

CAMBRIA COMMUNITY SERVICES DISTRICT

DIRECTORS:

DEBRA SCOTT, President
MICHAEL THOMAS, Vice President
HARRY FARMER, Director
TOM GRAY, Director
KAREN DEAN, Director



OFFICERS:

MATTHEW MCELHENIE, General Manager
TIMOTHY J. CARMEL, District Counsel

Physical address: 2150 Main Street, #1-A, Cambria, CA 93428
Mailing address: P.O. Box 65 • Cambria, CA 93428
Telephone (805) 927-6223

February 21, 2025

Jeremy Freund
County of San Luis Obispo
Department of Planning & Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Subject: Information Hold Letter No 2 DRC2013-00112 (Cambria Community Services District)
Development Plan/Coastal Development Permit

Dear Mr. Freund:

The Cambria Community Services District (CCSD) respectfully submits the following responses to the Information Hold Letter for the Development Plan/Coastal Development Permit DRC2013-00112. The CCSD remains committed to ensuring compliance with all applicable regulatory requirements and appreciates the opportunity to address the County's requests for additional information. This submission includes detailed responses to the outstanding items outlined in the Information Hold Letter, including land use, environmental impacts, infrastructure, and regulatory compliance considerations. We appreciate the County's review and look forward to continued collaboration to advance this critical water sustainability project for the community of Cambria.

If you have any questions, please call (805) 503-0466 or email me at mmcelhenie@cambriacsd.org.

Sincerely,

DocuSigned by:

Matthew McElhenie

03DA2D7CA89B440...

Matthew McElhenie
General Manager

Enclosures: Exhibit 1: CCSD Coastal Development Permit Project Description
Exhibit 2: Emergency Water Supply Project Record Drawings
Exhibit 2.1: Geologic Peer Review
Exhibit 3: CDM Smith Daily Construction Reports
Exhibit 3.1: Project Completion Report
Exhibit 3.2: Brine Evaporation Pond Plan
Exhibit 4: Storm Water Pollution Prevention Plan
Exhibit 5: 2025 Proposal for Civil Engineering for WRF

Exhibit 6: Emergency Water Supply Project 5.7 Noise & 5.7.1 Environmental Setting Noise Scales & Definitions
Exhibit 7: Revised Final Subsequent Environmental Impact Report (SEIR) for the Sustainable Water Facility
Exhibit 7.1: Addendum to the 2017 Subsequent Environmental Impact Report for the Cambria Water Reclamation Facility Project
Exhibit 8: Biological Resources Assessment
Exhibits 8.1: through 8.8 District Biological Reports
Exhibit 9: Project Monitoring Plan
Exhibit 10: Policy Consistency Analysis
Exhibit 10.1: Adaptive Management Plan
Exhibit 10.2: Cambria Emergency Water Supply Project San Simeon Creek Basin Groundwater Modeling Report
Exhibit 11: San Simeon Creek Instream Flow Assessment for San Simeon Creek and Lower Van Gordon
Exhibit 12: Gus Yates Technical Groundwater Memorandum
Exhibit 13: Response to Coastal Commission Letter dated 10/1/2024
Exhibit 14: Final Construction Report
Exhibit 15: HMBP Submittal History
Exhibit 15.1: HMBP Application Submittal

Items Required for Acceptance:

Based upon preliminary review, the items in this list are required before your project can be accepted as complete for processing.

PLAN INFORMATION / PROJECT CLARIFICATION

PERMIT APPLICATION REQUIREMENTS

1. Project Description

District Response: Please see Exhibit 1.

2. Plan Set for Development Plan

- a. Please provide plans in compliance with section 23.02.034 - Development Plan. The plans shall include the following details of the proposed development (existing uses and proposed). Site plan shall be to scale:
- Location and dimensions of the proposed temporary above-ground pipeline
 - Please represent all proposed uses on both site plan and elevation formats.
 - Setbacks of wells and other features to property lines
 - Extent of ground disturbance and specific project boundaries
 - Existing vegetation and paths / roadways in the vicinity of the proposed project areas
 - Possible permanent project features
 - Clear outlines of parcel boundaries
 - Topographic features of site

District Response: Please see Exhibit 2.

3. Ground Disturbance (23.05.024 Grading Plan, 23.05.042 Drainage Plan)

- a. Please provide a grading and drainage plan and include the total ground disturbance estimations for the project as a whole, including the disturbance resulting from construction activities associated with the installation and removal of the test injection well, the monitoring well, the outfall connection pipeline, the water storage tanks, and the temporary above ground pipeline. Please include total cut/fill in cubic yards.

