

MORRO BAY
OUR WATER
RELIABLE. CLEAN. FOR LIFE.

City of Morro Bay
Water Reclamation Facility Project

Other Authorizations
SPECIAL CONDITION NO. 13
LIFT STATIONS AND OFFSITE
PIPELINES

KK
APPROVED 6/17/21

FINAL | December 2020

CALIFORNIA
COASTAL COMMISSION
CENTRAL COAST DISTRICT OFFICE
725 FRONT ST., STE. 300
SANTA CRUZ, CA 95060

carollo



City of Morro Bay
Water Reclamation Facility Project

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FINAL | December 2020





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Water Reclamation Facility Project

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SPECIAL CONDITION NO. 13

FINAL | December 2020



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Abbreviations

BOD	biochemical oxygen demand
brine	treated effluent
Carollo	Carollo Engineers, Inc.
CCC	California Coastal Commission
CDP	Coastal Development Permit
CDFW	California Department of Fish and Wildlife
City	City of Morro Bay
Conveyance Facilities	pipelines and pump stations
CWA	Clean Water Act
CWSRF	Clean Water State Revolving Fund
FEIR	Final Environmental Impact Report
KMA	Kevin Merk Associates
IPR	GSI Water Solutions
mgd	million gallons per day
MRP	Monitor Reporting Program
NOI	Notice of Intent
RWQCB	California Regional Water Quality Control Board
SWPPP	Storm Water Pollution Prevention Plan
TSS	total suspended solids
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
WDR	waste discharge requirements
WIFIA	Water Infrastructure and Innovation Act
WRF	water reclamation facility
WRFCAC	Water Reclamation Facility Citizens Advisory Committee

Section 1

PROJECT BACKGROUND

On July 11, 2019, the California Coastal Commission (CCC) approved Coastal Development Permit (CDP) 3-19-0463 for the City of Morro Bay's (City's) Water Reclamation Facility (WRF) Project. On July 19, 2019, the City received the Notice of Intent (NOI) for the CDP, which contains sixteen special conditions. The City and CCC staff decided to take a phased approach to approval for construction since the WRF Project is actually a combination of three separate construction efforts which include:

- WRF
- Conveyance Facilities (i.e., pipelines and pump stations)
- Recycled Water Facilities (i.e., injection wells)

Four special conditions were required to be met prior to issuance of the CDP or prior to construction of the WRF including:

- Special Condition No. 1 - Final Plans and Specifications
- Special Condition No. 2 - Construction Plan
- Special Condition No. 6 - Recycled Water Management Plan
- Special Condition No. 13 - Other Authorizations

Special Conditions No. 1, 2, and 6 were approved by CCC staff on November 11, 2019. Special Condition No. 13 was approved by CCC staff on March 10, 2020. Construction of the WRF began on March 20, 2020. Approved copies of the special conditions are available to review onsite in the office of the construction manager at 555 South Bay Boulevard, Morro Bay, California 93442.

The City is now ready to begin construction of the conveyance facilities component of the WRF Project. Three special conditions are required to be met prior to construction of the conveyance facilities including:

- Special Condition No. 1 - Final Plans and Specifications
- Special Condition No. 2 - Construction Plan
- Special Condition No. 13 - Other Authorizations

The existing Morro Bay-Cayucos wastewater treatment plant is located at 160 Atascadero Road in Morro Bay and is jointly owned and operated by the City and the Cayucos Sanitary District. The wastewater treatment plant was originally built in 1954 in a low-lying area near the confluence of Morro Creek with the Pacific Ocean, and it provides wastewater treatment services to the City and to the unincorporated community of Cayucos approximately six miles to the north. The wastewater treatment plant was built before modern state and federal water quality standards, and does not meet federal Clean Water Act (CWA) standards for full secondary treatment. Instead, the wastewater treatment plant has been operating under a CWA waiver for full secondary treatment requirements for biochemical oxygen demand (BOD) and total suspended solids (TSS) since 1984. In 2018, the City received a time schedule order from

the Central Coast Regional Water Quality Control Board (RWQCB) requiring compliance with full CWA secondary treatment requirements by February 28, 2023.

Because of the age of the existing wastewater treatment plant, its failure to meet core CWA water quality standards and the possibility of potential fines/penalties for failure to meet the RWQCB's mandate for CWA compliance by 2023, the City has been pursuing a new upgraded wastewater treatment facility for more than a decade. The City and the Cayucos Sanitary District initially proposed to redevelop the wastewater treatment plant at its current site, but the Coastal Development Permit (CDP) was appealed to the California Coastal Commission (CCC), and ultimately in 2013, the CCC denied the City's redevelopment-in-place proposal on the basis of inconsistencies regarding avoiding coastal hazards, land use priorities, recycled water provisions and public view protections.

Following the CDP denial and given the CCC's direction to the City and the Cayucos Sanitary District on the appropriate path to upgraded wastewater and water reclamation functions, the City developed a Water Reclamation Facility Citizens Advisory Committee (WRFCAC), identified 17 potential sites for plant relocation, and developed criteria for a potential water reclamation facility project, including coastal hazards avoidance through plant relocation inland, water quality improvement through compliance with applicable water quality standards, and water supply security through recycled water provision. Over the past six and a half years, through significant public input that shaped this project, including making critical decisions in public forums regarding WRF siting (e.g., in town vs. outside of town), components/operations, recycled water end uses (e.g., agricultural uses only or full potable reuse), funding (e.g., through two City-wide votes to raise utility fees to pay for the project), and process (i.e., two public hearings to approve the project Environmental Impact Report and two affirmative votes by the Morro Bay City Council and County Board of Supervisors to authorize a consolidated CDP approval process).

This proposed Project meets Coastal Act consistency on many fronts—for the protection and enhancement of coastal resources, for providing essential public services to Morro Bay residents and visitors, and for providing adaptation and resiliency in an era of increased hazards exacerbated by climate change. The Commission directed the City to propose a project of this type back in 2013, finding that a project that perpetuated the City's water and wastewater status quo was not appropriate or consistent with the Coastal Act. The City responded to the CCC's directive, and the proposed project is the end result that addresses the Coastal Act concerns previously raised by the CCC in a way that provides a more sustainable wastewater and water supply future for the City.

Section 2

PROJECT COMPONENTS

The WRF Project includes construction of a new one million gallon per day (mgd) advanced treatment facility on South Bay Boulevard north of Highway 1, two new lift stations, approximately 3.5 miles of pipelines and wells to inject the purified water into the groundwater aquifer, which can be extracted for reuse through the City's existing infrastructure. Construction began in March 2020 on the WRF Facility with project completion expected by 2023.

