



Morro Bay Water Reclamation Facility

Final Addendum No. 2 to the 2018 Final
Environmental Impact Report

State Clearinghouse No. 2016081027

prepared by

City of Morro Bay

595 Harbor Street

Morro Bay, California 93442

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prepared with the assistance of

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Responses to Comments on the Draft Addendum No. 2

This section includes comments received during the circulation of the Draft Addendum No. 2 to the 2018 Final Environmental Impact Report for the Morro Bay Water Reclamation Facility Project (hereinafter referred to as the project).

The Draft Addendum was circulated for a 27-day public review period that began on April 24, 2025 and ended on May 21, 2025. Table 1 presents the list of commenters, including the numerical designation for each comment letter received, the author of the comment letter, and the date of the comment letter. Comment letters have been ordered by the date they were received by the City of Morro Bay (City). In addition, a comment provided during the Public Works Advisory Board hearing for the Draft Addendum, held on May 21, 2025, is addressed herein.

Table 1 List of Commenters

Letter/Commenter No.	Commenter	Date
1	Chris Bjornstad, Associate Transportation Planner, California Department of Transportation	May 21, 2025
2	Paul Donnelly	May 21, 2025
Public Hearing		
1	Onan Champi	May 21, 2025

The comment letters and responses follow. The comment letters are numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

California Department of Transportation

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May 21, 2025

SCH #2016081027
SLO/1/Var.

Damaris Hanson
Utilities Division Manager
City of Morro Bay
595 Harbor Street
Morro Bay, CA 93442

Re: Morro Bay Water Reclamation Facility Project – Addendum No. 2 to the 2018 Final Environmental Impact Report (FEIR)

Dear Ms. Hanson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Morro Bay Water Reclamation Facility Project Addendum (ADM). The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and State of California planning priorities. The following comments are based on our review of the April 2025 ADM.

Project Understanding

1.1

This project proposes to construct the Morro Bay Water Reclamation Facility (WRF) adjacent to the west of State Route 1 in Morro Bay. The project will create an indirect potable reuse recycled water system from the WRF featuring the construction of administration, operations, and maintenance buildings; lift stations and pipelines; and a new distribution system to convey advanced treated recycled water to new groundwater injection wells in the Morro Valley Groundwater Basin. Addendum No. 2 provides minor modifications to the certified August 2018 FEIR and August 2019 Addendum No. 1.

Encroachment Permit Comments

1.2

Please be aware that if any work is completed in the State's right of way it will require an encroachment permit from Caltrans and must be done to Caltrans engineering and environmental standards, and at no cost to the State. Any right of way and

environmental issues (including stormwater) must be resolved prior to submittal of the encroachment permit application.

1.2
cont.

The proposed Pipeline Segments 2A and 4 appear to possibly connect to State right of way. Caltrans requests plans with the State right of way lines clearly marked. An Encroachment Policy Exception (EPE) will be required if manholes or vaults are proposed within State right of way. Depending on the proposed depths, an engineered shoring plan may be required. If all work is outside State right of way, an encroachment permit would be required for any traffic control or temporary construction area signs placed on the State highway.

The encroachment permit application form, directions to complete the form, and plan requirements can be found at the following web address:
<https://dot.ca.gov/programs/traffic-operations/ep/applications>. Completed application packages may either be emailed to d5.permits@dot.ca.gov or submitted through the Caltrans Encroachment Permit System (CEPS) public portal.

1.3

Should you have any questions or need further clarification on the items discussed above, please contact me at (805) 888-1508 or email christopher.bjornstad@dot.ca.gov.

Sincerely,

Christopher Bjornstad

Chris Bjornstad
Associate Transportation Planner
Local Development Review Coordinator

CC:

Veronica Lezama, Branch Chief – Regional Planning &
Local Development Review (South)

Letter 1

COMMENTER: Chris Bjornstad, Associate Transportation Planner, Local Development Review Coordinator, California Department of Transportation (Caltrans) District 5

DATE: May 21, 2025

Response 1.1

The commenter provides a summary of the proposed project and the review responsibilities of the Caltrans Local Development Review Program.

