

APPENDIX A
Notice of Preparation,
Project Information Packet/
Environmental Checklist,
and NOP Comment Letters

**Project Information Packet/
Environmental Checklist**



1.0 PROJECT INFORMATION PACKET

1.1 INTRODUCTION

Pursuant to CEQA Guidelines Section 15082, *Notice of Preparation and Determination of Scope of EIR*, Cambria has distributed this Notice of Preparation/Project Information Packet for the Cambria Emergency Water Supply Project Environmental Impact Report (EIR).

The sections that follow describe the Project's regional location, summarize the Project Background and Description, and list the issue areas to be evaluated through the EIR, which will be prepared in accordance with CEQA Guidelines Section 15161, *Project EIR*.

1.2 PROJECT LOCATION

Cambria is located in central California's coastal region, in the northwest portion of San Luis Obispo County (SLO County); see [Exhibit 1, Regional Context](#). Cambria lies within the Santa Rosa Creek Valley, south of San Simeon. The Project site is located in unincorporated SLO County, north of Cambria, north and east of the Hearst San Simeon State Park (State Park). The Project site is more specifically located southeast of the San Simeon Monterey Creek Road/Van Gordon Creek Road intersection, at 990 San Simeon Monterey Creek Road; see [Exhibit 2, Local Context](#).

The approximately 96-acre Project site involves two parcels of land (APNs 013-051-024 and 013-051-008) owned by the Cambria Community Services District (CCSD) and used as their San Simeon well field and percolation pond system. Access to the Project site is provided along the northern site boundary, via San Simeon Monterey Creek Road.

1.3 BACKGROUND AND HISTORY

All of Cambria's potable water is supplied from groundwater wells in the San Simeon Creek and Santa Rosa Creek aquifers. For water Year 2013/2014, the total rainfall in Cambria was approximately 80 percent of the minimum rainfall needed to fully recharge these two aquifers. This severe drought condition has placed Cambria's water supply in immediate jeopardy. Consequently, on January 30, 2014, the CCSD Board of Directors declared a Stage 3 Water Shortage Emergency, the most stringent of three water shortage levels, which included an unprecedented ban on all outdoor use of potable water. As part of its same January 30, 2014 meeting, the CCSD also authorized emergency contracting procedures to complete an emergency water supply project. Reflecting on the severity of the drought conditions experienced in Cambria, as well as the rest of California, on January 17, 2014, Governor Edmund G. Brown proclaimed a State of Emergency to exist in California due to current drought conditions. Similarly, on March 11, 2014, the SLO County Board of Supervisors proclaimed a local State of Emergency due to the County's drought conditions. On April 25, 2014, Governor Brown issued an Executive Order to mitigate the effects of the drought conditions upon California's people and property. The CCSD anticipates continued water shortages and drought conditions over the course of the next 20 years, as a result of climate change impacts.¹

In response to the ongoing severe drought emergency, as well as the forecast drought conditions, the CCSD proposed and constructed the Cambria Emergency Water Supply Project (Project). The Project is specifically intended to avoid current and projected water supply shortages, and provide additional benefits including: preventing migration of secondary wastewater effluent into the San Simeon well field production wells; preventing intrusion of seawater into the CCSD's San Simeon well field production wells; avoiding potential ground subsidence; and maintaining adequate groundwater levels at the San Simeon well field to ensure proper production well operations (no loss of suction). Due to continued water shortages and forecast drought conditions, the CCSD anticipates the need for use of the Project facilities during at least 8 to 10 years of the next 20 years.²

¹ CDM Smith, *Cambria Emergency Water Supply Project Description*, Page 1, June 2014.

² *Ibid*.



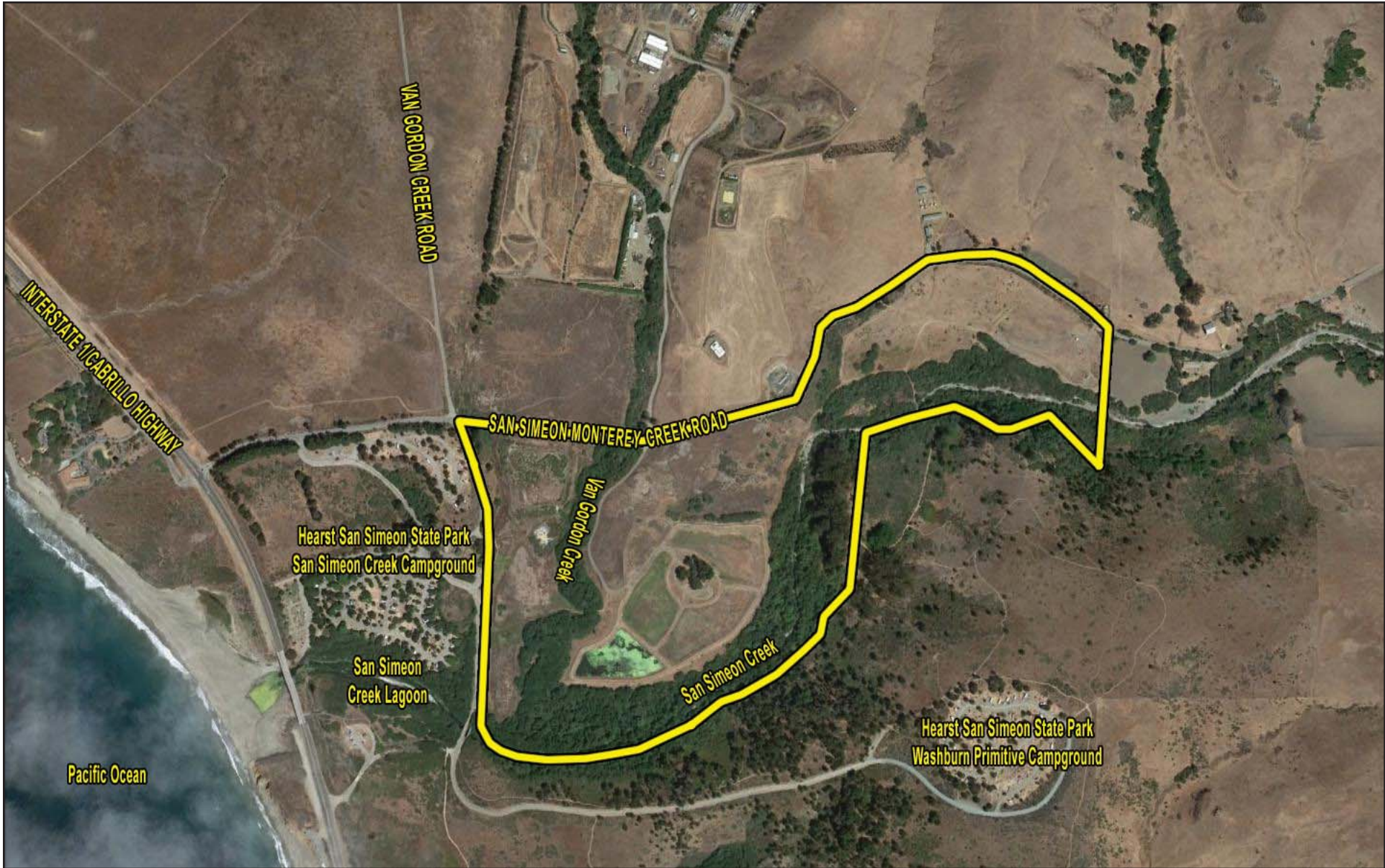
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CAMBRIA EMERGENCY WATER SUPPLY PROJECT

Regional Context



Source: Google Earth, 2014.
 [Yellow line symbol] - Project Boundary

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 CAMBRIA EMERGENCY WATER SUPPLY PROJECT

Local Context



On April 22, 2014, the CCSD submitted an application to SLO County for an Emergency Coastal Development Permit (E-CDP), in order to construct and operate the proposed Project. On May 15, 2014, the County issued an E-CDP (ZON2013-00589), authorizing construction and operation of an emergency brackish water supply project to serve existing development within the CCSD's service area, subject to various conditions. E-CDP Condition 5 required construction authorized by the CDP to be completed within 180 days from Permit issuance. Project construction began on May 20, 2014 and was completed on November 14, 2014. Testing and commissioning of the completed facility began on December 8, 2014 and was completed on January 20, 2015, when Project operations began. The Project is unique in that Project design and construction occurred concurrent with Project analysis and permitting.

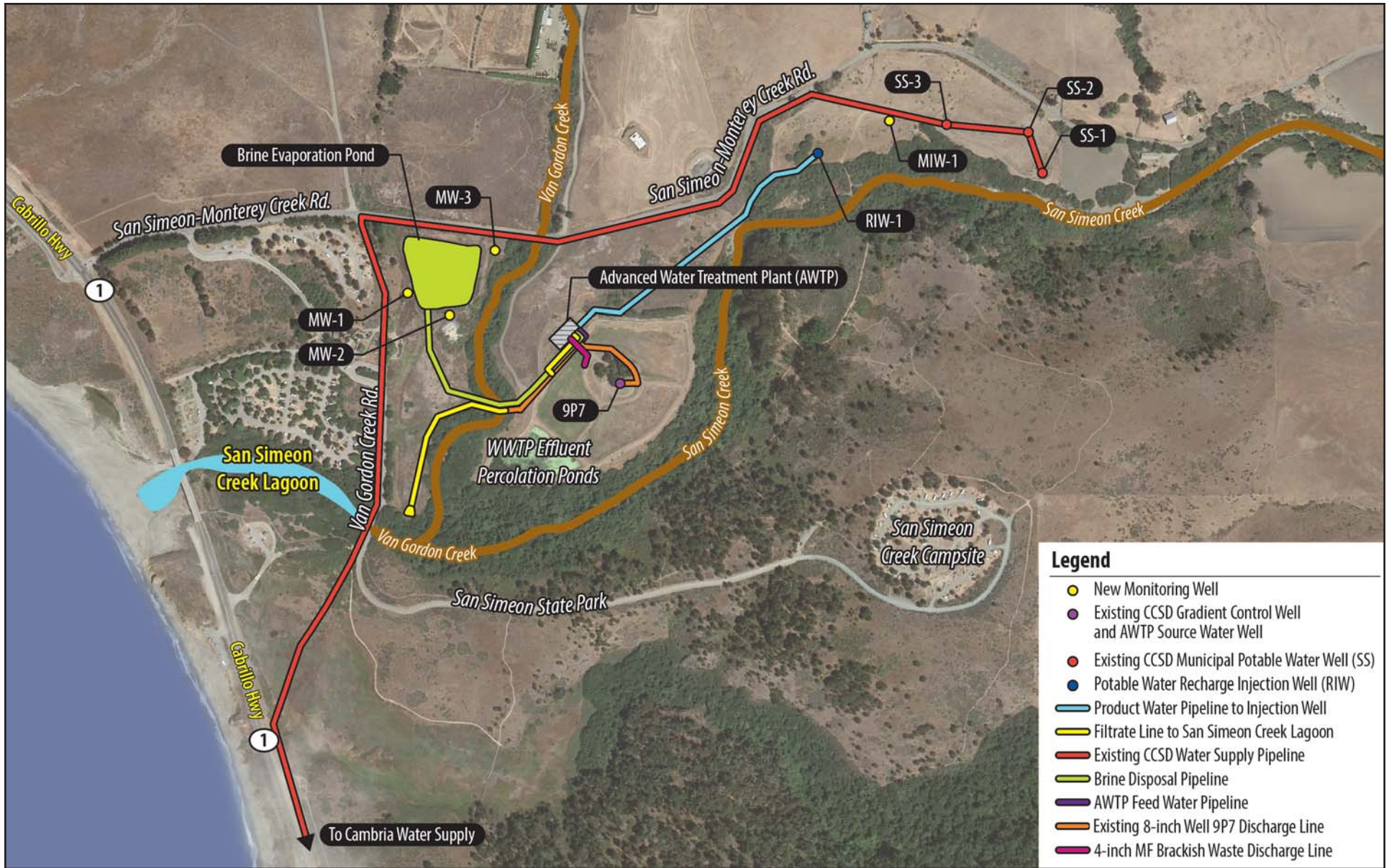
The E-CDP also included a list of conditions concerning Project construction/operations and general land use entitlement matters, as well as hydrology/water quality, light/glare, noise, air quality, cultural resources, and biological resources, among other conditions. In order to authorize the Project, E-CDP Condition 6 required that the CCSD apply for a Regular Coastal Development Permit (R-CDP) within 30 days from E-CDP issuance. In compliance with E-CDP Condition 6, the CCSD applied to the County for an R-CDP on June 13, 2014. The Project's R-CDP will allow operation of the Project facilities during future dry seasons. Support documentation submitted along with the R-CDP application included hydrogeological data and the *Cambria Emergency Water Supply Project Initial Study/Mitigated Negative Declaration (IS/MND)* (RBF Consulting, June 20, 2014).

The IS/MND was made available for a 30-day public review period from June 23, 2014 to July 22, 2014. A total of approximately 20 comment letters were received during the public review period. Additionally, a meeting with public agencies was held at the California Coastal Commissions' (CCC) Santa Cruz office on August 27, 2014. In response to the comment letters and the subsequent consultation with public agencies, the Project was modified and additional design features were added. Notable differences between the earlier Project analyzed in the IS/MND and the Project that was constructed include realignment of the filtrate, brine disposal, and product water pipelines, and installation of gopher and frog barriers around the evaporation pond's perimeter. Additionally, discharge into San Simeon Creek via a surface flow discharge structure was included.

1.4 PROJECT CHARACTERISTICS

The CCSD proposed the Cambria Emergency Water Supply Project (Project) in response to the CCSD Board of Directors' January 30, 2014 declaration of a Stage 3 Water Shortage Emergency in Cambria. The Project involves construction and operation of emergency water facilities at the CCSD's existing San Simeon well field and percolation pond system property. The Project was designed and constructed to treat brackish water using advanced treatment technologies and recharge the CCSD's San Simeon well field aquifer with advance treated water. The brackish water source is a combination of diluted seawater that occurs from the subterranean dispersion of salts from a deeper saltwater wedge into an overlying freshwater interface zone, creek underflow, and percolated treated wastewater effluent. The Project is capable of pumping up to 452 gallons per minute (gpm) of advance treated water into a re-injection well located a minimum of two months travel time from existing potable production Wells SS-1 and SS-2. A 400 gpm maximum extraction rate from existing CCSD Well SS-1, SS-2, or a combination of both wells can occur during Project operations. The Project's net water production is approximately 300 gpm, or approximately 250 acre-feet over an assumed six-month dry season. The Project's operational period varies according to the amount and timing of seasonal rainfall and the water levels in the CCSD's well field. In addition to providing water supply augmentation during dry periods, the Project prevents both seawater intrusion into the groundwater aquifer and potential subsidence, and protects existing well pumps from losing suction. The Project provides up to 100 gpm of fresh water to San Simeon Creek Lagoon when operational.

