existing pipeline ... Archaeological construction monitoring. - New Addition to LS2 Force Main ... CA SLO-239 ... Trenching or coring after property acquired by City ... Likely will require archaeological construction monitoring - Pipeline Station 147 to 150 ... CA SLO-2232H ... HA20-22 Possible sparse intact Native American site deposit in HA20 ... Not eligible for National Register.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 3/4 Monitoring Plan (FUTURE)	Determining Activities Requiring Monitoring	PHASE 3/4 - RECYCLED WATER AND EXISTING TREATMENT PLANT PROJECTS Extent of Monitoring	PHASE 3 - INJECTION WELLS PROJECT PHASE 4 - EXISTING TREATMENT PLANT DEMOLITION	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.



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California State Historic Preservation Office	October 2019 Programmatic Agreement	Section 1.B City Roles and Responsibilities	Staff Professional Qualifications	City will ensure that all historic preservation and archaeological work is performed by, or under the direct supervision of, a person or persons who meet, at a minimum, the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-44739) (Appendix A to 36 CFR §61) in the relevant field of study, as described under the Administrative Provisions of this Agreement. Hereinafter, such persons will be referred to as Qualified Professionals.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 1 and Phase 2 Monitoring Plans	Construction Crew Archeological Awareness Training	Archeological Awareness Training	Prior to any soil-disturbing construction activities, the archeological monitor will conduct a five- to 10-minute oral archaeological awareness training for the construction crew, including all equipment operators and personnel involved in the mass excavation activities. The Native American monitor will also likely offer comments on their concerns.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 1 Monitoring Plan WRF	Reporting	Extent of Monitoring	The archaeological Principal Investigator will submit weekly status reports to the City detailing monitoring activities and any discoveries. The weekly status reports will include both archaeological and Native American daily monitoring logs, photos, and maps (as appropriate).	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 1 Monitoring Plan WRF	Scheduling	Extent of Monitoring	If there are no findings, an Archeological Resources Monitoring Report for Construction Phase 1 will be prepared and submitted to the City for review within 30 days of completion of monitoring activities.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 1 Monitoring Plan WRF	Archeological Monitoring Guidelines	Construction Monitoring	The Archeological and Native American Monitors will observe soil disturbance during construction activities (e.g., manual or machine excavations, grading). The Archeological monitor will observe consistency or changes in soils or may examine specific materials that may be cultural in origin.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Reporting	Extent of Monitoring	The archaeological Principal Investigator will submit weekly status reports to the City detailing monitoring activities and any discoveries. The weekly status reports will include both archaeological and Native American daily monitoring logs, photos, and maps (as appropriate). If no archaeological materials are identified during construction monitoring, an Archeological Resources Monitoring Report will be prepared and submitted to the City for review within 30 days of completion of monitoring activities. In accordance with Stipulation VI of the Programmatic Agreement, the City will provide the report to the EPA for review, who will in turn submit it to all Parties of the Agreement. The final Monitoring Report will be submitted to all Parties of the Agreement and to the Central Coast Information Center at the University of California, Santa Barbara. If archaeological remains are identified during monitoring and cannot be avoided, they will be evaluated and mitigated (if warranted) in accordance with the Archeological Research Design and Treatment Plan (Kajankoski et al. 2019:Appendix E).	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Scheduling	Extent of Monitoring	An archaeological monitor and Native American monitor shall be present according to a schedule agreed upon by the archaeological Principal Investigator and City Project Manager prior to the beginning of construction. The archaeological Principal Investigator will review all anticipated soil disturbing activities with the construction contractor to determine which could potentially expose archaeological deposits and when these activities will be taking place. A tentative schedule will be prepared for monitoring, with the understanding that it is flexible depending on construction progress and findings.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Archeological Monitoring Guidelines	Construction Monitoring	<ol style="list-style-type: none"> The archaeological Principal Investigator and archaeological monitor(s) will meet the Secretary of Interior's professional qualification standards for prehistoric archeology. An Archeological monitor will be present for all ground-disturbing activities in the pipeline segments and components where archaeological monitoring is recommended. Local Native American community will request to monitor all Construction Phase 2 ground disturbance. A local archaeologist will assess discovery made by the Native American monitor. The need for more than one archaeological and Native American monitors may be necessary if work is being conducted in a variety of locations. The City Project Manager will provide the construction schedule (location, day, time, and nature of work) to the archaeological and Native American monitors. The archaeological monitor(s) will have the experience and demonstrated ability to recognize all types of archaeological materials and features. Native American monitors should be from groups listed on the Native American Heritage Commission list of interested individuals. Should the need arise to record or collect samples and artifacts, the archaeological monitor shall immediately consult with the archaeological Principal Investigator. The archaeological and Native American monitors will document monitoring activities in a daily log. 10. Monitors will take periodic digital photographs. 	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-16 MITIGATION PLAN	Mitigation of project impacts to site SLO-16 under both Section 106 of the National Historic Preservation Act and the California Environmental Quality Act will be required as the site can be considered significant and avoidance not feasible. All work will be conducted in accordance with the project's archaeological treatment plan (Kajankoski et al. 2019) and needs to be approved by Caltrans within their right-of-way. A Native American monitor will be present to observe all archaeological excavations. Methods and extent of excavation will ultimately be determined once the deposits are exposed during construction excavation and initial hand excavations. Mitigation will require extensive support and collaboration from the project construction contractor who will need to secure the area and provide mechanical excavation equipment, operators, and support equipment. A location for deep reburial of human remains that may be encountered should be considered prior to construction, although ultimately the Most Likely Descendent will need to approve of this. Uncollected archaeological deposits will need to be permanently reburied on-site in accordance with the wishes of local Native American groups. Portions of the site not impacted by the project should be designated Environmentally Sensitive Areas with orange fencing. A short mitigation work plan can then be prepared and submitted to all interested parties for review.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.



