

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
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W37a

CDP Application 3-16-0233

**South San Luis Obispo County Sanitation District Wastewater Treatment
Plant Redundancy Project**

June 7, 2017 Revised Findings Hearing

Correspondence



SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT

Post Office Box 339 Oceano, California 93475-0339
1600 Aloha Oceano, California 93445-9735
Telephone (805) 489-6666 FAX (805) 489-2765
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May 5, 2017

Dayna Bochco, Chair
California Coastal Commission
Central Coast District Office
725 Front Street, Suite 300
Santa Cruz, CA 95060

Subject: **APPLICATION NO. 3-16-0233 FOR A COASTAL DEVELOPMENT
PERMIT (CDP) FOR THE SOUTH SAN LUIS OBISPO COUNTY
WASTEWATER SECONDARY TREATMENT FACILITY REDUNDANCY
PROJECT**

Dear Ms. Bocho:

On behalf of the South San Luis Obispo County Sanitation District (District), I would like to thank your staff's continuing and ongoing assistance to allow the District's Redundancy Project to reach this important milestone. We very much appreciate and **support the staff recommendation to approve the Project**. We have worked closely with Coastal staff, and appreciate their recognition of the necessity of this Project to improve public safety, while protecting coastal resources.

Although we agree with vast majority of conditions included in the CDP, we are concerned about Special Condition No. 2, which relates to the Duration of Authorization. We share the Commission's goal of ensuring that an appropriate long-term solution be found to address the region's wastewater treatment requirements. However, we believe the characterization of the duration as a "temporary 10-year authorization" could adversely affect the District's ability to secure financing for the project. As you know, many loans are based on a 30-year timeframe, consistent with the lifecycle of typical public works improvements.

In addition, a "temporary 10-year authorization could jeopardize efforts towards future recycled water efforts" in South San Luis Obispo County area, such as proposed by the *"Regional Groundwater Sustainability Project"*, a collaborative water reuse project between the City of Pismo Beach, the District and its member agencies (Cities of Arroyo Grande and Grover Beach, and Oceano Community Service District).

Therefore, the **District requests this condition be changed to a 30-year authorization**, and/or clarification to say that the District will be required to show substantial progress toward efforts related to evaluating replacement of the existing facility with one that meets both regional and Commission needs as an alternative to significant replacement or rehabilitation. "Substantial progress" could include, but not be limited to:

- Ongoing discussions with Coastal Commission staff on a future project design, either onsite or in a different location;
- Evidence of collaboratively working with agencies in the District's service area to evaluate alternatives, including preliminary design concepts, technical studies, and environmental evaluation of such efforts;
- Evidence of working with property owners on identifying appropriate sites for such a facility, if it is to be considered in a different location;
- Evidence of working with the community, including neighbors, on vetting potential sites and issues associated with such a development; and
- Working with appropriate permitting agencies on developing a path forward to achieve such a project.

We appreciate your consideration of our one CDP condition change request, and look forward to working with you and Coastal Commission staff collaboratively as we move forward toward the next step on this Project.

Sincerely,



Gerhardt Hubner
District Administrator



To: California Coastal Commission

Date: May 3, 2017

Re: *Agenda Item 21a, Application No. 3-16-0233 (South San Luis Obispo County Sanitation District Redundancy and Improvements)*

Honorable Commissioners,

The Surfrider Foundation is dedicated to the protection of our ocean, waves, and beaches. The San Luis Obispo chapter of Surfrider supports approval of CDP number 16-0233 pursuant to staff's recommendation (dated 04/21/2017). We believe staff's recommendations will help guide the SSLOCSD toward managed retreat of vital infrastructure. Our county's water quality and coastal resources will greatly benefit from the results of this process.

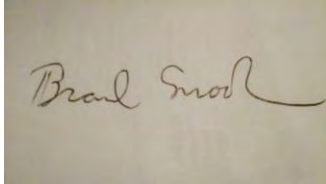
Also of future benefit, SSLOCSD and the city of Pismo Beach are developing a partnership called a "Regional Groundwater Sustainability Project". The partnership is beneficial to all, potentially supplying a drought-proof water supply for 44,000 people. Our chapter has supported this type of arrangement for many years, as we have advocated for a reduction in ocean outfall while raising public awareness of water conservation options, including the benefits of wastewater reclamation.

