County of San Luis Obispo Local Coastal Program Consistency Analysis

Policy		Determination of Consistency
Environmentally Sensitive Habitats		
Sensitive Habitats		
ESH 1	Land Uses Within or Adjacent to Environmentally Sensitive Habitats. New development within or adjacent to locations of environmentally sensitive habitats (within 100 feet unless sites further removed would significantly disrupt the habitat) shall not significantly disrupt the resource. Within an existing resource, only those uses dependent on such resources shall be allowed within the area.	**Consistent:** The Emergency Water Supply Project (EWSP) product water, San Simeon Creek Lagoon Surface Discharge water filtrate, and reverse osmosis (RO) concentrate disposal pipelines, and monitoring well MW-4 are within 100 feet of an environmentally sensitive habitat area (ESHA) (wetlands, streams, and riparian vegetation). The conversion of the EWSP to a Water Reclamation Facility/WRF) would keep these facilities (the RO concentrate disposal pipeline would be abandoned) and would extend the San Simeon Creek Lagoon Surface Discharge water filtrate pipeline to a point further south along San Simeon Creek bank, which would be within 100 feet of an ESHA. As discussed in 2017 SEIR Section 5.3, Biological Resources, to minimize impacts to ESHA wetlands, streams, and riparian vegetation, the project is subject to compliance with Mitigation Measures BIO-4, BIO-5, BIO-6, and BIO-8. Mitigation Measure BIO- 3 requires that the filtrate pipeline be extended to relocate the discharge point further south to the San Simeon Creek bank to more efficiently deliver surface water into San Simeon Creek to maintain water levels at San Simeon Creek Lagoon. Mitigation Measure BIO- 7 requires implementation of an Adaptive Management Plan (AMP) for long-term WRF operations. Mitigation Measure BIO-18 requires that the filtrate pipeline extension and surface discharge structure be designed to avoid impacts to riparian habitat to the greatest extent feasible, and that the Cambria Community Services District (CCSD) comply with all applicable local, state, and federal regulations concerning impacts to riparian habitat, including CWA Sections 401 and 404, and/or California Fish and Wildlife Code Section 1602. Finally, Mitigation Measure BIO-19 requires that the CCSD minimize the disturbance and removal of riparian vegetation, to the extent possible. Thus, implementation of the identified EIR Mitigation Measures would reduce impacts to ESHA to less than significantly and would not significantly disrupt the ESHA resource. The pipeline alignments were determined based on the shortest distance between the two points that avoided both the riparian tree line to the maximum extent practicable, and avoided the existing cultural resources, as discussed in detail in 2017 SEIR Section 5.4, Cultural Resources. The vast majority (approximately 90 percent) of the conveyance piping that was installed with the EWSP was installed above grade to minimize disturbance. Additionally, horizontal directional drilling construction was used during construction of the EWSP to install pipeline under Van Gordon Creek without disturbing the ground surface, with entrance and exit pits located outside of the tree drip line. Thus,

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		the EWSP/WRF was designed and located to avoid significant disruption degradation of ESHA. Additionally, the WRF's product water and San Simeon Creek Lagoon Surface Discharge water filtrate pipelines and MW-4 are allowable within the ESHA since they involve water supply, an essential incidental public utility. Therefore, the project is consistent with Environmentally Sensitive Habitats Policy 1.
ESH 2	Permit Requirements. As a condition of permit approval, the applicant is required to demonstrate that there will be no significant impact on sensitive habitats and that proposed development, or activities will be consistent with the biological continuance of the habitat. This shall include an evaluation of the site prepared by a qualified professional which provides a) the maximum feasible mitigation measures (where appropriate), and b) a program for monitoring and evaluating the effectiveness of mitigation measures where appropriate.	**Consistent**: Refer to Response to Environmentally Sensitive Habitats Policy 1, above. As discussed in 2017 SEIR Section 5.3, Biological Resources and the 2025 Addendum to the 2017 Subsequent Environmental Impact Report for the Cambria Water Reclamation Facility Project (2025 SEIR Addendum), sensitive habitats were impacted by the construction of the EWSP and would be impacted by the conversion of the EWSP to a WRF. In addition to compliance with regulatory requirements, mitigation measures have been identified to reduce potential impacts to less than significant levels. Mitigation Measure BIO-3 requires that the San Simeon Creek Lagoon Surface Discharge water filtrate pipeline be extended to relocate the discharge point further south to the northern San Simeon Creek bank to more efficiently deliver surface water into San Simeon Creek to maintain water levels in the San Simeon Creek Lagoon. The Groundwater Modeling Report referenced in the 2017 SEIR (CDM Smith 2014) included detailed hydrogeological modeling and found that 100 gallons per minute (GPM) of mitigation water would maintain water levels in the creeks/lagoon, thereby avoiding potential impacts to sensitive habitats. Further, the Technical Memorandum (CDM Smith 2016) concluded that under normal climatic conditions, flows of 50 GPM (or one-half of the proposed 100 GPM mitigation flow) would be sufficient to maintain lagoon levels similar to conditions without the EWSP/WRF. Based on the Groundwater Modeling Report's and Technical Memorandum's findings, the 100-GPM mitigation flow to the lagoon would maintain water levels in the lagoon, and by extension the sensitive habitats. Notwithstanding, Mitigation Measure BIO-7 requires development and implementation of an AMP for post construction operations. The AMP is intended to monitor and protect the lagoon, creek, and riparian habitats adjacent to the site and, by extension, protect the species that inhabit it. The AMP's primary goal is to monitor the response of the lagoon, creek, and riparian habitats to EWSP/WRF operations. Based on the results of the biological monitoring and any noted adverse changes in these habitats, EWSP/WRF operations would be adjusted such that the amount of treated water that is injected or discharged back into the system, is either increased or decreased to restore affected habitat features.