The lift stations and offsite pipelines (conveyance facilities) component of the City's WRF project involves constructing multiple pipelines to serve the WRF from the proposed influent lift stations. The pipelines include two parallel sewer force mains which convey raw sewage by a lift station located at the existing wastewater treatment plant location sourced from the City's sewer collection system.

The conveyance facilities also include the treated effluent (brine) disposal line from the WRF which is pumped directly to the ocean outfall pump station from the WRF to ultimately be discharged via the ocean outfall diffuser.

The WRF will be producing purified water to be injected into the Morro Groundwater Basin via injection wells to be extracted by the City's municipal wells for indirect potable reuse (IPR). The IPR pipeline will be used to supply purified water from the WRF to the injection wells. The conveyance facilities project is expected to begin construction in early 2021 with completion in 2022.

Section 3

DOCUMENT PURPOSE

This document describes the proposed measures to be taken by the City to address the requirements of Special Conditions No. 13 – Other Authorizations listed in the Notice of Intent NOI to Issue CDP 3-19-0463 for the City’s WRF Lift Stations and Offsite Pipelines Project.

The City is taking a phased approach to meeting Special Condition No. 13 for the CDP. As described above, the Project is being delivered via three distinct construction efforts: WRF, Conveyance Facilities (i.e., pipelines and pump stations), and Recycled Water Facilities (i.e., injection wells). The Other Authorizations described herein are specific to the WRF Lift Stations and Offsite Pipelines Project. The City will submit separate Recycled Water Facilities Other Authorizations information to the Executive Director at the appropriate time when that design has been completed. Construction of the Recycled Water Facilities will not begin until the Executive Director reviews and approves the Other Authorizations and authorizes construction.

The objective of this memorandum is to meet the requirement of Special Condition No. 13 for CDP 3-19-0463. The City shall provide written documentation of authorizations, or evidence that no such authorizations are required, from the following organizations:

- Central Coast Regional Water Quality Control Board (RWQCB)
- State Water Resources Control Board (State Water Board)
- California Department of Fish and Wildlife (CDFW)
- California State Lands Commission (Lands Commission)
- National Marine Fisheries Service (NMFS)

Section 4

AUTHORIZATIONS

In accordance with the requirements of Special Condition No. 13, the following section describes the City's evidence of compliance for the organizations listed on the Project Plans.

4.1 Central Coast Regional Water Quality Control Board

On September 19, 2019, the City sent a memorandum that included an overview of the Project and details regarding the two critical creek crossings at Willow Camp Creek and Morro Creek. Both of these creek crossings were determined to be jurisdictional by Kevin Merk Associates (KMA) in The Biological Resources Assessment South Bay Boulevard – City of Morro Bay Water Reclamation Facility Project Site (KMA, 2017) prepared for the Project's Final Environmental Impact Report (FEIR). The memorandum described the City's plans to utilize trenchless methods to cross these jurisdictional features and asked the RWQCB to concur with the jurisdictional determination made by the United States Army Corps of Engineers (USACE).

An email from Phillip Hammer from the RWQCB indicated that even if the USACE is not requiring a Section 404 Certification (hence no Section 401 Certification), the Project could still require a waste discharge requirements (WDR) permit if the Project includes fill in state waters. With no Section 404 Certification nexus or fill in state waters, no permits from the RWQCB are required for the Project.

The email correspondence between the City's WRF Program Manager (Eric Casares from Carollo Engineers, Inc.) and the RWQCB is included in Appendix A.

4.2 State Water Resources Control Board

On June 11, 2019, the CCC received a letter from Michael Downey at the State Water Board verifying that the City has submitted a final Facilities Plan for the Project. While the State Water Board determined that "final Facilities Plan" is not defined in the State Water Board policies. However, the City's application documents for the Clean Water State Revolving Fund (CWSRF) has sufficient information to meet the requirements for a final Facilities Plan. The letter from the State Water Board is included in Appendix B.

4.3 California Department of Fish and Wildlife

On November 13, 2020, the City, Program Manager, and KMA developed and submitted the notification to CDFW per Fish and Game Code Section 1602 in order to receive a Streambed Alteration Agreement (SAA) permit for the Willow Camp Creek and Morro Creek crossings discussed previously. The areas are shown in Figure 1 and Figure 2, respectively. The notification is included in Appendix C. The City will begin construction on portions of the Project not covered by the SAA before the actual SAA is received. Construction of the trenchless crossings for Willow Camp Creek and Morro Creek will not occur until a final SAA permit is received. At the start of construction, the biological monitor required by the FEIR and Biological Opinion negotiated with the United States Fish and Wildlife Service (USFWS) will stake the jurisdictional areas associated with the two crossings. No work will be allowed to occur within these jurisdictional areas until the Fish and Game Code Section 1602 process has been completed.