District Response: Please see Exhibit 4 Section 3.1

Regarding the total cut/fill in cubic yards for the project completed 14 years ago. At this time, we do not have a consolidated figure available on our records. However, please find attached the final construction report, which provides detailed documentation and visual insights into the amount of earth moved during the project. Perhaps, the county may have some record on the initial emergency permit and design an engineering document that may have been submitted regarding ground disturbance.

4. Sedimentation and Erosion Control (23.05.036)

- a. Please provide a sedimentation and control plan for the project as a whole, including the disturbance resulting from construction activities associated with the installation and removal of the test injection well, the monitoring well, the outfall connection pipeline, the water storage tanks, and the temporary above ground pipeline.

District Response: Please see Exhibit 4, Sections 3.1 and 3.2.

5. 23.05.104 Site Access and Driveway Requirements

- a. Provide plans in compliance for site access. San Simeon Creek Road is a county-maintained road, see Public Works comments.

District Response: Please see Exhibit 5. The District has engaged a qualified Civil Engineer to develop a comprehensive drainage plan and design essential roadway enhancements aimed at reconstructing the approach to the project site in accordance with B-1a rural driveway standards. This project will involve a detailed analysis of the existing drainage patterns, identifying potential problem areas, and implementing effective solutions to ensure optimal stormwater management. Additionally, the design for the road improvements will focus on creating a safe and functional roadway that meets the specific requirements of rural driveways, considering factors such as traffic flow, environmental impact, and the integration of local infrastructure.

6. Exterior Noise Level Standards (Section 23.06.044)

- a. Provide analysis of noise impacts to sensitive receptors.

District Response: Please see Exhibit 6.

Since the decommissioning of the Title 27 evaporation pond, the subsequent removal of the blowers, and the current removal of the sound enclosures, no noise will be associated with the project affecting low-cost visitor-serving facilities.

7. Environmental Compliance

- a. Please provide the supplemental EIR.

District Response: Please see Exhibits 7 & 7.1.

8. Compliance with Emergency Permit ZON2013-00589

- a. Biological Reporting per the EP needs to be provided.

District Response: Please see Exhibits 8 through 8.9.

9. Adaptive Management Plan (AMP)

- a. Please provide current AMP to verify compliance.

District Response: Please see Exhibit 9.

NORTH COAST AREA PLAN

Combining Designations NCAP outside of Urban and Village Reserve Lines:

10. 2 Arroyo de la Cruz, San Carpofo, Pico, San Simeon, Santa Rosa, Perry, and Arroyo Del Padre Juan Creeks (FH).

- a. These are identified areas of potential flood hazards; development and fill in the creeks should be avoided. Maintenance of the creek habitats is essential to protect many coastal resources. These creeks support a number of declining species, such as the Tidewater Goby, Striped Garter Snake, Western Pond Turtle, Red-legged Frog, and Steelhead Trout.
- b. Please identify how project does not impact these resources.

District Response: Development proposed under this CDP is, with the exception of the surface discharge structure, RIW, MW-4, and portions of the product water pipeline, outside of the 100-year flood zone and will result in no fill or development in the creeks. The development within the 100-year flood zone will result in no changes in the creeks' effective Base Flood Elevation (BSE) Please see Exhibit 1 – Project description pages 5-8, Exhibit 2, and Exhibit 7 – Exhibit A CEQA Findings page 8 and 9 (page 12 in the file) Section IV subsection E Item 5 Impact 5.5-5: Flood Hazard Areas - Structures, for details. For the maintenance of the creek habitats please see Exhibit 10 – ESH 2, Exhibit 9, and Exhibit 7, and Exhibit 10 - CZLUO Section 23.04.050 (Non-Agricultural Uses in the Agriculture Land Use Category).

11. 5. North Coast Creeks (SRA)(ESHA).

- a. Portions of Santa Rosa, San Simeon, Pico, and Little Pico, Arroyo de la Cruz, Arroyo del Padre Juan, and San Carpofo Creeks are anadromous fish streams which should be protected from impediments to steelhead migration and spawning. Adjacent riparian and wetland areas provide important wildlife habitat. Ground water and surface waters are linked, and maintenance of the creek habitats is essential to protect many coastal resources. These creeks support a number of declining species, such as the Tidewater Goby, Striped Garter Snake, Western Pond Turtle, Red-legged Frog, and Steelhead Trout.
- b. Please identify how project does not impact these resources.

