



To: California Regional Water Quality Control Board -- Central Coast Region
Attn: Katie.DiSimone, Katie.DiSimone@waterboards.ca.gov
DT: 11/26/2018

Re: Draft Order No. R3-2019-0002, SSLOCSD Reissuance of Waste Discharge Requirements

Surfrider Foundation is dedicated to the protection and enjoyment of the world's ocean, waves, and beaches through a powerful activist network. After reviewing Draft Order R3-2019-0002, we have concluded that the order does not address many of the key issues at SSLOCSD. If the permit is approved as written, these issues may not be addressed for decades. We are hopeful that your consideration of our comments and requests below will help to improve the long-term outlook and increase coastal protections.

The Draft Order relies heavily on sampling and reporting. However, Surfrider SLO believes the permitting process needs to address SSLOCSD's discharge and the danger to our local marine ecosystem because of potentially inadequate filtration. For instance, the Draft Order does not add measurement and filtration of textile microplastic discharged through SSLOCSD's ocean outfall, which recent studies have shown are impacting ocean ecosystems (<http://www.beachapedia.org/Microfibers>). Please add a process for SSLOCSD to sample and report microplastic discharge to their ocean outfall as a requirement of the Order. Based on the results of the accumulated data, a future Order might require SSLOCSD to upgrade to tertiary treatment.

Surfrider SLO is also concerned with the accelerated use of the SSLOCSD's ocean outfall to dump brine waste and how the brine is trucked in, sampled, and discharged. According to Order No. R3-2009-0046, in 2008 SSLOCSD discharged **325,000 gallons** of brine waste. A SSLOCSD Staff Report from January 2018 shows the District discharged almost **3 million gallons** of brine waste in 2017. **So, in 10 years, SSLOCSD increased their amount of brine discharge by over 900 percent!**

We understand the SSLOCSD is permitted to discharge 50,000 gallons of brine per day, though on average they discharge 8,000 gallons per day. Thus, **SSLOCSD is presently permitted to discharge over 5000 percent more brine than discharged in 2008.**

Surfrider SLO has many concerns with the trajectory of SSLOCSD's Brine Discharge Program (Draft Order No. R3-2019-0002, Attachment E, Section 9D) which will lead to further impacts on our local community and ocean ecosystem. They are outlined here:

- SSLOCSD's Standard Operating Procedure for their Brine Discharge Program asks the brine truck driver (their customer), to pull a sample from the brine load and deliver it to the District's State-certified Laboratory Technician. The District contends it is not safe for District employees to pull the sample themselves. We believe brine sampling should be conducted by SSLOCSD trained and State-certified technicians, as this process would be more protective of our ocean ecosystem and compliant with Draft Order No. R3-2019-0002, Attachment E, Section 1A.
- Brine is discharged directly to SSLOCSD's ocean outfall from the brine truck. We believe the brine discharge should be removed from the truck, sequestered, mixed, inspected, sampled and tested before being discharged to the ocean. Further inspection will help protect our ocean ecosystem and remove the possibility of involving the District in a potentially criminal act of illegal discharge shown in Section III (Discharge Prohibitions) of Draft Order No. R3-2019-0002.
- The accelerated permitting of truck traffic for brine discharge at SSLOCSD is having unmitigated impacts on our community and watershed. Prior to last year, brine trucks were instructed to enter along paved roads and through the secure main gate at SSLOCSD. As such, SSLOCSD's standard procedure called for secure inspection of trucks entering the facility along paved roads. However, in 2017, the District instructed brine truck drivers to enter along a route passing south of Oceano Airport near the Arroyo Grande Creek channel, through chained gates bordering homeless encampments, along a route that is unpaved and has not been studied for potential environmental impacts of additional truck traffic. Our chapter remains extremely concerned about the impacts brine trucks have on the Arroyo Grande Creek watershed. Prior to permitting the Draft Order No. R3-2019-0002, we ask the Board to require SSLOCSD to return to standard access and re-route brine truck traffic through the secure main gate with paved roads. Before permitting access along the alternative route, the route should be studied for appropriate brine truck size, frequency, and security of access. If permitting is not restricted in such a way, SSLOCSD might increase brine truck traffic by 5000% along an unstudied, unpaved road through the Arroyo Grande Creek watershed. We hope you agree that access to ocean outfall should not degrade quality of life in surrounding neighborhoods or risk the health of surrounding watersheds.

The environment and neighborhood surrounding SSLOCSD's sewage plant have changed since the plant went online in the 1960s. The threats of microplastic discharge to the ocean were not understood at that time. Further, truck traffic for brine discharge was barely a consideration. Surfrider Foundation San Luis Obispo believes the permitting process for Draft Order No. R3-2019-0002 should better address existing risks as outlined above and point SSLOCSD toward long term changes aimed at decreasing impacts to our local watershed, to coastal users and the community, and to our marine ecosystem.

Thank you for your kind consideration,

A handwritten signature in black ink that reads "Brad Snook". The signature is written in a cursive, slightly slanted style.

Brad Snook
Chair, Surfrider Foundation San Luis Obispo
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