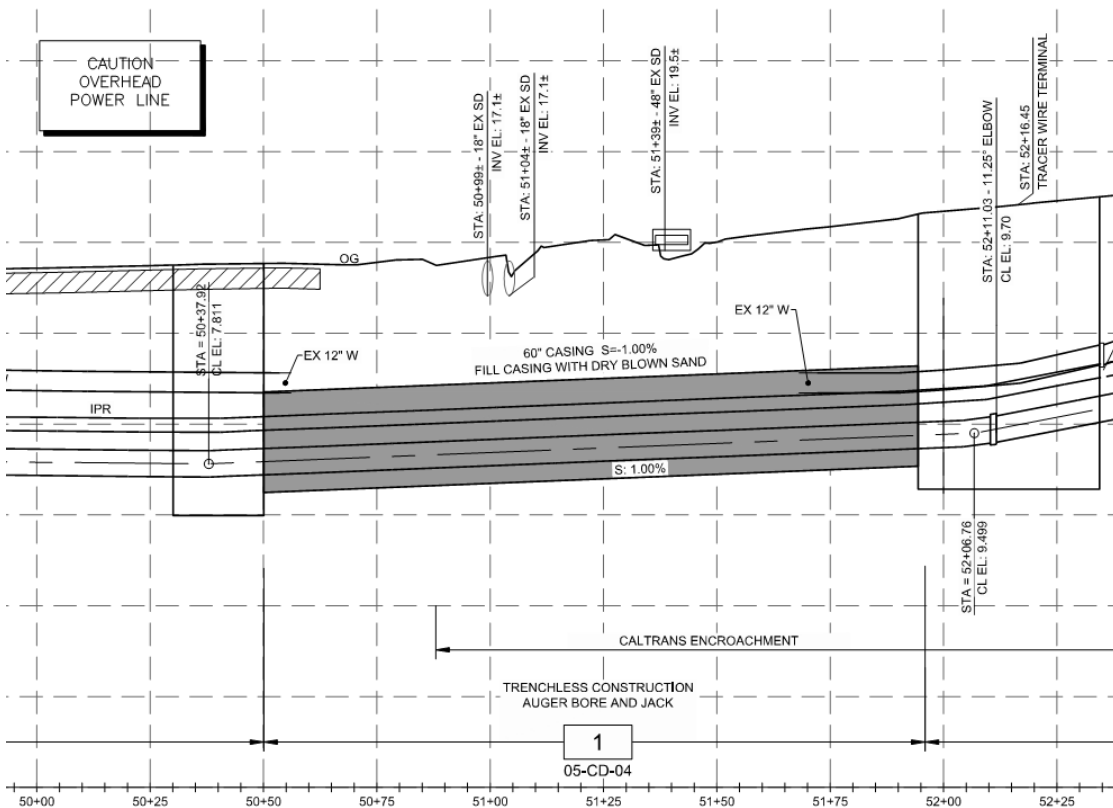


Figure 1 Jack and Bore of Willow Camp Creek

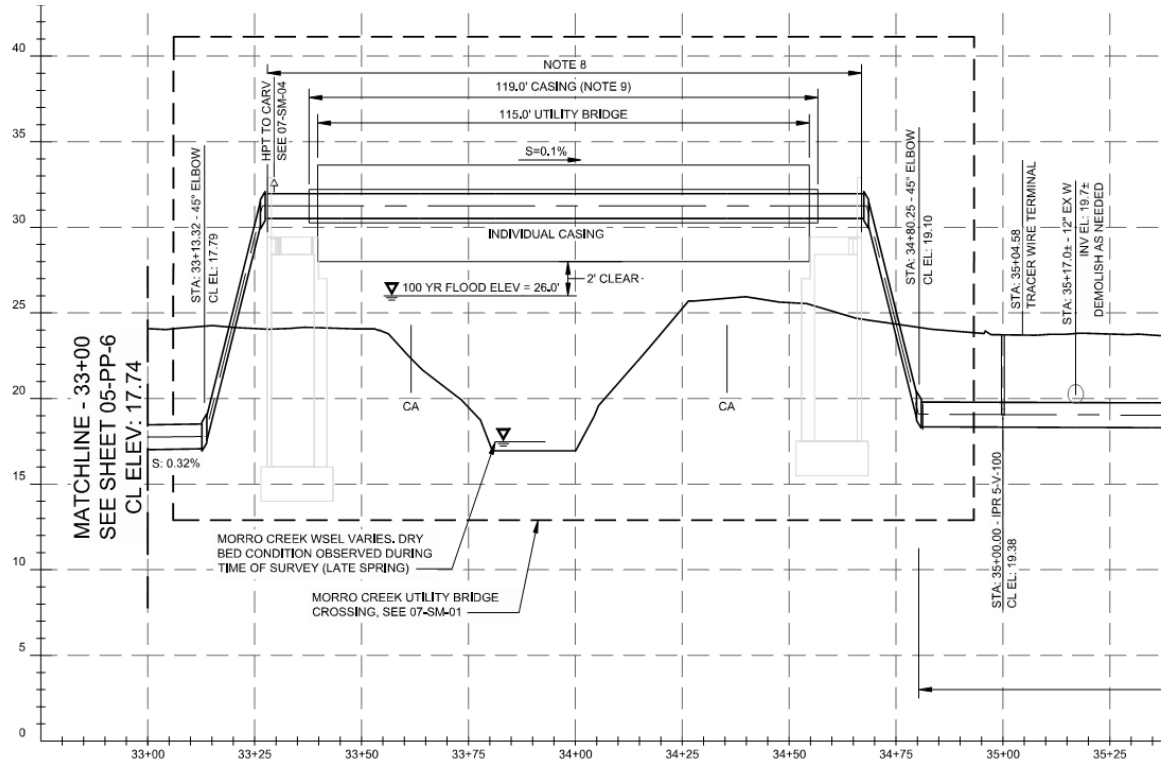


Figure 2 Pipe Bridge at Morro Creek

4.4 California State Lands Commission

On October 04, 2019, Eric Casares contacted Reid Boggiano from the Commission. After providing additional information to the Lands Commission, it was determined that all sovereign Public Trusts lands within the Project area have been granted to the City. Therefore, no lease or written authorization is required from the Commission. The email correspondence between Carollo and the Commission is included in Appendix D.

4.5 National Marine Fisheries Service

The Project is receiving funding from the United States Environmental Protection Agency's (USEPA's) through their Water Infrastructure and Innovation Act (WIFIA) program. Since the Project will be receiving federal funds, the USEPA is required to consult with other federal agencies. One of these agencies is NMFS. On September 04, 2019, the USEPA received technical assistance from NMFS regarding the Project design and potentially required mitigation measures and permits. On September 05, 2019, the City responded with clarity on the Project design and permitting needs. On September 11, 2019, the NMFS was provided a wetland delineation report, project design drawings, and records of correspondence with water quality permitting agencies supporting that the project has no potential to effect jurisdictional waters. On September 13, 2019, the NMFS responded by asking if there is any other evidence that jurisdictional waters could be affected. On September 16, 2019, based on the information, the NMFS asked USEPA for clarification that they would be making a "no effect" determination for the project. On September 17, 2019, USEPA confirmed the "no effect" finding, and the NMFS thanked the USEPA for seeking technical assistance. No federal nexus exists for the NMFS regarding the project; therefore, no written determination would be issued for the "no effect" finding. The email correspondence between the environmental lead for the USEPA's WIFIA program, Alaina McCurdy, and Brittany Struck from National Oceanic and Atmospheric Administration (NOAA) is included in Appendix E.

Appendix A

EMAIL CORRESPONDENCE BETWEEN THE
RWQCB AND CAROLLO

Eric Casares

From: Hammer, Phillip@Waterboards <Phillip.Hammer@waterboards.ca.gov>
Sent: Friday, September 20, 2019 8:33 AM
To: Eric Casares; DiSimone, Katie@Waterboards; Packard, Harvey@Waterboards; John Rickenbach; rlivick@morrobayca.gov; Hicks, Kathleen@Waterboards; Roques, Dominic@Waterboards
Subject: Re: Morro Bay WRF - Project Overview and Stormwater Design Details

Eric,
Katie is the lead staff for NPDES and wastewater issues. Kathleen Hicks (cc'd here) and myself will be the contacts for 401-related issues. You can leave Katie off correspondence addressing 401 info.