This comment is noted.

Response 1.2

The commenter provides a summary of Caltrans' encroachment permit requirements and policy exceptions. The commenter indicates certain components of the Modified Project may be within the Caltrans right-of-way and requests project plans with the Caltrans right-of-way clearly marked. The commenter provides information on how to submit an application for an encroachment permit, if one is necessary.

This comment is noted, and the City will comply with Caltrans encroachment permit requirements should facilities be sited within the Caltrans right-of-way.

Response 1.3

The commenter provides contact information for further inquiries.

This comment is noted.

Letter 2

To: Damaris Hanson, Utilities Division Manager of the City of Morro Bay

From: Paul F. Donnelly, P.E., P.L.S. Member of the Public Works Advisory Board

Date: May 21, 2025

Subject: Water Reclamation Facility (WRF) Final EIR Addendum #2

To preface my comments and questions below regarding the subject addendum, these comments are mine and mine alone and are not representative of the board of which I am a member.

2.1 About the Final EIR, which had been certified in August of 2018, I would like to comment upon the responses published about my comments made to the FEIR back on May 18, 2018. I commented about the phases of the project which received a response by saying, ***“After evaluation of costs for implementing in multiple phases, the City determined implementation of the proposed project in one phase would be an option that more quickly and effectively achieves City goals to produce recycled water, maximizes opportunities to secure financing, and likely reduces costs overall.”*** It is my understanding that the Recycled Water component is now being characterized as Phase 3?? What has changed over the past seven years and why is it not what was claimed then? Obviously, it hasn't been any quicker or effective 7 years later.

2.2 In Response to Donnelly -7 the FEIR said, ***“Onsite drainage will be captured and detained onsite.”*** It is my understanding that it isn't working out quite well. What is being done to make it function properly?

2.3 In Response to Donnelly -11 the FEIR said, ***“Final construction details will be determined as part of design/build process prior to the initiation of construction.”*** According to §15126.4(1)(B) of the CEQA Guidelines, in part, it says, ***“Formulation of mitigation measures shall not be deferred until some future time.”*** Major changes and impacts occurred during construction of the conveyance pipelines along the bike path behind the power plant property which resulted in massive vegetation removal and a shift several feet westerly in the pipe alignment from the original approved plans. In October of 2021, the pipeline contractor clear cut almost every tree and removed all of the vegetation in the 70-foot-wide temporary construction easement along the bike path. Who approved that and why was it done? Need to have the record as-built drawings to see where they ended up placing the pipes so any tree replanting can avoid the new sewer lines.

2.4 In Response to Donnelly -13 the FEIR said, ***“Mitigation Measure TRAF-1 would require the preparation and implementation of a traffic control plan”***. Traffic control over the course of construction, especially for the pipeline construction, was poorly provided. At times when equipment and pipe occupied the roadways, there was no flagging provided at all. Advance notification for detours though neighborhoods had not been provided ahead of time and the only way residents knew of the disruption was from word of mouth. The WRF website was always

2.4 cont. out of date and was never giving advance notices of traffic issues related to the construction. It is still that way today. Neither the city, its consultants nor the contractors adequately informed the public of what they might encounter. This had not been mitigated properly and therefore, the DEIR mitigation measures have been proven to be inadequate. In October of 2019, Carollo Engineers prepared a document addressing Special Condition 2 of the state issued Coastal Development Permit (CDP) where it said, ***“no traffic control plans will be required for WRF”***. Really?

2.5 In Response to Donnelly -15 the FEIR said, ***“Final construction details will be determined as part of design/build process prior to the initiation of construction.”*** Again, shall not be deferred, according to §15126.4(1)(B) of the CEQA Guidelines.