The Project facilities are illustrated on [Exhibit 3, *Project Facilities*](#), and summarized, as follows:



Source: Google Earth, 2014.

NOT TO SCALE



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NOTICE OF PREPARATION
CAMBRIA EMERGENCY WATER SUPPLY PROJECT

Project Facilities

Exhibit 3



- Extraction Well - The Project's source water is pumped from existing Well 9P7 (aka well 27S-8E-9P7).
- Advanced Water Treatment Plant (AWTP) – An AWTP treats brackish water to advance treated water quality suitable for injection into the groundwater basin to augment the potable water supply. The AWTP's main treatment processes include membrane filtration (MF), reverse osmosis (RO), and advanced oxidation process (AOP) utilizing ultraviolet (UV) light, and hydrogen peroxide.
- Recharge Injection Well (RIW-1) – The treated AWTP product water is re-introduced/pumped for injection into the San Simeon groundwater basin through RIW-1.
- Evaporation Pond – The AWTP generated waste stream (brine) is disposed for evaporation in the Project's Title 27 compliant evaporation pond (in the same location and footprint occupied by a basin that was previously used to store treated wastewater effluent). The evaporation pond provides both monitoring and lining to ensure brine containment. The brine evaporation is aided with five mechanical spray evaporators within three-sided sound enclosures.
- Lagoon Surface Discharge – Included as mitigation to protect the San Simeon Creek Lagoon, AWTP product water is pumped during dry weather conditions for surface discharge onto CCSD property, near the vicinity of the upstream end of the San Simeon Creek Lagoon. An interconnecting four-inch diameter pipeline provides treated water from the AWTP to the surface discharge structure near the head of the San Simeon Creek Lagoon. The water provided to the lagoon is treated and tested to meet Regional Water Quality Control Board (RWQCB) conditions specified within a NPDES General Permit for Low Threat Discharges. The lagoon water pipeline discharge structure dissipates velocity, in order to create a sheet flow of mitigation water, prior to it entering the upstream area of the San Simeon Creek Lagoon.
- Monitoring Wells (MW) – The Project includes five monitoring wells (MW-1, MW-2, MW-3, MW-4, and one un-named monitoring well). Monitoring wells MW-1, MW-2 and MW-3 are provided up-gradient and down-gradient from the evaporation pond. Monitoring well MW-4 is being provided up-gradient from the lagoon water discharge structure to ultimately replace existing monitoring well 16D1 (aka well 27S-8E-16D1). MW-4 was added to the original Project in response to RWQCB concerns over the 100 gpm high quality lagoon water biasing its testing towards higher quality results. An un-named groundwater MW is also provided on the CCSD well field, between RIW-1 and the existing production wells.
- Pipelines – Four pipelines:
 - AWTP Feed Water Pipeline: connects with the Well 9P7 Discharge Pipeline between Well 9P7 and the AWTP;
 - Product Water Pipeline: connects the AWTP with RIW-1;
 - Lagoon Water Pipeline: connects the AWTP to the lagoon discharge structure (this alignment includes horizontal directional drilling placement under Van Gordon Creek); and,
 - Brine Disposal Pipeline: a double contained pipeline that connects the AWTP to the evaporation pond (this alignment includes horizontal directional drilling placement under the Van Gordon Creek).

1.5 POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will focus on the following environmental issues:

- Aesthetics;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Hydrology and Water Quality;
- Land Use and Planning; and
- Noise.



Due to the decision to prepare an EIR, an Initial Study for the current Project was not prepared. This option is permitted under CEQA Guidelines Section 15063(a), which states that if the Lead Agency determines that an EIR will be required for a Project, the Lead Agency may skip further initial review and begin work on the EIR. An Environmental Checklist is attached to indicate the areas being considered within the EIR. As previously noted, an IS/MND was prepared in June 2014 for an earlier version of the Project; see Section 1.3, *Background and History*.



2.0 ENVIRONMENTAL CHECKLIST

Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
1. AESTHETICS. <i>Would the Project:</i>				
a. Have a substantial adverse effect on a scenic vista?			X	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	X			
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	X			
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	
2. AGRICULTURE AND FOREST RESOURCES. <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:</i>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
3. AIR QUALITY. <i>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:</i>				
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?	X			
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-	X			



Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
d. Expose sensitive receptors to substantial pollutant concentrations?	X			
e. Create objectionable odors affecting a substantial number of people?			X	
4. BIOLOGICAL RESOURCES. <i>Would the Project:</i>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X			
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X			
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X			
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	X			
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	X			
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
5. CULTURAL RESOURCES. <i>Would the Project:</i>				
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?	X			
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	X			
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X			
d. Disturb any human remains, including those interred outside of formal cemeteries?			X	



Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
6. GEOLOGY AND SOILS. <i>Would the Project:</i>				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
2) Strong seismic ground shaking?			X	
3) Seismic-related ground failure, including liquefaction?				X
4) Landslides?			X	
b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
7. GREENHOUSE GAS EMISSIONS. <i>Would the Project:</i>				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
8. HAZARDS AND HAZARDOUS MATERIALS. <i>Would the Project:</i>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X



Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?				X
f. For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?				X
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	
9. HYDROLOGY AND WATER QUALITY. <i>Would the Project:</i>				
a. Violate any water quality standards or waste discharge requirements?	X			
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	X			
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	X			
f. Otherwise substantially degrade water quality?	X			
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X



Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
j. Inundation by seiche, tsunami, or mudflow?				X
10. LAND USE AND PLANNING. <i>Would the Project:</i>				
a. Physically divide an established community?				X
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X			
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
11. MINERAL RESOURCES. <i>Would the Project:</i>				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
12. NOISE. <i>Would the Project result in:</i>				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c. A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?	X			
d. A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?	X			
e. For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?				X
f. For a Project within the vicinity of a private airstrip, would the Project expose people residing or working in the Project area to excessive noise levels?				X
13. POPULATION AND HOUSING. <i>Would the Project:</i>				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X



Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X
14. PUBLIC SERVICES.				
a. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			X	
2) Police protection?			X	
3) Schools?				X
4) Parks?				X
5) Other public facilities?				X
15. RECREATION.				
a. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
16. TRANSPORTATION/TRAFFIC. <i>Would the Project:</i>				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X	
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e. Result in inadequate emergency access?				X
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or				X



Threshold	Potentially Significant Impact	Potentially Significant Unless Mitigated	Less Than Significant Impact	No Impact
otherwise decrease the performance or safety of such facilities.				
17. UTILITIES AND SERVICE SYSTEMS. <i>Would the Project:</i>				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
d. Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?				X
f. Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?				X
g. Comply with federal, state, and local statutes and regulations related to solid waste?				X
18. MANDATORY FINDINGS OF SIGNIFICANCE. <i>Would the Project:</i>				
a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X			
b. Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	X			
c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	



LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

I find that the proposed use COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that, although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described in Section 5.0 have been incorporated. A NEGATIVE DECLARATION will be prepared.

I find that the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposal MAY have a significant effect(s) on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigation incorporated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

Signature

Cambria Community Services District

Agency

Mr. Robert C. Gresens, P.E.,
District Engineer

Printed Name and Title

March 4, 2015

Date

NOP Comment Letters

3/9/15

In Regards: NOP for Cambria EWS Project

TO: Ms Rita Garcia, Technical Manager
RBF Consulting, an M. Baker International Co.
1472 Alton Parkway
Irvine California 92618

From: Leslie Richards
1501 San Simeon Creek Rd
Cambria Calif 93428

(805) 924-0404
(805) 927-0384 fax

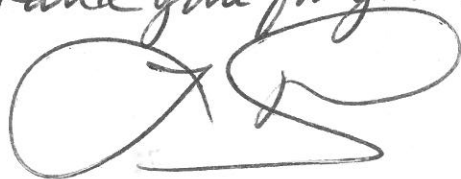
Per our phone conversation this morning,
here is my written request for:

A) Information pertaining to the
Evaporation pond blowers
specifically: manufacturer &
operational guidelines

B) Any current chemical analysis
of brine pond contents.

With this info I can "target" my specific
concerns related to the project's potential
environmental effects.

Thank you for your time,



cc. 1 Grube
2 Gerson
3 Gibson
4 Warner
5 Monning

Please either mail to above address or
fax (with my name & phone # at top of page)

Steele, Noelle

From: Ted Siegler <soroka@ix.netcom.com>
Sent: Tuesday, March 17, 2015 6:06 PM
To: Garcia, Rita
Subject: Cambria EWSP NOP

Ms. Garcia,

I am a full time resident of Cambria. This email is in response to the request for comments during the Notice of Preparation period related to the EIR for the Cambria Emergency Water Supply Project (Project).

As a resident, I have many concerns related to our community's water supply. In general, I support the Project because it mitigates a number issues that have plagued the community for many years. Below I list some of the concerns I consider most important.

- As a result of our current water emergency, homeowners are limited in the amount of water they can use without penalty. Health and hygiene are suffering. Unflushed toilets, standing water waiting for reuse, lack of water for handwashing and bathing, etc. are substantial problems for the health our community.
- There are significant economic issues. Homeowners have lost investments in landscaping or have incurred increased cost to maintain it.
- Continued water shortages have harmed or will harm property values.
- There have been calls around town to limit tourism, including events such as Pinedorado and the Scarecrow Festival. Cutbacks in tourism would have an obvious negative effect on Cambria's businesses and their owners, quite possibly putting many of them out of business.
- Loss of tourism also impacts the service workers who staff the businesses, people who can least afford the economic consequences. This burden falls disproportionately on our Latino community.
- Limiting tourism restricts access to California's coastal resources, counter to the intentions of the Coastal Act.
- There is an existential safety problem. Insufficient water will hamper fire suppression efforts at a time of severely heightened fire danger.

While the Project does not solve all of these concerns, it will contribute to solutions. As a member of the community, I support the Project as a constructive step in making Cambria a better place to live.

Ted Siegler

2151 Ogden Drive

Cambria, CA 93428

805-924-0125

Steele, Noelle

From: Iggy Fedoroff <chefed@att.net>
Sent: Thursday, March 19, 2015 5:36 PM
To: Garcia, Rita
Subject: Cambria EWS Environmental Impact Report

Ms. Rita Garcia
Technical Manager
RBF Consulting
[14725 Alton Parkway](#)
[Irvine, CA 92618](#)

Dear Ms. Garcia,

I would like to lend my support for the EWS because I am concerned about the long-term availability of potable water for Cambria, including sustainable supplies of clean water for the purposes of drinking, hygiene and fire protection. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages. My wife and I have owned our home here for nearly 27 years and have watched the community struggle with various options to provide the town with a sustainable water supply.

I am pleased that the Cambria Community Services District Board of Directors finally took affirmative action to provide a sustainable potable water source for our community. To me, the environmental impact of not providing such a state-of-the-art water regeneration facility would be catastrophic.

The EIR should address the detriment to the community environment in terms of: loss of service jobs due to loss of tourism; loss of sensitive habitat resulting from the San Simeon lagoons drying up; potential catastrophic fires spreading due to the absence of sufficient water resources needed to abate early fire outbreaks; and finally the impact on the remaining citizenry once many are forced to leave when insufficient potable water is available to meet the community's daily needs.

We need not be alarmists, but it will not be beyond the realm of possibility to have many empty, abandoned houses interspersed among occupied homes. Such a negative impact to our environment can be avoided if the EWS receives the green light for permanent, regular production of potable water for not only the citizens of our community, but also to the area's visitors on whom many businesses in Cambria depend for their livelihood.

Sincerely,

Igor V. Fedoroff
5580 Sunbury Avenue
Cambria, CA 93428-2412
805.927.3234

Steele, Noelle

From: Al & Claudia Solomon <2solos@charter.net>
Sent: Thursday, March 19, 2015 7:53 PM
To: Garcia, Rita
Subject: Support for Cambria Community Service District's Emergency Water System (EWS)

Based on an analysis by NASA California reservoirs will be out of water in the coming year and based on Cambria's rainfall to date our situation could be just as bleak. But because of the foresight of our District's directors we are on the cusp of having a reliable water source that will not only benefit humans but wildlife as well. One of our water sources, San Simeon Creek, will and has been infused with additional water from our plant and if all goes as planned, during our trial run, this is a win-win situation for us all. We are fully in support of this project.

Al & Claudia Solomon
3225 Bradford Circle
Cambria, CA 93428
805-927-7732



Air Pollution Control District
San Luis Obispo County

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MAR 27 2015
RBF CONSULTING

March 20, 2015

Ms. Rita Garcia
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, CA 92618

SUBJECT: APCD Comments Regarding the DRC2013-00112 CAMBRIA CSD Emergency
Back-Up Brackish Water Supply NOP Project Level

Dear Ms. Garcia,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the project located at 990 San Simeon Creek Road in Cambria. This project was done in response to the declaration of the Stage 3 Water Shortage Emergency in Cambria and is proposed to avoid water supply shortages anticipated by the end of summer/early fall 2014. The Advanced Water Treatment Plant (AWTP) is assumed to operate continuously for six months for the year when drought conditions are the most severe. *The following are APCD comments that are pertinent to this project.*

1. Contact Person:

Meghan Field
Air Pollution Control District
3433 Roberto Court
San Luis Obispo, CA 93401
(805) 781-5912

2. Permit(s) or Approval(s) Authority:

Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Power screens, conveyors, diesel engines, and/or crushers;
- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generator;

- Internal combustion engines;
- Rock and pavement crushing;
- Unconfined abrasive blasting operations;
- Tub grinders;
- Trommel screens; and,
- Portable plants (e.g. aggregate plant, asphalt batch plant, concrete batch plant, etc).

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

3. Environmental Information:

The project under development has the potential for significant impacts to local air emissions, ambient air quality, sensitive receptors, and the implementation of the Clean Air Plan (CAP). A complete air quality analysis should be included in the DEIR to adequately evaluate the overall air quality impacts associated with implementation of the proposed project. This analysis should address both short-term (construction) and long-term (operational) emissions impacts (including traditional air pollutants, air toxics and greenhouse gas emissions). The following is an outline of items that should be included in the analysis:

The "2012 CEQA Air Quality Handbook" (the Handbook) can be used as guidance for assessing the air quality impacts for this project and defining mitigation measures. A copy can be accessed on the APCD web page at:

http://slcleanair.org/images/cms/upload/files/CEQA_Handbook_2012_v1.pdf

- a) A description of existing air quality and emissions in the impact area, including the attainment status of the APCD relative to State and Federal air quality standards and any existing regulatory restrictions to development. The most recent Clean Air Plan (CA) should be consulted for applicable information and the APCD should be consulted to determine if there is more up to date information available.
- b) A detailed description of all phases of the project should be included in the EIR. Based on the description, a detailed quantitative air emissions analysis at the project scale needs to be completed and all emissions from each phase of the project need to be quantified. A complete emission analysis should be performed on all relevant construction and operational phase emission sources using the latest approved version of CalEEMod (www.caleemod.com), EMFAC, OFF-ROAD, AP-42 "Compilation of Air pollutant Emission Factors" or other APCD approved emission calculator tools. This analysis should include both stationary and mobiles sources, regardless if APCD permits are needed for the equipment. A process flow diagram for the process equipment should be included in the DEIR and detail of the size and specification of each piece of equipment that will be used. All assumptions used in the air emissions calculations should be included in the DEIR. Modeling results should include detailed output reports that include data input parameters, assumptions, and default modification if applicable. The quantitative analysis needs to

address criteria pollutants, greenhouse gases, air toxics, and diesel particulate matter and be compared to APCD's CEQA threshold.