District Response: The project will result in no fill or development in San Simeon Creek. Please see Exhibit 1 – Project description pages 5-8, Exhibit 2, and Exhibit 3.1 for details of the project footprint. For the maintenance of the creek habitats and declining species protections please see Exhibit 10 – ESH 2, and Exhibit 9, Exhibit 7 – Exhibit A CEQA Findings page 20 and 32 (pages 24-36 in the file) Section V subsection C Item 1 Impact 5.3-1: Special Status Plant and Wildlife Species.

12. 10. San Simeon Creek Lagoon (SRA).

- a. This estuary is located within San Simeon State Beach, and is composed of several biotic communities including salt and freshwater marshes, grasslands, Monterey pine forest, as well as estuarine habitat. The creek supports steelhead trout and other fish species. The area is a major waterfowl feeding and nesting site. Close to 190 bird species have been reported at the lagoon and in adjacent areas.
- b. Please identify how project does not impact these resources.

District Response: Please see Exhibit 1 – Project description pages 5-8 and Exhibit 2 for details of the project footprint. For an analysis of project impacts and the mitigation measures for those impacts please see Exhibit 7 – Exhibit A CEQA Findings page 20 and 32 (pages 24-36 in the file) Section V subsection C Item 1 Impact 5.3-1: Special Status Plant and Wildlife Species, Exhibit 9, and Exhibit 13.

Sensitive Resource Areas (SRA)

- a. 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.
- b. Please identify how project complies with this standard.

District Response: The project was sited and used as much existing infrastructure as feasible to minimize impacts. Please see Exhibit 10, 10.2, Exhibits 7, 7.1, and Exhibit 3.1 Project Completion Report. No construction is proposed within the streambeds, lagoon, or within the terrestrial extent of the riparian vegetation.

CZLUO and Coastal Plan Policies

Several provisions within CZLUO requires special finding for the project and requires feasibility study. Please consult with project biologist to provide feasibility study (siting) as well as required findings for the project. Below is the summary of applicable Title 23 and Coastal Plan Policies that are applicable to the proposed project.

13. CZLUO 23.08.288 (d) (Public Utility Facilities)

- a. Section does not allow public utility facilities located within prime agricultural soils, ESHA, or Hazard findings, unless a finding is made by the approval body. Applications for Public Utility Facilities in the above sensitive areas shall include a feasibility study, that includes constraints analysis, and analyze alternative locations.

District Response: The Cambria Community Services District (CCSD) will be entering into a contract to conduct an updated feasibility study to support the required special finding under the Coastal Zone Land Use Ordinance (CZLUO) for the Water Reclamation Facility (WRF) project. This study will evaluate the project's compliance with applicable land use policies, environmental considerations, analyze alternative locations and projects, and long-term feasibility in alignment with coastal development requirements. The analysis will address critical factors such as water resource sustainability, site suitability, and potential impacts on surrounding land uses. The feasibility study will provide essential data to substantiate the special finding required under the CZLUO, ensuring that the project meets regulatory standards and advances the district's efforts to enhance water resilience in Cambria. CCSD remains committed to working closely with regulatory agencies and stakeholders throughout this process to ensure transparency, compliance, and the successful implementation of the project.

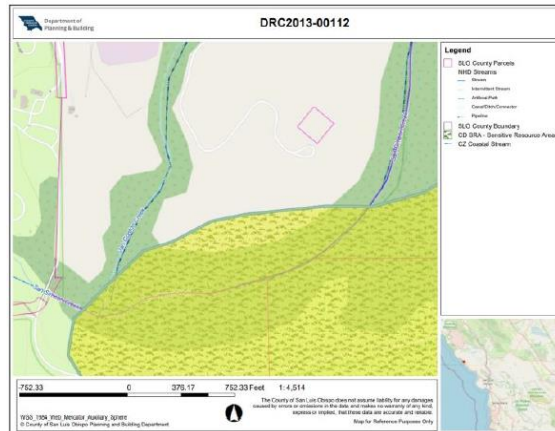
14. CZLUO 23.04.050 (Non-Agricultural Uses In The Agricultural Land Use Category)

- a. Supplemental non-agricultural uses may be established only if the following findings are made by the applicable approval body:
 1. For prime soils, it has been demonstrated that no alternative project site exists except on prime soils; and
 2. The least amount of prime soils possible will be converted; and
 3. The proposed use will not conflict with surrounding agricultural lands and uses.

District Response: Please see Exhibits 10 & 10.2.

15. CZLUO 23.07.164 (Sensitive Resource Area Permit and Processing Requirements)

- a. Project is located within the Sensitive Resource is San Simeon Creek Lagoon.



- b. Any land use permit application within a Sensitive Resource Area shall be approved only where the Review Authority can make the following required findings:
1. The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design.
 2. Natural features and topography have been considered in the design and siting of all proposed physical improvements.
 3. Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource.
 4. The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff

District Response: Please see Exhibit 10 & 10.2, Exhibit 1 – Project description pages 5-8, and Exhibit 2 for details.