We agree with staff's recommendation as written in the report: "Commission staff believes the proposed redundancy infrastructure is necessary in the near term and critical to avoiding potential water quality problems". Our county's residents and coastal users were impacted by the SSLOCCD's massive sewage spill of December, 2010. Our chapter presented public comment at the Regional Water Quality Control Board's hearing, where the State Water Board laid out their case against SSLOCSD. We were critical of SSLOCSD's management, their conflicts of interest in leadership roles, and leadership's inability to address operational and emergency preparation issues which may have avoided the sewage spill. SSLOCSD eventually plead "guilty", leadership of SSLOCSD has changed, and many of those changes have been positive. However, why risk the health and safety of our coastal community again?

Our chapter has stated in public comments to the SSLOCSD as follows, "The Redundancy Project is duct tape and bubble gum until the new plant can be built outside the flood zone". Our chapter will continue to advocate for managed retreat of vital infrastructure, as we have at SSLOCSD, Morro Bay, and elsewhere. We also recognize that the siting of a new wastewater reclamation plant can be challenging for our communities, so we appreciate staff's reference to

3 previously identified sites (See MKN document, Exhibit 7 in the Staff Report). The Commission's approval of CDP number 16-0233 pursuant to staff's recommendation will help SSLOCSD's management design a better project which is outside a coastal flooding zone, clearly a superior long-term solution for siting of SSLOCSD's next wastewater treatment and reclamation plant.

Thank you for your consideration,

A photograph of a handwritten signature in brown ink on a light-colored piece of paper. The signature reads "Brad Snook" in a cursive script.

Brad Snook

Chair, Surfrider Foundation San Luis Obispo

E-mail: chair@slo.surfrider.org



CITY OF
ARROYO GRANDE
CALIFORNIA



April 26, 2017

John Ainsworth, Executive Director
California Coastal Commission
45 Fremont Street, #2000
San Francisco, CA 94105

Email: John.Ainsworth@coastal.ca.gov

Subject: **COASTAL DEVELOPMENT PERMIT (CDP) APPLICATION NO. 3-016-0233 – SSLOCSD WASTEWATER SECONDARY TREATMENT FACILITY REDUNDANCY PROJECT – LETTER OF SUPPORT**

Dear Mr. Ainsworth:

On behalf of the City of Arroyo Grande, I am pleased to submit this letter of support for the South San Luis Obispo County Sanitation District's (District) Redundancy Project. We urge the Coastal Commission to approve the Coastal Development Permit that would allow the project to move forward.

As you know, the existing Wastewater Treatment Plant (WWTP) operated by the District is a critical facility that processes wastewater generated from our community as well as other municipalities in the region. Its continued safe operation is crucial to maintenance of public health and safety not only within our community, but within much of the greater Five Cities region.

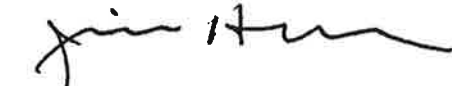
The Redundancy Project is a critical and necessary action to maintain that public safety. The intent of the project is to provide redundant facilities within the framework of the existing WWTP to allow for ongoing maintenance without interrupting ongoing operations. These backup facilities are also important in the context of the long-term operation of the WWTP, in case of potential failure of the facilities for which they are intended to provide redundancy.

The Redundancy Project would in no way increase the plant's capacity that could potentially induce population growth and development. Instead, it would help safeguard the existing operations that are necessary to each community that it serves, including our community. The District has our full support in moving this project forward as quickly as possible, and we urge the Coastal Commission to approve the Coastal Development Permit for a thirty-year (30) reauthorization.

California Coastal Commission
April 26, 2017
Page 2

We appreciate your diligent efforts related to this project, and please don't hesitate to call if you would like to discuss our perspective on this matter.

