

## CALIFORNIA COASTAL COMMISSION

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# F8c

November 2, 2016

To: Coastal Commissioners and Interested Parties

From: Alison Dettmer, Deputy Director  
Tom Luster, Senior Environmental Scientist

Subject: **Addendum to 9-16-0849 – City of Morro Bay**

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This addendum provides proposed revisions to the staff report. These revisions do not change staff's recommendation that the Commission conditionally **approve** the coastal development permit.

### Proposed Revisions to the Staff Report

The proposed revisions below are recommended findings and will be incorporated into relevant portions of the staff report as adopted findings. Additions are shown below in **bold underline** and deletions in ~~striketrough~~.

*Page 4, Delete **Special Condition 4:***

~~“**Deed Restriction.** PRIOR TO PERMIT ISSUANCE, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.”~~

Page 5, second paragraph:

“The desalination facility itself is within the City’s certified Local Coastal Program (“LCP”) jurisdiction. Project components within the Commission’s retained jurisdiction include the seawater wells, the facility’s outfall into the former power plant discharge channel, and portions of the pipelines between the wells and the facility and between the facility and the discharge that run beneath Embarcadero Road and Morro Rock City Beach. **These project components are under three separate ownerships – portions are on the state’s Tidelands Trust lands, City-owned property, or on an easement to the City granted by the power plant owner.**”

Page 6, last paragraph:

“Concurrently, the City has also been working with Commission staff to relocate its wastewater treatment facility and the desalination facility, due to their location in an area subject to coastal hazards, including flooding and tsunami runup. The work includes site alternative analyses, a planned update to the City’s Local Coastal Program (“LCP”), and an expected subsequent submittal of a CDP application for the new proposed facilities. Depending on the eventual location of these facilities, the City may propose keeping the existing seawater wells or may propose alternative locations that are more suitable to serve the new facility location. **The currently proposed project is only to provide for emergency, non-routine operation of the seawater wells. Changes to the location of the desalination facility, the seawater wells, or to the proposed operation of these wells are development for which a permit amendment or a new coastal development permit would be required.**”

Page 7, beginning of first paragraph:

“**Operations:** Proposed development within the Commission’s retained jurisdiction consists of the intermittent withdrawal of seawater and discharge of the desalination facility’s effluent into coastal waters during facility operations; there is no new construction associated with this CDP. When the facility operates using brackish water, its effluent has salinity levels of about 21-26 parts per ~~million~~ **thousand** (“~~ppm~~ **ppt**”), which is somewhat less than levels in ambient seawater of about 31-34 ~~ppm~~ **ppt**. The Central Coast Regional Water Quality Control Board has determined that the discharge is subject to the Board’s “General Low-Threat” discharge permit, which is available to discharges that contain minimal amounts of pollutants and pose little threat to water quality. The facility’s proposed ongoing use of the seawater wells would increase its discharge salinity to up to about 45-47 ~~ppm~~ **ppt** and will require the Regional Board to reassess the facility’s permit to ensure the facility continues to meet water quality standards and is protective of marine life.”

Page 9, first full paragraph:

“The City has acknowledged the potential that the facility itself or the facility components within the Commission’s retained jurisdiction may be damaged due to these hazards and it has stated it will stipulate to indemnification of the Commission should

any of the facility components be damaged. **Special Condition 2** provides the relevant indemnity for damage that may result from these hazards. In addition, **Special Condition 3** identifies measures the City will take if project components are damaged or threatened due to coastal hazards, including, if necessary, submittal of a CDP application and Removal Plan if the components can no longer be used or if they create a hazard. ~~In recognition of the ongoing hazards at this location, **Special Condition 4** ensures that these restrictions are recorded as part of the property.”~~

*Page 9, second-to-last paragraph:*

“As noted above, this project involves no construction within the Commission’s retained jurisdiction, though any needed repair and maintenance activities for these components would be subject to additional review and approval by the Commission or subject to the Coastal Act’s repair and maintenance exemption. Additionally, as noted in **Special Condition 3**, any major modifications or removal of the components would also be subject to additional review and approval.”

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# F8c

Date Filed: 8/5/16  
180<sup>th</sup> Day: 2/1-17  
Staff: TL-SF  
Staff Report: 10/20/16  
Hearing Date: 11/4/16

## **STAFF REPORT REGULAR CALENDAR**

**Application No.:** 9-16-0849

**Applicant:** City of Morro Bay

**Project Location:** Embarcadero Road and Coleman Drive, Morro Bay, County of San Luis Obispo.

**Project Description:** Request for after-the-fact approval for ongoing use of existing seawater wells and discharge for City's desalination facility.