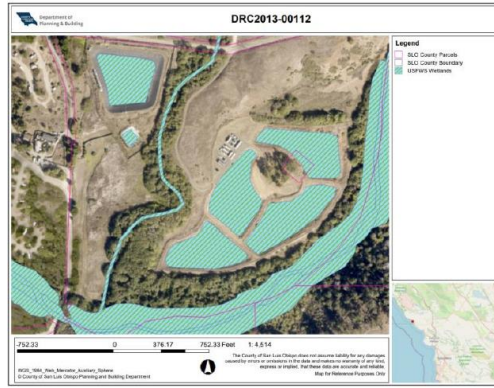
16. CZLUO 23.07.170 (Environmentally Sensitive Habitats)

- a. Approval of a land use permit for a project within or adjacent to an Environmentally Sensitive Habitat shall not occur unless the applicable review body first finds that:
1. There will be no significant negative impact on the identified sensitive habitat and the proposed use will be consistent with the biological continuance of the habitat.
 2. The proposed use will not significantly disrupt the habitat.

District Response: Please see Exhibits 10 & 10.2, Exhibit 7 and 7.1, Exhibit 11 – Instream Flow Study for Lower Van Gordon and Lower San Simeon Creek, and Exhibit 9.

17. CZLUO 23.07.172 (Wetland)

- a. Project is located near a wetland.



- b. Open space easement required: A land use or construction permit for a structure larger than 1000 square feet in floor area shall not be approved on a parcel of one acre or larger that contains a wetland, unless the property owner first grants the county or an approved land trust an open space easement or fee title dedication of all portions of the site not proposed for development, as well as the entire wetland.

District Response: Please see Exhibit 10 & 10.2.

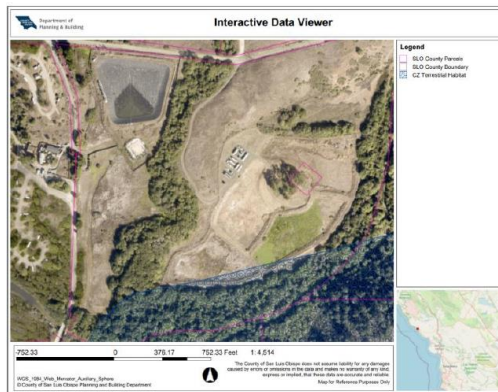
18. CZLUO 23.07.174 (Streams and Riparian Vegetation)

- a. Structures that divert all or a portion of streamflow for any purpose, except for agricultural stock ponds with a capacity less than 10 acre-feet, shall be designed and located to not impede the movement of native fish or to reduce streamflow to a level that would significantly affect the production of fish and other stream organisms.

District Response: The proposed development would use groundwater and would not divert any streamflow. Please see Exhibit 10 & 10.2, Exhibit 9, Exhibit 1, Exhibits 2, Exhibit 7 section yy, and Exhibit 11.

19. CZLUO 23.07.176 (Terrestrial Habitat Protection)

Project is located adjacent to or within a Terrestrial Habitat, see below:

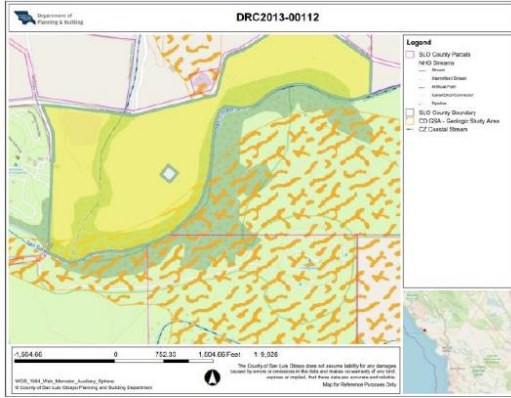


- a. Vegetation that is rare or endangered, or that serves as habitat for rare or endangered species shall be protected. Development shall be sited to minimize disruption of habitat. See exhibit of Terrestrial Habitat.

District Response: The proposed development is sited outside the area designated as Terrestrial Habitat Please see Exhibit 1, Exhibit 2, Exhibit 7 section yy.

20. CZLUO 23.07.080 (Geologic Study Area (GSA))

- a. Project is located within the Geologic Study Area (GSA), see below. A Geologic Study Area combining designation is applied by the Official Maps (Part III) of the Land Use Element, to areas where geologic and soil conditions could present new developments and their users with potential hazards to life and property. These standards are applied where the following conditions exist Moderate potential for liquefaction and landslide risk. Please provide an engineering soils report.