Sincerely,



Jim Hill
Mayor
City of Arroyo Grande

cc: Gerhardt Hubner, District Administrator, South San Luis Obispo County Sanitation Dist.
Bob McFall, Interim City Manager, City of Arroyo Grande
Chris Magdosku, Public Works Director, City of Arroyo Grande
Daniel Robinson, Coastal Planner, Coastal Commission, Daniel.Robinson@coastal.ca.gov



Oceano Community Services District

1655 Front Street, P.O. Box 599, Oceano, CA 93475

(805) 481-6730 FAX (805) 481-6836

John Ainsworth
Executive Director
California Coastal Commission
45 Fremont Street, #2000
San Francisco, CA 94105

Email: John.Ainsworth@coastal.ca.gov

April 26, 2017

Subject: **COASTAL DEVELOPMENT PERMIT (CDP) APPLICATION NO. 3-016-0233 –
SSLOCSD WASTEWATER SECONDARY TREATMENT FACILITY
REDUNDANCY PROJECT – LETTER OF SUPPORT**

Dear Mr. Ainsworth:

On behalf of the Oceano Community Services District (OCSD), I am pleased to submit this letter of support for the South San Luis Obispo County Sanitation District's (District) Redundancy Project. We urge the Coastal Commission to approve the Coastal Development Permit that would allow the project to move forward.

As you know, the existing Wastewater Treatment Plan (WWTP) operated by the District is a critical and necessary facility that processes wastewater generated from our community as well as other municipalities in the region. Its continued safe operation is crucial to maintenance of public health and safety not only within our community, but within much of the greater Five Cities region.

The intent of the project is to provide redundant facilities within the framework of the existing WWTP to allow for ongoing maintenance without interrupting ongoing operations. These backup facilities are also important in the context of the long-term operation of the WWTP and in the event of potential failure of the facilities for which they are intended to provide redundancy. The Redundancy Project would in no way increase the plant's capacity that could potentially induce population growth and development. Instead, it would help safeguard the existing operations that are necessary to each community that it serves, including our community. The District has our full support in moving this project forward as quickly as possible, and we urge the Coastal Commission to approve the Coastal Development Permit needed to facilitate this action.



Oceano Community Services District

Board of Directors Meeting

We appreciate your diligent efforts related to this project, and please don't hesitate to contact us to further discuss our perspective on this matter.

Sincerely,


Karen M. White, Board President


Linda M. Austin, Board Vice President

cc: Daniel Robinson, Coastal Planner, Coastal Commission,
Daniel.Robinson@coastal.ca.gov

May 5, 2017

California Coastal Commission
725 Front Street, Suite 300
Santa Cruz, CA
Attention: Daniel Robinson

W21a

RE: 3-16-0233
South San Luis Obispo County Sanitation District "Redundancy Project"

Dear Commissioners,

Thank you for including me as an interested party in the project referenced above. I regret I will be unable to attend the May 10th Coastal Commission meeting, especially item W5 Beach and Coastal Dunes discussion, presented by Dr. Patrick Barnhard -- one of the lead researchers for the sea level rise/coastal erosion work going on in California. This discussion underscores the inadequacies of the subject location for continued use as a wastewater treatment facility.

On balance, I support the recommendations of CCC staff and the proposed conditions of approval. I believe the project will have impacts that were not analyzed in the Mitigated Negative Declaration of 2010 (and re-adopted in September of 2016). One such concern is the potential impacts to sensitive coastal resources from the temporary construction traffic impacts and long-term impacts from brine disposal delivery trucks.

Until very recently, brine disposal delivery trucks were driving through the adjacent residential neighborhood causing great disturbance. Now trucks have been routed to the south entrance to the WWTF off Delta Street. This is a dirt road which presently meanders through wetland and riparian habitats. The current use of this narrow dirt road combined with construction traffic related to project implementation will have significant impacts. Prior to project implementation an assessment should be conducted to determine if the access and its potential impacts to coastal resources can be mitigated. Please consider conditions limiting traffic, speed, dust control measures and silt fencing along the road should be added.