**Staff Recommendation:** Approval with Conditions

## **SUMMARY OF STAFF RECOMMENDATION**

The City of Morro Bay operates a desalination facility that provides part of the City's water supply. The City is requesting after-the-fact approval for ongoing use of facility components within the Commission's retained permit jurisdiction, which include five existing seawater wells, an outfall, and the piping between the wells and the facility and between the facility and the outfall, all located along Embarcadero Road and Morro Rock City Beach in the City. The project includes no new construction within the Commission's retained jurisdiction, though this coastal development permit would authorize ongoing intermittent withdrawal of seawater through the wells and discharges from the facility to coastal waters.

Commission staff has determined the proposed work would conform to Coastal Act Sections 30230 and 30231 (marine biological resources), 30253 (coastal hazards), and 30211 (public access). Staff therefore recommends the Commission **approve** the proposed permit, as conditioned.

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## APPENDICES

Appendix A – Substantive File Documents

## EXHIBITS

Exhibit 1 – Location Map

### I. MOTION AND RESOLUTION

Staff recommends the Commission **approve** coastal development permit amendment application 9-16-0849.

#### **Motion:**

*I move that the Commission approve the proposed amendment to coastal development permit 9-16-0849.*

Staff recommends a **YES** vote. Passage of this motion will result in approval of the amendment and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of Commissioners present.

#### **Resolution:**

*The Commission hereby approves coastal development permit amendment 9-16-0849, and adopts the findings set forth below on grounds that the development, as amended, will be in conformity with the policies of Chapter 3 of the Coastal Act. Approval of the amended permits complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.*

## II. STANDARD CONDITIONS

This permit is granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. **Interpretation.** Any questions of intent of interpretation of any condition will be resolved by the Executive Director or the Commission.
4. **Assignment.** The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

## III. SPECIAL CONDITIONS

1. **Other Discretionary Approvals and Proof of Legal Interest.** PRIOR TO PERMIT ISSUANCE, the Applicant shall submit documentation of permit approval from the Central Coast Regional Water Quality Control Board for the facility's proposed discharge of effluent resulting from its use of seawater wells. If this approval results in the need for changes to the discharge structure or location as approved by the Commission, the Applicant shall notify the Coastal Commission's Energy and Ocean Resources Division of the required changes. No changes to the approved project shall occur without a Commission approved amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.
2. **Assumption of Risk, Waiver of Liability and Indemnity.** By acceptance of this permit, the Permittee acknowledges and agrees (1) that the site may be subject to hazards from ground motion, liquefaction, lateral spread, storm waves, storm surges, erosion, and flooding; (2) to assume the risks to the Permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (3) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (4) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

- 3. Coastal Hazards Response.** By acceptance of this permit, the Permittee acknowledges and agrees, on behalf of itself and all successors and assigns, that:
- a. The intent of this permit is to allow for the approved development to be constructed and used consistent with the terms and conditions of this permit for only as long as it remains safe for use without additional substantive measures beyond ordinary repair and/or maintenance to protect it from coastal hazards; however, the Permittee may apply to relocate threatened development elsewhere on the site;
  - b. In the event that the approved development is threatened with damage or destruction from coastal hazards, or is damaged or destroyed by coastal hazards, protective structures (including but not limited to seawalls, revetments, groins, deep piers/caissons, etc.) shall be prohibited;
  - c. Any rights to construct such protective structures, including rights that may exist under Public Resources Code Section 30235 are waived;
  - d. If an appropriate government agency has ordered that the approved development or portions of the approved development are not to be occupied or used due to any coastal hazards, and such safety concerns cannot be abated by ordinary repair and/or maintenance, then the Permittee shall remove such development or portions of such development. Prior to removal, the Permittee shall submit a proposed Removal Plan to the Executive Director for review and approval. If the Executive Director determines that an amendment to this permit or a separate coastal development permit is legally required, the Permittee shall immediately submit the required application. The Removal Plan shall clearly describe the manner in which such development is to be removed and the affected area restored so as to best protect coastal resources, and shall be implemented immediately upon Executive Director approval or approval of the permit or amendment application.
- 4. Deed Restriction.** PRIOR TO PERMIT ISSUANCE, the applicant shall submit to the Executive Director for review and approval documentation demonstrating that the applicant has executed and recorded against the parcel(s) governed by this permit a deed restriction, in a form and content acceptable to the Executive Director: (1) indicating that, pursuant to this permit, the California Coastal Commission has authorized development on the subject property, subject to terms and conditions that restrict the use and enjoyment of that property; and (2) imposing the Special Conditions of this permit as covenants, conditions and restrictions on the use and enjoyment of the Property. The deed restriction shall include a legal description of the entire parcel or parcels governed by this permit. The deed restriction shall also indicate that, in the event of an extinguishment or termination of the deed restriction for any reason, the terms and conditions of this permit shall continue to restrict the use and enjoyment of the subject property so long as either this permit or the development it authorizes, or any part, modification, or amendment thereof, remains in existence on or with respect to the subject property.