I'll ask Kathleen to review this next week. We will be in contact late next week or early the week after.

Please be aware that even though the Corps may not require a 404, the project may still involve discharge of fill to waters of the state, which requires WDRs from us. Last time we met, we discussed parts of the project that included discharge of fill to state waters. I understand that may have changed. Hopefully that is the case. If the project still involves fill in state waters, WDRs will be required. In that instance, your timeline may be difficult for us to meet.

For stormwater issues, you should contact Dominic Roques (cc'd here).

Regards,
-Phil

From: Eric Casares <ECasares@carollo.com>
Sent: Thursday, September 19, 2019 2:26 PM
To: DiSimone, Katie@Waterboards <Katie.DiSimone@waterboards.ca.gov>; Hammer, Phillip@Waterboards <Phillip.Hammer@waterboards.ca.gov>; Packard, Harvey@Waterboards <Harvey.Packard@waterboards.ca.gov>; John Rickenbach <jfrickenbach@aol.com>; rlivick@morrobayca.gov <rlivick@morrobayca.gov>
Subject: Morro Bay WRF - Project Overview and Stormwater Design Details

Katie,

It is good to have you back at the Regional Board. Since Carollo took over as Program Management of the Morro Bay Water Reclamation Facility (WRF) Project, we have been meeting with Phil and Harvey periodically to discuss various aspects of the Project. We have prepared the attached memorandum that provides a general overview of the Project as well as determinations from USACE on various aspects of the Project and specifics of our stormwater design approach at the WRF site.

Based on consultation with the USACE regarding drainages in the Project area (WRF site, Willow Camp Creek, and Morro Creek), they have determined that no Section 404 consultation is required. We are looking for the Regional Board to make a similar determination based on USACE's determination and the information presented in the memo.

In July 2019, the California Coastal Commission (CCC) approved a Coastal Development Permit (CDP) for the Project. In order to receive the CDP and begin construction, the City needs to provide the CCC with written authorization from numerous stakeholders including the Regional Board that construction of the WRF portion of the Project can be started. Please let us know how we can facilitate receipt of this authorization.

We look forward to meeting with you soon to discuss the Project. We are working to begin construction of the WRF before the end of October 2019.

Eric Casares, PE

Project Manager | Vice President

710 West Pinedale Avenue | Fresno, CA 93711

P (559) 490-4361 | M (559) 240-2739

carollo.com



Files attached to this message

Filename	Size	Checksum (SHA256)
Pjm_DiSimone_Overview and Stormwater_2019-0916.pdf	61.1 MB	c40eb464296af4d5d02302ed488c539574fd6ee1b6e3e509a9463d91c48a97e

Please click on the following link to download the attachments:
<https://files.carollo.com/message/xEUtNkVBUQFhVmRcb1zPCN>
This email or download link can not be forwarded to anyone else.
The attachments are available until: **Saturday, 19 October.**
Message ID: xEUtNkVBUQFhVmRcb1zPCN

Appendix B

LETTER FROM STATE WATER BOARD TO THE
COASTAL COMMISSION (JUNE 11, 2019)



GAVIN NEWSOM
GOVERNOR



JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

JUN 11 2019

Mr. Kevin Kahn
District Supervisor
Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA 95060

Dear Mr. Kahn:

Thank you for your email dated May 29, 2019 in which you requested verification that the City of Morro Bay has submitted a final Facilities Plan (or current proxy) for the Morro Bay Water Reclamation Facility (Project), Clean Water State Revolving Fund (CWSRF) Project No. 8185-210.

Division of Financial Assistance (DFA) staff has determined that "final Facilities Plan" is not defined in State Water Board policies and procedures; however, the CWSRF application documents require a final Environmental Assessment and a Project Report containing sufficient information to allow an assessment of the financial impact of constructing the Project on properties within the affected service area. DFA staff have reviewed the City's CWSRF application and confirm that it is complete and that the Project Report is in final form. The City has followed application procedures of the CWSRF Policy and Water Recycling Funding Program (WRFP) Guidelines, and the Project is listed on the Fundable List in the draft CWSRF 2019-2020 Intended Use Plan.

DFA may require that the applicant submit additional information or certifications to assess the Project's ability to meet water quality objectives or plans or useful to ensure that the financing complies with state and federal requirements.

If you have any questions about this letter, please contact me at (916) 324-8404.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Downey".

Michael Downey, P.E.
Senior Water Resource Control Engineer

cc: Christopher Stevens, DFA
Ashley Zellmer, DFA

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

Appendix C
SECTION 1602 NOTIFICATION TO CDFW

MBWRF CONVEYANCE ELEMENT - ATTACHMENT A

Project Description. The following should be used in conjunction with project description information provided in the FEIR and Biological Opinion issued by USFWS to the USEPA. The below information describes project activities at the four project areas within the project site identified as subject to CDFW 1602 jurisdiction. Please note that all work in, over or under drainage features will occur with no flowing water present. Biological clearance surveys and biological monitoring as required in the FEIR and BO will also occur for all work occurring in the vicinity of the drainage features discussed below.

Utility Pipe Bridge over Morro Creek (refer to page 30 of 222 of PDF-Conveyance Facilities Plans). Pipelines will run through welded steel casing pipes from the existing Wastewater Treatment Facility on Atascadero Road and extend to the new Water Reclamation Facility off South Bay Boulevard. The pipelines (i.e., 10" and 16" force mains, 16" brine, and 8" IPR) in the casing will daylight outside the north top of bank in Lyla Keiser Park as shown on the Conveyance Facility Plans included electronically with the notification. Concrete footings will be constructed in park turf areas on the north side of the creek away from the top of bank to support the pipeline span. Two horticultural trees (blue gum eucalyptus) in the park will require removal, but weedy annual grasses and forbs on the north bank within CDFW jurisdiction will not be affected. For the southern bridge footing, eucalyptus and horticultural plantings will require trimming around an existing building outside the top of bank. A small patch of willow riparian scrub (1,200 square feet) will be trimmed to near ground level, but will not be removed by the roots. Other weedy species such as cape ivy, garden nasturtium and castor bean will be removed as feasible during work activities. Excavators, cranes, bulldozers, concrete pumping trucks, water trucks and hand tools will be used to construct the pipe bridge.