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		The proposed project includes the extension of the San Simeon Lagoon Surface Discharge water filtrate pipeline. Construction would occur within the terrestrial extent of the riparian vegetation. Vegetation disturbance would be limited to the minimum amount necessary to extend the pipeline to the creek bank and construct the discharge structure. The filtrate pipeline would be routed/placed by hand to protect the riparian habitat. Standard BMPs would be implemented to prevent sedimentation into the lagoon during this construction. Mitigation Measure BIO-18 requires that the lagoon surface discharge extension be designed to avoid impacts to riparian habitat to the greatest extent feasible, and that the CCSD comply with all applicable local, state, and federal regulations concerning impacts to riparian habitat, including Clean Water Act (CWA) Sections 401 and 404, and/or California Fish and Wildlife Code Section 1602. Mitigation Measure BIO-19 requires that the CCS minimizes the disturbance and removal of riparian vegetation, to the extent possible. Therefore, the proposed project is consistent with Environmentally Sensitive Habitats Policy 2.
Wetlands		
ESH 7	Protection of Environmentally Sensitive Habitats. Coastal wetlands are recognized as environmentally sensitive habitat areas. The natural ecological functioning and productivity of wetlands estuaries shall be protected, preserved and where feasible, restored.	**Consistent:** San Simeon Creek includes 0.39 acres of wetland within the project area. Refer to Response to Environmentally Sensitive Habitats Policy 2, above.
ESH 16	Adjacent Development. Development adjacent to coastal wetlands shall be sited and designed to prevent significant impacts to wetlands through noise, sediment or other disturbances. Development shall be located as far away from the wetland as feasible, consistent with other habitat values on the site.	**Consistent**: Refer to Response to Environmentally Sensitive Habitats Policy 7, above. As discussed in 2017 SEIR Section 5.3, Biological Resources, coastal streams, riparian areas, and wetlands, such as are present on the site, are ESHA, which are protected through compliance with the Coastal Zone Land Use Ordinance (CZLUO). The site contains one wetland (San Simeon Creek Lagoon). According to the CZLUO, new development is required to be located a minimum of 100 feet from the upland extent of all wetlands. The WRF's product water and San Simeon Creek Lagoon Discharge water filtrate pipelines and MW-4 were constructed within the wetland setback. However, permitted uses within wetland setbacks include utility lines/pipelines, provided it can be demonstrated that alternative routes are infeasible/more environmentally damaging and adverse environmental effects are mitigated to the maximum extent feasible. The project components within the setback are limited to utility lines/pipelines and therefore are permitted within the wetland setback. Additionally, compliance with construction-related standards occurred during the EWSP's construction phase. Mitigation Measures BIO-4 (Emergency Coastal Development Permit [E-CDP] Condition 16), BIO-5 (E- CDP Condition 17), BIO-8 (E-CDP

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		Condition 12), and BIO-6 (E-CDP Condition 20) were implemented during construction/ground disturbing activities. Further, as noted in 2017 SEIR Section 5.3, Biological Resources, construction-related noise impacts at the lagoon are negligible, since they would be short-term and, on the surface, out of the water, and generally out of the immediate creek/lagoon's vicinity. As discussed in response to Environmentally Sensitive Habitats Policy 1, the adverse environmental effects to wetlands are mitigated to the maximum extent feasible. To minimize impacts to wetlands and jurisdictional waters, the proposed project would be subject to compliance with Mitigation Measures BIO-4, BIO-5, BIO-6, and BIO- 8, as described above. Therefore, the WRF would be consistent with Environmentally Sensitive Habitats Policy 16.
Coastal Streams		
ESH 20	Coastal Streams and Riparian Vegetation. Coastal Streams and adjoining riparian vegetation are environmentally sensitive habitat areas and the natural hydrological system and ecological function of coastal streams shall be protected and preserved.	**Consistent**: Refer to Response to Environmentally Sensitive Habitats Policy 2, above.
ESH 21	Development in or Adjacent to a Coastal Stream. Development adjacent to or within the watershed (that portion within the coastal zone) shall be sited and designed to prevent impacts which would significantly degrade the coastal habitat and shall be compatible with the continuance of such habitat areas. This shall include evaluation of erosion and runoff concerns.	**Consistent:** Refer to response to Environmentally Sensitive Habitats Policies 1 and 2, above.
ESH 25	Streambed Alterations. Channelizations, dams or other substantial alterations of rivers and streams shall be limited to: a) necessary water supply projects, b) flood control projects when there are no other feasible methods for protecting existing structures in the flood plain and where such protection is necessary for public safety or to protect existing development, and c) development where the purpose is to improve fish and wildlife habitat. All projects must employ the best feasible mitigation measures. Maintenance and flood control facilities shall require a coastal development permit.	**Consistent:** The project is a necessary water supply project. The EWSP was constructed in 2014 to treat brackish groundwater and treated wastewater using advanced treatment technologies, in order to augment the CCSD's potable water supply in response to the area's extreme drought. Conversion of the EWSP to a WRF would allow the WRF to operate up to 24 hours per day, 5 days per week, for 7 months per year, depending on precipitation. The WRF is primarily designed to meet the current demands of the community and ensure a reliable water supply for the existing service connections of the CCSD. However, as part of future operations, evaluations will be conducted through research studies, biological assessments, and consideration of impacts on other stakeholders. These assessments will determine whether the WRF is sufficient to fulfill existing commitments.
ESH 26	Riparian Vegetation. Cutting or alteration of naturally occurring vegetation that protects riparian habitat is not permitted except for permitted streambed alterations (defined in	**Consistent:** Two acres of coyote brush vegetation and one acre of upland mustard vegetation were removed from Van Gordon Reservoir during construction of the EWSP. No additional vegetation is anticipated for conversion of the EWSP to a WRF.