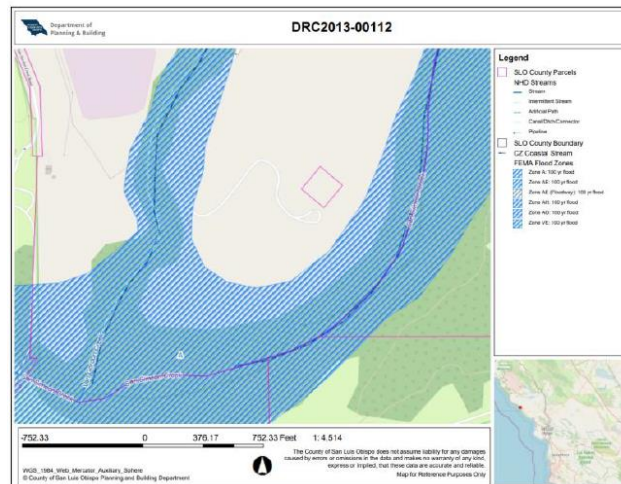


b.

District Response: Please see Exhibit 2 and 2.1.

21. CZLUO 23.07.060 - Flood Hazard Area (FH)

- a. Project is located in the Flood Hazard area, see below. A drainage plan approval is required where any portion of the proposed site is located within a Flood Hazard combining designation. Please provide a drainage plan, see Public Works Comment letter.



District Response: Please see Exhibit 2.

Following Coastal Plan Policies are pertinent to the proposed project. Please review the Coastal Plan Policies (attached) and please provide a written justification of how the proposed project will meet the following policies:

Chapter 6 - Environmentally Sensitive Habitats

Policy 3. Habitat Restoration – requires restoration of damaged habitats as a condition of approval when feasible.

District Response: Please see Exhibit 7 section yy.

Policy 7. Protection of Environmentally Sensitive Habitats – requires restoration of wetlands.

District Response: Please see Exhibit 7 section yy.

Policy 8. Principally Permitted Use – requires special findings if the proposed project is not principally permitted use (special use).

District Response: Please see Exhibit 10 & 10.2.

Policy 11 and 12. Regional Water Quality Control Board “208” Program and CDFW Review - RWQCB/CDFW review may be required.

District Response: Please see Exhibit 10 & 10.2.

Policy 16. Adjacent Development – Development shall be located as far away from the wetland as feasible.

District Response: Please see Exhibit 10 & 10.2.

Policy 17 and 18. Wetland Buffer – requires buffer of minimum of 100 feet in width measured from upland extent of the wetland. For buffers less than 100 feet, mitigation measure shall be required to ensure wetland protection.

District Response: Please see Exhibit 10 & 10.2.

Policy 20. Coastal Streams and Riparian Vegetation – requires protection and preservation of natural hydrological system and ecological function of coastal streams.

District Response: Please see Exhibit 7 and 7.1, Exhibit 9, and Exhibit 11.

Policy 21. Development in or Adjacent to a Coastal Stream – requires design and siting of the project to prevent impacts to coastal habitats.

District Response: Please see Exhibit 7 and 7.1.

Policy 23. County and State Review of Coastal Stream Projects – requires SWRCB and the County to ensure that the beneficial use of coastal stream water is protected. The proposed project shall ensure that the quantity and quality surface water discharge from streams and rivers shall be maintained at levels necessary to sustain the functional capacity of streams.

District Response: Please see Exhibit 7 and 7.1, Exhibit 9, and Exhibit 11.

Policy 22, and 25: Streambed Alteration and CDFW Review – requires review of 1601-1603, may also require a permit from USACE. All project must employ best feasible mitigation measures.

District Response: Please see Exhibits 2, 10 & 10.2.

Policy 26. Riparian Vegetation – alteration of naturally occurring vegetation that protects riparian habitat is not permitted except for permitted streambed alteration (Policy 23) where no feasible alternative exists or an issue of public safety exists.

District Response: Please see Exhibits 10 & 10.2.

Policy 27. Stream Diversion Structures – shall be sited and designed to not impede up and downstream movement of native fish or to reduce stream flows to a level that would significantly affect the biological productivity of the fish and other stream organisms.

District Response: Please see Exhibits 10 & 10.2.

Policy 28. Buffer Zone for Riparian Habitats – rural area requires 100 feet between any new development. 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.

District Response: Please see Exhibits 10 & 10.2.

Policy 28, 29 and 35: Protection of Terrestrial Habitats (TH) and Native Vegetation – TH and native vegetation shall be protected whenever possible. All development shall be designed to disturb the minimum amount possible of wildlife or plant habitat.