Again, thank you for the opportunity to comment.

Julie Tacker

A handwritten signature in cursive script that reads "Julie Tacker".

Julie Tacker
PO Box 6070
Los Osos, CA 93412

Photos Attached:



North Entrance through neighborhood-South Entrance through sensitive habitat.



Rear Entrance of Delta Street – sensitive habitat

South County sewage plant repairs have cost millions — with more on the way

April 16, 2017 6:37 PM

By Kaytlyn Leslie

kleslie@thetribunenews.com

With \$1.5 million in improvements already underway and a separate \$20 million project in the pipeline, the [South San Luis Obispo County Sanitation District](#) is spending big as it attempts to update the aging 50-year-old wastewater treatment plant in Oceano.

Most residents won't notice the changes in their daily lives — toilets will still flush and sinks will keep draining like they always have. But the upgrades are necessary to keep the plant running smoothly and prevent potentially disastrous malfunctions like the sewage spill that occurred at the Oceano plant in 2010, according to District Administrator Gerhardt Hubner.

Walking through the plant, there are several areas in obvious need of improvement.

Cracks zigzag across many of the large, squat cylinders that are key to various aspects of the water treatment process. One of the cylinders leaks into a dumpster below. Then there are hidden problems that workers can't see because, without a backup, they haven't been able to shut down parts of the plant for maintenance.

To address these problems, the district board has embarked on an ambitious \$1.5 million plan — \$500,000 for a new grit-removal structure to remove fine particles from the sewage; \$600,000 in improvements to the plant's headworks, which removes non-organic material like trash from the water; [\\$380,000](#) to clean one of the plant's two digesters, where bacteria break down organic material in the sewage; and \$36,000 to rent equipment to help with the cleaning.

The grit-removal structure was added late last year, while the headworks improvements project is ongoing. The digester clean-out was an unanticipated but necessary cost for the district, Hubner said. It was approved by the board April 5.

Ratepayers in the district — which covers Arroyo Grande, Grover Beach and Oceano — likely won't see higher bills for this work beyond the rate increase that took effect about a year ago and tops out in 2019, Hubner said.

The rate change increases the average residential customer's bill incrementally by about 70 percent through 2019. (The district charges a flat rate based on the type of building or business being billed). The first jump was from \$14.86 to \$19.60 in July 2016. It is expected to increase to \$21.56 this coming July.

The rate increase was approved to help pay for much larger changes at the plant:

- A redundancy project that will allow the district to take some of the plant's major processing units offline for maintenance without damaging the water quality. About \$1.5 million has already been set aside for early planning and permitting costs, but Hubner estimates the entire project could cost upwards of \$20 million.

The project, which requires approval from the [California Coastal Commission](#), is expected to be discussed at the commission's next meeting May 10-12. If successful, construction could start in summer 2018 and be completed by 2019.

- A regional water project that would recycle treated wastewater from South County cities by running it through a third level of filtration (also known as a tertiary level) so it can be injected into the Santa Maria groundwater basin.

The district's wastewater treatment plant and a Pismo Beach treatment plant are both being considered for this water treatment process. Both could end up being selected.

It's still in the early planning phase, but estimates placed the cost of that endeavor at \$29.7 million. Once completed, up to 2,400 acre-feet of water per year — or about 782 million gallons — could be recycled, to recharge the basin. An acre-foot of water is enough to serve three average households for a year.

It's not yet known how the district would pay for the regional water project.

Kaytlyn Leslie: [805-781-7928](tel:805-781-7928), [@kaytyleslie](https://www.instagram.com/kaytyleslie)



South San Luis Obispo County Sanitation District Administrator Gerhardt Hubner stands on top of the wastewater treatment plant in Oceano. The district has had an expensive year for capital projects as it tries to update its 50-year-old plant in Oceano.



Jack Early prepares pads for concrete pipe stands. The 12-inch emergency bypass pipe is being moved to accommodate upgraded equipment. The South San Luis Obispo County Sanitation District has had an expensive year for capital projects as its board tries to update its 50-year-old wastewater treatment plant in Oceano.