2.6 On page 2 of the subject addendum about the decommissioning of the existing wastewater treatment plant (WWTP) on Atascadero Road, it says, ***“Once the WRF is operational, the WWTP will be shut down and demolished, and facilities and infrastructure will be removed from the WWTP site.”*** According to Special Condition 7 of the 2019 state issued CDP, ***“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 new facility became operational in late 2022 and there is no evidence that the Coastal Commission Executive Director reviewed or gave approval of such a plan. The central coast district staff of the California Coastal Commission in Santa Cruz received a conceptional plan document in March of 2023, but the Executive Director has yet to approve of that. That plan did not come about PRIOR TO OPERATION OF THE WRF so this is considered an unrecoverable deficiency. The city received proposals in March this year from prospective firms to prepare construction contract documents for the WASTEWATER TREATMENT PLANT DECOMMISSIONING AND DEMOLITION DESIGN AND ENGINEERING SERVICES DURING CONSTRUCTION. The Coastal Commission Executive Director should review and give approval of these construction contract documents as well. Will that happen?

2.7 Also on page 2, there is a footnote which says, ***“The WRF is now referred to as the Water Resources Center. However, for consistency with the Final EIR and Addendum No. 1, the term WRF is used in this Addendum.”*** According to a footnote on page 4 in Time Schedule Order NO. R3-2018-0019 issued by the Central Coast Regional Water Quality Control Board in June of 2018 it says, ***“The Discharger has indicated the new facility will be called a Water Reclamation Facility, as opposed to the existing facility’s name of Wastewater Treatment Plant.”*** Is the recent name change so the city can dance around the CDP Special Conditions requiring compliance PRIOR TO OPERATION OF THE WRF? Where are the special conditions for a Water Resources Center in the CDP? All of the agencies know it as the “Water Reclamation Facility” and a sign at the entrance of the facility on Teresa Drive once said that until a new entrance sign was constructed upon a concrete wall which said, “Water Resources Center”. That new sign and wall has since been demolished. What is going on? Are the agencies and the public being deceived?

2.7
cont.

On page 6 it states that the Original Project (meaning the Water Reclamation Facility) includes construction of the WRF at 555 South Bay Boulevard, north of State Route 1. The location of the new wastewater treatment plant is in the 1400 block of Teresa Drive (Casa De Flores is right next-door at 1405 Teresa Drive). South Bay Blvd. terminates on the southerly side of State Route 1.

2.8

On page 7 it mentions the Collection System that had been completed in 2023 but doesn't say anything about the problems with the Brine Line pipeline which became apparent after operations began where the discharge pipeline couldn't handle the extreme wet weather flows. The problem still exists so what impacts will occur in order to make it function properly? Furthermore, according to the WRF FY25 Q1 & Q2 Quarterly Reports, the IPR pipeline apparently hasn't been pressure tested or disinfected even though the construction contract for the WATER RECLAMATION FACILITY LIFT STATION AND OFFSITE PIPELINES required it to be done. Being that the IPR pipeline has yet to be put into service, the same problem with the Brine Line pipeline most likely exists with the IPR pipeline as well. If the IPR pipe is ever pressure tested and disinfected, where will that wastewater be disposed? How much of the city's drinking water will be utilized to do these tests?

2.9

On page 8 about the recycled water distribution system and injection wells, it says, ***"While the Final EIR identified general areas in which injection wells would be located, the exact number or locations of injection wells were not identified for the Original Project at the time of the Final EIR."*** BEFORE anything was built and money spent, this should have already been determined with certainty otherwise all that has been done was to just build a new wastewater treatment plant and nothing more while looking for a location to dispose of the treated wastewater. According to §15124(a) of the CEQA Guidelines, ***"The precise location and boundaries of the proposed project shall be shown on a detailed map"***. Furthermore, the EPA WIFIA loans stipulated a minimum of four injection wells. Why hasn't this all been figured out yet? In an email message sent to the Division of Financial Assistance at the State Water Resources Control Board in November of 2023, the city's Public Works Director said this, ***"These reductions in water demand and associated reductions in wastewater generation may make it difficult for the City to reach the recycled water usage targets included in the City's SRF application."*** What do the lending agencies have to say about the city's progress or lack thereof? Whatever happened to the 825 acre-feet each year of reusable reclaimed water that was to be delivered to existing users or is it all just being discharged to the ocean as it was before? It was supposed to provide us with 80% of our water supply! What are the ratepayers paying for? How will we ever know that reclaimed water is actually coming out of our faucets. Will it be the taste or smell that will be detected? In what year is this supposed to be apparent?