- c) As indicated above greenhouse gases should be quantified as part of the project. The short term greenhouse gas impacts from the construction should be amortized over the life of the project and added to the operational phase impacts. Additionally, if the project will result in any loss and or conversion of vegetated land (i.e., cropland, forestland, grassland, wetlands, other) the GHG emissions associated with that loss or conversion should be quantified and mitigated as appropriate.
 - d) This project has the potential to emit toxic or hazardous air pollutants which may impact sensitive receptors. Sensitive receptors are people that have increased sensitivity to air pollution. Sensitive receptor locations include schools, residential dwellings, parks, day care centers, nursing homes, and hospitals. Health impacts may be significant due to an increased cancer risk for the affected population, even at a very low level of emissions. This project should be required to include a health risk assessment in the DEIR to document the potential level of risk associated with their operations. The assessment should include both mobile and stationary sources.
 - e) The EIR should include a range of feasible alternatives to the proposed project that could effectively minimize air quality impacts. A thorough emission analysis should be conducted for each of the proposed alternative identified. All calculations and assumptions used should be fully documented in an appendix to the EIR.
 - f) A cumulative impact analysis should be performed to evaluate the combined air quality impacts of this project and impact from existing and proposed future development in the area. This should encompass all planned construction activities within one mile of the project.
 - g) Odors from the operation could be an issue for local residences in the area. Odor sources should be identified as part of the DEIR and mitigation measures to control odors proposed. An Odor Monitoring and Complaint Response Plan will need to be developed as part of the project and reviewed and approved by the APCD prior to construction of the project.
 - h) Mitigation measures to reduce or avoid significant air quality impacts should be recommended. The DEIR should address any proposed off-site mitigation measures and describe feasible mitigation measures to reduce air quality impacts on-site. Off-site mitigation may be required in the event that emission cannot be reduced on-site below APCD specified thresholds.
4. Permit Stipulation/Conditions:
- It is recommended reference material include the 2012 version of the "CEQA Air Quality Handbook" (the Handbook). It can be accessed on the APCD web http://slcleanair.org/images/cms/upload/files/CEQA_Handbook_2012_v1.pdf

March 20, 2015

5. Alternatives:

Any alternatives described in the DEIR should involve the same level of air quality analysis as described in section 3 listed above.

6. Reasonably Foreseeable Projects, Programs or Plans:

None at this time.

7. Relevant Information:

As mentioned earlier, the CEQA Air Quality Handbook should be referenced in the DEIR for determining the significance of impacts and level of mitigation recommended.

8. Further Comments:

On July 18, 2014, the APCD submitted a comment letter in regards to the Initial Study/Mitigated Negative Declaration for this project. **All items in that letter still apply. Please review the July 18 letter for project specific comments and recommendations.**

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Meghan Field
Air Quality Specialist

MDF/mag/arr

cc:

Robert Gresens, Cambria Community Service District
Tim Fuhs, APCD
Gary Willey, APCD



Air Pollution Control District
San Luis Obispo County

July 18, 2014

Robert C. Gresens, P.E.
Cambria Community Service District
1316 Tamson Drive, Suite 201
Cambria, California 93428

SUBJECT: APCD Comments Regarding CAMBRIA CSD Emergency Water Supply Project

Dear Mr. Gresens,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at 990 San Simeon Creek Road in Cambria. This project is being proposed in response to the declaration of the Stage 3 Water Shortage Emergency in Cambria and is proposed to avoid water supply shortages anticipated by the end of summer/early fall 2014. The Advanced Water Treatment Plant (AWTP) is assumed to operate continuously for six months for the year when drought conditions are the most severe. The total estimated construction period for this project is approximately 6 months. *The following are APCD comments that are pertinent to this project.*

CONSTRUCTION PHASE IMPACTS- Below Threshold

The initial study/ mitigated negative declaration evaluated the construction impacts of this project using the CalEEMod computer model for estimating construction emissions related to the development of land uses. The APCD has reviewed this information and concurs with the modeling results that indicate that the construction phase impacts will likely be less than the APCD's significance threshold values as identified in Table 2-1 of the CEQA Air Quality Handbook. However, the Diesel Particulate Matter, depending on the actual activity on site has a high potential to exceed our daily significance threshold of 7lbs per day. **The APCD recommends on-site mitigation from construction activities to the greatest extent possible to ensure that the DPM value does not exceed our significance threshold. Please see below for measures that should be included.**

Standard Mitigation Measures for Construction Equipment

The standard construction equipment mitigation measures for reducing nitrogen oxide (NO_x), reactive organic gases (ROG), and diesel particulate matter (DPM) emissions are listed below and in section 2.3.1 of the APCD's 2012 CEQA Handbook. **These measures are applicable to all projects where construction phase emissions exceed APCD thresholds. In the case of this project, as listed above, this project has the potential to emit more than the APCD's DPM significance threshold of 7lbs per day:**

- Maintain all construction equipment in proper tune according to manufacturer's specifications;
- Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State off-Road Regulation;
- Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
- Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;
- All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
- Diesel idling within 1,000 feet of sensitive receptors is not permitted;
- Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
- Electrify equipment when feasible;
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and,
- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

Daily Employee Trips

In section 4.3b under Mitigation Measures, it is mentioned that based on the nominal amount of daily work trips required for the project construction phase that construction worker trips were not considered a notable emission source. **When determining the air quality emissions from a project, all emission sources need to be accounted for and included in the air quality modeling and assumptions. This section needs to be updated to include the total number of daily worker trips for the project. This figure should then also be accounted for in the CalEEMod emission estimates.**

Table 4.3-3 Construction Air Emissions Table

According to section 4.3b under the Total Daily Construction Emissions section, emissions would be reduced with the implementation of Mitigation Measure AQ-1. Table 4.3-3, however, the table does not account for any reductions due to mitigation measures implemented on site. **Please update Table 4.3-3 to reflect any mitigation construction emissions due to measures implemented in AQ-1.**

Naturally Occurring Asbestos

The information contained in the Asbestos Section on page 4.3-5 is incorrect and needs to be modified. Naturally occurring asbestos (NOA) has been identified by the state Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain naturally occurring asbestos. The SLO County APCD has identified areas throughout the County where NOA may be present (see the APCD's 2012 CEQA Handbook, Technical Appendix 4.4). **This project site is located in a candidate area for Naturally Occurring Asbestos (NOA), and the following requirements apply. Prior to any construction activities at the site.**

the project proponent shall ensure that a geologic evaluation is conducted to determine if the area disturbed is exempt from the regulation. An exemption request must be filed with the APCD. If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD. More information on NOA can be found at <http://www.slocleanair.org/business/asbestos.php>.

Hydrocarbon Contaminated Soil

Should hydrocarbon contaminated soil be encountered during construction activities, the APCD must be notified as soon as possible and no later than 48 hours after affected material is discovered to determine if an APCD Permit will be required. In addition, the following measures shall be implemented immediately after contaminated soil is discovered:

- Covers on storage piles shall be maintained in place at all times in areas not actively involved in soil addition or removal;
- Contaminated soil shall be covered with at least six inches of packed uncontaminated soil or other TPH -non-permeable barrier such as plastic tarp. No headspace shall be allowed where vapors could accumulate;
- Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted;
- The air quality impacts from the excavation and haul trips associated with removing the contaminated soil must be evaluated and mitigated if total emissions exceed the APCD's construction phase thresholds;
- During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and,
- Clean soil must be segregated from contaminated soil.

The notification and permitting determination requirements shall be directed to the APCD Engineering Division at 781-5912.

Demolition Activities

The project referral did not indicate whether there are existing structures on the proposed site that will be demolished. Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, demolition, and disposal of asbestos containing material (ACM). Asbestos containing materials could be encountered during demolition or remodeling of existing buildings. Asbestos can also be found in utility pipes/pipelines (transite pipes or insulation on pipes). **If building(s) are removed or renovated; or utility pipelines are scheduled for removal or relocation, this project may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - asbestos NESHAP).** These requirements include, but are not limited to: 1) written notification, within at least 10 business days of activities commencing, to the APCD, 2) asbestos survey conducted by a Certified Asbestos Inspector, and, 3) applicable removal and disposal requirements of identified ACM. Please contact the APCD Enforcement Division at (805) 781-5912 for further information.

Developmental Burning

Effective February 25, 2000, **the APCD prohibited developmental burning of vegetative material within San Luis Obispo County.** If you have any questions regarding these requirements, contact the APCD Enforcement Division at 781-5912.

Dust Control Measures

Although your AQ-1 Mitigation Measure section includes mitigation measures for dust, **the list is not complete and several items need to be added or modified. Projects with grading areas that are greater than 4-acres or are within 1,000 feet of any sensitive receptor shall implement the following mitigation measures to manage fugitive dust emissions such that they do not exceed the APCD's 20% opacity limit (APCD Rule 401) or prompt nuisance violations (APCD Rule 402). All measures below should be added to or updated in your AQ-1 Mitigation Measure section:**

- a. Reduce the amount of the disturbed area where possible;
- b. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible;
- c. All dirt stock pile areas should be sprayed daily and covered with tarps or other dust barriers as needed;
- d. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible, following completion of any soil disturbing activities;
- e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established;
- f. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;
- g. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;
- h. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
- i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;
- j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers shall be used with reclaimed water should be used where feasible. Roads shall be pre-wetted prior to sweeping when feasible;
- l. All PM₁₀ mitigation measures required should be shown on grading and building plans; and,

- m. The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the APCD's limit of 20% opacity for greater than 3 minutes in any 60 minute period. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the APCD Compliance Division prior to the start of any grading, earthwork or demolition.

Construction Permit Requirements

Based on the information provided, we are unsure of all the equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit.

The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the APCD's 2012 CEQA Handbook.

- Diesel engines;
- Portable generators and equipment with engines that are 50 hp or greater; and,
- Use of standby generator.

To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.

OPERATIONAL PHASE IMPACTS - Below Threshold

APCD staff considered the operational impact of this development by reviewing the CalEEMod emission estimates provided with the initial study/ mitigated negative declaration. This indicated that operational phase impacts will likely be less than the **APCD's thresholds** in Table 3-2 in the CEQA Handbook. **Therefore, with the exception of the requirements below, the APCD is not requiring other operational phase mitigation measures for this project.**

Evaporation Pond

As listed in Section 2.5.3 and Exhibit 2-9 (Brine Pond Plan), the project proposes five (four duty and one standby) mechanical evaporators. It was unclear from the initial study and emissions estimates if the air quality emissions from these mechanical sprayers were included in the air quality emission estimates. **Should these sprayers be diesel operated, they need to be included in the overall emissions for the operational phase of this project.**

Operational Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present at the site. Operational sources may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements, but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's 2012 CEQA Handbook.

- Portable generators and equipment with engines that are 50 hp or greater;

- Electrical generation plants or the use of standby generator;
- Pipelines;
- Public utility facilities; and,
- Internal combustion engines.

Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. A diesel engine-only facility limited to 20 non-emergency operating hours per year or that has demonstrated to have overall diesel particulate emissions less than or equal to 2 lb/yr does not need to do additional health risk assessment. **To minimize potential delays, prior to the start of the project, please contact the APCD Engineering Division at (805) 781-5912 for specific information regarding permitting requirements.**

Nuisance

This AWTP associated with this project, and its need to operate continuously for a six month period, could pose as nuisance to local residents and sensitive receptors. As defined in APCD's Rule 402, a person shall not discharge, from any source whatsoever, such quantities of air contaminant or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or public, or which cause or have a natural tendency to cause, injury or damage to business or property.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Meghan Field
Air Quality Specialist

MDF/aag/arr

cc: Airlin Singewald, SLO County Planning & Building
Karen Brooks, Enforcement Division, APCD
Tim Fuhs, Enforcement Division, APCD
Gary Willey, Engineering Division, APCD

Attachments: 1. Naturally Occurring Asbestos – Construction & Grading Project Exemption Request Form, Construction & Grading Project Form

"Where the Pines
meet the Sea"



CAMBRIA CHAMBER OF COMMERCE

767 MAIN STREET, CAMBRIA, CA 93428 • (805)927-3624 • FAX (805)927-9426
www.cambriachamber.org

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MAR 23 2015

RBF CONSULTING

March 20, 2015

Mr. Jerry Gruber
General Manager
Cambria Community Services District
PO Box 65
Cambria, Calif. 93428

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, Calif. 92618

Sir/Madam:

As President of the Cambria Chamber of Commerce, an organization representing 354 business owners and operators in Cambria, I want to reiterate the business community's strong support for the Emergency Water Supply (EWS) project. More specifically, I want to explain how operation of the EWS is crucial to health and safety as well as the welfare of the local economy.

For business owners, a reliable supply of adequate potable water is more than just a convenience. It is necessary for them to meet legal requirements for sanitation, food safety and employee health. This is especially true for restaurants and lodgings, which form the core of Cambria's tourist-based economy. Under the current Emergency Coastal Development Permit for operation of the EWS, businesses must cut their water consumption to 80% of historical averages or face steep surcharges. There are no easy ways for them to reduce water use to that degree without compromising basic cleanliness. So they must opt for the economic hardship of the surcharges.

Another major area of concern is fire safety. All property owners, commercial and residential, have an interest in adequate water not only for direct use by fire fighters, but also to irrigate landscapes for protection of vegetation and structures. The long drought already has killed a large percentage of the native Monterey Pines. The total ban on using

potable water to irrigate outdoor landscaping denies property owners an affordable water source that could be used to feed still-living trees on their property and to maintain a fire-resistant zone around structures. Heightened fire risk is thus a *direct* environmental impact of the current restrictions on operation of the EWS. A reasonable permit would allow sufficient use of potable water to maintain a basic level of safety in this area.

Finally, again on the subject of tourism, Cambria and its environment are not merely of value to local residents and businesses. The Chamber of Commerce sees Cambria as a vital resource for all Californians – a place of affordable access to one of the most beautiful, historically significant and unspoiled stretches of the state's coastline. The health and safety issues that I have described above are also issues of access. When draconian water restrictions make tourist business difficult to conduct, access to coastal resources is impeded. When the restrictions endanger one of the area's signature natural features, its pine forest, those resources themselves are in jeopardy.