The older digester in the foreground at the South San Luis Obispo County Sanitation District is overdue for being cleaned out



Water undergoes a chlorine treatment to kill bacteria and chlorine is neutralized before being released into outfall. The South San Luis Obispo County Sanitation District has had an expensive year for capital projects as its board tries to update the 50-year-old wastewater plant in Oceano.



The South San Luis Obispo County Sanitation District provides wastewater processing for Arroyo Grande, Grover Beach and Oceano.



The Oceano wastewater treatment plant has room for expansion. The South San Luis Obispo County Sanitation District has had an expensive year for capital projects as its board tries to update the 50-year-old plant in Oceano.



The South San Luis Obispo County Sanitation District has had an expensive year for capital projects as its board tries to update the 50-year-old plant in Oceano. The sanitation district provides wastewater processing for Arroyo Grande, Grover Beach and Oceano.



A grit-removal system will help prevent buildup in the digester at the Oceano wastewater treatment plant.



A new grit-removal system helps prevent solids from building up and plugging systems at the Oceano wastewater treatment plant.

Photos by David Middlecamp

<http://www.sanluisobispo.com/news/local/article144958934.html>

Central Coast Regional Water Quality Control Board

April 5, 2017

Dayna Bochco, Chair
California Coastal Commission

Email: dayna.bochco@coastal.ca.gov

Dear Ms. Bochco:

LETTER OF SUPPORT, SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT REDUNDANCY PROJECT

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) has been working with South San Luis Obispo County Sanitation District on the District's Long Range Secondary Treatment Process Redundancy Project (Project) for its wastewater treatment plant in Oceano. The District submitted California Environmental Quality Act documentation in early 2016 and determined that the Project would not have a significant effect on the environment. In September 2016, the District's adopted a resolution approving the Project. We understand that California Coastal Commission staff intends to put the District's permit application for the Project on the Commission's agenda for its May 2017 meeting.

The Central Coast Water Board strongly supports this project because upgrades at the District's wastewater treatment plant will help protect human health and the environment and prevent sewage spills due to aging infrastructure. The Central Coast Water Board asks that the Commission approve the District's Project permit application.

If you have any questions, please call or e-mail **Katie DiSimone** at (805) 542-4638 or Sheila Soderberg (805) 549-3592.

Sincerely,

John M. Robertson Digitally signed by John M. Robertson
Date: 2017.04.04 17:52:20 -07'00'

John M. Robertson
Executive Officer

cc:

Mr. Gerhardt Hubner, SLOCSO Gerhardt@sslocsd.us
Mr. Daniel Robinson, California Coastal Commission Daniel.Robinson@coastal.ca.gov
Mr. John Ainsworth, California Coastal Commission John.Ainsworth@coastal.ca.gov
Ms. Katie DiSimone, RWQCB Katie.DiSimone@waterboards.ca.gov
Ms. Sheila Soderberg, RWQCB Sheila.Soderberg@waterboards.ca.gov

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From the Office of the Mayor

Ed Waage
760 Mattie Road
Pismo Beach, CA 93449
(805) 550-3345

Office of the Mayor

April 18, 2017

John Ainsworth, Executive Director
California Coastal Commission
45 Fremont Street, #2000
San Francisco, CA 94105

Subject: **COASTAL DEVELOPMENT PERMIT (CDP) APPLICATION NO. 3-016-0233 –
SSLOCSD WASTEWATER SECONDARY TREATMENT FACILITY REDUNDANCY
PROJECT – LETTER OF SUPPORT**

Dear Mr. Ainsworth:

On behalf of the City of Pismo Beach, I am pleased to submit this letter of support for the South San Luis Obispo County Sanitation District's (District) Redundancy Project. We urge the Coastal Commission to approve the Coastal Development Permit that would allow the project to move forward.

As you know, the existing Wastewater Treatment Plant (WWTP) operated by the District is a critical facility that processes wastewater generated from our neighboring agencies, who are partners in our recycled water project, the Regional Groundwater Sustainability Project. Its continued safe operation is crucial to maintenance of public health and safety within much of the Five Cities region.