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	Policy 23) and where no feasible alternative exists or an issue of public safety exists. This policy does not apply to agricultural use of land where expanding vegetation is encroaching on established agricultural uses. Minor incidental public works project may also be permitted where no feasible alternative exists including but not limited to utility lines, pipelines, driveways and roads. Riparian vegetation shall not be removed to increase agricultural acreage unless it is demonstrated that no impairment of the functional capacity of the habitat will occur. Where permitted, such actions must not cause significant stream bank erosion, have a detrimental effect on water quality or quantity, or impair the wildlife habitat values of the area. This must be in accordance with the necessary permits required by Sections 1601 and 1603 of the California Fish and Game Code.	
ESH 28	Buffer Zone for Riparian Habitats. In rural areas (outside the USL) a buffer setback zone of 100 feet shall be established between any new development (including new agricultural development) and the upland edge of riparian habitats. In urban areas this minimum standard shall be 50 feet except where a lesser buffer is specifically permitted. The buffer zone shall be maintained in natural condition along the periphery of all streams. Permitted uses within the buffer strip shall be limited to passive recreational, educational, or existing nonstructural agricultural developments in accordance with adopted best management practices. Other uses that may be found appropriate are limited to utility lines, pipelines, drainage and flood control facilities, bridges and road approaches to bridges to cross a stream and roads when it can be demonstrated that: 1) alternative routes are infeasible or more environmentally damaging and 2) adverse environmental effects are mitigated to the maximum extent feasible. Lesser setbacks on existing parcels may be permitted if application of the minimum setback standard would render the parcel physically unusable for the principal permitted use. In allowing a reduction in the	**Consistent**: Refer to response to Environmentally Sensitive Habitats Policy 1, above.

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	minimum setbacks, they shall be reduced only to the point at which a principal permitted use (as modified as much as is practical from a design standpoint) can be accommodated.	
Terrestrial Environments		
ESH 29	Protection of Terrestrial Habitats. Designated plant and wildlife habitats are environmentally sensitive habitat areas and emphasis for protection should be placed on the entire ecological community. Only uses dependent on the resource shall be permitted within the identified sensitive habitat portion of the site. Development adjacent to environmentally sensitive habitat areas and holdings of the State Department of Parks and Recreation shall be sited and designed to prevent impacts that would significantly degrade such areas and shall be compatible with the continuance of such habitat areas.	**Consistent**: Refer to response to Environmentally Sensitive Habitats Policy 1, above.
Public Works		
PW 2	New or Expanded Public Works Facilities. New or expanded public works facilities shall be designed to accommodate but not exceed the needs generated by projected development within the designated urban reserve lines. Other special contractual agreements to serve public facilities and public recreation areas beyond the urban reserve line may be found appropriate.	**Consistent:** The WRF is primarily designed to meet the current demands of the community and ensure a reliable water supply for the existing service connections of the CCSD. However, as part of future operations, evaluations will be conducted through research studies, biological assessments, and consideration of impacts on other stakeholders. These assessments will determine whether the WRF is sufficient to fulfill existing commitments. The project will not exceed the needs of projected development within the existing urban reserve line and as contracted (via a historic 1977 agreement) with the San Simeon Creek State Campground area.
Visual and Scenic Resources		
VSR 1	Protection of Visual and Scenic Resources. Unique and attractive features of the landscape, including but not limited to unusual landforms, scenic vistas and sensitive habitats are to be preserved protected, and in visually degraded areas restored where feasible.	**Consistent:** As discussed in 2017 SEIR Section 5.1, Aesthetics, views of naturally vegetated open space within the San Simeon Creek and Van Gordon Creek corridors were not impacted by the constructed EWSP components. The advanced water treatment plant (AWTP) was constructed on a site containing ruderal vegetation and the evaporation pond, which also contains ruderal vegetation, was cited in the same location and footprint occupied by the Van Gordon Reservoir. However, these project components, as well as the mechanical spray evaporators, which will be removed with the conversion of the EWSP to a WRF, and the proposed zero liquid discharge (ZLD) facility are within the scenic vistas afforded from the San Simeon Trail, Washburn Primitive Campground, and San Simeon Creek Campground of San Simeon State Park.

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		The WRF components (i.e., AWTP, evaporation pond, and ZLD) are intermittently visible from portions of the San Simeon Trail. Monterey pines grow along the ridgeline and buffer the campers' (Washburn Primitive Campground) southerly views of the WRF components. Mitigation Measure AES-3 (as amended per the 2025 SEIR Addendum) requires that the AWTP and ZLD be color treated so that they more uniformly blend in with the surrounding landscape. With implementation of AES-3, the WRF would not have a substantial adverse effect on this scenic vista. Construction of the EWSP resulted in three acres of vegetation removal, which contributed to aesthetic impacts. Mitigation Measure AES- 4 requires that all areas where native vegetation was removed and where water facilities were not located, be re-vegetated with indigenous plants. With implementation of AES-3 and AES-4, the WRF would not have a substantial adverse effect on scenic vistas. Additionally, the articulating concrete block (ACB) lining that would be installed at the San Simeon Creek channel bank could also be visible. The ACB would not impact views of naturally vegetated open space within the San Simeon Creek corridor, since it would be installed at the creek bank and the existing riparian vegetation would buffer views. Additionally, the proposed ACB would allow for the continued growth of riparian vegetation, which would minimize visual impacts. Therefore, with implementation of the specified Mitigation Measures, the project would be consistent with Visual and Scenic Resources Policy 1.
VSR 2	Site Selection for New Development. Permitted development shall be sited so as to protect views to and along the ocean and scenic coastal areas. Wherever possible, site selection for new development is to emphasize locations not visible from major public view corridors. New development should utilize slope created "pockets" to shield development and minimize visual intrusion.	**Consistent**: Refer to response to Visual and Scenic Resources Policy 1, above.
VSR 4	New Development in Rural Areas. New development shall be sited to minimize its visibility from public view corridors. Structures shall be designed (height, bulk, style) to be subordinate to, and blend with, the rural character of the area. New developments which cannot be sited outside of public view corridors is to be screened utilizing native vegetation; however, such	**Consistent:** Refer to response to Visual and Scenic Resources Policy 1, above. As discussed in 2017 SEIR Section 5.1, Aesthetics, pursuant to County of San Luis Obispo's Conservation and Open Space Element Table VR-2, there are no scenic corridors located within the project site's viewshed. Although, the EWSP mechanical evaporators were color-treated