Unnamed Drainage 1 (refer to page 34 of 222 of PDF-Conveyance Facilities Plans). The pipeline casings enclosing the pipelines identified on the Conveyance Plans will be installed under the Drainage 1 concrete culvert at the bikepath crossing using jack and bore methods. Horizontal directional drilling will not be used to avoid the potential for frac-out. The bore entry pit (20 feet wide by 40 feet long) and exit pit (20 feet wide by 15 feet long) will be excavated in disturbed areas at least 50 feet from the identified jurisdictional limits in the stream as shown on project plans and Figure 4B in the KMA Memorandum from June 27, 2019 included on the enclosed flash drive.

Unnamed Drainage 2A (refer to page 52 of 222 of PDF-Conveyance Facilities Plans; between stations 121+00 and 122+00). The existing culvert in the center of Quintana Road is degraded, and the project will utilize open trench construction for this location. The contractor will cut and remove 45 linear feet of existing CMP storm drain buried in the roadway. Once removed, the pipelines will be installed and then the storm drain pipe will be replaced with an equivalent size of corrugated HDPE pipe that will be connected to the remaining pipe using appropriate repair coupling and/or concrete collar. No work will occur to the south end of the pipe and associated outfall zone that discharges into the environmentally sensitive area of Drainage 2 supporting willow riparian scrub.

Unnamed Drainage 2B (refer to page 57 of 222 of PDF-Conveyance Facilities Plans; station 144+00). The plans at this location provide some flexibility to the contractor. Open cut construction may be possible to install the pipelines under this culvert, but the contractor may submit for approval of a trenchless construction alternative. Most likely, jack and bore techniques would be used, however, if HDD is proposed, then a frac-out plan would also be required at this location to ensure impacts to the drainage feature are avoided.

Photo Plate

Photo 1. Southerly view of grassland, ornamental, and riparian scrub habitats at the pipe bridge crossing location of Morro Creek. The bikepath bridge can be seen to the right. Willow scrub on the north bank will require trimming of branches.



Photo 2. Westerly view of Morro Creek downstream of the bikepath bridge showing shallow channel and riverine and riparian scrub habitats. No large pools capable of supporting species such as CRLF were observed in this area.



Photo 3. Looking downstream at the pipe bridge crossing location during high flows observed in the winter of 2019. Non-native, invasive plant species such as Kikuyu grass, garden nasturtium and castor bean were observed throughout the area.



Photo 4. View of Morro Creek and pipe bridge location in the fall 2019 showing dry channel with no aquatic habitat. Abutments will be constructed outside the top of bank on each side of creek and the pipes dropped in place using a crane.



Photo 5. Easterly view of Drainage 1 at the bikepath concrete culvert that will be buffered 50 feet and jack and bore techniques used for pipeline installation to avoid impacts to the drainage feature.



Photo 6. Easterly view of Drainage 2A work area at Quintana Road and Loma Road intersection. Willow riparian scrub present in the distance will not be affected by construction activities since all work will occur in the disturbed road right of way.



Photo 7. Easterly view of Drainage 2B work area along Quintana Road. Willow riparian scrub present in the drainage feature will not be affected since work will occur in the disturbed road right of way.

Appendix D

EMAIL CORRESPONDENCE BETWEEN
CALIFORNIA STATE LANDS COMMISSION AND
CAROLLO

Eric Casares

From: Boggiano, Reid@SLC <Reid.Boggiano@slc.ca.gov>
Sent: Wednesday, October 23, 2019 3:06 PM
To: Eric Casares
Subject: RE: Morro Bay Water Reclamation Facility Project - Authorization from SLC

Hi Eric,

All sovereign Public Trust lands within the project area have been granted to the City of Morro Bay. Therefore, no lease or written authorization is required from the Commission.

> Reid Boggiano, Granted Lands Program Manager CALIFORNIA STATE LANDS
> COMMISSION External Affairs
> 100 Howe Avenue, Suite 100-South | Sacramento | CA 95825
> Phone: 916.574.0450 | Email: Reid.Boggiano@slc.ca.gov
>

-----Original Message-----

From: Eric Casares <ECasares@carollo.com>
Sent: Wednesday, October 23, 2019 2:36 PM
To: Boggiano, Reid@SLC <Reid.Boggiano@slc.ca.gov>
Subject: RE: Morro Bay Water Reclamation Facility Project - Authorization from SLC

Reid,

Just following-up on this. We are dealing with some environmental issues that have slowed progress, but I would like to get something from you for our Coastal Development Permit.

-Eric

Eric Casares, PE
Project Manager | Vice President
710 West Pinedale Avenue | Fresno, CA 93711 P (559) 490-4361 | M (559) 240-2739 carollo.com

-----Original Message-----

From: Eric Casares
Sent: Monday, October 7, 2019 8:34 AM
To: Boggiano, Reid@SLC
Subject: Re: Morro Bay Water Reclamation Facility Project - Authorization from SLC

Reid,

We are doing an evaluation of the city's ocean outfall. All the work will be done on the water and not from the shore. It will consist of a diver doing a visual inspection. Pending the evaluation we may put new diffusers on the end of the outfall.

Sent from my iPhone

> On Oct 7, 2019, at 9:29 AM, Boggiano, Reid@SLC <Reid.Boggiano@slc.ca.gov> wrote:
>
> Eric - Unless I'm missing something, it looks like the project will be taking place on the uplands and not within the
tidelands or submerged lands.
>
> -----Original Message-----
> From: Eric Casares <ECasares@carollo.com>
> Sent: Monday, October 07, 2019 8:19 AM
> To: Boggiano, Reid@SLC <Reid.Boggiano@slc.ca.gov>
> Subject: RE: Morro Bay Water Reclamation Facility Project -
> Authorization from SLC
>
> Reid,
>
> Please see the attached. I am out of the office on vacation for a few days, but could find some time to talk later this
afternoon after you have had a chance to review the attached figure.
>
> Thank you for your help with this.
>
> Eric Casares, PE
> Project Manager | Vice President
> 710 West Pinedale Avenue | Fresno, CA 93711 P (559) 490-4361 | M (559)
> 240-2739 carollo.com
>
>
> -----Original Message-----
> From: Boggiano, Reid@SLC [mailto:Reid.Boggiano@slc.ca.gov]
> Sent: Friday, October 4, 2019 1:01 PM
> To: Eric Casares
> Subject: RE: Morro Bay Water Reclamation Facility Project -
> Authorization from SLC
>
> Hi Eric,
>
> Do you have a site plan of the project? The public trust lands within the project area are likely granted to the city of
Morro Bay. If that's the case, State Lands won't have any leasing jurisdiction over the project area. I'm happy to provide
a jurisdictional determination to satisfy CCC permit requirements. I'll be back in office on Monday if you'd like to discuss
further.
>
>
> Reid Boggiano, Granted Lands Program Manager CALIFORNIA STATE LANDS
> COMMISSION External Affairs
> 100 Howe Avenue, Suite 100-South | Sacramento | CA 95825
> Phone: 916.574.0450 | Email: Reid.Boggiano@slc.ca.gov
>
>
>
>
>
>
>
> -----Original Message-----
> From: Eric Casares <ECasares@carollo.com>