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California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-239 (STATION 53 TO 61)	Cores C26 and C27 both contained a small amount of disturbed archaeological deposits. This material almost certainly originated from site SLO-239 located on the higher terrace to the south. Additionally, adjacent Cores 51-54 contained trace amounts of disturbed shellfish. Therefore archaeological construction monitoring is recommended along the boundary of site SLO-239 between stations 53 to 61. Additional Testing Required: A recent addition to the LS-2 force main measures approximately 300 meters near SLO-239. The area also has an elevated buried site sensitivity. This project component could not be tested as it lies on private property with no permission to access. The City is currently acquiring the property through eminent domain. In accordance with the Programmatic Agreement, the component will be tested once access is secured. This would involve approximately 12 trenches or cores spaced at 25-meter intervals over a two day period. If disturbed deposits associated with SLO-239 are identified, monitoring for human remains will be recommended and an addendum to this test report prepared. If intact archaeological deposits are identified, they will be immediately evaluated and mitigated in accordance with the Treatment Plan and documented in the final report.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-2022 (STATION 138 TO 143)	Testing was conducted between Stations 138 and 143 due to the presence of site SLO-2022 that is visible in the roadcut immediately northeast of the ADI. Quintana Road is cut into the hillside that this site is situated upon as it descends in elevation to South Bay Blvd. Additionally, this area has the lowest buried site sensitivity due to the ancient age of the surface landform. Thirteen hand augers (HA7-19) were excavated split evenly between each side of the road adjacent to the ADI. Results were all negative despite processing samples from most augers (see Table 3). Therefore, no archaeological construction monitoring or mitigation is recommended for this segment. However, it is recommended that site SLO-2022 be designated an Environmentally Sensitive Area and be protected during construction with orange fencing or other measures.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-2232H (Station 147 TO 150)	Stations 147 to 150 are adjacent to site SLO-2232H, where a prehistoric component was reported to have been recently discovered during construction of a housing complex to the south. After testing for this project was complete, communications with the archaeologist overseeing the housing complex work revealed that the prehistoric deposit (including human remains) encountered is in fact associated with site SLO-1183 and located more than 100 meters (330 feet) south of the ADI. Access constraints (numerous underground utilities) only allowed for three hand augers (HA20-22) to be excavated along the south side of the road. HA21 and HA22 were negative, while a possible sparse prehistoric site deposit was identified in HA20. It is possible that the materials recovered in HA20 originated from site SLO-2022 and were pushed downhill when Quintana Road was cut through the site. This very sparse deposit of uncertain integrity is recommended not eligible for the National Register. However, archaeological construction monitoring for human remains is warranted for this pipeline segment.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
California State Historic Preservation Office	Programmatic Agreement	Section IX – Annual Reporting	Annual Reporting	In addition to the final reports described within this Stipulation, EPA shall provide the Parties to this Agreement an annual update on the implementation of this Agreement. Such update shall include any scheduling changes proposed, any problems encountered, failures to adopt proposed mitigation measures, and any disputes and objections received in EPA's efforts to carry out the terms of this Agreement. The update will be due no later than December 31 of each year, beginning December 31, 2019 and will continue annually thereafter throughout the duration of this Agreement.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required. The appropriate level of monitoring was provided during investigatory testing.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 1.6 - Required Non-Compliance Reporting	Reporting Requirements	If a discharge violation occurs the QSP shall immediately notify the LRP and the LRP shall file a violation report electronically to the Regional Water Board within 30 days of identification of non-compliance using SMARTS. Corrective measures will be implemented immediately following the discharge or written notice of non-compliance from the Regional Water Board.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 1.7 – Annual Report	Reporting Requirements	The General Permit requires that permittees prepare, certify, and electronically submit an Annual Report no later than September 1st of each year. Reporting requirements are identified in Section XVI of the General Permit.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 3.2 – Erosion and Sediment Control	Control Measures	Erosion and sediment controls are required by the General Permit to provide effective reduction or elimination of sediment related pollutants in stormwater discharges and authorized non-stormwater discharges from the Site.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 3.3 – Non-Stormwater Controls and Waste and Materials Management	Control Measures	Non-stormwater discharges into storm drainage systems or waterways, which are not authorized under the General Permit, are prohibited.	Project Complete	Project Complete	City is in the design phase for the Recycled Water Facilities and will incorporate these design elements as required.