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	vegetation, when mature, must also be selected and sited in such a manner as to not obstruct major public views. New land divisions who's only building site would be on a highly visible slope or ridgetop shall be prohibited.	to blend in with the surrounding landscape, they appear more dominant in character compared to the existing water facilities, particularly for the San Simeon Campground to the west. Additionally, vegetation that had overgrown the Van Gordon Reservoir was removed when the reservoir was converted to an evaporation pond. The project is proposing, and Mitigation Measure AES-2 requires, removal of the evaporators, which would remove this visual incompatibility. Once the evaporation pond liner is removed, native vegetation would be planted in Van Gordon Reservoir, which would help screen the facility from public views. Additionally, Mitigation Measure AES-3 (as amended per the 2025 SEIR Addendum) requires that the AWTP and ZLD be color treated so that they more uniformly blend in with the surrounding landscape. With implementation of AES-3, the WRF would not have a substantial adverse effect on this scenic vista. Therefore, the project would be consistent with Visual and Scenic Resources Policy 4.
VSR 7	Preservation of Trees and Native Vegetation. The location and design of new development shall minimize the need for tree removal.	**Consistent**: As discussed in 2017 SEIR Section 5.1, Aesthetics, no trees were removed in association with construction of the EWSP and no Monterey pine trees impacted. Construction of the EWSP resulted in the removal of 3 acres of onsite vegetation, since it was obstructing improvements that could not be reasonably designed to avoid their removal. The WRF is required to comply with Mitigation Measure AES-4, which requires that all areas where native vegetation was removed and where water facilities were not located, be re-vegetated with indigenous plants to minimize changes in visual character Thus, the WRF would be consistent with Visual and Scenic Resources Policy 7.
Archaeology		
AR 1	Protection of Archaeological Resources. The county shall provide for the protection of both known and potential archaeological resources. All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored at the time of a development proposal to avoid development on important archaeological sites. Where these measures are not feasible and development will adversely affect identified archaeological or paleontological resources, adequate mitigation shall be required.	**Consistent:** As discussed in 2017 SEIR Section 5.4, Cultural Resources, construction-related activities could adversely impact archaeological resources. In compliance with CUL-3, earthmoving personnel received cultural and paleontological sensitivity training prior to EWSP construction. In compliance with E-CDP Condition 10 (CUL-1) and CUL-4, an archaeological monitor and a Native American monitor were present onsite during all EWSP ground disturbing activities whence monitoring for the presence of prehistoric and historic cultural resources took place. Prior to EWSP construction the archaeological monitors performed surveys to identify archaeological deposits. The archaeological monitor observed all ground disturbing activities performed by tractor equipment and other vehicles, inspecting the soil and spoils piles for artifacts, ecofacts, and any other evidence of prehistoric or historic cultural resources. In addition, sidewalls were examined following soil and materials removal. The monitors performed regular site walks multiple times daily in search of cultural resources within the project area, as new layers were continually being exposed. Also, in compliance with E-CDP Condition 11 (CUL-2) (and the CZLUO), when encountered,

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		artifacts were mapped, photographed, and collected for reburial. Activities related to conversion of the EWSP to a WRF would include minor grading (50 cubic yards of cut and 50 cubic yards of fill) and trenching for the extension of the San Simeon Creek Lagoon Surface Discharge water filtrate pipeline, which would be approximately 300 linear feet. The new pipeline would be installed by trenching, with depths approximately two feet wide by five feet deep. The project would be subject to CZLUO standards and E-CDP Conditions 10 and 11 (Mitigation Measures CUL-1 and CUL-2, respectively), which address protection of archaeological resources. Additionally, prior to the start of construction, earthmoving personnel would receive cultural sensitivity training (Mitigation Measure CUL-3) and a qualified archaeologist and Native American monitor would be present during construction (Mitigation Measure CUL-4). Compliance with CZLUO standards and Mitigation Measures CUL-1 through CUL-4 would ensure project impacts to archaeological resources are reduced to less than significant. Therefore, the project would be consistent with Archaeology Policy 1.
AR 4	Preliminary Site Survey for Development within Archaeologically Sensitive Areas. Development shall require a preliminary site survey by a qualified archaeologist knowledgeable in Chumash culture prior to a determination of the potential impacts of the project.	**Consistent:** As discussed in 2017 SEIR Section 5.4, Cultural Resources, the project site is considered an Archaeologically Sensitive Area. A preliminary survey of the project site was conducted by a qualified archaeologist and a mitigation plan was developed by a qualified archaeologist.
AR 5	Mitigation Techniques for Preliminary Site Survey before Construction. Where substantial archaeological resources are found as a result of a preliminary site survey before construction, the county shall require a mitigation plan to protect the site. Some examples of specific mitigation techniques include: a. Project redesign could reduce adverse impacts of the project through relocation of open space, landscaping or parking facilities. b. Preservation of an archaeological site can sometimes be accomplished by covering the site with a layer of fill sufficiently thick to insulate it from impact. This surface can then be used for building that does not require extensive foundations or removal of all topsoil. c. When a project impact cannot be	**Consistent:** Refer to response to Archaeology Policies 1 and 4, above. In compliance with CUL-3, earthmoving personnel received cultural and paleontological sensitivity training prior to EWSP construction. In compliance with E-CDP Condition 10 (CUL-1) and CUL-4, an archaeological monitor and a Native American monitor were present onsite during all EWSP ground disturbing activities whence monitoring for the presence of prehistoric and historic cultural resources took place. Prior to EWSP construction the archaeological monitors performed surveys to identify archaeological deposits. The archaeological monitor observed all ground disturbing activities performed by tractor equipment and other vehicles, inspecting the soil and spoils piles for artifacts, ecofacts, and any other evidence of prehistoric or historic cultural resources. In addition, sidewalls were examined following soil and materials removal. The monitors performed regular site walks multiple times daily in search of cultural resources within the project area, as new layers were continually being exposed. Also, in compliance with E-CDP Condition 11 (CUL-2) (and CZLUO Sections 23.05.140), when encountered, artifacts were mapped,