District Response: Please see Exhibits 10 & 10.2.

Chapter 7: Agriculture

Policy 1. Maintaining Agricultural Lands – requires prime agricultural land shall be maintained, or available for, agricultural production.

District Response: The proposed project site is located within an area designated for public utility use and has historically not been utilized for agricultural production. Additionally, the CCSD has taken significant measures to avoid encroachment on prime agricultural land, focusing on previously disturbed areas and ensuring that the facility's footprint does not compromise existing or potential agricultural operations.

Furthermore, the WRF will contribute to the long-term sustainability of water resources in the region, which is essential for the viability of local agriculture. By providing a reliable, drought-resilient water source, the facility helps safeguard agricultural operations in the broader Cambria area, ensuring that water shortages do not adversely impact agricultural productivity.

Policy 3. Non-Agricultural Uses – Non-agricultural developments shall meet the following requirements:

- a. No development is permitted on prime agricultural land. Development shall be permitted on non-prime land if it can be demonstrated that all agriculturally unsuitable land on the parcel has been developed or has been determined to be undevelopable.
- b. Continued or renewed agricultural use is not feasible as determined through economic studies of existing and potential agricultural use without the proposed supplemental use.
- c. The proposed use will allow for and support the continued use of the site as a productive agricultural unit and would preserve all prime agricultural lands.
- d. The proposed use will result in no adverse effect upon the continuance or establishment of agricultural uses on the remainder of the site or nearby and surrounding properties.
- e. Clearly defined buffer areas are provided between agricultural and non-agricultural uses.

- f. Adequate water resources are available to maintain habitat values and serve both the proposed development and existing and proposed agricultural operations.
- g. Permitted development shall provide water and sanitary facilities on-site and no extension of urban sewer and water services shall be permitted, other than reclaimed water for agricultural enhancement.
- h. The development proposal does not require a land division and includes a means of securing the remainder of the parcel(s) in agricultural use through agricultural easements. As a condition of approval of non-agricultural development, the county shall require the applicant to assure that the remainder of the parcel(s) be retained in agriculture and, if appropriate, open space use by the following methods:
 - **Agricultural Easement.** The applicant shall grant an easement to the county over all agricultural land shown on the site plan. This easement shall remain in effect for the life of the non-agricultural use and shall limit the use of the land covered by the easement to agriculture, non-residential use customarily accessory to agriculture, farm labor housing and a single-family home accessory to the agricultural use.
 - **Open Space Easement.** The applicant shall grant an open space easement to the county over all lands shown on the site plans as land unsuitable for agriculture, not a part of the approved development or determined to be undevelopable. The open space easement shall remain in effect for the life of the non-agricultural use and shall limit the use of the land to non-structural, open space uses.

District Response: The Water Reclamation Facility (WRF) has been planned and designed in full consideration of these requirements, as detailed below:

No Development on Prime Agricultural Land

The WRF is not proposed on prime agricultural land. The selected site consists of non-prime land that has been previously disturbed and does not support agricultural production. The project location was chosen to avoid impacts on agricultural resources while addressing Cambria's critical need for a sustainable water supply.

Development on Non-Prime Land

The WRF is sited on land determined to be unsuitable for agricultural use. The site selection process included evaluating alternative locations and ensuring that all agriculturally suitable land remains available for agricultural production.

Feasibility of Continued or Renewed Agricultural Use. The WRF project represents a necessary supplemental use that does not interfere with potential agricultural productivity.

Support for Agricultural Use and Preservation of Prime Agricultural Lands

The proposed WRF supports agricultural sustainability by enhancing local water resources. Reclaimed water produced by the facility may provide an additional water source for agricultural irrigation, reducing dependence on traditional water supplies and helping mitigate the effects of drought conditions on the agricultural sector.

No Adverse Effect on Agricultural Uses

The project has been designed to ensure that it does not negatively impact agricultural activities on adjacent or nearby properties. The facility's operations will not interfere with agricultural activities, and CCSD remains committed to maintaining a balanced approach to land use in the region.

Defined Buffer Areas

The project includes appropriate buffer areas to separate facility operations from nearby agricultural activities. These buffers help maintain the integrity of agricultural land and ensure no conflicts arise between different land uses.

Adequate Water Resources for Habitat and Agricultural Use

The WRF will improve local water sustainability, benefiting agricultural and environmental needs. The project will not diminish water resources available for agricultural use but will contribute to water security in the area, particularly in drought.

