

CALIFORNIA COASTAL COMMISSION

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**June 5, 2023**

Phil Angelo
Monterey County - Housing and Community Development
1141 Schilling Place, South 2nd Floor
Salinas, CA 93901

Subject: **PLN220055 (Carmel Meadows Sewer Enhancement)**

Dear Phil,

Coastal Commission staff would like to provide the following comments on CDP application PLN220055, consisting of sewer infrastructure improvements in the Carmel Meadows neighborhood including, among other things, the replacement and realignment of a section of sewer line. Currently, this section of sewer line is located partway down a steep slope between the Carmel River Lagoon and the Carmel Meadow residences, and the application materials note that the line is deteriorating and is in critical need of replacement. According to the Central Coast Regional Water Quality Control Board, this section of sewer line has spilled 13 times in the last 21 years, and twice in the last 2.5 years. Due to the location on a steep slope that drains to the Lagoon, these spills pose an unacceptable hazard to both the highly sensitive wetland/riparian ecology (including steelhead and red legged frogs) and visitors to Carmel River State Beach. As such, spills at this location are incredibly problematic from both ecological and public access perspectives.

As proposed, the project would abate these hazards by abandoning and partially removing the deteriorating sewer line, and utilizing a combination of existing sewer lines, replaced sewer lines, new sewer lines, and new pumps to both improve the physical integrity of the sewer infrastructure in this area, and pull sewer infrastructure back farther away from the highly sensitive lagoon. Coastal Commission staff is highly supportive of the project's goals as well as the decision to site sewer infrastructure farther away from the lagoon, which we believe best meets Local Coastal Program (LCP) objectives to protect sensitive coastal resources.

We understand that there is a project alternative that would include an in-kind replacement of the existing gravity sewer in its current alignment, and while that is not the project that is currently before the County, some interested parties are advocating for that project alternative. Coastal Commission staff is highly concerned about this alternative as it would result in a sewer line remaining in the middle of a steep slope adjacent to the lagoon. While replacing the sewer line in kind would be an improvement

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over current conditions, any sewer line in the current alignment poses unacceptable long-term risks to coastal resources.

The Carmel Area Land Use Plan (LUP) specifically requires the water quality in the Carmel River Lagoon and the Carmel Bay be protected, and pollution sources minimized: "Point and non-point sources of pollution of Point Lobos and Carmel Bay ASBS's, coastal streams and the Carmel River Lagoon and Marsh shall be controlled and minimized" (Policy 2.4.3.3). Regarding public access, LUP Policy 5.3.3.1.a specifically names Carmel River State Beach as one of the three most important locations for public access within the area covered by the LUP. Leaks of untreated effluent into the lagoon and coastal waters pose a significant barrier to public access at this location due to the health and safety risks associated with exposure to untreated sewage, as well as any closures that may be required to protect the public from these hazards. These LCP polices, and others, require that sewage infrastructure in this area be carefully sited and designed to minimize the risk of spills into the lagoon. In kind replacement of the existing sewer line in the existing alignment is incompatible with these requirements and is thus unlikely to be approvable under the LCP. It appears that the proposed project should be approved and completed as soon as possible to prevent further deterioration of the existing infrastructure and to eliminate the risk of additional spills.

Thank you for the opportunity to comment, and please notify us once a hearing date is scheduled for the application.

Sincerely,

Breylen Ammen

Breylen Ammen