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	avoided, it may be necessary to conduct a salvage operation. This is usually a last resort alternative because excavation, even under the best conditions, is limited by time, costs and technology. Where the chosen mitigation measure necessitates removal of archaeological resources, the county shall require the evaluation and proper deposition of the findings based on consultation with a qualified archaeologist knowledgeable in the Chumash culture. d. A qualified archaeologist knowledgeable in the Chumash culture may need to be on-site during initial grading and utility trenching for projects within sensitive areas.	photographed, and collected for reburial. Conversion of the EWSP to a WRF would be subject to compliance with Mitigation Measures CUL-1 through CUL-4. Compliance with LCP Policies (implemented through CZLUO standards) and Mitigation Measures CUL-1 through CUL-4 would ensure project impacts to archaeological resources are reduced to less than significant. Therefore, the project is consistent with Archaeology Policy 5.
AR 6	Archaeological Resources Discovered during Construction or Through Other Activities. Where substantial archaeological resources are discovered during construction of new development, or through non-permit related activities (such as repair and maintenance of public works projects) all activities shall cease until a qualified archaeologist knowledgeable in the Chumash culture can determine the significance of the resource and submit alternative mitigation measures.	**Consistent:** Refer to response to Archaeology Policy 4, above.

County of San Luis Obispo North Coast Area Plan Consistency Analysis

	Standard	Determination of Consistency
Rural Area Standards		
Areawide		
6	Site Selection. Primary site selection for new development shall be locations not visible from Highway 1 as follows: a. Sites shall be selected where hills and slopes would shield development unless no alternative location exists or the new development provides visitor serving facilities. b. New development shall be located so that no portion of a structure extends abode the highest horizon line of ridgelines as seen from Highway 1. c. Where single ownership is on both sides of Highway 1, building sites shall be located on the east side of Highway 1 except for identified visitor-serving development. d. Development proposals for sites with varied terrain are to include design provisions for concentrating development on moderate slopes, retaining steeper slopes visible from public roads undeveloped.	**Consistent:** The project is not visible from Highway 1.
Combining Designation – Sensitive Resource Areas (SRA)		
10	Site Planning – Development Plan Projects. Projects requiring Development Plan approval are to concentrate proposed uses in the least sensitive portions of properties. Native vegetation is to be retained as much as possible.	**Consistent:** The project is located in the least sensitive portion of the project site, in the least vegetated portion and generally away from the two streams.
13	Monterey Pine Forest (SRA) Clustering. Clustering shall be required for new subdivisions or large-scale development projects within forested areas. Where feasible, new development shall be restricted to slopes less than 20%.	**Consistent:** The project is not located in a forested area, is not located in an area of Monterey pine trees and is located on slopes less than 20%.
14	Monterey Pine Forest (SRA) Tree Preservation. Where development requires removal of Monterey pines greater than six inches in diameter, replacement of native stock will be required.	**Consistent:** Construction of the EWSP did not require removal of any Monterey pine trees. Conversion of the EWSP to a WRF will not require removal of any Monterey pine trees.

County of San Luis Obispo Coastal Zone Land Use Ordinance Consistency Analysis

CZLUO Section 23.01.031 (Land Use and Coastal Development Permits Required). This section requires all permits to be obtained prior to construction. On May 15, 014, the County issued an E-CDP (ZON2013-00589), authorizing the construction and operation of the EWSP, subject to various conditions that addressed EWSP construction/operations and general land use entitlement matters, as well as hydrology/water quality, light/glare, noise, air quality, cultural resources, and biological resources. E-CDP Condition 6 required that the CCSD apply for a regular CDP to authorize the emergency work as permanent. On June 13, 2014, the CCSD submitted their application for a CDP, complying with this condition. Approval of a CDP will ensure compliance with CZLUO Section 23.01.031.

CZLUO Section 23.01.033 (Consistency With the Land Use Element and Local Coastal Plan Required). This section requires a determination that the proposed use is allowable in the land use category where the proposed site is located before issuance of any permits. The project site is designated Agriculture (AG) and contains CCSD water facilities, and is consistent with the "Public Utility Facilities [J5]" land use definition, as follows:

> *Public Utility Facilities [J5]: Fixed-base structures and facilities serving as junction points for transferring utility services from one transmission voltage to another or to local distribution and service voltages. These uses include any of the following facilities: electrical substations and switching stations; telephone switching facilities; natural gas regulating and distribution facilities; public water system wells, treatment plants, and storage; and community wastewater treatment plants, settling ponds, and disposal fields.*

Per Table O of the *Coastal Zone Framework for Planning*, Public Utility Facilities on sites designated AG are "S-13" use. The S-13 status indicates the land use is a special use, allowable subject to special standards and/or processing requirements unless otherwise limited by a specific planning area standard. The special standards for Public Utility Facilities are outlined in CZLUO Section 23.08.280, *Transportation, Utilities, and Communication*; refer to the *CZLUO Chapter 23.08, Special (S) Uses* section below. Additionally, CZLUO Section 23.04.050, *Non-Agricultural Uses in the Agriculture Land Use Category*, establishes permit requirements and standards for non-agricultural uses in the agriculture category; refer to the *CZLUO Section 23.04.050, Non-Agricultural Uses in the Agriculture Land Use Category*, section below.

CZLUO Chapter 23.04 (Site Design Standards). This Chapter requires compliance with various site development features (parcel size, minimum site area, setbacks, heights, fencing and screening, and outdoor lights). The WRF is required to comply with all applicable site design standards prior to approval and issuance of the CDP. Consistency with the applicable site design standards would be enforced through CDP conditions of approval. The WRF complies with the applicable site design standards identified in this section, including setbacks and heights.

Minimum Site Area: No site area is required for public utility and pipeline uses.

