

Supplemental Item –
**Correspondence for Item 7. Resolution to Ratify the
Community Development Director Request to Consolidate a
Coastal Development Permit for the Central Coast Blue
Project**

Agenda Item No. 7

Correspondence

(CC Mtg 1/23/2023)

From: [Jeff Edwards](#)
To: [Wendi Sims](#); [Matthew Bronson](#); [Karen Bright](#)
Subject: City Council Meeting of Jan. 9th, Consent Item No. 4, Central Coast Blue
Date: Friday, January 6, 2023 5:49:39 AM
Attachments: [CCB A Case Study in EJ ihe 12-26-22 as published.pdf](#)

Ladies and Gentlemen,

I wish to object to the consolidation of permits in connection with Central Coast Blue. Consolidation of the Coastal Development Permit would further remove the public from the decision making process.

Over the last several years there has been very little, to no, public input with respect to the project components, environmental review or permitting. I encourage your staff and council to take a more active role in the project and review the thousands of pages of related documents. CCB is not what Pismo Beach claims it is.

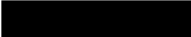
Please find attached an opinion piece published recently for your consideration. Please distribute to the council and public for the meeting on Monday.


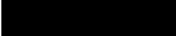
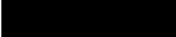
Please confirm receipt and let me know if you have any questions.

Thanks,
Jeff Edwards

Julie Tacker
Administrative Assistant

J.H. Edwards Company


Los Osos, CA 93412

 - Jeff
 - Julie
 - Office

Central Coast Blue, a study in environmental justice

December 30, 2022



OPINION by JEFF EDWARDS

The City of Pismo Beach is a regional hegemon, wealthy, well connected and used to getting its way. The city has been the lead on Central Coast Blue, a nearly \$100 million proposal to treat its own sewage and inject between 700-900 acre-feet per year into the groundwater basin, predominately in Oceano.

The underserved and often marginalized community of Oceano is governed by a Community Services District (OCSD).

The community of Oceano has been a “poster child” for environmental justice, before it was “a thing.” Environmental justice means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. Oceano has about 7,600 residents, nearly half being Latino and the OCSD has a budget of just over \$3 million.

By comparison, the City of Pismo Beach, with a similar population of 8,000 people is 83% Caucasian and has an annual budget of around \$30 million.

The City of Pismo Beach, now joined by the cities of Arroyo Grande, and Grover Beach comprise the newly formed Joint Powers Agency pursuing Central Coast Blue.

Central Coast Blue poses a threat to Oceano’s most valuable asset, its water portfolio. The OCSD’s diversified water portfolio includes state water for 750

acre-foot per year and costs \$1,440 per acre feet, Lopez Lake for 303 acre-foot per year and costs \$1,750 per acre feet and significantly, 900 acre-feet per year of groundwater as adjudicated by the court in 2008. The OCSD pumps its groundwater for about \$350 per acre-foot resulting in the average cost of water in the portfolio at just under \$1,000 per acre-foot.

The injection of Pismo's treated wastewater near OCSD's primary water supply well is likely to impact Oceano's ability to preserve its 900 acre-feet per year groundwater entitlement. Pismo Beach has already made veiled legal threats because Oceano doesn't need any Central Coast Blue water and is not a participating member.

Pismo has asserted that "the only way this project works is if all agencies are members and paying and if you're not paying ... you will not pump more than you are pumping today." By way of example, in 2021 the OCSD pumped 85-acre feet or just 9% of its entitlement, potentially placing at least 800 acre-feet per year of its groundwater entitlement in jeopardy, with a market value of around \$2,000 per acre-foot.

What is at risk for Oceano is approximately 40% of the community's entire water portfolio of 1,953 acre-feet per year. If managed away, or more like confiscated, the loss of value would exceed \$1.6 million per year, indefinitely.

Presently, the OCSD largely relies on grants for basic infrastructure needs and can ill afford to incur such a loss. This isn't the first time Oceano has realized adverse impacts way beyond any conceivable benefit, constituting chronic environmental injustice. Historical examples include entrance to the Oceano Dunes State Vehicular Recreational Area, location of the South SLO County Sanitation District sewer plant and the sixty-acre County Airport fenced off to the public and home to only a handful of privately owned planes.

To date, the City of Pismo Beach has received multiple state and federal grants totaling almost \$15 million for Central Coast Blue based upon the misrepresentation of key factual aspects of the proposal as to need and potential efficacy. Unfortunately, it appears the stage has been set once again for Oceano to be made further subservient into the future, thus repeating past injustices.

Pismo justifies Central Coast Blue as a regional collaboration, but at a projected cost of \$6,500 per acre feet of water, it's more like a central coast boondoggle.

The community of Oceano is disadvantaged and deserves the kind of protections envisioned by state legislation enacted into law in 2016. Both SB 1000 (Leyva) and AB 2616 (Burke) do that, the latter of which requires environmental justice implications to be considered when approving a Coastal Development Permit (CDP).

In 2019, the California Coastal Commission adopted an Environmental Justice Policy. Most importantly, Central Coast Blue still needs approval of a CDP from the commission for the injection wells. Pismo Beach, at its City Council meeting on Dec. 20, agreed to attempting yet another shortcut by seeking a consolidation of the CDP, which would likely avoid any local hearings. If consolidation is granted, the CDP would likely be considered by the commission in 2023.

A Nov. 2022 community survey conducted by the Rural Community Assistance Corporation for the California State Water Resources Control Board determined the Median Household Income of Oceano to be \$52,000 confirming the disadvantaged community status.

By contrast, Pismo Beach has a median household Income of around \$95,000. Central Coast Blue is all about Pismo Beach and it is alarming to watch other agencies, including the partners, regulatory authorities and grant providers enable bad behavior wittingly, or not.

As a result, Pismo Beach has involved these agencies as coconspirators under the guise of recycled water working to "manage" away Oceano's valuable groundwater entitlement.

Oceano, once envisioned as the "Atlantic City of the West," has been in steady decline for decades and suffered multiple indignities. Its neighbors have taken what they want from Oceano and dumped what they don't. Pismo Beach claimed the beach and the clams, Grover the train station and now they want Oceano's water.

Truly, a classic case study in environmental justice. Oceano also needs to defend itself, however Pismo Beach excels at obfuscation and persuasion, whether you like it, or not.

Jeff Edwards is a Los Osos resident who has been following Oceano since 2009 and Central Coast Blue since 2012 when it was the not so catchy Groundwater Replenishment & Reuse Project. An acre-foot of water is equal to 325,828 gallons or enough to serve seven to eight residences for one year.