It is for these reasons that the Chamber of Commerce supports a reasonably flexible regular Coastal Development Permit for EWS operation – as opposed to the overly restrictive emergency CDP now in effect – and believes that such a regular CDP would be a net gain for the Cambria community and its environment.

Thank you for your consideration and approval of the EIR



Mel McCulloch
President
Cambria of Commerce

Copy:
Supervisor Bruce Gibson
CCSD Board Members

Steele, Noelle

From: Richard Breen <richard@breenrealty.com>
Sent: Friday, March 20, 2015 11:10 AM
To: Garcia, Rita
Subject: Permanent water supply for the town of Cambria

To whom it may concern:

I have been a resident of Cambria and have been in real estate that entire time. I have seen at least five different proposals for permanent water come and go during that time period. I no longer participate in sales of any vacant lots as we are in a building moratorium for 14 years now and have 656 people on a waiting list and another 700 owners that cannot get on that list.

- 1) This drought is real. We need to be able to provide water for our current Population and future generations.
- 2) we have conserved water like no other town in California and should be viewed as a model for other communities.
- 3) the 2 aquifers that supply our towns water are not reliable and depend solely on seasonal rainfall.
- 4) our town only survives because of tourism and Hearst Castle. It is a destination resort on the Central Coast like no other. Second homes and vacation rental homes pay additional surcharges for water then permanent residents. Our company BVS manages approximately 50 vacation rental homes and provides a tremendous amount of service jobs to local residents.
- 5) I support a permanent EWS and depend on CCSD to use the most efficient and advanced technology available for the treatment plant as used by other cities in California recently.
- 6) I have supported and voted for the reelection of two CCSD board members because I totally believe they have the best interest of our town's future water needs in mind.

Please feel free to contact me with any questions or concerns Most sincerely, Richard and Kara Breen (Owner's and Broker's of Breen Realty and Breen Vacation Station)

Richard

Sent from my iPad

Steele, Noelle

From: Linda Douglass <lindadouglass45@gmail.com>
Sent: Friday, March 20, 2015 5:55 AM
To: Garcia, Rita
Subject: Cambria EWS comment

I support the EWS project because of my concern for long term supplies of water for personal use and fire protection. This project is needed to weather the drought years now and in the future.

Linda Douglass
686 Canterbury Ln, Cambria, CA 93428

Stewart Edwards

1957 Sherwood Dr.
Cambria, Ca 93428
PHN (805) 900 5003
CELL (818) 439 8358
wacowako@gmail.com

March 20, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

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MAR 23 2015
COUNCIL

Dear Ms. Garcia;

My wife and I have been residents of Cambria for more than five years. We have reduced our water usage to 3 units (2248 gallons) in the course of 2 months with substantial effort during the emergency water drought designated in Cambria.

We are very concerned that the community could, with a continued drought, run completely out of water, or worse, contaminate the local aquifers with sea water without an emergency operating permit.

It is extremely important to approve Cambria's EWS for a regular Coastal Development Permit so that the water purification system can be brought on line as required, rather than obtaining temporary permits. Intervention from various parties and red tape to obtain emergency temporary permits have proven to be costly and time consuming for the residents of Cambria.

Additionally, at some point in the future, my wife and I would like to flush our toilet more than twice a day, and with restrictions, water some plants in our garden.

Regards:


Stewart and Constance Edwards

Steele, Noelle

From: marshall hamilton <marshallha@att.net>
Sent: Friday, March 20, 2015 2:08 PM
To: Garcia, Rita
Subject: Cambria Water Project

Please include my letter of support with the environmental review of the Cambria EWS project.

Marshall Hamilton

Steele, Noelle

From: Lynne Harkins <l.harkins@charter.net>
Sent: Friday, March 20, 2015 12:39 PM
To: Garcia, Rita
Subject: Receipt of NOP for Cambria EWS DEIR by certified mail

Ms. Garcia,

In acknowledging having received this 2-sided, single page document from RBF:
"Notice of Preparation of a Draft Environmental Impact Report for the Cambria Emergency Water Supply Project" ,
I write to thank you for sending it. Does CEQA require that you send this NOP to all persons/agencies
who commented in July 2014 on the IS-MND for the Cambria EWS?

I would also ask if there is some prohibition that prevented the inclusion of the "Project Information Packet" itself?
Couldn't that foster the public participation that you're seeking?

Thank you for your time in responding to my questions.

Sincerely,
Lynne Harkins
Cambria

Steele, Noelle

From: Bruce Johnson <brucekj3298@gmail.com>
Sent: Friday, March 20, 2015 4:11 PM
To: Garcia, Rita
Subject: Cambria EWS

I have lived in Cambria for twenty-five years and we finally have a reliable water project. It seems ridiculous in these times of severe drought that anyone would be against a project that will supply us with potable water. We should all be working together to overcome any environmental impacts our much needed project might have. Any energy that community members have should be put to use to make this project work. My wife and I are conserving as much water as we can, but we still worry about a reliable supply of water for our needs. I am pleased that our CCSD has finally taken action and I fully support what they have done.

Bruce Johnson

Steele, Noelle

From: Sue <r2nsue@charter.net>
Sent: Friday, March 20, 2015 9:11 AM
To: Garcia, Rita
Cc: jgruber@cambriacsd.org; board@cambriacsd.org
Subject: Cambria EWS Project

I have been a resident of Cambria since 2002. During that time I have heard constant debates about how to resolve the water situation. Cambria is an isolated community of about 6,000 mostly retired people. We are surrounded by pine trees, many of which are dying due to the four year drought. Most Cambrians are in fear of what could happen should a fire break out.

Even before Governor Brown declared a water emergency and asked that Californians reduce their water usage by 20%, Cambria had already reduced theirs by over 40%. We do not take this drought lightly. The majority of Cambrians applaud the Cambria Community Services District for their forward thinking and perseverance that has resulted in the new EWS Project. Communities throughout the United States have taken note of this project and, shall I say, are quite envious of us. The EWS project is currently just a temporary solution to a permanent problem. It needs to be a PERMANENT solution. There are those that will say the EWS is not needed. These are the same people that would like to see Cambria go back to the dark ages. Some opposed to the project have openly stated that businesses should close down until the drought is over. Thankfully the majority of Cambrians see the EWS as a much more viable solution to the current drought for many reasons.

- There is major concern about the long-term availability of potable water for Cambria, including sustainable supplies of clean water for the purposes of drinking, hygiene and fire protection. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages.
- Without the EWS, the town's potable water supply is not reliable but, instead, depends entirely on just two aquifers that fluctuate considerably depending on seasonal rainfall.
- Cambrians cannot assure adequate water supplies through additional conservation measures alone. On average, Cambrians use approximately 30 gallons of water per day compared to the average American who uses approximately 100 gallons of water per day. *EPA, Water Sense, An EPA Partnership Program.*
- Without the EWS, during dry spells there will be harmful saltwater intrusion into the San Simeon Creek aquifer and the potential of soil subsidence over such aquifer.
- Without the EWS, the San Simeon Creek Lagoon habitats may be harmed or destroyed by salt water intrusion or drying up completely during the inevitable droughts that occur on the Central Coast.
- The town's substantial need for a reliable supplemental potable water source should be balanced against environmental risks. The EWS achieves such balance by, among other things: (1) optimizing existing groundwater sources including brackish water and relatively small amounts of treated wastewater; (2) not disturbing ocean habitats by sourcing its water directly from the ocean or discharging waste streams directly into the ocean; and, (3) using relatively small amounts of energy to operate the plant compared to a traditional sea water desalination plant.

- Through reasonable modification of the EWS and other means, such environmental risks can be mitigated.
- Without the EWS, Cambria will no longer be able to serve as an attractive and reasonably priced tourist destination for the hundreds of thousands of tourists from around the World that visit our town each year in order to enjoy this part of California's beautiful Central Coast.
- Without robust tourism, which is Cambria's predominant industry, many service jobs will be lost which will disproportionately disadvantage individuals within the lower economic classes, many of which are Hispanic.
- The EWS utilizes a state-of-the-art three stage reverse osmosis based water treatment technology that has been successfully used at other California water projects including the Carlsbad, California desalination plant and the recent expansion of the Anaheim wastewater treatment plant.

Please do not allow a few naysayers deprive Cambrians of a quality of life we have all worked hard to achieve. We live in a beautiful community and we are proud of the wonderful community it has become. We need a permanent solution to the largest threat we face. Please approve a permanent EWS Project without delay.

Sue Robinson
3141 Wood Drive
Cambria CA 93428



David Sassaman
 1141 Hartford St.
 Cambria, CA 93428

20 Mar 15

Dear Ms. Garcia:

I am sending you this letter in support of Cambria's EWS.

Our water supply is from a basin that gets its sole supply from rain. Last year we were alarming close to be forced on water rationing meaning some days no water. Based on our 50% of water this year it is my opinion we would have run out of water part of the time. Not so now with the EWS, thank God.

Cambria now has a long term water supply. What a relief.

If you read about the situation in Brazil there are large towns (1 million) that have the water turned off 2-3 days per week. It's common sense that this kind of condition would ruin the tourist business this town depends on.

I am really impressed how the EWS system designers came up with a water mix of sewer water, (300-500,000 gals/day) brackish water, & fresh water at San Simian Creek. The mix has about 10% salt water versus 100% ocean salt water.

What does this mean? Simple, a greatly reduced energy to break the salt ions producing pure drinking water.

We are adding to our water supply from two new sources. Sewer water & brackish water. This will increase our water supply about 33%. That is a big wow!

The EWS is a unique design using proven technology. This is not state-of-the-art.

To top it off there is no EWS processed operating water being dumped into the ocean. The concentrated salts go to an evaporating pond assisted by evaporating blowers that only operate when the environment meets certain conditions as monitored. This is another wow!

The EWS has a planned water bypass to support the San Jimin Lagoon.

To my informed knowledge those opposed to the EWS have got to offer a single solution to improve our water supply. Informed debate is welcome. I don't condone whining.

I am asking for your support of the Cambrien EWS.

My sincere thanks,

David S. Serrano

Steele, Noelle

From: Deanna Straugh <deannastraugh@gmail.com>
Sent: Friday, March 20, 2015 4:47 PM
To: Garcia, Rita
Subject: Cambria EWS
Attachments: CCSD letter.pdf

Dear Ms. Garcia:

Please see letter attached in support of the EWS.

--
Deanna K. Straugh

Deanna K. Straugh
Bruce D. Nii
Deannastraugh@gmail.com

March 20, 2015

Ms. Rita Garcia
Technical Manager
Rgarcia@mbakerintl.com

Dear Ms. Garcia:

We are writing in support of the EWS as it is the most important item that the town of Cambria has undertaken. We purchased a new home in Cambria (400 Wellington Drive) in December 2014. It is our retirement and “forever” home. When friends and family learned that we were looking in Cambria each and every one mentioned something about the water shortage that Cambria was experiencing. They questioned why we were looking in Cambria and suggested Cayucos, Morro Bay, anywhere else but Cambria. We were able to assure everyone that because of the EWS project we would not run out of water but would be able to enjoy our new home for years to come.

We support the EWS because we are concerned about the long term availability of portable water and the EWS is necessary to ensure that water is available now and in the future. Cambria cannot assure enough water supplies through additional conservation measures alone. We have doing our best - our landscaping is dying and we have brought in water tanks to collect our rain water. This will not be enough – we need the EWS to ensure that we will be able to live in our residence.

We also support the EWS because we want to ensure that there are no harmful saltwater intrusion into the San Simeon Creek aquifer during times of little or no rain. We also want to ensure that the San Simeon Creek Lagoon habitats are not harmed by the lack of water and/or salt water intrusion.

EWS has done the important work of balancing the environmental risks involved, weighing the considerable needs of the citizens of Cambria as well as the environmental needs. EWS has shown that the risks can be mitigated.

My husband and I ask that everything possible is done to ensure that the EWS becomes a long term solution for Cambria. We would hate for all of our friends and family to be right and that we should have chosen a different city. Cambria is too charming and wonderful a city to let die because of a preventable lack of portable water.

Very truly yours,



DEANNA K. STRAUGH

Robert Tieman
390 Pembroke Dr.
Cambria, CA 93428
~ ~ ~ ~ ~

26 March 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Dear Ms. Garcia,

I am writing to you today to express my full and unequivocal support for the Emergency Water Supply [EWS] project that has been undertaken by the Cambria Community Services District.


As has been widely reported, the entire state of California has been experiencing almost unprecedented rainfall & snowpack scarcity. The central part of the state has fared worse than other areas, and Cambria in particular has been hit extremely hard. We residents of Cambria have pared our water usage down to an extremely slim volume of 30 gallons per day. We have done this to help stretch our water supply as far as we can given the drought situation. The need for more water, and for a sustainable supply, has never been more urgent.

I support the EWS project because it will ensure a reliable supply of additional potable water for drinking and cooking. I support the EWS project because it will let Cambrians maintain a clean and healthy home environment, including proven health benefits from frequent hand washing. But most of all, I support the EWS project because the town we love needs water to fight fires, and in the projected fire season to come, we are particularly vulnerable.

The recently released SLO County Grand Jury report brings to light the risk to life and property posed by fire in our drought-stricken Monterey pine forest and the community that weaves through it. Without an adequate, steady and guaranteed supply of water, the town could very well be faced with fighting a fire and not having water to drink afterwards.

The EWS project will enable us to continue living in this beautiful location—safely, healthfully, and happily—for many years to come.

Sincerely,


Robert Tieman

Steele, Noelle

From: Dixie <dixie.walker@att.net>
Sent: Friday, March 20, 2015 8:40 AM
To: Garcia, Rita
Subject: Cambria EWS

I have lived in Cambria since 1993. I purchased a home and really had no idea about water permits or water shortages. I was aware, living in California since 1966, that California is subject to drought years. Almost immediately, I began hearing about the limited sources of water in Cambria and the attempts that had been made to do something about it. Over the years nothing was done.

I am proud of our current CCSD board because they, with the exception of one, voted to do something and then actually did!

I was very concerned, especially in the last few years, that there was a real possibility that our two aquifers could dry up and leave Cambria with no water supply. I had heard that, on at least one occasion, San Simeon had tasted salt in their water. Salt water invasion into the aquifer and, potentially, the Lagoon harming the habitat, was frightening and depressing.

I do fear without a permanent additional source of water, Cambria could become a ghost town. No water, no tourists, no businesses, no Cambria

Thank you.

Dixie D. Walker
1241 Knollwood Drive
Cambria, CA. 93428
805-927-3366

dixie walker
Sent from my iPad

Steele, Noelle

From: Dave & Louise Boyd <DLKCOAST@charter.net>
Sent: Saturday, March 21, 2015 10:52 AM
To: Garcia, Rita
Subject: Cambria Emergency Water system

Dear Ms.Garcia
Technical Manager

Louise and I have lived in Cambria full time since July of 1998.We ask that you support the Emergency Water System.