Setbacks: The project site is over one acre and requires a 25-foot front setback and 30-foot side and rear setbacks. The project structures constructed as part of the EWSP (i.e., the Advanced Water Treatment Plant (AWTP)) meet these setbacks, and the structures proposed as part of the conversion of

the EWSP to a WRF (i.e., Zero Liquid Discharge (ZLD)facility) would also meet these setbacks. Additionally, the existing Van Gordon Reservoir is located outside these setbacks.

Height: The AWTP and the proposed ZLD facility are below the 35-foot height limit allowed in the AG land use category.

CZLUO Section 23.04.050 (Non-Agricultural Uses in the Agriculture Land Use Category). The project site is designated AG. This section establishes permit requirements and standards for non-agricultural uses in the AG land use category. The WRF is required to comply with all applicable standards for non-agricultural uses in the AG category before approval and issuance of the CDP. Specifically, the project must be designed so that no development occurs on prime agricultural soils, except where it is demonstrated that all agriculturally unsuitable land on the site has been developed or cannot be used because of terrain constraints.

The project site has soils designated "prime farmland if irrigated". However, the site is not and has not been irrigated since 1979. Though designated AG, the project site is not used for agricultural uses and has been used by the CCSD since 1979 for public facility uses when the CCSD constructed its San Simeon well field and treated wastewater effluent disposal system. In addition to non-irrigated soils and public facilities infrastructure, the site is bifurcated by two creeks and riparian vegetation, which generally make the site not viable for a commercial agricultural operation.

CZLUO Chapter 23.06 (Operational Standards). This Chapter establishes standards to be applied to the operation and conduct of land uses after their establishment associated with noise, air quality, water quality, and hazardous materials. The WRF would be subject to compliance with the relevant operational standards specified in CZLUO Chapter 23.06. Refer to 2017 SEIR Section 5.2, *Air Quality*, Section 5.5, *Hydrology and Water Quality*, Section 5.7, *Noise*, and Section 8.0, *Effects Found Not To Be Significant*.

CZLUO Chapter 23.07 (Combining Designation Standards). The purpose of Combining Designation standards is to require project design that will carefully consider the land features, structures, and activities identified by the Combining Designations. The project site is designated with various Combining Designations, as outlined below. Accordingly, the WRF is subject to compliance with the following CZLUO sections:

- San Simeon Creek Flood Hazard (FH): Sections 23.07.060 through 23.07.066; refer to 2017 SEIR Section 5.5, *Hydrology and Water Quality*; with the exception of pipeline, no other project components are within the FH Combining Designation;

- Geologic Study Area (GSA): Sections 23.07.080 through 23.07.086; refer to 2017 SEIR Section 8.0, *Effects Found Not To Be Significant*; the southern portion of the project site is within the GSA Combining Designation, but no project components are located in this area;

- Sensitive Resource Area (SRA): Sections 23.07.160 through 23.07.166; refer to 2017 SEIR Section 5.1, *Aesthetics/Light and Glare*, and Section 5.3, *Biological Resources*;

- Environmentally Sensitive Habitat Area, Terrestrial Habitat (ESHA-TH): Section 23.07.176; refer to 2017 SEIR Section 5.1, *Aesthetics/Light and Glare*, and Section 5.3, *Biological Resources*;

- Environmentally Sensitive Habitat, Coastal Creek (ESH-CC): Sections 23.07.170 and 23.07.174; refer to 2017 SEIR Section 5.1, *Aesthetics/Light and Glare*, Section 5.3, *Biological Resources*, and Section 5.5, *Hydrology and Water Quality*;

CZLUO Chapter 23.08 (Special (S) Uses). The purpose of this Chapter is to establish special additional standards for certain land uses that may affect adjacent properties, the neighborhood, or the community even if the uniform standards of Chapter 23.04 and all other standards of Title 23 are met. As noted above, the project site is consistent with the "Public Utility Facilities [J5]" land use definition. Per Table O of the *Coastal Zone Framework for Planning*, Public Utility Facilities on in the AG land use category are an "S-13" use. The S-13 use status indicates the land use is a special use, allowable subject to special standards and/or processing requirements, unless otherwise limited by a specific planning area standard. The special standards that apply to Public Utility Facilities are outlined CZLUO Section 23.08.280; refer to CZLUO Section 23.08.280, *Public Utility Facilities*, below.

CZLUO Section 23.08.280 (Transportation, Utilities, and Communication (S-13)). Transportation and Public Utility Facilities identified as allowable, S-13 uses by the Land Use Element (see Coastal Table 0, Part I of the Land Use Element) are subject to CZLUO Section 23.08.288, *Public Utility Facilities*, see below.

CZLUO Section 23.08.288 (Public Utility Facilities). The requirements of this section apply to Public Utility Facilities where designated as S-13 uses by Coastal Table "O." Public Utility Facilities (other than electric and communications transmission and natural gas regulation and distribution) require Development Plan approval pursuant to Section 23.02.034, *Development Plan*. Consistency with the applicable requirements would be confirmed through the CDP application process.

As stated, the WRF would be subject to compliance with the land use- related CZLUO standards specified above, as well as the standards identified throughout 2017 SEIR Section 5.0, including implementation of mitigation measures identified to reduce the significance of potential impacts. Consistency with the CZLUO requirements would be confirmed through the CDP application process. Thus, upon issuance of the CDP, the WRF would be consistent with the CZLUO.

Other

Neither the County CZLUO nor the North Coast Area Plan identifies standards for water reclamation/desalination facilities that apply to the project site. However, the North Coast Area Plan includes standards for desalination facilities and projects undertaken by the CCSD within the Cambria Urban Area. These standards only apply to development on lands located within the Cambria Urban Reserve Line, which the proposed WRF does not. However, the following analysis is provided for contextual purposes only.