## IV. FINDINGS AND DECLARATIONS

The Commission finds and declares as follows:

### A. PROJECT DESCRIPTION AND BACKGROUND

**Project Description:** Since the early 1990s, the City of Morro Bay (“the City”) has operated a desalination facility that provides part of the City’s water supply. The facility is located within the City’s corporation yard near its wastewater treatment facility at 170 Atascadero Road in the City (see Exhibit 1 – Location Map). It obtains its source water from several nearby brackish water wells and five seawater wells located along Embarcadero Road and the Harbor Walk pathway in the City. It discharges effluent to the channel that the now-retired Morro Bay Power Plant formerly used to discharge its power plant cooling water flows.

The desalination facility itself is within the City’s certified Local Coastal Program (“LCP”) jurisdiction. Project components within the Commission’s retained jurisdiction include the seawater wells, the facility’s outfall into the former power plant discharge channel, and portions of the pipelines between the wells and the facility and between the facility and the discharge that run beneath Embarcadero Road and Morro Rock City Beach.

The City originally constructed the facility in response to drought conditions of the early 1990s, and its initial coastal development permits (“CDPs”) allowed it to operate for only a limited time (see Project Background below). The City has since used the facility intermittently as a backup or emergency water supply, though it has not had a CDP allowing operations since 1999.<sup>1</sup> The currently requested CDP would allow the City to continue intermittent operation of the seawater wells and facility discharge, as described below.

The City is proposing to upgrade the facility by installing new treatment systems, tanks, and other similar infrastructure, but does not propose any new construction to the project components within the Commission’s retained jurisdiction. Development within the Commission’s jurisdiction is limited to the ongoing intermittent withdrawal of seawater from beneath Morro Bay and discharge to coastal waters.

The proposed upgrades will allow the facility to more effectively treat the two different types of source waters it relies on – brackish groundwater and seawater – which have different water quality characteristics and different treatment needs. The facility is able to produce up to 581 acre-feet per year from the brackish water wells and up to 645 acre-feet from its seawater wells.<sup>2</sup>

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<sup>1</sup> Development including, but not limited to, ongoing use of project components within the Commission jurisdiction and discharge of facility effluent to coastal waters, has taken place without benefit of a coastal development permit. Although this development has taken place prior to submission of a permit application, consideration of this application by the Commission is based solely upon the policies of Chapter 3 of the Coastal Act. Commission review and action on this permit does not constitute a waiver of any legal action with regard to the alleged violation(s), nor does it constitute an implied statement of the Commission’s position regarding the legality of any development undertaken on the subject site without a coastal permit, or that all aspects of the violation(s) have been fully resolved.

<sup>2</sup> Since the late 1990s, the City has treated water from the brackish water wells only.



The facility would continue to rely primarily on brackish water, due in part to its higher recovery rate (about 75% compared to a 50% rate for seawater), but the proposed modifications would enable the City to simultaneously treat both brackish water and seawater to produce up to 1,226 acre-feet per year, if necessary. The City expects to treat seawater primarily during water emergencies, such as that it declared in April 2014, or when there are limitations on its other main sources – i.e., local groundwater and the State Water Project (“SWP”) – due to low aquifer levels, limited allocations, reduced reliability of SWP supplies, or other reasons. In 2010, for example, the facility served as the City’s primary water source for several months during a partial SWP shutdown. The City’s current Urban Water Management Plan (“UWMP”), completed in July 2016, specifically identifies the brackish water treatment facility as part of the City’s future water supply portfolio and states that it is also expected to provide up to 645 acre-feet of seawater desalination per year to the City through 2040.<sup>3</sup>

**Project Background:** In the late 1980s and early 1990s, the City experienced various water shortages due in part to drought conditions. The facility was originally approved in the early 1990s under emergency CDPs, which were conditioned to be valid for no more than two years during the City’s declared water emergency and required the City to submit a new CDP application for use of the facility beyond that time. During the 1990s, the City and Commission issued several additional CDPs to address changes to the facility and its different operating conditions. In 1995, the Commission approved CDP 3-94-46, which included Special Conditions that allowed for construction and use of the seawater wells, for the facility to produce up to 400 gallons per minute (which is equal to about 645 acre-feet per year), and for discharge of the facility’s effluent into the Morro Bay Power Plant outfall. This CDP also required the City to obtain a subsequent CDP for the facility if it planned to continue operations past December 31, 1999. The City continued to use the facility beyond that deadline but did not obtain the required CDP.