On-Site Water and Sanitary Facilities

The facility includes self-sustaining water and sanitary infrastructure and does not require an extension of urban sewer and water services. In alignment with Policy 3, the potential for reclaimed water use for agricultural enhancement aligns with the policy's objectives.

No Land Division and Agricultural Easements

The project does not require a land division. CCSD is open to discussing appropriate mechanisms, such as agricultural or open space easements, to ensure that adjacent lands remain dedicated to agriculture or open space use.

Chapter 8: Public Works

Policy 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.

District Response: Please see Exhibits 1 and 2.

The District has engaged a qualified Civil Engineer to develop a comprehensive drainage plan and design essential roadway enhancements aimed at reconstructing the approach to the project site in accordance with B-1a rural driveway standards. This project will involve a detailed analysis of the existing drainage patterns, identifying potential problem areas, and implementing practical solutions to ensure optimal stormwater management. Additionally, the design for the road improvements will focus on creating a safe and functional roadway that meets the specific requirements of rural driveways, considering factors such as traffic flow, environmental impact, and the integration of local infrastructure.

Chapter 9: Coastal Watershed

Policy 1. Preservation of Groundwater Basins - The safe yield of the groundwater basin, including return and retained water, shall not be exceeded except as part of a conjunctive use or resource management program which assures that the biological productivity of aquatic habitats are not significantly adversely impacted.

District Response: Please see Exhibits 7 and 7.1, Exhibit 9, and Exhibit 11.

Policy 2. Water Extractions - Groundwater levels and surface flows shall be maintained to ensure that the quality of coastal waters, wetlands and streams is sufficient to provide for optimum populations of marine organisms, and for the protection of human health.

District Response: Please see Exhibits 7 and 7.1, Exhibit 9, Exhibit 11, and Exhibit 12.

Policy 3. Monitoring of Resources – County shall require applicants to install monitoring devices and participate in water monitoring management programs.

District Response: The Water Reclamation Facility (WRF) has been designed with robust monitoring and reporting protocols to ensure compliance with regulatory requirements and to contribute to regional water resource management efforts.

Installation of Monitoring Devices

The WRF includes advanced monitoring technology to track water quality, groundwater levels, and overall resource usage. These monitoring systems are essential for ensuring the facility operates efficiently and sustainably while protecting local water resources.

Participation in Water Monitoring Management Programs

The district will work closely with regulatory agencies, including the County of San Luis Obispo, the Regional Water Quality Control Board, and other stakeholders, to ensure that data collection and reporting align with established water management policies.

Regular Data Collection and Reporting

The WRF (when in operation) will implement a structured monitoring and reporting program that provides regular updates on water production, groundwater recharge, and environmental impacts.

Ensuring Sustainable Water Resource Management

The implementation of monitoring measures at the WRF will help ensure that the facility contributes positively to the long-term sustainability of water resources in the Cambria area, and the CCSD can make data-driven decisions to support responsible water management practices.

Adaptive Management Approach

CCSD will employ an adaptive management strategy, using monitoring data to refine and improve operational practices over time. If any concerns arise regarding water resource impacts, adjustments can be made proactively to mitigate potential issues.

Policy 8, 9, and 10 – Timing of Construction and Grading, Minimizing Sedimentation, and Drainage Provision – avoid rainy season, if there is a potential for serious erosion and sedimentation problems, and appropriate control measures shall be used to minimize erosion and sedimentation. Site design shall ensure that drainage does not increase erosion.

District Response: Please see Exhibit 2 and Exhibit 4.

Policy 11- Preserving Groundwater Recharge - In suitable recharge areas, site design and layout shall retain runoff on-site to the extent feasible to maximize groundwater recharge and to maintain in-stream flows and riparian habitats.

District Response: Please see Exhibit 2. The advanced water treatment plant portion of the project is located adjacent to the wastewater percolation ponds, and all runoff from that site flows into the ponds.

OTHER DEPARTMENTS/AGENCIES

Agency Comments:

Sheriff Comment letter Dated 9/17/2024

County Public Works Comment Letter Dated 10/4/2024

1. The project site is located on San Simeon Creek and Van Gordon Creek Roads, both of which are County maintained roadways.
2. Recommended road improvements along San Simeon Creek Road may impact or require removal of existing trees. Native and non-native trees in the right-of-way that would be impacted by public improvements (e.g. road and utility) associated with this project should be considered by the Planner during the land use permit authorization and environmental review process.
3. The proposed project is within the North Coast Area A Road Fee Area. Payment of Road Improvement Fees is required prior to building permit issuance.
4. The proposed project is within a drainage review area. A drainage plan is required to be prepared by a registered civil engineer and will be reviewed at the time of Building Permit submittal by Public Works. The applicant should review Section 23.05.040 of the Land Use Ordinance prior to future submittal of development permits.
5. The proposed project is currently located within the 100-year flood zone. The project engineer should be prepared to determine the 100-year base flood elevation and comply with County flood hazard construction standards, Section 23.07.060 of the Land Use Ordinance.
6. This project appears to not meet the applicability criteria for Stormwater Management, as it is located outside a Stormwater Management Area (MS4) or is within but creates or replaces less than 2,500 sf of impervious area.
7. If the project site disturbs 1.0 acre or more the applicant must enroll for coverage under California's Construction General Permit, which may require preparation of a project Stormwater Control Plan even if it is located outside a Stormwater Management Area.

District Response: The CCSD remains committed to ensuring that all necessary requirements related to roadway improvements, environmental considerations, drainage, flood zone compliance, and stormwater management are addressed in coordination with the County. Below are our responses to the specific items outlined in the letter:

Roadway Improvements and Tree Impacts

- The CCSD recognizes that San Simeon Creek Road and Van Gordon Creek Road are County-maintained roadways and will work closely with County Public Works to implement any necessary road improvements.
- Any required modifications to San Simeon Creek Road that may impact trees in the right-of-way will be evaluated in coordination with County Planning during the land use permit authorization and environmental review process.
- A tree impact assessment will determine the extent of potential removals, and mitigation measures will be explored where necessary, particularly for native trees.

Road Improvement Fees

- The CCSD acknowledges that the project is within the North Coast Area A Road Fee Area and will ensure that the required Road Improvement Fees are paid before the issuance of building permits in accordance with County regulations.

Drainage Review and Plan Requirements

- The WRF site is within a designated drainage review area, and CCSD will comply with the requirement to submit a drainage plan prepared by a registered civil engineer.
- The drainage plan will be developed in accordance with Section 23.05.040 of the Land Use Ordinance and will be submitted for review as part of the Building Permit process.

Flood Zone Compliance

- The CCSD acknowledges that the project site is within the 100-year flood zone.
- The project engineer will determine the 100-year base flood elevation and ensure compliance with County flood hazard construction standards outlined in Section 23.07.060 of the Land Use Ordinance.
- The project design will incorporate necessary flood protection measures to mitigate risks associated with potential flooding.

Stormwater Management

- Based on the County's comments, the project does not appear to meet the applicability criteria for Stormwater Management, as it is either outside a designated Stormwater Management Area (MS4) or creates/replaces less than 2,500 square feet of impervious area.
- If the project site disturbs one acre or more, CCSD will enroll for coverage under California's Construction General Permit as required.
- If enrollment in the General Permit is required, a Stormwater Control Plan will be prepared in compliance with state and local regulations.

Environmental Health Comment Letter Dated 10/7/2024

District Response: Please see Exhibits 15 and 15.1.

The Cambria Community Services District (CCSD) has evaluated the proposed Water Reclamation Facility (WRF) project to determine whether modifications or updates to the Hazardous Waste Self-Reporting Requirements will be necessary.

Based on the current project scope and operations, CCSD anticipates that the WRF will generate and manage small quantities of chemicals and residual waste materials associated with water treatment processes. These materials will be handled in compliance with all applicable local, state, and federal hazardous waste regulations, including reporting requirements established by the California Department of Toxic Substances Control (DTSC) and the San Luis Obispo County Environmental Health Services Division.

To ensure compliance:

- CCSD will review and update its Hazardous Materials Business Plan (HMBP) if necessary, as required under the California Health and Safety Code (Section 25500-25520).
- The district will continue to self-report hazardous waste generation and disposal activities to the appropriate regulatory agencies, including the Certified Unified Program Agency (CUPA) for San Luis Obispo County.
- Suppose operational changes result in new hazardous waste streams or exceed established regulatory thresholds. In that case, CCSD will submit the necessary modifications to its reporting documents and notify the relevant oversight agencies accordingly.
- Currently, CCSD does not anticipate significant changes to its existing hazardous waste reporting obligations. However, the district will continue to monitor regulatory requirements

and ensure that all applicable reporting updates are submitted as needed throughout the development and operation of the WRF.

Coastal Commission Letter dated 10/1/2024

District Response: Please see Exhibit 13.

- Additional information from the submittal may warrant more information and planning will notify of the items.
- Ag Commissioner Office
- APCD
- Building Department
- Cal/Fire
- County Parks
- North Coast Advisory Council
- Army Corps of Engineers
- Cal Fish and Wildlife Service
- Cal Trans
- RWQCB
- State Parks
- US Fish and Wildlife Service