2.10

On page 10 about delivering non-potable irrigation water use at Lila Keiser Park and the Morro Bay High School, that would be considered unreasonable use according to California Water Code §100 as it is highly purified expensive tertiary treated water. California Water Code §13550 says, **"The Legislature hereby finds and declares that the use of potable domestic water for nonpotable uses, including, but not limited to, cemeteries, golf courses, parks, highway landscaped areas, and industrial and irrigation uses, is a waste or an unreasonable use of the water"**. California Constitution Article X - Water, §2 says, **"It is hereby declared that because of the conditions prevailing in this State the general welfare requires that the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and that the waste or unreasonable use or unreasonable method of use of water be prevented, and that the conservation of such waters is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare"**. I added the underlining for emphasis. Discharge order R3-2022-0029 issued in 2022 was for allowing discharge either into the ocean or injected into the ground, not for irrigation. §3.1 of that order said, **"The discharge of treated wastewater at a location or in a manner other than as prescribed by this Order is prohibited."** On page 1 of the Rate Study from July of 2018 it said, **"The full WRF project includes a new wastewater treatment plant, pumping facilities, a pipeline to convey wastewater to the new WRF, and water recycling facilities for potable reuse."** That is what the ratepayers were told the rate increases were to be used for, not for irrigation at the school and park.

2.11

On page 36 about the geology and soils, there is no mention of the 2 landslides which occurred while grading the treatment plant site just outside city limits in the county's jurisdiction. It was the implementation of the design which triggered the slides and had a significant financial impact costing more than 1 million dollars to repair. Then there was the lack of dust control when the landslide material had been stockpiled right behind Bayside Care Center and Casa De Flores. APCD was contacted about the lack of dust control but the dust problem continued unmitigated. The photos don't lie. I believe this project was never exempt from the County's Coastal Zone Land Use Ordinances as it pertains to grading (LUO §25.05.028(b)). It's the County who has the expertise to review and approve engineered grading plans not the coastal staff in Santa Cruz who convinced the agencies to do a consolidated Coastal Development Permit (CDP) for the WRF project.

2.12

Preparation for the pilot injection well site removed a great amount of vegetation occurring on PG&E's property and within the Vistra easement that should have required a CDP. Apparently, no environmental determination had been made prior to the disturbance to address this activity, so this is another unrecoverable deficiency. A property corner common to the two properties had been disturbed while clearing the vegetation so it involved both properties and obviously, they didn't know that they were treading on the adjoining land. How did they know where to drill the pilot injection well in August of 2022 since the property corners had not been flagged back then? That property corner needs resetting by a licensed Professional Land Surveyor.

