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Nov. 8, 2013

TO: Morro Bay City Council

RE: First Public Draft Options Report, New Water Reclamation Facility Project

Following are our comments on the Water Reclamation Facility Draft Options, dated Oct. 29, 2013.

While we are pleased to see the much improved approach that is being taken with the new project, we do have some concerns with the text of this draft.

On page 44, we are told:

“Selecting a site that is large enough to allow a wide range of treatment technologies will provide flexibility to the City as project goals and plans proceed.”

Surely project goals should not “proceed” after a site has been selected. Goals should be established before the selection of the site or treatment technology and should inform the selection of both the site and technology, after which there should be no need for “flexibility.” It would seem wise to select a treatment technology before determining the site on which to build the treatment plant. The technology will dictate the footprint of the plant and the need – or lack thereof -- for expansion, and could thereby alter cost considerations and the rankings of sites based on potential challenges. We don’t see the point of incurring potential unnecessary additional expense by acquiring a land parcel that may turn out to be larger than necessary.

Re Site E: Power Plant Site. A primary challenge associated with this site is listed as the “Possible political perception that it may have constraints because of its location relatively near the coast.” The council should request that the consultant provide the definition of the term “political perception,” which we are not familiar with in the context of an environmental review. If the intent here is to express concern about coastal issues arising from potential constraints in the LCP and California Coastal Act, we suggest the City do what it did not do on the previous project: consult with Coastal Commission staff now, early in the process, rather than at the end of the process, and ask those questions.

Re cost estimates: We suggest the City require that cost estimates be refined to include a review of the various design/build delivery models and determine under which models the City does and does not carry liability and risk for cost overruns and change orders. Factored into this estimate should be a determination of which plant types have the shortest construction times, occupy the smallest physical

footprint, and provide for the highest degree of efficiency and reliability in the production of reclaimed water and the protection of public health.

Re “Table ES12 Summary of Issues and Weighting Used in This Report.” We note that the power plant site received the highest score because it could be built at the lowest cost, and that all environmental issues combined are weighted at 28.6%, with no single environmental sub-issue rising above a weighting of 3.8%. In the Cost category, which is weighted at 30.2%, the weighting of each sub-issue ranges between 7.9 - 13.1%. We appreciate that the city wants community input on what residents think the most important considerations should be in evaluating project alternatives, but we caution that the legitimacy of the project and the City’s ability to acquire the necessary permits depends upon the evaluation of impacts to the environment and coastal resources, and this is a matter of following the rules established by the State of California, not an issue of public opinion. Previous city councils placed economic concerns over environmental issues, the fundamental error that sealed the fate of the previous project. The experience of the prior city council provides a cautionary tale: if the City’s process results in the selection of the lowest-cost alternative and shorts coastal issues and full water reclamation, the resulting project will be unlikely to receive a Coastal Development Permit and any cost savings will be moot.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Andrew Christie". The signature is fluid and cursive, with a large initial "A" and "C".

Andrew Christie
Chapter Director