Since we have lived here a small group of people have used our strained town water supply as leverage to control any perceived growth by opposing any improvement to existing water supply systems,storage,or delivery infrastructure.

Prior to the severe Calif. Drought the Cambria water supply was very limited and during several years our village wells almost ran dry.Now we have a safe,clean alternative in the EWS Water project.

Conservation,lack of watering a garden,and saving shower water will not supply us with enough water to continue to live here.We ask you to support the EWS system as it is the correct,common sense,and cost effective approach to help Cambria continue to exist.

Thank you,
Sincerely,
David & Louise Boyd
1440 Burton Drive
Cambria, Ca.93428

I-PAD D Boyd

Steele, Noelle

From: Paul Carlson <pcarlson@charter.net>
Sent: Saturday, March 21, 2015 10:07 AM
To: Garcia, Rita
Subject: Cambria CSD EIR
Attachments: Rita Garcia CCSD EIR.docx

rgarcia@mbakerintl.com

Ms. Garcia,

Attached is my letter with written comments for the Cambria CSD EIR.

Paul Carlson

Paul Carlson
2150 McCabe Drive
Cambria, CA 93428

March 21, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Mailed and emailed: rgarcia@mbakerintl.com

Subject: Cambria CSD EIR

Dear Ms. Garcia,

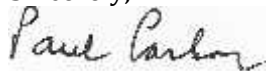
As a resident of Cambria, I am writing to express my support for the Cambria Emergency Water Supply Project (Project). Cambria is undergoing a severe water shortage and may completely run out of water in the future without relief from the Project. Many of us in the community are using only 10 or 15 gallons of water per day. We are doing this by not flushing our toilets, by not taking daily showers and when doing so, briefly running the water. We are irrigating only with non-potable water. In any case, we are restricted from using more than 50 gallons of water per day and face severe penalties and fines if we do so. This is half the average daily water use in the United States or less. It is far less water than being used anywhere in the State of California

This project was chosen because it recycles water, providing additional potable water for the community while injecting water into the aquifer as a buffer to restrict seawater intrusion. At the same time, it is replenishing the San Simeon Lagoon thereby helping the environment and enhancing the lagoon for endangered species. Note that this project was nominated at the Global Water Summit for desalination project of the year.

One of the mandates from the California Legislature to the Coastal Commission is to provide projects that "are essential to the economic and social well-being of the people". This project fits that mandate. This project will provide needed water for the residents of Cambria as well as visitors traveling to Cambria from California and many points of our nation as well as the world.

In closing, I would like to request that you keep in mind that we are in a severe drought and there is no assurance when this drought will end. The CCSD water project is a good project that will perhaps be a model for other communities as this drought continues. The water it will provide will restore normal lives to Cambrians, Cambria businesses, and ensure our scenic coast will be accessible to the one million annual visitors to Cambria and Hearst Castle.

Sincerely,



Paul Carlson

Steele, Noelle

From: Mark Landgreen <marklandgreen@gmail.com>
Sent: Saturday, March 21, 2015 9:00 AM
To: Garcia, Rita
Subject: Support for Cambria water project

I am a Cambria resident and former Vice Chair of the Friends of the Fiscalini Ranch Preserve. Our lack of water in Cambria is real and the success of the Emergency Water Project will help Cambrians get through the current drought.

In addition, I am totally supportive of making the project permanent. With continued household water conservation efforts by citizens and responsible use of the new system, we in Cambria can return to a relatively normal lifestyle.

One other bonus with our water project is that our creek and aquifer's will also get recharged in the process. Thanks for taking on the tough challenges and I hope you agree that we in Cambria should continue to move forward with appropriate solutions to what looks to be an ongoing water crisis.

Respectfully,

Mark Landgreen
215 Bryan place
Cambria, CA.

Steele, Noelle

From: alexandra lopardo-sopp <alisopp@earthlink.net>
Sent: Saturday, March 21, 2015 4:06 PM
To: Garcia, Rita
Subject: ESW-Cambria
Attachments: EWS21032015.pdf

March 21, 2015

Per Sopp
Alexsandra Lopardo-Sopp
375 Gaines St
Cambria, CA 93428
alisopp@earthlink.net

Ms. Rita Garcia
Technical Manager
Rgarcia@mbakerintl.com

Dear Ms. Garcia,

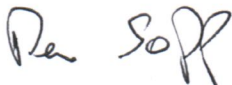
We have been property owners in Cambria since 1985. We are in support of the EWS as it is imperative to the survival of Cambria. We moved from Miami in 2007, our retirement was part of a twenty -year plan and are grateful that we could fulfill our dreams.

The EWS is the best opportunity we have for supplemental potable water in times of drought. The technology is cutting edge it takes in account both the natural environment, and protects against possible salt-water intrusions to the San Simeon Creek Lagoon.

We support the EWS and believe any concerns of damage to our ecosystem will be minimal and can mitigated. As California continues to manage its' drought, Cambria has the ability to demonstrate that a combination of science, and necessity can save a Village from sure demise. If our treasured forest should catch fire, the water supplied by the EWS gives us a chance to save our homes and the forest.

Potable water has become a finite resource for many during this drought. Water storage can only be possible if we have water to store, for example, rainwater. We believe the EWS will ensure a future for Cambria, we can show that surviving doesn't means sacrificing the nature that surrounds us.

Kind Regards,



PER SOPP



ALEXSANDRA LOPARDO-SOPP

Ms. Rita Garcia
2015
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

March 21,

Dear Ms. Garcia,

I am writing to express my support for the Cambria "Emergency Wastewater System. I am in full agreement with the board of the Cambria Community Services District in putting forth this project to ensure more potable water for all Cambrians.

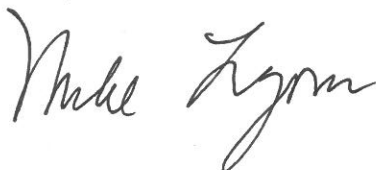
I believe that the process of planning, permitting, and building this Project was done with the open cooperation of all government agencies and has the overwhelming support of Cambria ratepayers and citizens.

It makes no sense to me to be forced to declare a Stage 3 emergency before we can make use of our substantial investment in the Project, which will encumber residents of Cambria for many years to come.

The CCSD is currently in the process of preparing the required EIR and all other necessary steps in order to obtain the permit for Cambrians to control their own water system.

As shown in the recent election for CCSD board seats, which amounted to a clear referendum on the EWS, a great majority of voters re-elected only the candidates who are in favor of a regular permit. I sincerely hope that all agencies responsible will help to move the permit forward to an early and unequivocal decision in favor of allowing Cambrians to control their own water destiny.

Sincerely yours,
Mike Lyons
2758 Patterson Place
Cambria, CA 93428



Steele, Noelle

From: Charlie Casale <charliecasale@me.com>
Sent: Sunday, March 22, 2015 11:01 AM
To: Garcia, Rita
Cc: Charlie iphonekur Casale
Subject: Support for EWS Project
Attachments: Support_letter_for_the_EWS.docx.pdf

March 22, 2015

Ms. Rita Garcia
Technical Manager
rgarcia@mbakerintl.com

Dear Ms. Garcia,

We are writing in support of the EWS Project in Cambria. We support the EWS because we are concerned about the long term availability of water now and in the future.

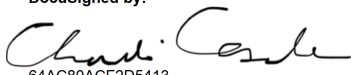
Cambria cannot assure enough water through additional conservation measures alone. 90% of our pine trees are dying and we are concerned about fire protection. This is the 4th year of the drought.

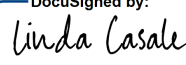
The CCSD Board and managers are totally working together in a positive way on this project. 80% of the community supported a water bill increase to fund the project. We also received a 4 million dollar grant to help pay for the project.

The Regional Water Control Board voted 7-0 to support the project. There is tremendous community support for the project to ensure that the EWS becomes a long term permanent solution for Cambria.

Cambrians don't wait for things to happen, they make things happen.

Sincerely,

DocuSigned by:

64AC80ACF2D5413...

DocuSigned by:

64AC80ACF2D5413...

Charlie and Linda Casale
Cambria residents since 1996

Steele, Noelle

From: L <coffiele@yahoo.com>
Sent: Sunday, March 22, 2015 12:04 PM
To: Garcia, Rita
Subject: Support of the EWS in Cambria, CA
Attachments: My letter.docx

Dear Ms. Garcia:

Please find my letter attached.

Thank you
Gloria Coffie

March 22, 2015

8971 Tracy Avenue
Garden Grove, CA 92841

Ms. Rita Garcia
Technical Manager
rgarcia@mbakerintl.com

Dear Ms. Garcia:

I am writing in support of the EWS because I am concerned about the long-term availability of potable water for Cambria, for all purposes used in a civilized society. The EWS is an important part of Cambria's potable water supply system. California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages begs for a solution such as this EWS.

I am concerned that the environmental risks of any supplemental water supply be mitigated. Through reasonable modification of the EWS and other means, such environmental risks can be mitigated.

Very truly yours,

Gloria Coffie

Steele, Noelle

From: L <coffiele@yahoo.com>
Sent: Sunday, March 22, 2015 12:24 PM
To: Garcia, Rita
Subject: My Support for the EWS project in Cambria, California
Attachments: EWS Support letter.docx

Dear Ms. Garcia:

Please find my letter attached.

Thank you

Lonnie Coffie

March 22, 2015

8971 Tracy Avenue
Garden Grove, CA 92841

Ms. Rita Garcia
Technical Manager
rgarcia@mbakerintl.com

Dear Ms. Garcia:

I am writing in support of the EWS for the following reasons:

1. Without the EWS, the town's potable water supply is not reliable. It depends entirely on just two aquifers that fluctuate considerably depending on seasonal rainfall.
2. Without the EWS, during dry spells there will be harmful saltwater intrusion into the San Simeon Creek aquifer and the potential of soil subsidence over such aquifer.
3. Without the EWS, the San Simeon Creek Lagoon habitats may be harmed or destroyed by salt water intrusion or drying up completely during the inevitable droughts that occur on the Central Coast.

Very truly yours,

Lonnie Coffie

Steele, Noelle

From: Steve Monaco <stevesuelane@comcast.net>
Sent: Sunday, March 22, 2015 7:11 PM
To: Garcia, Rita
Subject: Cambria EWS Project
Attachments: Cambria EWS Project-Sue and Steve Monaco.pdf

Dear Ms. Garcia,

The attached pdf document is in response to CCSD's request for comments on the EWS Project.

Peace & Blessing,
Sue and Steve Monaco

March 21, 2015

Rita Garcia
Technical Manager, RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Dear Ms. Garcia,

As residents of Cambria, California we are writing you to express our support of the EWS project.

We have lived in Cambria since 2004 and have enjoyed the values of the community including the conservative approach to conservation. Preserving the natural habitat is important to us. However, without the EWS project, the San Simeon Creek aquifer is at risk of an invasion by harmful salt water or the lagoon habitats may completely dry up due to frequent droughts. The EWS also achieves the balance of supporting the community and environment by not disturbing ocean habitats by sourcing its water from the ocean and by not discharging waste streams directly into the ocean.

In a recent news story, we learned that Cambria's Monterey Pine forest mortality range from 40% throughout the stand to 90% in some areas. Another TV news story stated if we had a forest fire, all of Cambria would be wiped out. Without a significant water supply we wouldn't be able to save our homes and businesses. The two existing aquifers fluctuate considerably depending on seasonal rainfall and are not a reliable source for fire protection.

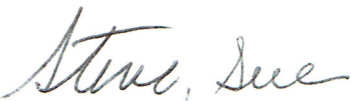
We support the main industry of tourism in Cambria and those that serve the visitors. Many lower income families would be effected if they lost their jobs due to businesses going out of business due to lack of water.

We've made significant changes to our water usage by installing low flow aerators, eliminating irrigation and converting all toilets to dual flush. Other Cambria residents have made similar adjustments - as a community we are using approximately 50-60% less water a day than other parts of the nation. But those changes are not enough to assure adequate water supplies in the future.

We understand there is opposition to this program, but we believe the EWS project will make the most of the groundwater sources without wasting energy to operate the facility compared to a traditional sea water desalination plant.

We strongly believe Cambria's need for a reliable supplemental portable water source would serve the residents and the environment by the EWS project.

Sincerely yours,



Stephen and Susan Monaco
1785 Ogden Drive
Cambria, CA 93428

Ms. Rita Garcia,

Doris Ann and I have owned a vacation home in Cambria since 1989. After completion of a new home in 2004 we moved to Cambria as full time residents.

We fully support the EWS for all the reasons that have been enumerated in the past 20 years:

- long-term availability of potable water
- conservation measures are not be enough
- potential saltwater intrusion
- environmental concerns are being might
- the village businesses will shrink
- fire concerns

But, foremost is our concern that our lovely village with become a dyeing village, without reliable availability of **potable water**.

Doris Ann and Wes Densmore

Doris Ann Densmore
Wes Densmore

Steele, Noelle

From: Bill & Suzanne Hughes <pelicanhill@charter.net>
Sent: Monday, March 23, 2015 4:40 PM
To: Garcia, Rita
Subject: Letter in support of the EWS Project
Attachments: EWS Support Letter_3-23-15.pdf

William & Suzanne Hughes

434 Plymouth Street

• Cambria, CA • Phone: 805 927 2535 • Fax: 805 927 3337
E-Mail: pelicanhill@charter.net



March 23, 2015

Ms. Rita Garcia
Technical Manager
Rgarcia@mbakerintl.com

Dear Ms. Garcia:

We are writing this letter to you because we support the EWS and are concerned about the long-term availability of potable water for the town of Cambria including sustainable supplies of clean water for the purposes of drinking, hygiene and fire protection. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages.

We built our home at 434 Plymouth Street in 1998 and have experienced the cycles of many dry years and a few wet years. The town's ability to have sustainable water for drinking and fighting fires has always been a fearful question in our minds. The recommendation of the Water Master Plan outlined that a reliable source of water would be necessary for future of Cambria. This is why we support the CCSD's EWS project. The EWS insures that Cambria will have water now and in the future without harming the surrounding environment. The ongoing water conservation efforts combined with the EWS Project operating during the dry periods will insure that we can have a sustainable water supply to survive, fight fires and protect the local habitat.

We ask that everything possible be done to ensure that the EWS project becomes a long-term reality for Cambria. The reliable source of water that the EWS provides will remove the fear for survival for this community.