> Sent: Friday, October 04, 2019 8:59 AM
> To: Boggiano, Reid@SLC <Reid.Boggiano@slc.ca.gov>
> Subject: Morro Bay Water Reclamation Facility Project - Authorization
> from SLC
>
> Mr. Boggiano,
>
> The City of Morro Bay is currently pursuing a new wastewater treatment plant project. The new wastewater facility will allow the City to reuse the majority of the treated effluent to offset 80 percent of their current potable water usage. The City's existing wastewater facility is located near the coast in an area of coastal hazards and is being relocated approximately 3.5 miles inland based on direction from the Coastal Commission.
>
> One of the special conditions is receiving written authorization from a number of listed agencies (or information indicating that no authorization is needed). One of these agencies is the California State Lands Commission.
>
> The project consists of construction of a new water reclamation facility, 3.5 miles of conveyance pipelines connecting the existing facility near the coast and the new facility, and indirect potable reuse groundwater injection wells. The conveyance pipelines are crossing several waters of the state and US, but with our construction methods (pipe bridges and trenchless construction) we will not be impacting these jurisdictional features and will therefore not need a Section 404 or 401 permit based on direction from the USACE or Central Coast Regional Water Quality Board.
>
> I would like the opportunity to discuss this project with you further and see how we can meet the Coastal Commission's requirements. Please let me know when you may have some time over the next few days to discuss.
>
> The City is on a compressed timeline and is looking to start construction by the end of October. I appreciated your time and help with this in advance.
>
> Eric Casares, P.E.
> Vice President
> Project Manager
> Carollo Engineers
> O: (559) 490-4361
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Appendix E
EMAIL CORRESPONDENCE BETWEEN NMFS
AND USEPA

From: [McCurdy, Alaina](#)
To: [Brittany Struck - NOAA Federal](#)
Cc: [Chandy, Danusha](#); [Irving, Cedric@Waterboards](#)
Subject: RE: NMFS follow up questions for Morro Bay
Date: Tuesday, September 17, 2019 11:00:00 AM
Attachments: [image001.png](#)

Hi Brittany,

It's my understanding from your last email that NMFS is not objecting to our no effect determination and that no further consultation is recommended.
Thank you for coordinating with us on this project.

Thanks,
Alaina

Alaina McCurdy
WIFIA Program
Mccurdy.alaina@epa.gov
Office- **202-564-6996**
Cell- 202-809-5795

****Please note the NEW phone number****

From: Brittany Struck - NOAA Federal <Brittany.Struck@noaa.gov>
Sent: Tuesday, September 17, 2019 10:42 AM
To: McCurdy, Alaina <McCurdy.Alaina@epa.gov>
Cc: Chandy, Danusha <Chandy.Danusha@epa.gov>; Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>
Subject: Re: NMFS follow up questions for Morro Bay

Good Morning,

Thank you for coordinating with us on this project - should you need additional technical assistance on future projects, we are happy to help.

Thanks,
Brittany

On Tue, Sep 17, 2019 at 4:29 AM McCurdy, Alaina <McCurdy.Alaina@epa.gov> wrote:

Hi Brittany,
Correct, EPA is making a no effect determination for our action of issuing federal funds.

Thanks,
Alaina

Alaina McCurdy
WIFIA Program
Mccurdy.alaina@epa.gov
Office- **202-564-6996**
Cell- 202-809-5795

****Please note the NEW phone number****

From: Brittany Struck - NOAA Federal <Brittany.Struck@noaa.gov>
Sent: Monday, September 16, 2019 4:24 PM
To: McCurdy, Alaina <McCurdy.Alaina@epa.gov>
Cc: Chandy, Danusha <Chandy.Danusha@epa.gov>; Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>
Subject: Re: NMFS follow up questions for Morro Bay

Hi Alaina,

That makes things pretty clear. So for my records, the EPA (federal nexus is EPA funds) is making a no effect determination, correct?

Thanks,
Brittany

On Mon, Sep 16, 2019 at 12:36 PM McCurdy, Alaina <McCurdy.Alaina@epa.gov> wrote:

Hi Brittany,
To confirm, there are waters of the US in the project area, including Morro Creek, however, no impacts to waters of the US will occur. Changes to the design have led to avoidance and minimization of all impacts, including the bridge over Morro Creek.
Please let me know if you have any other questions or would like to set up a call to go through anything.

Thanks,
Alaina

Alaina McCurdy
WIFIA Program
Mccurdy.alaina@epa.gov
Office- **202-564-6996**
Cell- 202-809-5795

****Please note the NEW phone number****

From: Brittany Struck - NOAA Federal <Brittany.Struck@noaa.gov>

Sent: Friday, September 13, 2019 6:15 PM

To: McCurdy, Alaina <McCurdy.Alaina@epa.gov>

Cc: Chandy, Danusha <Chandy.Danusha@epa.gov>; Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>

Subject: Re: NMFS follow up questions for Morro Bay

I just read the Corps' letter. Can you specifically tell me which portions of the project involve "waters of the US"? We may still need to consult based on exactly how the project involves waters of the US.

Thanks!

On Fri, Sep 13, 2019 at 8:46 AM Brittany Struck - NOAA Federal <Brittany.Struck@noaa.gov> wrote:

Hi Alaina,

I was in the field Wednesday and Thursday, and just getting to this information package. Thank you for providing these details. I will stand by until you send a copy of the Corps' NPR letter. Alternatively, you could ask Jerry to cc NOAA Fisheries (Brittany Struck, [501 West Ocean Blvd., Long Beach](#)) on his letter (I have worked with him before).