The Redundancy Project is a critical and necessary action to maintain that public safety. The intent of the project is to provide redundant facilities within the framework of the existing WWTP to allow for ongoing maintenance without interrupting ongoing operations. These backup facilities are also important in the context of the long-term operation of the WWTP, in case of potential failure of the facilities for which they are intended to provide redundancy. The Redundancy Project would in no way increase the plant's capacity in a manner that could potentially induce population growth and development. Instead, it would help safeguard the existing operations that are necessary to each community that it serves. The District has our full support in moving this project forward as quickly as possible, and we urge the Coastal Commission to approve the Coastal Development Permit needed to facilitate this action.

In addition to providing the much needed redundancy to the District's WWTP, it is expected that the effluent produced once the project is completed will be of a higher quality and better suited for use in water reuse.

We appreciate your diligent efforts related to this project, and please don't hesitate to call if you would like to discuss our perspective on this matter.

Sincerely,

Ed Waage
Mayor

cc: Daniel Robinson, Coastal Planner, Coastal Commission, Daniel.Robinson@coastal.ca.gov





City of Grover Beach

Mayor John P. Shoals

Mayor Pro Tem Mariam Shah

Council Member Jeff Lee, Council Member Barbara Nicolls, Council Member Debbie Peterson

Matthew Bronson
City Manager

April 19, 2017

John Ainsworth, Executive Director
California Coastal Commission
45 Fremont Street, #2000
San Francisco, CA 94105

SENT VIA EMAIL and FIRST CLASS MAIL
Email: John.Ainsworth@coastal.ca.gov

**Subject: COASTAL DEVELOPMENT PERMIT (CDP) APPLICATION NO. 3-016-0233 –
SSLOCSD WASTEWATER SECONDARY TREATMENT FACILITY REDUNDANCY
PROJECT – LETTER OF SUPPORT**

Dear Mr. Ainsworth:


On behalf of the City of Grover Beach, I am pleased to submit this letter of support for the South San Luis Obispo County Sanitation District's (District) Redundancy Project. We urge the Coastal Commission to approve the Coastal Development Permit that would allow this important project to move forward.

As you know, the existing Wastewater Treatment Plan (WWTP) operated by the District is a critical facility that processes wastewater generated from our community, as well as other municipalities in the region. Its continued safe operation is crucial to the maintenance of public health and safety within our community and in much of the greater Five Cities region. Completion of the Redundancy Project is a critical component of the continued operation of the WWTP and the 37,000 customers served and is necessary to maintain public health and safety.

The intent of the project is to provide redundant facilities within the framework of the existing WWTP to allow for ongoing maintenance without interrupting ongoing operations. These redundant facilities are also important in the context of the long-term operation of the WWTP, in case of potential failure of the facilities for which they are intended to provide redundancy. The Redundancy Project would help safeguard the existing operations that are necessary to each community that it serves, including our community. The District has our full support in moving this project forward as quickly as possible, and we urge the Coastal Commission to approve the Coastal Development Permit needed to facilitate this action.

We appreciate your diligent efforts related to this project. Please don't hesitate to call if you would like to discuss our perspective on this matter.

Sincerely,



JOHN P. SHOALS
Mayor, City of Grover Beach

c: Daniel Robinson, Coastal Planner, Coastal Commission - Daniel.Robinson@coastal.ca.gov
Gerhardt Hubner, District Administrator, SSLOCSD - Gerhardt@sslocsd.us

154 South Eighth Street ♦ Grover Beach, California 93433 ♦ FAX (805) 489-9657 ♦ www.groverbeach.org

Administrative Services/Water (805) 473-4550 ♦ City Council/City Manager (805) 473-4567 ♦ City Clerk (805) 473-4568
Community Development - Building, Planning & Economic Development (805) 473-4520 ♦ Human Resources (805) 473-4564
Parks & Recreation (805) 473-4580 ♦ Police/Non-Emergency (805) 473-4511 ♦ Public Works (805) 473-4520