Sincerely,

WILLIAM HUGHES



NOEL & MARY SCHMIDT
1348 Burton Drive
Cambria, CA 93428

March 23, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Dear Ms. Garcia

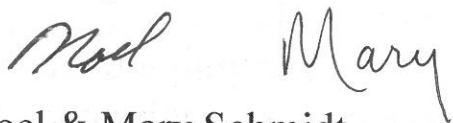
We strongly support the EWS because we are concerned about the possible consequences resulting from an extension of the current severe drought and the possibility of future droughts.

The consequences from lack of clean water that are high on our list of concerns are, but not limited to:

1. Insufficient supply for normal household use
2. Insufficient supply for controlling fire
3. Environmental damage to the residential Monterey Pine Forest.
4. Increased possibility of severe fires because of the many dead trees here now.

We have lived in Cambria for nearly 18 years and hope to see Cambria continue to have a sufficient and reliable supply of potable water to allow us many more comfortable years here. Surviving this extended drought with additional conservation is not a possible solution to the current problem.

Sincerely,



Noel & Mary Schmidt

Steele, Noelle

From: Sheri Humphreys <sherihumphreys@sbcglobal.net>
Sent: Tuesday, March 24, 2015 3:59 PM
To: Garcia, Rita
Subject: I support CCSD's EWS Project

Dear Ms. Garcia:

I am writing this letter to you because I support the EWS and am concerned about the long-term availability of potable water for the town of Cambria including sustainable supplies of clean water for the purposes of drinking, hygiene and fire protection. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages.

Historically, Cambria has experienced cycles of many dry years and a few wet years. The town's ability to have sustainable water for drinking and fighting fires has always been a fearful question.

The recommendation of the Water Master Plan outlined that a reliable source of water would be necessary for future of Cambria. This is why I support the CCSD's EWS project. The EWS insures that Cambria will have water now and in the future without harming the surrounding environment. The ongoing water conservation efforts combined with the EWS Project operating during the dry periods will insure that Cambrians can have a sustainable water supply to survive, fight fires and protect the local habitat.

I ask that everything possible be done to ensure that the EWS project becomes a long-term reality for Cambria. The reliable source of water that the EWS provides will remove the fear for survival for this community.

Sincerely,
Sheri Humphreys
home owner
1166 Pinewood Dr.
Cambria, CA 93428

Sheri Humphreys
A Hero to Hold--coming 2015 from Boroughs Publishing Group
The Unseducible Earl--coming 2015 from Boroughs Publishing Group
<http://sherihumphreys.com>

Steele, Noelle

From: Mark <markali@charter.net>
Sent: Tuesday, March 24, 2015 12:55 PM
To: Garcia, Rita
Subject: Cambria's EWS

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine CA. 92618
rgarcia@mbakerintl.com

March 24, 2015

Dear Ms Garcia

We are writing to you to lend our support to the Emergency Water Supply Plant (EWS.) We are 17 year full-time residents of Cambria. Recognizing the increasing predictions of the continued and long term drought in California, as well as seeing other California communities run out of water last summer, many of us came together to support our Cambria Community Services district (CCSD)Board in its effort to fund and construct the EWS.

Running out of water would have an adverse effect on our entire working community which is dependent on tourism because of our proximity to the Hearst Castle (8 miles) as well as our beautiful coastal views and hiking trails.

The EWS will sustain our community's important tourist trade, keep our locals employed, and protect the value of our homes. All of us are breathing a lot easier today because we now have the EWS. Cambrians fully understand the phrase "nobody knows the real price of water until there isn't any".

We appreciate the various state agencies performing their environmental review and due diligence for the benefit of Cambria and all of California. Once that process is complete and all the facts are in, we trust that the CCSD's regular coastal development permit application should be granted allowing Cambrians to return to the normal quality of life that we envisioned when we moved here.

Ali & Mark Kramer
4934 Windsor Blvd
Cambria, CA. 93428
(805) 924-1101
markaki@charter.net

Steele, Noelle

From: Rick R <techno1@roadrunner.com>
Sent: Tuesday, March 24, 2015 3:57 AM
To: Garcia, Rita
Subject: Cambria EWS

March 24, 2015

Dear Ms. Garcia,

My wife Nancy and I support the efforts made by the Cambria CCSD to finally do something to alleviate the ongoing (30+ years) water shortage in Cambria, CA.

We purchased a lot on Avon Ave. in 1988 with the understanding we would have to wait 5-6 years until we could start building as they were only issuing a limited number of permits a year. We came very close to getting a water permit when the current building moratorium went into effect.

Now, 27 years later we see a small glimmer of hope that one day we, or our children at this point, may be able to build on our lot.

We visit Cambria several times a year, and it's a shame to see how this charming little town has deteriorated over time. No new businesses, tourism is a fraction of what it once was, and over half of the restaurants and shops are closed, including the nicer ones. Even the cherished pine trees have been decimated by a lack of water, about 40% of the trees have died.

Potable water is the life blood of any small town or community. Cambria's EWS would give this town a transfusion to bring it back to the bustling days of the 70's and 80's when Main Street was always busy and the town felt alive!

Thank you,

-Rick & Nancy Rentler
2421 Glenside Lane
Camarillo, CA 93012
805.491.2728

Steele, Noelle

From: Benjamin Schick <ben@schickconstruction.com>
Sent: Tuesday, March 24, 2015 11:13 AM
To: Garcia, Rita
Subject: EWS

Ms. Garcia,

I am a property owner in Cambria and I urge you to vote in favor of the EWS.

I support the project on several grounds, not the least of which is my concern for long term availability of potable water for Cambria which needs to balance environmental concerns with reliable supplemental potable water.

Benjamin Schick

Ben@schickconstruction.com

310-266-8367

Steele, Noelle

From: Stephey <stephey@charter.net>
Sent: Tuesday, March 24, 2015 4:27 PM
To: Garcia, Rita
Subject: In support of Cambria EWS

Dear Ms. Garcia,

We are in support of the Cambria Emergency Water Supply because of the following reasons:

We are concerned about the long-term availability of potable water for Cambria, including sustainable supplies of clean water for the purposes of drinking, hygiene and fire protection. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages.

We are concerned that, without the EWS, the town's potable water supply is not reliable but, instead, depends entirely on just two aquifers that fluctuate considerably depending on seasonal rain, Cambrians cannot assure adequate water supplies through additional conservation measures alone. On average, Cambrians use approximately 30 gallons of water per day compared to the average American who uses approximately 100 gallons of water per day.

We support the EWS because we are concerned that, without the EWS, during dry spells there will be harmful saltwater intrusion into the San Simeon Creek aquifer and the potential of soil subsidence over such aquifer.

The new plant, as constructed, represents the best technology for this particular site. Cambrians have done about all that they can do up to this point, to conserve water by their personal actions and are now hoping that a permanent operating permit will be issued by the various agencies that are involved.

We do indeed need a an effective supplemental water supply, which the EWS provides.

Sincerely,

Harold and Dawn Stephey

665 Evelyn Ct. Cambria, CA 93428

Steele, Noelle

From: William Thompson <wmthomp@hotmail.com>
Sent: Tuesday, March 24, 2015 3:48 PM
To: Garcia, Rita
Subject: Support for Cambria's EWS
Attachments: 20150324154449251.pdf

Dear Ms. Garcia

Please see the attached which notes our support for Cambria's EWS.

Thank you,

Bill Thompson

Ms. Rita Garcia
Technical Manger
rgarcia@mbakerintl.com

March 24, 2015

Dear Ms. Garcia

We've owned our Cambria home on Sherwood Avenue over 20 years and are thrilled to finally see our community has a water source to augment our local wells.

We are very supportive of our new CCSD EWS and applaud the efforts of all CCSD employees and others who worked so hard in bringing it online.

Very difficult drought conditions continue and our EWS is a comforting addition to help assure a continuing water supply in reasonable quantity for homeowners and local businesses. Most would agree it would be hard to imagine just how difficult 2015 might have been without our EWS being online.

We trust EWS support will continue so that drought conditions now and in coming years will not severely impinge on the quality of life for all those who enjoy Cambria.

Best regards,



Bill Thompson
Jean Thompson
2101 Sherwood Avenue

Steele, Noelle

From: swartcr@earthlink.net
Sent: Wednesday, March 25, 2015 2:11 PM
To: Garcia, Rita
Subject: Comments on Cambria Draft EIR
Attachments: Forest Committee Comments AWTP 7-22-14.pdf; Buildout Reduction Brochure.pdf

Dear Rita,

The Cambria Forest Committee and a number of other organizations submitted comments on the Cambria EWS Initial Study/Mitigated Negative Declaration last July (see attached). Many of those comments apply to the current draft Environmental Impact Report.

Do you plan to address those earlier comments in the draft EIR? If not, would you like to have the earlier comments submitted again?

We were surprised that the Environmental Checklist Item 13 Population and Housing ranked the EWS Project as having No Impact on population growth. The North Coast Area Plan and the Program EIR for the Cambria Water Master Plan require adoption of a Buildout Reduction Program to mitigate the adverse growth-inducing impacts of any new water supply project. The attached CCSD brochure on the Buildout Reduction Plan is a good summary on this subject.

Regards,
Crosby Swartz, Chairman
Cambria Forest Committee
forest@cambriaforestcommittee.org

CAMBRIA FOREST COMMITTEE
TO CONSERVE AND MANAGE THE NATIVE FOREST OF CAMBRIA

Mr Robert C Gresens, PE, District Engineer
Cambria Community Services District
PO Box 65
Cambria, CA 93428

July 22, 2014

**COMMENTS ON AWTP INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
DRC2013-00112 CAMBRIA CSD**

Dear Mr Gresens,

The Cambria Forest Committee has reviewed the Initial Study / Mitigated Negative Declaration for the proposed Emergency Supplemental Water Supply and has the following suggestions.

1. LAND USE AND PLANNING (Page 3-2)

The North Coast Area Plan (Pages 3-9 and 4-17) states "The CCSD's intent is to incorporate recommendations from the Buildout Reduction Program into the program level Environmental Impact Report as mitigations to offset the growth-inducing impacts of a new water supply."

Although the current permit application is for existing customers, the scope of the permit could be expanded at some future date to cover new additional water service connections.

The capacity and cost of the proposed AWTP is larger than needed for an emergency supplemental water supply. The proposed capacity of 250 acre-feet in 6 months is greater than the community's current projected total usage for 6 months (6 x 40 acre-feet/ month equals 240 acre-feet). Additional water output could be achieved in the future by operating the AWTP for more than 6 months during the year.

We request that the Initial Study / Mitigated Negative Declaration be revised to require that when the permit is expanded to cover new connections, a Buildout Reduction Program is implemented as required by the North Coast Area Plan.

Yours truly,



Crosby Swartz, Co-Chairman
Cambria Forest Committee
PO Box 23, Cambria, CA 93428

Funding



BRP funding would come from a fee for new water connections, water rate increases for existing CCSD commercial and residential customers, a fee for remodels, and the sale of 65 unallocated water connections (3 per year for the 22-year program).

A current study is underway to review all water rates including the proposed BRP increase. Preliminary rate projections to fund the BRP are \$8.81 per month for residential customers and \$39.40 per EDU per month for commercial accounts. All commercial users will receive the same percentage rate increase as residential users. A one-time buildout reduction fee for new residential and commercial connections is estimated at \$10,127. A fee for major remodels would be approximately \$1,000.

ESTIMATED BRP COSTS

Cost Item	Property Acquisition Costs
Land Acquisition ²	\$29,313,000
Program Administration	\$2,200,000
Initial Weed Abatement	\$439,500
Transaction Costs ³	\$2,931,300
Merger Incentive Costs	\$3,549,600
TOTAL	\$38,433,400
Annual operational/maintenance fees estimated at \$283,284 ⁴	

² 861 lots at \$33,000 each and 18 lots at \$50,000 each.
³ Costs include appraisal, title insurance, recording fee, escrow agent, buyer-paid commissions and miscellaneous closing costs.
⁴ The O & M cost shown is an average annual expense that covers the first 22 years of the program. The cost is less during the initial years as lots are acquired, and levels off at \$370,325 per year after all the lots are acquired.
⁵ To promote specified conservation goals (like forest and habitat protection), conservation easements restrict what can occur on a lot, typically prohibiting construction.
⁶ From September 2005 – February 2006, vacant lots without a water meter sold for an average of \$13.12/sq ft or \$18,750 to \$75,000 for a single (25 x 70 sq ft) lot, depending on location.

Lot Mergers and Retirements

Under the 4,650 maximum water connections, 3,357 lots would remain vacant. The program, however, will target only potential building sites, not all vacant lots. This will reduce program costs because many lots are already retired, owned by conservation groups, in protected Special Project Areas, or too small to acquire water rights.

Some lot owners may voluntarily merge vacant lots with existing improved lots or may purchase part of an adjacent building site and merge it with their own home site. The County and CCSD offer incentives for mergers. There may also be tax benefits for merging lots. Other owners may elect to voluntarily retire a potential building site with deed restrictions or conservation easements.⁵

Acquisition Costs

The BRP generates funds to pay lot owners who want to sell their lots at fair market value. No one will be forced to sell his or her property. Lot size and views are key factors in Cambria land costs. Below are estimates based on asking prices and sales from September 2005 through February 2006.⁶

	Single family Residence
Average lot size	2,500 sq ft
Percent view lots	25%
Price per square foot, view lots	\$30.00
Price per square foot, non view lots	\$ 7.50
Weighted average	\$13.12/sq ft
Average price per lot	\$33,000





**CAMBRIA
COMMUNITY
SERVICES
DISTRICT**

P.O. Box 65
Cambria, CA 93428



For more information:

CCSD General Manager Tammy Rudock
805-927-6230 • E-mail: trudock@cambriacsd.org • www.cambriacsd.org

Citizens Finance Committee*

Bill Allen, Wayne Attoe, Ron Crummitt, Bob Hill, Jeannette Johnson, John Linder,
Wayne Parrack, Gail Robinette, Wayne Ryburn

Other Contributors

Art Montandon, CCSD Legal Counsel; Bob Gresens, CCSD Engineer; Tammy Rudock,
CCSD General Manager; Roger Dale, The Natelson Group;
Steve Bein, Jim McPherson, Glenn Lajoi, RBF Consulting.

Photography by Merle Bassett

**This Committee was appointed by the CCSD Board of Directors.*

Buildout Reduction



PRESERVING CAMBRIA'S
QUALITY OF LIFE FOREVER.





Introduction

For decades, Cambria's natural beauty and small-town charm have attracted residents and visitors from around the world.

And, like many communities across America, Cambria is at a crossroads. The town has experienced significant growth, straining its already limited water supply, infrastructure and public services. A substantial amount of Monterey pine forest and open space has vanished.

Without careful planning, the things that make Cambria special will be gone forever and it will become like so many other faceless towns...congested with traffic, devoid of open space, and burdened with the high cost of additional infrastructure.

The Cambria Community Services District (CCSD) is proud to present an innovative Buildout Reduction Plan (BRP) to ensure Cambria's small-town character, natural resources, and quality of life remain intact.