Standard		Discussion
Cambria Urban Area Standards		
Communitywide		
1.A.	Marine Habitat Protection - Projects with Point-Source Discharges. The richness, sensitivity, and unspoiled character of the marine in the Cambria demand particularly rigorous measures to protect, maintain, enhance, and restore these special resources. Accordingly, no surface point-source discharges into the marine environment are allowed, except as follows: Exceptions: A. Cambria Community Services District. Discharges by the Cambria Community Services District (CCSD) that have been properly permitted, when permits are required, by the County, the California Coastal Commission (CCC), Regional Water Quality Control Board (RWQCB), State Lands Commission (SLC), Environmental Protection Agency (EPA), and Monterey Bay National Marine Sanctuary (MBNMS). Any discharge of brine from desalination facilities directly into the marine environment shall be prohibited unless the following criteria have been satisfied: (1) The brine discharge receives all legally required approvals from the agencies listed above. (2) The discharge point is located south of San Simeon Point, and where it will not adversely impact any kelp bed or intertidal habitat. (3) The discharge point is designed to maximize rapid mixing of the brine with ambient seawater in order to minimize hypersaline concentrations. (4) Other locations or types of discharges (e.g., subsurface discharges, colocating new discharges with existing discharges)	The project is located outside of the Cambria Urban Area, and therefore this standard does not apply. Notwithstanding, the EWSP did not discharge brine into the marine environment. Brine was collected in a brine evaporation pond and concentrated through the use of mechanical spray evaporators. The remaining brine slurry was collected and hauled offsite to an approved disposal facility. The WRF would utilize a ZLD facility, which would remove virtually all the liquid from the brine and leave behind a semi-solid brine concentrate (i.e., brine puck) that would be hauled offsite to an approved disposal facility.

Standard		Discussion
	are infeasible or more environmentally damaging. (5) The discharge sustains the biological productivity of coastal waters and maintains healthy populations of all species of marine organisms. (6) The adverse effects of discharges are minimized and mitigated.	
1.E.	Marine Habitat Protection - Projects with Point-Source Discharges. The richness, sensitivity, and unspoiled character of the marine in the Cambria demand particularly rigorous measures to protect, maintain, enhance, and restore these special resources. Accordingly, no surface point-source discharges into the marine environment are allowed, except as follows: Exceptions: E. Water Quality Enhancement. Discharges to streams, for the purpose of hydrologic replenishment and/or stream water quality enhancement, that are consistent with LCP requirements, and provided that: (1) Discharge is consistent with NMFS, U.S. Fish & Wildlife Service (USFWS), EPA, RWQCB, and CDFG Regulations. (2) The discharged waters will be of appropriate temperature and quality so as not to disrupt the steelhead runs, nor the in-stream habitat for any other sensitive species including, but not limited to, the red-legged frog and tidewater goby nor will impact adjacent agriculture.	The project is located outside of the Cambria Urban Area, and therefore this standard does not apply. Notwithstanding, the EWSP/WRF includes a point-source discharge for the purpose of hydrologic replenishment and stream water quality enhancement. The Groundwater Modeling Report referenced in the 2017 SEIR (CDM Smith 2014) included detailed hydrogeological modeling and found that 100 gallons per minute (GPM) of mitigation water would maintain water levels in the creeks/lagoon, thereby avoiding potential impacts to sensitive habitats. Further, the Technical Memorandum (CDM Smith 2016) concluded that under normal climatic conditions, flows of 50 GPM (or one-half of the proposed 100 GPM mitigation flow) would be sufficient to maintain lagoon levels similar to conditions without the EWSP/WRF. Based on the Groundwater Modeling Report's and Technical Memorandum's findings, the 100-GPM mitigation flow to the lagoon would maintain water levels in the lagoon, and by extension the sensitive habitats. Notwithstanding, Mitigation Measure BIO-7 requires development and implementation of an AMP for post construction operations. The AMP is intended to monitor and protect the lagoon, creek, and riparian habitats adjacent to the site and, by extension, protect the species that inhabit it. The AMP's primary goal is to monitor the response of the lagoon, creek, and riparian habitats to EWSP/WRF operations. Based on the results of the biological monitoring and any noted adverse changes in these habitats, EWSP/WRF operations would be adjusted such that the amount of treated water that is injected or discharged back into the system, is either increased or decreased to restore affected habitat features.
4.C.	Supplemental Water Supply Standards. Any major public works water supply project to support new development within the CCSD service area shall be subject to the following approval standards and findings: (1) Maximum Capacity. The maximum service capacity of the project will not induce growth inconsistent with the	The project is located outside of the Cambria Urban Area, and therefore this standard does not apply. Notwithstanding, the EWSP/WRF would not support new development. The EWSP/WRF was designed and constructed to improve the reliability of the CCSD's potable water supply during drought conditions and other dry periods. The Emergency CDP authorizes the EWSP to operate during CCSD Stage 3[1] Water

[1] The pre-2020 Stage 3 Water Shortage condition correlated to a Water Shortage Emergency. This stage was triggered when the water supply and demand model indicated groundwater levels would be insufficient to provide water for human consumption, sanitation and fire protection, water delivery capabilities were impaired such that the water supply or delivery system was incapable of providing water for human consumption, sanitation and fire protection, or the CCSD Board of Directors found that

Standard		Discussion
	protection of coastal resources and public access and recreation opportunities. (2) Creek Withdrawals. The project shall assure that CCSD water withdrawals from Santa Rosa and San Simeon Creeks will be sufficiently limited to protect: (1) adequate instream flows necessary to support sensitive species and other riparian/wetland habitats within the reach of the streams affected by CCSD pumping; (2) underlying groundwater aquifers; and (3) agricultural resources. (3) Priority Uses. The project shall demonstrate that water capacity is available, and allocations are reserved for Coastal Act priority uses. (4) Fire Safety. The project shall demonstrate that water storage and delivery systems will be adequate to meet the fire safety and other public health and safety needs of new development supported by the project, consistent with the protection of other coastal resources. North Coast Area Plan 7-29 Chapter 7: Planning Area Standards Revised April 2022 (5) Other Public Service Capacities. The maximum level of development supported by the project shall not exceed that supported by other available public services, including wastewater treatment capacity and road capacity. The project shall not induce growth beyond that level necessary to maintain acceptable road Levels of Service and circulation to protect coastal access and recreation opportunities, and provide for public safety (e.g., fire evacuation). (6) Water Supply Management Planning. The project shall demonstrate that it is an	Shortage declarations. (Note that the CCSD re-classified their water stages with the adoption of the 2020 Water Shortage Contingency Plan (WSCP), and the 2014 Stage 3 condition now correlates to WSCP Stage 5 and Stage 6 conditions.) The WRF is designed to provide a reliable water supply to the CCSD's service connections. The CCSD water system currently serves 4,034 service connections (commercial and residential) while delivering an average of 520 AFY of water to its customers. The WRF would initially serve to satisfy existing connections, as defined above, but during future operations, impact assessments would be determined based on research studies, biological assessments, and impacts on other stakeholders to determine whether this mechanism would be adequate to serve existing commitments.