According to an article in the November 2021 edition on page 14 in Vol. #3, Issue #21 of the Estero Bay News regarding the concern of the tree removal along the bike path behind the power plant property, the article reported the following, ***“Another possible misunderstanding on the subject is that the environmental impact report doesn’t go into the level of detail that would name all the trees to be removed, but just makes a general statement requiring replacement. Mimiaga pointed to a thick set of stamped engineering plans sitting on a table at the construction office trailer at the new treatment plant site and said those and the final CDP approved by the Coastal Commission are the project’s controlling documents, not the EIR.”*** Stephen Mimiaga of Mimiaga Engineering Group is who managed the WRF construction. He did acknowledge the appearance of the tree removal work along the power plant bike path is ugly however, the trees have never been replaced as promised and required. Oddly enough, the EIR mitigation measures had been provided on Sheet G-18 of those ***“thick set of stamped engineering plans”*** that were made part of the construction contract documents. Obviously, the construction manager didn’t study those plans well enough. What good did it do to include them and what else had been dismissed? Mitigation measure BIO-10 on Sheet G-18 addressed tree protection but was never provided. When tree cutting began in late 2020 and early 2021 along the bike path behind the power plant property, there was never any ***“orange construction fencing or sufficient staking to identify the protection area will surround each tree or clusters of trees”***. The initial tree cutters admitted removing more trees than they were supposed to and admitted that they never received any environmental training. After the removals in late 2020 and early 2021, the city hired an expert tree consultant in the spring of 2021 who inventoried the remaining trees (trees marked with blue numbers). In October of 2021, the pipeline contractor clear cut almost every tree and removed major vegetation in the 70-foot-wide temporary construction easement along the bike path. Need to compare what is now remaining to that inventory list to see how many more trees were removed after the initial tree removal began in late 2020. Will the trees be replaced in accordance with existing city policies or not? During construction, why were some trees characterized as shrubs? A tree is not a shrub! Was this characterization so as to not be counted as a tree removed? These trees had been valuable habitat which is now lost and unmitigated. Most of the trees were the adopted city trees, namely Monterey Cypress. The state issued CDP never permitted any major vegetation or tree removal so all that activity was unpermitted. You will not find the word, “tree” anywhere in that document. The Basis of Design Report prepared by the engineering firm who designed the conveyance pipeline said this, ***“WaterWorks has identified that there may be up to 20 trees that would be impacted by the West Alignment and could require pruning or removal”***. Why were so many more than identified removed and who approved of the clear cutting and realignment? Where is the written authorization, permitting, and an environmental determination for what has been done? Several trees were also removed during construction along Quintana Road that have never been replaced. So much for Morro Bay being a Tree City.

2.14

On page 42 of the subject addendum it says, ***“The Final EIR determined the Original Project could degrade surface water or groundwater quality in the event of a pipeline rupture or accidental spill. However, the Final EIR concluded impacts related to surface and groundwater quality would be less than significant with compliance with regulatory requirements, which would include a SWPPP during construction.”*** Indeed, there was a SWPPP (Storm Water Pollution Prevention Plan, WDID #3 40C388977-514071) for the construction of the treatment plant site on Teresa Drive however, in November of 2021, the City Engineer was notified by the Central Coast Regional Water Quality Control Board of violations of the Board’s General Permit because of erosion from the construction site and pollution of the estuary watershed. The City Engineer was designated as the Legally Responsible Person (LRP). Then in late December of 2021 the City Engineer receive another notice stating that the city continues to be in violation of the Board’s General Permit. How can these events be ignored? Mitigation measures did not do any good. Erosion continued whenever it rained afterwards and had been reported to the Central Coast Regional Water Quality Control Board with no further action. What are the consequences of violations of the Federal Clean Water Act? What are the consequences of violations of the California Environmental Quality Act?

2.15

The construction of wastewater treatment plant and conveyance pipelines took almost 3 years to complete and the city’s Climate Action Plan never mentions the increase in emissions resulting from the construction equipment starting in March of 2020. Those emissions could be determined from all of the fuel that had been consumed by the equipment and trucks for that period ending in early 2023. Construction records should exist that can quantify that. Several trips delivering hundreds of truckloads of plastic pipe from Cedar City, Utah, 600 miles away to Morro Bay also attributed additional emissions as a result of the project’s implementation. The city’s Climate Action Plan should be updated to include these emissions during this time period which resulted in an increase in emissions within or by cause of the city’s project.

2.16

Since there is federal financial assistance being provided for the project, how does this addendum satisfy NEPA and possibly even the National Historic Preservation Act? Is the EPA and the Bureau of Reclamation okay with this latest addendum or will there be another one forthcoming?

Letter 2

COMMENTER: Paul Donnelly

DATE: May 21, 2025

Response 2.1

The commenter indicates the comments provided are not representative of the Public Works Advisory Board, of which the commenter is a member. The commenter refers to comments previously submitted on the 2018 Environmental Impact Report (Final EIR) and questions why the project is being developed in multiple phases.