TOTAL BUILDOUT

Water Meter Allocations	Single-family	Multi-family	Total Residential
Existing residential water connections	3,569	217	3,786
Pending connections	3	3	6
Intent to serve letters outstanding	n/a	n/a	31
Grandfathered meters	n/a	n/a	42
Existing CCSD waitlist positions	666	35	701
Potential additional CCSD connections	n/a	n/a	84
Maximum total connections. . . .			4,650

Background

Following decades of severe water supply challenges, the CCSD Board declared a water emergency in 2001 and stopped the issuance of all new water connections until a viable water supply could be identified.

The CCSD is developing a Water Master Plan, scheduled for completion in 2007, which identifies a maximum of 4,650 residential water connections as the target capacity for final Cambria buildout. This is considered a sustainable number based on Cambria's limited infrastructure, services and resources. It includes 3,784 current residential water connections and 866 pending connections (701 are on the CCSD waitlists).

Buildout reduction and the target 4,650 residential water connections are consistent with County and California Coastal Commission recommendations.

In early 2006, the Citizen's Finance Committee, a broad cross-section of Cambria stakeholders, was appointed by the CCSD Board to develop a Buildout Reduction Plan (BRP). They completed their work and presented a report in May 2006, which is the basis for most of the information in this brochure.





Concept

The BRP's main goals are to conserve water, minimize infrastructure impacts, and preserve the town's dwindling forests and open space, allowing Cambria to retain its small-town character and quality of life. The

BRP also satisfies the California Environmental Quality Act's requirement to mitigate any growth-inducing impacts of the Water Master Plan.

The BRP seeks to retire or merge building sites¹ that exceed the approved maximum 4,650 water connections. This includes multi-family connections and lots. It does not include commercial connections, which are limited to 20% of the residential water allocation in a given year.

Most of the estimated 879 lots to be retired will be owned and maintained by the CCSD with open space easements held by land trusts. Some may be owned by land trusts if they complement existing forest and open space reserves. Most will be open space and forest habitat.

It's not known who will sell their lots, so there is no master lot list. The purchase of the 879 lots will occur over the 22-year life of the BRP. The choice of lots will depend on cost, habitat and forest protection attributes, open space proximity, and relationship to existing development.

Controlling growth on the edge of Cambria complements the BRP. In November 2006, Cambrians will have an opportunity to vote for the creation of a water service growth boundary. This measure would require voter approval for adjacent areas to be annexed and to obtain water and sewer connections.

¹ A building site must be a minimum of 3,500 square feet or have two underlying lots and at least 50 feet of street frontage.

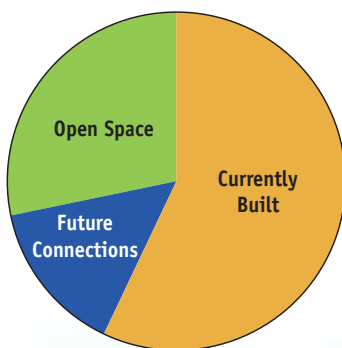
How the BRP Works

Of the 4,650 maximum residential connections, 84 are unallocated. Of these, 65 would be sold through the BRP. Selected local land trusts with land acquisition experience and community knowledge would sell three of the 65 unallocated water connections a year over the 22-year life of the program and use the proceeds to purchase and retire potential building sites. Property sales to the land trusts would be voluntary; no landowner would be forced to sell. Lots would be retired with a deed restriction or conservation easement. Once a lot is retired, it would remain retired forever. Market value of lots will be determined by a qualified real estate appraiser.

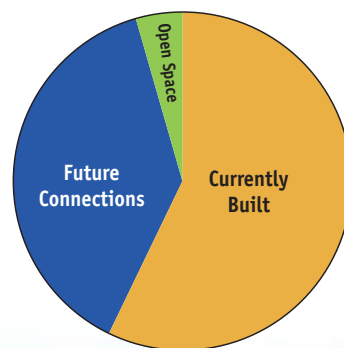
Land trusts will have flexibility in choosing lots for purchase and retirement as long as a potential building site is retired. Factors for consideration include adjacency to other retired lots, least costs for greatest benefit and strategic importance for habitat or open space protection.

Lot maintenance will be the responsibility of the lot owner—private party, land trust or CCSD—and will consist mainly of weed abatement and fuel reduction for fire safety. CCSD cost of maintenance will be funded through the BRP.

► With Buildout Reduction



► Without Buildout Reduction





Timing

Based on the County's current 1% growth rate, complete buildout will be achieved in approximately 22 years. If this growth rate is increased, development could occur

faster, but the 4,650 maximum residential connections would remain the same. Building site retirement can occur faster than approval of water connections.

The CCSD could begin implementing the BRP sometime in 2007 when the Water Master Plan is approved. The BRP ends when all the lots are retired.

When the BRP is implemented and water connections are sold, buyers can expect to build when the CCSD Board lifts its moratorium and when a water supply project is far enough along to ensure that supplemental water is available to meet the new demand.

Program Implementation

Following is the sequence of steps to implement the BRP:

1. Approve Buildout Reduction Program
2. Approve and adopt Water Master Plan Program EIR
3. Adopt Water Master Plan
4. Incorporate proposed water rate adjustment into Water and Wastewater Rate Analysis and Modeling Study currently underway
5. As funds accumulate, make them available for lot purchases and retirements
6. Offer conditional Intent to Serve Letters to a portion of the CCSD waitlist
7. Begin donating meters (three a year) to land trusts for sale, subject to lifting of moratorium
8. Lift moratorium once a viable water supply project has made substantial progress and is nearing completion

FOR MORE INFORMATION:

For more details on the Buildout Reduction Program, please go to the CCSD website at www.cambriacsd.org and click on "Buildout Reduction Report" on the home page. You may also contact CCSD General Manager Tammy Rudock at 805-927-6230 or by email at trudock@cambriacsd.org.

LOT OWNERS NOT ON CCSD WAIT LIST

Please note that no one will be forced to sell his or her property. Due to their size or location, many properties have been ineligible for water service for decades. The purchase of land in the CCSD has never guaranteed water service.

For those lot owners who have a buildable lot but are not on the CCSD water wait list, several options are available under the BRP:

- Acquire and move a meter or CCSD waitlist position from another lot
- Purchase an unallocated water connection from a land trust
- Sell the property at fair market value
- Donate the property
- Merge the property with an adjacent parcel
- Retain the property

LOT OWNERS WITH A CCSD WATER POSITION

The 701 properties on the CCSD water wait lists will receive water connections during the 22-year projected life of the BRP.

SPECIAL PROJECT AREAS

Special Project Areas 1 and 2 are County planning areas with restrictions because of their unique resources, i.e. the trees and habitat of Area 1 and the viewshed and habitat of Area 2. Water entitlements may not be transferred to Area 1 and, after September 24, 2007, may not be transferred to Area 2 either. These areas are not included in the BRP because other acquisition programs are already in place for them.



March 25, 2014

Ms. Rita Garcia, Technical Manager

RBF Consulting, a Michael Baker International Company

14725 Alton Parkway

Irvine, CA. 92618

Subject: Cambria Emergency Water Project

Dear Ms. Garcia,

Hi my name Kim Adams and I have live with my husband, daughters, and recently my elderly father at 1022 San Simeon Creek Rd. for about 20 years, my husband is the ranch manager for Clyde and Sue Warren at Rancho San Simeon. I am a Cambria native and understand the drought situation, and have been through it more than once in my life time.

I saw the work being started some months back and kind of understood what was going on, however I assumed that an environmental impact report had been done on the project before work had started. At that time I did not realize that there would be such noise when it would not be running at full capacity, nor did I realize that there would be such a heavy misty over spray.

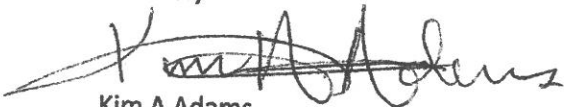
You see I have a terminal illness, Pulmonary Hypertension, and several autoimmune diseases, so my immune system is compromised. With the PH I have to be cautious of what I am breathing in, I can't be around people while they are smoking, or even BBQ smoke.

During the week of February 9th all the blowers where going 24/7 for 3 or 4 days, I have a couple goats that I take on walks with me on the ranch. My goats where very skittish, which is not normal, and did not want to walk south from where their goat pin is, which would be heading toward the spay field across San Simeon Creek Road. The noise bothered me as well as my goats, but even more disturbing to me was the heavy mist I could see, smell and almost feel. What's in the misty overspray, has there been any kind of air quality monitoring done?

We love living here on the ranch, it can be a busy place during the weekdays but in the evenings and the weekends it is so peaceful, you remember why you chose to live here.

I am here tonight to be put on the record with my concerns regarding the noise and overspray from the brine pond. Thank you for addressing the issues for those of us impacted by the above mentioned, and finding ways to resolve these issues.

Sincerely



Kim A Adams

1022 San Simeon Creek Rd.

Cambria, CA. 93428

Ph: 805-927-0952

Steele, Noelle

From: Jerry Gruber <JGruber@cambriacsd.org>
Sent: Thursday, March 26, 2015 10:10 AM
To: Garcia, Rita
Cc: Bob Gresens; Tim Carmel (tcarmel@carnaclaw.com)
Subject: FW: Cambria Emergency Water Project

FYI.

From: Denise Hearst [mailto:denise.hearst@gmail.com]
Sent: Wednesday, March 25, 2015 8:17 PM
To: annie.aguiniga@sen.ca.gov; bgibson@co.slo.ca.us
Cc: bgibson@co.slo.ca.us; kharris@waterboards.ca.gov; Jerry Gruber; Board; Kolb-hkolb@waterboards.ca.gov; Ryan.Lodge@waterboards.ca.gov.
Subject: Cambria Emergency Water Project

3/26/15

Governor Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Senator Bill Monning

Capitol Office State Capitol,
Room 313 Sacramento, CA 95814

Supervisor Bruce Gibson
1055 Monterey St.,
San Luis Obispo, CA 93401

CCRWQCB Executive Officer Ken Harris
895 Aerovista Place, Suite 101
San Luis Obispo, CA. 93401-7906

CCSD Board Members
1316 Tamson St, Cambria, CA 93428

Dear Governor Brown, Senator Monning, Supervisor Bruce Gibson, Executive Officer Ken Harris, Jerry Gruber and the CCSD Board Members,

In recent weeks the final stages of development of Cambria's "emergency water project" have been characterized by an erosion of the public's trust in the responsible agencies as revelations about the potential toxic waste produced by the project have begun to surface. I am not among those opposed to Cambria's growth or development of water resources, quite the contrary. However, it is now time to pause and take another look at this.

In the EPA's "Guidelines for Water Reuse," for which the primary consultant was CDM Smith (coincidentally, the contractors who built Cambria's emergency water project), Chapter 8 is entitled, "Public Outreach, Participation, and Consultation." It advises ways to frame the benefits of water reuse projects, rather than focus on the risks.

So with that in mind I'd like to talk about an issue that most locals seem to know little about, because it has not been widely reported.

As we all know by now, the District began operating the plant under an "emergency" designation without having completed its application for a permanent coastal development permit.

This means that there are several critical questions that have not been answered. I will set aside the issues concerning the integrity of the San Simeon creek and lagoon, and the effects of the chemicals used in the extraction process for others to address, and focus here on the evaporation pond.

In one phase of the plant's process, brine wastes are discharged into an evaporation pond. The pond is filling with potentially toxic wastes that have been removed from the extracted water (which concentrates partially-treated sewage water including pathogens) during the treatment process. The pathogen-rich brine waste includes salts and other contaminants. To aid in the evaporation of the brine waste, 5 spray evaporators are being used to accelerate the evaporation from the pond, shooting the mist hundreds of feet into the air, including testing yesterday during which the mist was blown well outside the impoundment limits and digested ducks through the intakes. (The District has proposed running them 12 hours a day, 350 days/year.)

Thus the project's brine evaporation pond and spray evaporators are exposing nearby campers and residents to this aerosolized brine waste.

The chemical constituency of the aerosolized brine is believed to contain pathogens (viral, bacterial, mycoplasma or protozoa, according to the EPA Guidelines, Chapter 4) as well as the potentially methylated bioavailable metals copper, chromium, steel, lead, mercury, and arsenic, all harmful or toxic when airborne.

The potential for adverse health, recreational and aesthetic impacts on people living and working nearby, as well as agricultural crops, is very real. Yet these potential impacts have not been evaluated since the District has not conducted the required environmental review. In addition, since prior State Health Department review has been delegated to

the Regional Water Quality Board, no medical doctor has reviewed the human health impacts.

Back to the EPA's Guidelines, Chapter 8: it is noted that the water industry's vocabulary and means of communicating with the public are not well understood or well received. To remedy that, the report cites survey results revealing that people are most reassured by the term "very high quality water," and that the least reassuring terms are those that include the "re" prefix, as in, reuse, reclaimed, etc.

The EPA Guidelines also mentions people's visceral aversion to human waste and the difficulty of overcoming a "perception" of contamination. Perhaps that's why we rarely hear the term "Toilet to Tap" applied to this project, even though it is an apt description of the process employed at Cambria's emergency water project.

Of course at this point, the CCSD and NCAC do not know if it is only a "perception" of contamination that we are facing.

And then there is the matter of noise pollution. For the past 10 years, I have lived on Clyde Warren's ranch across the road from the plant. Those of us in proximity to the plant have been listening to the test runs of the evaporator engines that began in early January. During the week of February 9, the fan engines ran at 110% capacity 24/7, for 4 days causing a substantial increase in noise levels that kept us awake at night.

I called the CCSD offices three times, beginning in early January to express concern about the noise and to ask what the proposed operation schedule would be. To this day I have not received the courtesy of a reply.

I found something else in those EPA Guidelines most relevant to our situation (when I say "our" I mean those of us living and working in the immediate vicinity of the plant), also in Chapter 8, under the heading "Environmental Justice."

One such environmental justice issue is that of geographic inequity. This is when one portion of the community perceives that it is required to share a majority or disproportionate share of the impact from the project siting.

The guiding principle of environmental justice is that no group of people should bear an unbalanced share of negative environmental impacts of a project or program, including not only health hazards and noise pollution, but also potential decreases in property values and a substantial reduction in quality of life.

One might wish that in the rush to get the plant online, while circumventing the permitting process, that someone in a position of responsibility in our town or county had shown a modicum of concern for those people who are most at risk from the negative impacts of the plant...because ultimately, if this system is as deeply flawed as early indications suggest, all the town's residents will bear the burden for decades to come.

Sincerely,

Denise P. Hearst, Cambria, Ca

Steele, Noelle

From: Susan McDonald <smcdon13@wildblue.net>
Sent: Wednesday, March 25, 2015 9:20 PM
To: Garcia, Rita
Cc: Tom Gray; Gail Robinette; James Bahringer
Subject: Cambria EIR scoping response
Attachments: CCSD letter.docx

Please see the attached letter in response to the request for comments on the scope of the EIR for Cambria's Emergency Water Supply project,. Let me know if you have any questions.