Thanks,
Brittany

On Wed, Sep 11, 2019 at 11:00 AM McCurdy, Alaina <McCurdy.Alaina@epa.gov> wrote:

Hi Brittany,

As a follow up from our call earlier this week, please find the requested information, including:

- Wetland Delineation Report. (Note that there is a summary of the wetland assessment included in the Supplemental Biological Resources Report)
- Email correspondence with the Corps on crossings. (formal letter from Corps expected soon and will be provided once received)
- 60% Design drawings - Alignment overview; Trenchless crossing detail; Morro Creek pipe bridge; Figure from the FEIR addendum showing the latest alignment, pump stations, etc.

Please let me know if you have questions on these materials or would like to discuss anything over a call.

Thanks,
Alaina

Alaina McCurdy

WIFIA Program
Mccurdy.alaina@epa.gov
Office- **202-564-6996**
Cell- 202-809-5795

****Please note the NEW phone number****

From: Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>
Sent: Monday, September 9, 2019 1:35 PM
To: Chandy, Danusha <Chandy.Danusha@epa.gov>; Brittany Struck - NOAA Federal <Brittany.Struck@noaa.gov>
Cc: Lenz, Tessa <Tessa.Lenz@Waterboards.ca.gov>; McCurdy, Alaina <McCurdy.Alaina@epa.gov>
Subject: RE: NMFS follow up questions for Morro Bay

Hello Alaina,

Thank you for fronting the federal correspondence, and corresponding with the applicant. Please request from the applicant a map of the final design footprint, supporting information, and correspondence with the US Army Corps and the CA Fish Wildlife affirming they have no water quality permitting requirements. This is essential to substantiate our Section 7 ESA findings for anadromous fish.

Sincerely,

Cedric Irving
Environmental Scientist
Division of Financial Assistance | SWRCB
Phone: 916-341-6983
Resources: <http://go.usa.gov/3HKXB>

From: Chandy, Danusha <Chandy.Danusha@epa.gov>
Sent: Monday, September 9, 2019 10:06 AM
To: Brittany Struck - NOAA Federal <Brittany.Struck@noaa.gov>
Cc: Lenz, Tessa <Tessa.Lenz@Waterboards.ca.gov>; Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>; McCurdy, Alaina <McCurdy.Alaina@epa.gov>
Subject: FW: NMFS follow up questions for Morro Bay

Danusha S. Chandy, P.E.
(O) [202-566-2165](tel:202-566-2165)
(C) [202-281-0714](tel:202-281-0714)

Chandy.Danusha@epa.gov

From: Eric Casares <ECasares@carollo.com>
Sent: Thursday, September 5, 2019 7:14 PM
To: McCurdy, Alaina <McCurdy.Alaina@epa.gov>
Cc: Chandy, Danusha <Chandy.Danusha@epa.gov>; Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>; Lenz, Tessa <Tessa.Lenz@Waterboards.ca.gov>; McDonald, Kevin <mcdonald.kevin@epa.gov>; rlivick@morrobayca.gov; John Rickenbach <jfrickenbach@aol.com>; Kevin Merk <kmerk@kevinmerkassociates.com>
Subject: FW: NMFS follow up questions for Morro Bay

Alaina,

Please see our responses below to help with your discussions with NMFS early next week.

Eric Casares, PE

Project Manager | Vice President

[710 West Pinedale Avenue | Fresno, CA 93711](#)

P (559) 490-4361 | M (559) 240-2739

carollo.com

From: McCurdy, Alaina [<mailto:McCurdy.Alaina@epa.gov>]
Sent: Wednesday, September 4, 2019 9:27 AM
To: Eric Casares <ECasares@carollo.com>
Cc: Irving, Cedric@Waterboards <Cedric.Irving@waterboards.ca.gov>; Lenz, Tessa <Tessa.Lenz@Waterboards.ca.gov>; Chandy, Danusha <Chandy.Danusha@epa.gov>; McDonald, Kevin <mcdonald.kevin@epa.gov>
Subject: NMFS follow up questions for Morro Bay

Hi Eric,

We've received some initial feedback from NMFS on the technical assistance request. NMFS comments are in **blue**. Please have the biologists on your team develop some draft responses to these comments on the mitigation measures.

Responses should update which consultations/permits are expected based on the current impacts as well as which mitigation measures, for example de-watering plan or erosion controls, are anticipated to be necessary based on current project impacts. Please try to have draft responses back to us by Monday so we can keep discussions with NMFS moving.

If you have any questions, we can set up a call with the biologists.

Thanks,
Alaina

Mitigation Measures (as outlined in April 2017 Biological Report)

1. During the project planning phase, the City should initiate consultation with regulatory agencies to determine which regulatory permits will be necessary. The type of permits and compensatory mitigation required will depend on the proposed project impacts associated with the chosen pipeline alignment and proposed construction methods, and would likely include a Section 404 Permit from USACE, a Section 401 Water Quality Certification from RWQCB, and a Section 1602 Streambed Alteration Agreement from CDFW.

>These specific permits usually mean there will be disturbance to the creek channel or disturbance to flow/sediment within the channel; it would be helpful to share the application for these permits with NMFS ahead of submitting them to the regulatory agency; with a no effect call, it seem somewhat odd you would need these additional permits.

ETC – Through consultation with USACE, we have determined that no Section 404 permits will be needed for the jurisdictional waterways we will be crossing including Willow Camp Creek and Morro Creek. For Willow Camp Creek, we will be using trenchless construction methods including either Bore and Jack, Pipe Ramming or Microtunneling. For Morro Creek will be using a pipe bridge, which will include civil work on the two embankments to install the two reinforced concrete abutments. This would consist of site grubbing, cleaning, grading, and excavation to the desired depth and to meet the necessary dimensions, installation of the concrete abutments, and installation of the pre-manufactured pipe bridge span via large cranes. Construction will not be done below the top of banmk so no Section 1602 Streambed Alteration Agreement from CDFW will be required.

2. Once the project development footprint and construction methods have been finalized, the drainage impact areas can be calculated and impacts to federal and state jurisdictional areas can be determined. To compensate for impacts to riparian and wetland habitat and non- wetland drainage features, a Habitat Mitigation and Monitoring Plan (HMMP) should be prepared. The HMMP should be consistent with federal and state regulatory requirements and local City policies. The HMMP should be submitted with permit applications for agency approval. The City would then be required to implement the HMMP during construction and immediately following project completion for an estimated period of five years.

>With a no effect call, it seems strange you would need a HMMP or that you would even anticipate impacts to riparian and wetland habitat.

ETC – We do not have impacts to state or federal jurisdictional areas.