This comment is noted but does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and does not warrant revisions to Draft Addendum No. 2. The Draft Addendum No. 2 evaluates the Modified Project and the construction phasing of the proposed modifications as described in Chapter 2, *Background and Project Description*, of Draft Addendum No. 2.

Response 2.2

The commenter inquires as to whether the on-site drainage for Original Project components is functioning properly.

This comment is noted but does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.3

The commenter expresses a concern about deferred mitigation. The commenter summarizes impacts to vegetation and changes in pipeline alignments for the conveyance pipelines installed as part of the Original Project, inquires about the vegetation removal, and requests record as-built drawings to inform replanting of trees.

CEQA Guidelines Section 15126.4(a)(1)(B) states, in part, "Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review." The Final EIR includes a suite of specific mitigation measures to address the environmental impacts of the Original Project; therefore, the formulation of mitigation measures was not deferred. In addition, CEQA Guidelines Section 15004 indicates that "EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." Furthermore, CEQA Guidelines Section 15124(c) indicates that the Project Description included in an EIR should include "a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities." Accordingly, CEQA does not require all final characteristics of a proposed project to be specified in a CEQA document nor all final construction details to be known at the time the CEQA document is prepared. The

Original Project was adequately described to the level of detail available at the time of preparation of the Final EIR in compliance with the requirements of CEQA.

This comment is noted but does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.4

The commenter expresses concerns about the implementation of Mitigation Measure TRAF-1 and its traffic control requirements during construction of prior phases of the Original Project.

This comment is noted but does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2. The impacts of the proposed modifications as they pertain to transportation and traffic are discussed in Section 5.14, *Transportation and Traffic*, of Addendum No. 2.

Response 2.5

The commenter refers to a response made to their comments on the Final EIR regarding the determination of final construction details for the Original Project and expresses a concern that the response constitutes deferred mitigation.

This comment is noted but does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2. Refer to Response 2.3 of this Response to Comments document for a discussion of deferred mitigation.

Response 2.6

The commenter refers to conditions of the Coastal Development Permit issued for the Original Project and expresses concern regarding whether conditions were met and the involvement of the California Coastal Commission in the review of plans and construction contract documents for the Original Project.

This comment is noted but does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.7

The commenter inquires about the change in name of the Water Resources Center (previously called the Water Reclamation Facility) and the implications of the name change for compliance with the Coastal Development Permit. The commenter also inquires about the address of the Water Reclamation Facility.

The change in the name of the Water Reclamation Facility/Water Resources Center does not alter the City's obligation to comply with the requirements of the Coastal Development Permit as they pertain to this facility. The address assigned to the Water Reclamation Facility property by the County of San Luis Obispo is 555 South Bay Boulevard. This comment does not pertain to the

analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.8

The commenter inquires about components previously constructed under the Original Project.

This comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.9

The commenter asks several questions regarding why the final number or locations of injection wells were not known at the time the Final EIR was prepared, if agencies issuing funding to the Original Project had comments on this topic, and the use of recycled water for water supply.

As stated on page 7 of Draft Addendum No. 2, the Final EIR anticipated the injection wells would be located on vacant lands owned by the City or within public rights-of way either east of the city near State Route 41 (IPR-East injection well area) or in an area west of State Route 1 near the Morro Bay Power Plant site (IPR-West injection well area). However, the specific locations of the injection wells and the number of injection wells were not known at the time, so construction of the injection wells within these two areas was evaluated programmatically in the Final EIR.

The remainder of this comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2. Refer to Response 2.5 of this Response to Comments document for a description of the level of detail required to be included in the Project Description of an EIR.

Response 2.10

The commenter provides objections to the use of recycled water for irrigation at Lila Keiser Park and Morro Bay High School.