Since the late 1990s, the facility has relied solely on source water provided by the brackish water wells. In 2007, the City determined that the facility would require modifications to more effectively treat the relatively high nitrate levels in the brackish water supply and would also benefit from additional modifications that would allow it to more effectively treat both brackish water and seawater, as described above. In 2009, it expanded its brackish water treatment train.

Concurrently, the City has also been working with Commission staff to relocate its wastewater treatment facility and the desalination facility, due to their location in an area subject to coastal hazards, including flooding and tsunami runup. The work includes site alternative analyses, a planned update to the City’s Local Coastal Program (“LCP”), and an expected subsequent submittal of a CDP application for the new proposed facilities. Depending on the eventual location of these facilities, the City may propose keeping the existing seawater wells or may propose alternative locations that are more suitable to serve the new facility location.

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<sup>3</sup> Section 10631(g) of the state’s Water Code requires each UWMP to include a detailed description of all water supply projects and programs needed to meet the identified total expected water use. This detailed description is to identify specific projects, the amount of water supply expected from each project, and the expected implementation timeline for each.

## **B. COASTAL COMMISSION JURISDICTION AND STANDARD OF REVIEW**

Portions of the overall project within the Commission's retained jurisdiction include the desalination facility's five seawater wells, the facility's discharge, and appurtenant piping between these project components and the desalination facility itself. The standard of review for these project components is Chapter 3 of the Coastal Act. The project will also be subject to continuing review and approval by the Central Coast Regional Water Quality Control Board, as described in Section IV.C below.

## **C. PROTECTING MARINE RESOURCES AND WATER QUALITY**

Coastal Act Section 30230 states:

*Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

Coastal Act Section 30231 states:

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

**Intake:** Project components within the Commission's retained jurisdiction include five existing seawater wells located about 100 feet inland of the shoreline along Embarcadero Road. These wells are a type of subsurface intake that causes essentially no effect on marine resources because the rate at which seawater is drawn into the wells is imperceptible in nearby coastal waters from which the water is drawn and causes no adverse impacts to marine life. This type of well also represent one of the preferred methods identified in the state's Ocean Plan Amendment for desalination facilities to obtain source water.

**Discharge:** Another project component within the Commission's retained jurisdiction is the facility's existing discharge into the channel formerly used by the Morro Bay Power Plant to discharge its cooling water. The channel is sometimes open to Estero Bay, but the cessation of the power plant cooling water flows has resulted in the channel sometimes filling with sand from nearby beaches. The facility is able to discharge under either condition – i.e., discharging to the open water within the channel or to beneath sediments that may be in the channel.

**Operations:** Proposed development within the Commission’s retained jurisdiction consists of the intermittent withdrawal of seawater and discharge of the desalination facility’s effluent into coastal waters during facility operations; there is no new construction associated with this CDP. When the facility operates using brackish water, its effluent has salinity levels of about 21-26 parts per million (“ppm”), which is somewhat less than levels in ambient seawater of about 31-34 ppm. The Central Coast Regional Water Quality Control Board has determined that the discharge is subject to the Board’s “General Low-Threat” discharge permit, which is available to discharges that contain minimal amounts of pollutants and pose little threat to water quality. The facility’s proposed ongoing use of the seawater wells would increase its discharge salinity to up to about 45-47 ppm and will require the Regional Board to reassess the facility’s permit to ensure the facility continues to meet water quality standards and is protective of marine life. **Special Condition 1** therefore requires the City, prior to issuance of this CDP, to provide documentation from the Regional Board that it has approved the proposed discharge during operations using seawater that no additional approval is needed. **Special Condition 1** also notes that if the Regional Board requires any physical changes to the discharge structure or its location, the City will be required to obtain an amendment to this CDP unless the Executive Director determines no amendment is legally required. Additionally, and as noted above, the City is working with Commission staff to identify an alternative location for the desalination facility and its wastewater treatment plant. Depending on the eventual location, the City may propose a new intake or discharge location, which would also be subject to a new or amended CDP.

