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*Comment Received From: Melodie Grubbs
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Morro Bay National Estuary Program Comments

Additional submitted attachment is included below.



February 28, 2022

California Energy Commission
Docket Unit MS-4
Docket No. 21-AFC-01
715 P Street
Sacramento, CA 95814-5512

Also e-mailed to Lisa Worrall, project manager, at Lisa.Worrall@energy.ca.gov

Re: the Pecho Energy Storage Project

The Morro Bay National Estuary Program (MBNEP) is one of 28 National Estuary Programs established by the US Congress through the Clean Water Act Section 320. As such, the MBNEP is a non-regulatory program funded in part by the US EPA. The MBNEP has developed a Comprehensive Conservation and Management Plan for the Morro Bay estuary and its watershed, approved by the US EPA, that includes Chorro Creek and the Pecho Energy Storage Project site. The estuary and its tributaries, including Chorro, San Luisito, and San Bernardo Creeks, have been the focus of water quality and habitat improvement efforts for decades.

The MBNEP is concerned that certain topics within the Pecho Project AFC application appear to be too narrowly focused on the site and its nearby surroundings and don't fully consider the project's location within the context of the Morro Bay estuary and watershed. These topics specifically include the biology, water, and land use sections. Our concerns, discussed below, appear to go beyond those specifically noted in the application materials and supporting documents. Please consider these issues when further evaluating the AFC completeness.

Chorro Creek, apart from itself being habitat for several special status species (including importantly the southern steelhead trout among others), is the largest freshwater source for the Morro Bay estuary. The estuary has been impacted by various pollutants, including notably excessive sediment from the watershed. Sedimentation has been accelerated by both land use in the watershed as well as changes to Chorro Creek itself. Historically, the natural morphology of the creek was altered, mostly to accommodate agriculture and related uses, by changing the creek's alignment and in many places constructing levees that controlled the flow. These significantly impaired the ability of the floodplain to act as a sediment trap; the straightening of the creek alignment also accelerated stream flows contributing both to the erosion of the creek themselves and to the delivery of unnatural levels of sediment downstream.

The Biological Resources Report (Section 5.2.1.2) also mentions significant regional wetland and protected areas but hasn't identified two protected areas near the proposed Pecho Energy Storage site. Upstream from the project site is the 320-acre Chorro Creek Ecological Reserve, managed by the California Department of Fish and Wildlife for habitat protection and floodplain restoration. An extensive floodplain restoration project was completed in 2019. Immediately downstream from the project site is the Chorro Flats Wetlands restoration project (80 acres) managed by the Coastal San Luis Resource Conservation District that similarly is intended to restore more natural stream morphology and floodplain sediment capture. This site was restored 20-years ago and provides valuable mature riparian habitat. The proposed Pecho Energy Project between these two preserves along Chorro Creek and any additional development should consider impacts to species movement and impacts to water use and water quality.



In addition to sediment capture, the floodplain areas adjacent to Chorro Creek also provide other ecological services such as recharging aquifers; taking up nutrients; cooling of waters by riparian and upland tree and shrubs; and providing direct habitat for a range of wildlife. The Biological Resources report completed by Golder Associates, Inc. (21-AFC-01) discusses a number of sensitive species including steelhead and California red-legged frogs. In addition to protecting habitat for these and other special status species, it will also be important to have an adequate buffer adjacent to Chorro Creek and tributaries (e.g., San Bernardo Creek) to support wildlife migration along the creek corridors and access to nearby upland habitats.

Habitat protection and restoration, sediment reduction, and maintaining water quality are considered high priority concerns for the long-term health of the Morro Bay estuary as identified in Morro Bay Estuary Comprehensive Conservation Management Plan that has been used as a guide for restoration activities in the watershed. Large amounts of money, mostly public, have been expended to acquire stretches of Chorro Creek and its adjacent lands to

protect and restore habitat in and along the creek itself, but also and importantly, to restore the floodplain to more natural functions, with the aim of improved sediment capture and reducing sedimentation in the estuary into which the creek drains.

Chorro Creek is considered a perennial stream with some supplemental water being discharged from the California Mens Colony Wastewater Treatment Plant (WWTP). However, in low flow conditions such as in summer 2021, one area of Chorro Creek near the project site (at Canet Road) did run dry. Given a likely increase in the frequency and duration of drought conditions with climate change, the availability of water for ecological benefits to fish and other wildlife is important. The hydrology of the watershed is expected to change with less frequent and more intense storms, which could also impact groundwater recharge and ultimately water being discharged to our creek systems. Additionally, while salt water intrusion under existing conditions was mentioned in project documents, please do consider the impacts to sea level rise and the likely change in where salt water intrusion takes place. Additionally, the MBNEP will be concerned about any water discharged from the proposed plant and further information related to water temperature and water quality will be important for assessing environmental impacts. Chorro Creek currently has elevated temperature and water quality concerns at certain times of the year, which can impact sensitive species such as steelhead.

Additionally, we would also note that one of the alternative transmission line routes (option 3) would cross an open space conservation easement funded in part by the California Coastal Conservancy and held by the Bay Foundation of Morro Bay, the nonprofit that administers the MBNEP.

The MBNEP has also completed a Climate Change Vulnerability Assessment Report (2021), available on MBNEP's website (www.mbnep.org/library/). Please also be aware that extensive additional data has been collected related to water quality, hydrology, macroinvertebrates, and fisheries for Chorro Creek.

In sum, a full evaluation of possible impacts from the Pecho Project must assess: 1) its potential to preclude further restoration of more natural creek hydrodynamics, floodplain restoration, and sediment capture efforts along Chorro Creek, as well as 2) its potential to adversely affect current and ongoing restoration efforts both upstream and, especially, downstream from the site. Please note that the sites of the large floodplain restoration projects near the Pecho Project site were also once privately owned agricultural parcels that were purchased with (mostly) public funds and then successfully restored to more natural floodplains.

While the MBNEP certainly is aware of and generally supports efforts to mitigate the impacts of climate change, care must be exercised for any project in such a sensitive location with a complete understanding of the larger context of efforts to protect and enhance the estuary and the creeks that drain through its watershed.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'M. Grubbs', with a long, sweeping horizontal stroke at the end.

Melodie Grubbs
Executive Director
Morro Bay National Estuary Program