The Water Reclamation Facility produces advanced purified recycled water that is suitable for injection into a groundwater basin and for recovery for use in a potable water distribution system. However, the Water Reclamation Facility is not a direct potable reuse facility, meaning that the effluent from the Water Reclamation Facility (i.e., advanced purified recycled water) would not meet regulatory requirements for direct delivery to customers but would instead be injected into the Morro Basin, which would serve as an additional buffer to prevent contamination of the potable water system. As discussed on page 10 of the Draft Addendum No. 2, groundwater would then be extracted from the Morro Basin, conveyed to the potable water distribution system, and may undergo treatment at the Brackish Water Reverse Osmosis treatment facility, be blended with other water supply sources, or provided directly to the potable water distribution system. As indicated on page 10 of the Draft Addendum No. 2, a portion of the advanced purified recycled water produced by the Water Reclamation Facility, which is considered non-potable prior to injection to the groundwater basin, may be delivered for non-potable irrigation use at Lila Keiser Park and Morro Bay High School if that is identified as a more effective way of offsetting the use of potable water for irrigation.

This comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.11

The commenter states that the Draft Addendum No. 2 does not discuss landslides that occurred at the Water Reclamation Facility site during construction of the Original Project. The commenter expresses concern about dust control measures implemented during construction of the Original Project, the exemption of the Original Project from the County of San Luis Obispo's Coastal Zone Land Use Ordinances as they pertain to grading, and the review of Original Project plans by Coastal Commission staff.

The location of the proposed modifications are not within or in close proximity to the Water Reclamation Facility site; therefore, the occurrence of such landslides is not relevant to the analysis of the environmental impacts of the proposed modifications included in Draft Addendum No. 2. The remainder of this comment does not pertain to the analysis of environmental impacts of the proposed modifications included in the Draft Addendum No. 2 and therefore does not warrant revisions to the Draft Addendum No. 2.

Response 2.12

The commenter expresses concerns regarding construction of the pilot injection well under the Original Project.

As stated on page 7 of Draft Addendum No. 2, the pilot injection well (IW-1) was installed within the IPR-West injection well area evaluated in the Final EIR; therefore, preparation of supplemental CEQA documentation was not required for this project component because it was adequately analyzed in the Final EIR. This comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.13

The commenter expresses concerns regarding tree removal associated with construction of prior phases of the Original Project.

This comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.14

The commenter expresses concern regarding implementation of the Stormwater Pollution Prevention Plan during construction of prior phases of the Original Project.

This comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.15

The commenter expresses a concern regarding greenhouse gas emissions associated with construction of prior phases of the Original Project and expresses an opinion that the City's Climate Action Plan should be updated to address these emissions.

This comment does not pertain to the analysis of environmental impacts of the proposed modifications included in Draft Addendum No. 2 and therefore does not warrant revisions to Draft Addendum No. 2.

Response 2.16

The commenter asks if the Draft Addendum No. 2 satisfies National Environmental Policy Act and National Historic Preservation Act requirements.

The Draft EIR Addendum No. 2 was prepared to satisfy the requirements of CEQA. An Environmental Assessment and Finding of No Significant Impact were prepared for the Modified Project in accordance with the National Environmental Policy Act and will be reviewed by the United States Environmental Protection Agency and United States Bureau of Reclamation. In addition, a supplemental cultural resources report was prepared for the proposed modifications in support of compliance with the National Historic Preservation Act. The City is engaging with the United States Environmental Protection Agency and United States Bureau of Reclamation to achieve compliance with the National Environmental Policy Act and National Historic Preservation Act for the Modified Project prior to the start of construction for the proposed modifications.

Public Works Advisory Board Meeting May 21, 2025

Comment 1 – Onan Champi

Comment PH1

The commenter inquires as to whether Draft Addendum No. 2 would eliminate the possibility for the City to use the eastern injection wellfield identified in the Final EIR.

Response PH1

The Draft Addendum No. 2 does not preclude future use of the IPR-East injection well area for injection wells because the potential environmental impacts of that activity were previously analyzed in the Final EIR.