3. Prior to start of construction activities, the applicant should retain a qualified biological monitor to ensure compliance with all permit requirements and avoidance and minimization measures (i.e.: preconstruction surveys, worker environmental training, and

construction monitoring) during work within and adjacent to drainage features.

4. Prior to start of construction, the project boundaries adjacent to Morro Creek and other drainages should 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.

5. Prior to start of construction, a Diversion and Dewatering Plan should be prepared in case flowing or ponded water is present in a work area. The Plan would be submitted to regulatory agencies to be approved under the project permits from the USACE, RWQCB, CDFW and City/Coastal Commission. The most up-to-date technology should be employed to avoid and minimize impacts to open water and riparian habitats. If pumps are incorporated to assist in temporarily dewater/divert stream flow from work areas, intakes should be completely screened with no larger than 0.2-inch (five-millimeter) wire mesh to prevent aquatic vertebrate species from entering the pump system. Any vertebrate species stranded in dewatered areas would be captured by the project biologist and relocated to appropriate habitat as soon as possible. Pumps will release the additional water to a settling basin allowing the suspended sediment to settle out prior to re-entering the channel outside of the isolated area. Additional regulatory agency requirements included in the project permits will be followed as directed. Additional measures developed in consultation with CDFW, USFWS and NOAA Marine Fisheries Service to protect special status species would also be followed.

>With a no effect call, this seems extremely strange to anticipate the need for a dewatering plan. If there is a need to dewater in designated critical habitat, then the EPA should request formal consultation under section 7 of the ESA.

ETC – We are not dealing with dewatering of flowing or ponded water as work at Morro Creek and Willow Camp Creek are happening outside jurisdictional areas.

6. Prior to issuance of construction permits, an Erosion Control Plan incorporating up to date Best Management Practices should be prepared by the project engineer to minimize impacts to aquatic habitats. The plan should address installation and maintenance of both temporary and permanent measures to control erosion and dust, contain spills, protect stockpiles, and generally maintain good housekeeping practices within the worksite. All project plans should show that erosion, sediment, and dust control measures must be installed prior to start of any ground disturbing work. All bare or disturbed soil areas that are outside the developed facility and roadway areas will be seeded with the native erosion control seed mix listed in Impact Bio 2.

>With a no effect call, this also seems extremely strange to anticipate the need to minimize impacts, like erosion, to aquatic habitats. If these measures need to be in place, then we are either in an informal or formal consultation situation, not a no effect situation.

ETC – This does not look to be applicable as we are not impacting aquatic habitats.

7. All applicable plans should clearly show project stockpile and materials staging areas. These areas should be at least 50 feet from drainage features, active storm drain inlets, and must conform to BMPs applicable for storm drain protection.

8. Prior to start of work, the contractor should prepare and implement a Spill Prevention Plan to ensure prompt and effective response to any accidental spills. All workers shall 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 should be cleaned up immediately. Spill prevention and cleanup materials should be on-site at all times during the course of the project.

>This measure is usually seen within an informal consultation request; it depends on where exactly the applicant/EPA anticipates a spill might occur.

ETC – While included in the Biological Assessment, this mitigation is included as a standard and generic practice for any ongoing construction activities. That said, this impact was found to be less than significant in the actual EIR because of a variety of existing regulations already in place. See Impact 3.9-2, page 3.9-31 and forward:

Impact 3 -2: The proposed project could degrade surface water or groundwater quality in the event of pipeline rupture or accidental spill Implementation of regulatory requirements, including a leak detection system and preventative maintenance program or new proposed project pipelines would ensure water quality in the project area is not adversely affected This is a Class III impact, Less than Significant

9. All refueling, maintenance, and washing of equipment and vehicles should occur on paved areas in a location where a spill would not travel onto bare ground or to a storm drain inlet. This fueling/staging area will conform to BMPs applicable to attaining zero discharge of stormwater runoff. 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 should occur only in a location where polluted water and materials can be contained for subsequent removal from the site.

10. A designated concrete washout location should be established onsite, in an area at least 50 feet from any drainage or storm drain inlet. The washout should be maintained and inspected weekly, and will be covered prior to and during any rain event. Concrete debris should be removed whenever the washout container reaches the 1/2 full mark.

11. BMP's for dust abatement shall be a component of the project's construction documents. Dust control requirements should be carefully implemented to prevent water used for dust abatement from transporting pollutants to storm drains leading to the creek channel.

>This measure is usually seen within an informal consultation request as the applicant/EPA is trying to minimize or avoid transporting pollutants that may

eventually enter the creek channel.

ETC - This mitigation is a standard practice to reduce potential impacts, whether significant or not. In this case, the EIR found the effects of fugitive dust to be significant but mitigable:

Impact 3 3-2: Proposed project construction would cause temporary increases in localized air pollutant emissions of ROG, NOx and DPM in excess of SLOAPCD construction thresholds which could lead to a violation of an air quality standard. Implementation of fugitive dust control measures and other standard control measures or construction equipment would reduce emissions. This impact would be Class II, less than significant with mitigation.

Below is the EIR mitigation, which applies to all construction activities consistent with SLOAPCD requirements:

Mitigation Measure AQ-1a: Fugitive Dust Control Measures. Construction projects shall implement the following dust control measures so as to reduce PM10 emissions in accordance with SLOAPCD requirements.

- Reduce the amount of the disturbed area where possible;*
- Water trucks or sprinkler systems shall be used during construction in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water shall be used whenever possible;*
- All dirt stock pile areas shall be sprayed daily as needed;*
- Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible following completion of any soil disturbing activities;*
- Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;*
- All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;*
- All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible after grading unless seeding or soil binders are used;*
- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;*
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance*

between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;

- Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;*
- Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible;*
- All of these fugitive dust mitigation measures shall be shown on grading and building plans; and*
- The construction contractor shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.*

12. During project activities, all trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris shall be removed from work areas.

Alaina McCurdy

Environmental Scientist, WIFIA Program
Water Infrastructure Division
Office of Wastewater Management
U.S. Environmental Protection Agency

mccurdy.alaina@epa.gov

Office- **202-564-6996**

Cell- 202-809-5795



****Please note the NEW phone number****

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Brittany Struck

Natural Resource Management Specialist

*U.S. Department of Commerce
NOAA Fisheries West Coast Region
[501 West Ocean Blvd., Suite 4200](#)
[Long Beach, CA 90802](#)*

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*"We cannot solve our problems with the same thinking we used when we created them."
- Albert Einstein*

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