the ordinary demands and requirements of water consumers could not be satisfied without depleting the water supply of the district to provide water for human consumption, sanitation and fire protection. The current Stage 5 water condition correlates to an Extreme Water Shortage Emergency. This stage is triggered when the dry season starts prior to April 1, rainfall is at 26-40% of normal, well levels are at 61-70% of normal, or the 9P2/SS4 gradient is at 61-70% of normal. The purpose of this stage is to reduce water consumption by up to 50% and provides restrictions of water use allotments and penalties for violation. The current Stage 6 water condition correlates to an Exceptional Water Shortage Emergency. This stage is triggered when the dry season starts prior to April 1, rainfall is at or below 25% of normal, well levels are at or below 60% of normal, or the 9P2/SS4 gradient is at or below 60% of normal. The purpose of this stage is to reduce water consumption by more than 50% and provides restrictions of water use allotments and penalties for violation. See CCSD Municipal Code Chapter 4.12 and the 2020 Urban Water Management Plan for more details on water shortage stages.

Standard		Discussion
	element (where economically and environmentally appropriate) of a balanced water supply portfolio that also includes other supply alternatives, including conservation and water recycling to the maximum extent practicable. (7) Build Out Reduction. That reasonable progress is being made to implement a build out reduction program within the boundaries of the CCSD.	
4.D.	Desalination Standards. Desalination facilities must: (1) Be public; (2) Avoid or fully mitigate any adverse environmental impacts to coastal resources; (3) Be consistent with all LCP and Coastal Act policies, including those for concentrating development, supporting priority coastal uses, and protecting significant scenic and habitat resources; (4) Be designed and sized based upon adopted community planning documents, which may include General Plans, Urban Water Management Plans, Regional Water Supply Plans, Local Coastal Programs, and other approved plans that integrate local or regional planning, growth, and water supply/demand projections; (5) Use technologies that are energy-efficient. Estimates of the projected annual energy use and the environmental impacts that will result from this energy production, and evidence of compliance with air pollution control laws for emissions from the electricity generation, shall be submitted with permit applications; (6) Use, where feasible, sub-surface feedwater intakes (e.g., beach wells) instead of open pipelines from the ocean, where they will not cause significant adverse impacts to either beach topography or potable groundwater supplies; (7) Use technologies and processes that eliminate or minimize the discharges of hazardous constituents into the ocean	The project is located outside of the Cambria Urban Area, and therefore this standard does not apply. Notwithstanding, the EWSP/WRF is a public project owned and operated by the CCSD. The EWSP/WRF avoids and/or mitigates adverse environmental impacts to coastal resources as identified in the 2017 SEIR and 2025 SEIR Addendum. As detailed above, the EWSP/WRF is consistent with all LCP policies. The EWSP was constructed and sized in 2014 to treat brackish groundwater and treated wastewater using advanced treatment technologies, in order to augment the CCSD's potable water supply in response to the area's extreme drought. Conversion of the EWSP to a WRF would allow the WRF to operate up to 24 hours per day, 5 days per week, for 7 months per year, depending on precipitation. The WRF is primarily designed to meet the current demands of the community and ensure a reliable water supply for the existing service connections of the CCSD. However, as part of future operations, evaluations will be conducted through research studies, biological assessments, and consideration of impacts on other stakeholders. These assessments will determine whether the WRF is sufficient to fulfill existing commitments. The EWSP/WRF does not include open pipelines from the ocean. The EWSP/WRF does not include discharges into the ocean. As noted above, the EWSP/WRF is primarily designed to meet the current demands of the community and ensure a reliable water supply for the existing service connections of the CCSD. The project is not designed to meet additional priority uses at this time. The EWSP/WRF is part of the CCSD's balanced water portfolio

Standard		Discussion
	and ensure that the least environmentally damaging options for feedwater treatment and cleaning of plant components are selected. Opportunities for combining brine discharges with other discharges (e.g., from a sewage treatment facility or power plant) should be considered and the least environmentally damaging alternative pursued. Applicants should provide information necessary to determine the potential impacts to marine resources from the proposed intake and discharge. Obtaining this information may require new or updated engineering, modeling and biological studies, or in some cases may be obtained from pre-operational monitoring, monitoring results from other Chapter 7: Planning Area Standards 7-30 North Coast Area Plan Revised April 2022 desalination facilities, and pilot studies conducted before building a full-scale facility; (8) Be designed and limited to assure that any water supplies made available as a direct or indirect result of the project will accommodate needs generated by development or uses consistent with the kinds, location and densities specified in the LCP and Coastal Act, including priority uses as required by PRC 30254, and; (9) Be an element (where economically and environmentally appropriate) of a balanced water supply portfolio that also includes conservation and water recycling to the maximum extent practicable	that includes water conservation.
5.	Desalinization Plants. Desalinization plants constructed to serve development within the service boundaries of the CCSD shall only be permitted if owned and operated by the CCSD. Private desalinization plants are prohibited.	The project is located outside of the Cambria Urban Area, and therefore this standard does not apply. Notwithstanding, the EWSP/WRF is owned and operated by the CCSD.