

**From:** "Santa Lucia Chapter of the Sierra Club" <sierra8@charter.net>  
**To:** <mthompson@waterboards.ca.gov>  
**Date:** 2/2/2006 9:13:35 PM  
**Subject:** MB/Cayucos WWTP - Reissuance of Waste Discharge Requirements to Discharge to the Pacific Ocean

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February 2, 2006

TO: Gary Sheh  
U.S. Environmental Protection Agency  
Region IX, WTR-5  
75 Hawthorne Street  
San Francisco, CA 94105-3901

RE: Reissuance of a National Pollutant Discharge Elimination System (NPDES) Permit, Modified Under Section 301(h) of the Clean Water Act to Discharge Pollutants to Waters of the United States for MB/Cayucos WWTP

TO: Matt Thompson  
California Regional Water Quality Control Board, Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906

RE: Reissuance of Waste Discharge Requirements to Discharge to the Pacific Ocean for MB/Cayucos WWTP

Dear Mr. Sheh and Mr. Thompson,

The latest 301(h) waiver from the Clean Water Act requested by the City of Morro Bay and Cayucos Sanitary District should be denied.

Three decades after the passage of the Clean Water Act, the Morro Bay-Cayucos wastewater treatment plant is still pumping primary treated sewage into the ocean. The proposed timetable to upgrade the WWTP to secondary or tertiary treatment is as unacceptable as the one that was first proposed in June 2004, which would have afforded the operators 15 years to complete the upgrade. The Santa Lucia Chapter joined with other conservation groups, local residents and RWQCB staff in vigorously protesting that timeline. The current timeline is likewise unacceptable and was also publicly opposed by us, contrary to Mr. Thompson's assertion in an e-mail to us of Dec. 29, 2005, that "only NRDC and an individual activist with questionable credibility have publicly opposed the 9.5 year timeline."

We urge denial of the waiver for the following reasons:

- The volume of wastewater treated by the plant is sure to increase over the

next five years

- The WWTP's sewage spills due to its age and inefficiency are a matter of record, and will only increase, and the level of treatment thereby decrease
- The WWTP's discharge pipe is ground zero in the die-off of Pacific sea otters succumbing to a welter of diseases due to weakened immune systems. As an indicator species, it is clear what sea otter deaths are indicating: We need to clean up our sewage. Mr. Thompson's statement: "When we learned that *Toxoplasma gondii* (a pathogen shed by felines) is contributing to sea otter mortality in the Central Coast, Morro Bay/Cayucos teamed up with UC Davis to monitor their discharge for presence of *Toxoplasma*, and found none" does not speak well for the agencies' level of study, as, per Mr. Thompson, it focused on the wrong problem. *Toxoplasma* should have a minimal, non-fatal effect on healthy sea otters. The lack of *T. gondii* in the WWTP's discharge indicates nothing; the documented accumulation of toxins around the outfall pipe as the immune systems of local sea otters deteriorate indicates much.
- Other treatment plants in California have completed upgrades of the same or greater magnitude in half the time or less, including coastal treatment plants. The argument that a 9.5-year upgrade schedule is necessary due to the higher degree of regulatory review in the coastal zone thus is not persuasive.

For these reasons, we request that the Regional Water Board deny the waiver and order the Morro Bay-Cayucos wastewater treatment plant to upgrade as fast as possible, in accordance with the law.

Sincerely,

Andrew Christie  
Chapter Coordinator

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