**Conclusion:** As proposed and conditioned, the Commission finds that the project will adequately protect marine resources and is therefore consistent with Sections 30230 and 30231 of the Coastal Act.

#### **D. COASTAL HAZARDS**

Coastal Act Section 30253 states, in relevant part:

*New development shall do all of the following:*

- (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
- (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

Project components within the Commission’s retained jurisdiction are subject to coastal hazards, including high storm waves, tsunami runup, and long-term sea level rise. Because these components are below grade, however, they are likely to experience less damage from these hazards than would above-grade structures. The wells are protected by an existing seawall that also protects accessways, businesses, and harbor facilities along Embarcadero Road.

The desalination facility itself, which is within the City’s LCP jurisdiction, is also located in an area subject to 100-year floods and maximum wave runup elevations and would presumably experience damage due to severe high water events. As noted above, the City is working with Commission staff to identify alternative sites and conduct the necessary analyses to relocate the

City's wastewater treatment and desalination facilities where they will not be affected by these hazards.<sup>4</sup>

The City has acknowledged the potential that the facility itself or the facility components within the Commission's retained jurisdiction may be damaged due to these hazards and it has stated it will stipulate to indemnification of the Commission should any of the facility components be damaged. **Special Condition 2** provides the relevant indemnity for damage that may result from these hazards. In addition, **Special Condition 3** identifies measures the City will take if project components are damaged or threatened due to coastal hazards, including, if necessary, submittal of a CDP application and Removal Plan if the components can no longer be used or if they create a hazard. In recognition of the ongoing hazards at this location, **Special Condition 4** ensures that these restrictions are recorded as part of the property deed.

**Conclusion:** Based on the discussion above, the Commission finds that the project, as conditioned, will conform to the geologic and coastal hazard provisions of Coastal Act Section 30253.

## **E. PUBLIC ACCESS**

Coastal Act Section 30211 states:

*Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

Although the portions of the project within the Commission's retained permit jurisdiction are in or adjacent to areas used for public access to the shoreline, there is no new construction contemplated in this permit request that would adversely affect public access. The seawater wells are located along Embarcadero Road, which is a popular public accessway along the shoreline of Morro Bay; however, the wellheads are below grade and do not affect public access in this area. The facility outfall extends below grade to the former power plant discharge channel, which is fenced to prohibit public access within the channel itself.

As noted above, this project involves no construction within the Commission's retained jurisdiction, though any needed repair and maintenance activities for these components would be subject to additional review and approval by the Commission. Additionally, as noted in **Special Condition 3**, any major modifications or removal of the components would also be subject to additional review and approval.

**Conclusion:** As proposed and conditioned, the Commission finds that the project will be protective of public access to the shoreline. For the reasons above, the Commission therefore finds that the project is consistent with Sections 30211 of the Coastal Act.

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<sup>4</sup> See, for example, Jenkins, Scott, *Proposed Work Statement for Analysis of Brine Dilution and Coastal Hazards Assessment for the City of Morro Bay Desalination Facility*, prepared for Michael Baker International on behalf of the City of Morro Bay, September 10, 2015.

## **V. CALIFORNIA ENVIRONMENTAL QUALITY ACT**

The City certified a Final Environmental Impact Report in April 1993 for the proposed project components within the Commission's jurisdiction. In addition, Section 13096 of the Commission's administrative regulations requires Commission approval of CDP applications to be supported by a finding showing the application, as modified by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of the CEQA prohibits approval of a proposed development if there are feasible alternatives or feasible mitigation measures available that would substantially lessen any significant impacts that the activity may have on the environment. Mitigation measures that will minimize or avoid all significant adverse environmental impacts have been required. As conditioned, there are no feasible alternatives or feasible mitigation measures available, beyond those required, which would substantially lessen any significant adverse impact that the activity would have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, can be found consistent with the requirements of the Coastal Act and to conform to CEQA.

**APPENDIX A:  
SUBSTANTIVE FILE DOCUMENTS**

File for Coastal Development Permit No. 9-16-0849

File for Coastal Development Permit No. 3-94-46

City of Morro Bay 2015 Urban Water Master Plan



# LEGEND

- Desalination Facility
- Sea Water Well
- Morro Well
- Feedwater Line
- Discharge Line



MORRO BAY DESALINATION FACILITY PROJECT

**Project Site**

**Michael Baker**  
INTERNATIONAL



not to scale

09/14/15 JN 142366-21283 MAS

**EXHIBIT 1**  
**9-16-0849**