Thank you,
Susan McDonald
Cambria

March 25, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618
rgarcia@mbakerintl.com

Dear Ms. Garcia:

I am writing to express my support for the Cambria Community Services District and the Emergency Water Supply project the district recently completed on San Simeon Creek.

My husband and I have lived in Cambria for more than 35 years and have experienced several droughts with great fear that the community will someday run out of water. That "someday" could be now if the district had not taken the bold, timely and well-considered action to build the EWS. For the first time, our community has water security during drought, which is wonderful, but doesn't go far enough. We would like to see the water plant available during future normal dry seasons, without an emergency declaration, to provide water for our town and help preserve the habitat of San Simeon Creek and lagoon.

Creek protection is extremely important to us because we have lived on San Simeon Creek for the past 15 years and have seen the changes that drought has brought. The creek bisects our 40-acre property and normally sustains a population of steelhead in a year-round pool. Last year, for the first time, the pool nearly dried up. The usual population of adults and young fish did not appear in the pool or in the spawning area below - a sign of real stress on our creek.

The current four-year drought shows no sign of easing and may be the new reality for all of us. We need to look ahead and be prepared for a water supply that is even scarcer.

I believe the CCSD should be praised for actually putting in place a new water source, instead of being criticized for it. I am relieved that Cambria voters endorsed the new plant in the November 2014 election and that now the district is beginning the EIR process to make it available beyond emergency conditions.

My Observations

The EWS is currently operating successfully under an emergency permit. I would like to relate my observations about operations and make some suggestions for the scope of the EIR.

Our home is nearly five miles from the plant, evaporation pond and blowers. We do not hear it here, but neighbors near the plant say they are bothered by noise from the blowers. I have heard claims that the sound is like a “jet engine” or a “turbine.” That is a gross exaggeration.

I drive past the pond and blowers at least twice every day. I have stopped a number of times and gotten out of my car on the road right next to the blowers and listened. To me, they sound like a whoosh, very much like the wind or the flow of the creek. I have stopped further up the road near the horse facility on Rancho San Simeon, and I could not hear the blowers at all.

Daily activities on and near San Simeon Creek Road create a pretty noisy place on their own. There’s a privately owned industrial site at Rancho San Simeon with a heavy equipment yard, storage facility for hundreds of chemical toilets, wood recycling yard, as well some homes occupied by ranch tenants. Added to the numerous daily trips in and out by large work trucks are the dozens of other vehicles with trailers from town that show up to haul water to irrigate their landscaping.

There are also loud sounds from agriculture - tractors plowing nearby fields, cattle trucks and trailers bouncing up and down the road, helicopters spraying orchards from overhead.

We also have a rock processing plant that creates quite a racket when it is occasionally turning rocks into sand and gravel. There are large diesel trucks and trailers hauling road base to projects up the road. And we have vacationers in motorhomes and tents at the State Park campground who produce their own variety of sounds. The area also experiences noise from traffic on Highway 1 - often loud on weekends and during the summer. Ocean waves and coastal winds add to the cacophony. Not to mention frogs, insects, cows, barking dogs, neighing horses and other critters.

I am not complaining about any of these sounds, and I don’t think any of my neighbors are complaining either. But, I am surprised by the complaints that some of them are making about what I consider comparatively benign sounds coming from the Emergency Water Supply project.

EIR Scoping Suggestions

I think the EIR should not only measure sound at the blowers, but at various points up and down San Simeon Creek at various times of day and night and in different weather conditions - fog, rain, wind and sun. In any condition, does the noise actually exceed what is allowed? Is it really loud enough to bother others? Also, noise from other activities I have mentioned should be included in the study. How does the noise from the EWS compare with all the other industrial, agricultural and human activities?

I also support the idea of screening the pond and blowers out of view from the road and the campground. While I believe the EWS is vital for the health and welfare of Cambria, the pond and blowers are not what I would call attractive. Adding some native vegetation would really help improve the view and make the facility fit in better with the natural surroundings.

Thank you for the opportunity to comment on this important and necessary project. I look forward to its full operation.

Susan McDonald
San Simeon Creek Road
Cambria

Steele, Noelle

From: Jim Spencer <trainmanjs@sbcglobal.net>
Sent: Wednesday, March 25, 2015 4:36 PM
To: Garcia, Rita
Cc: Judy Spencer
Subject: Cambria Emergency Water Supply
Attachments: Cambria EWS comments to RBF.docx; SpenKennethDr Tree Loss.pdf

We are writing in support of the EWS for Cambria.

We recently purchased the book: "The Monterey Pine Forest, Coastal California's Living Legacy" published in 2011. It is extremely informative about the threatened status of the five native Monterey Pine forest stands in California and two islands in Baja California. After reading it, we were surprised at how little attention in the debate over the EWS is being given to this rare variety -- one of the signature attractions of Cambria!

We own a forested lot on Kenneth Drive that is about 1/3rd of an acre. We purchased it in 2002 with the hope of building our retirement home there. At the time of purchase, we had the lot surveyed and identified the species and locations and diameters of all the existing trees. A copy of the survey is attached. It provides a reliable measure of the state of our piece of the forest over two points in time.

In 2002, there were 45 Pines on the property. In 2008 an updated count showed 21 pines had died and been removed. Those are shown on the drawing in red. In the following seven years, another 10 have died and been removed. We haven't yet marked them on the survey. The bottom line is it means that approximately 2/3rds of the pines on our property have been lost over a relatively short 13 years.

Our point in bringing this up is that we believe the root cause of the rapid die off has to do with over-drafting the water table for domestic and fire storage use. The trees on our property had survived for decades, including similar prolonged periods of drought. But with no other water source, CCSD had implemented near-record draw-downs each year of the water table, especially since the 2000's. This lowered the water table to the point where the tree roots can no longer reach it.

The EWS will provide a solution by reducing the need for such extreme water extraction from the system wells. This is if the EWS is allowed to operate on a regular basis -- not just during drought emergencies. With a capacity that we understand will provide roughly a third of the community's needs, it will free up countless acre feet of water that will help reverse the loss of our trees and maybe even allow a few additional residents over time.

Perhaps the acronym EWS should be changed to PWS (Permanent Water Supply). With an investment of roughly \$10 million, it is part of our water system now.

Thank you for considering this.

James and Judith Spencer
Kenneth Drive
and 424 California Terrace, Pasadena 91105

James G. Spencer, Architect, AIA

trainmanjs@sbcglobal.net

Ms. Rita Garcia
Technical Manager
rgarcia@mbakerintl.com
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Subject: Emergency Water Supply for the Cambria Community Services District

Dear Ms. Garcia:

We are writing in support of the EWS for Cambria.

We recently purchased the book: "The Monterey Pine Forest, Coastal California's Living Legacy" published in 2011. It is extremely informative about the threatened status of the five native Monterey Pine forest stands in California and two islands in Baja California. After reading it, we were surprised at how little attention in the debate over the EWS is being given to this rare variety -- one of the signature attractions of Cambria!

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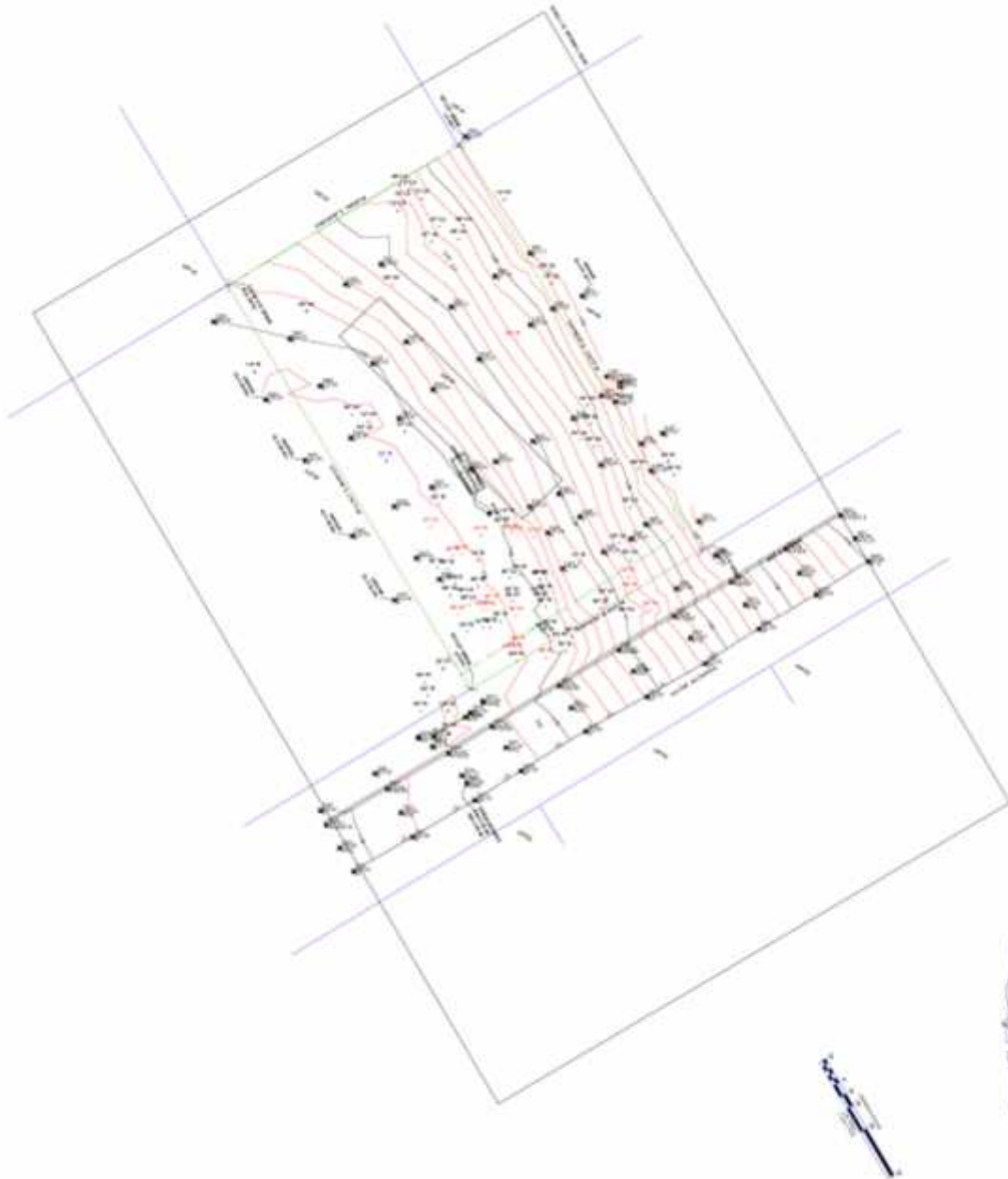
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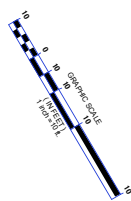
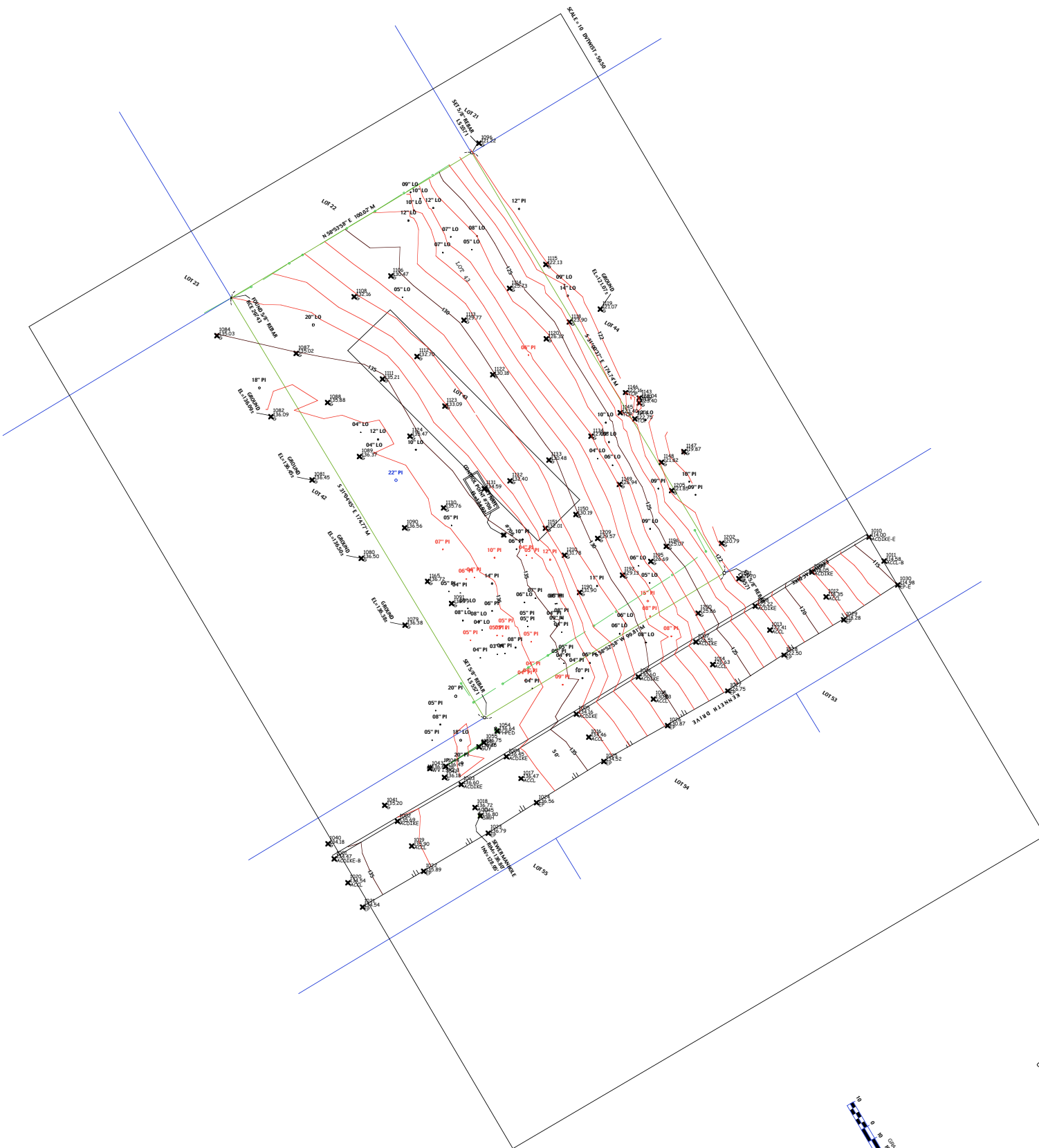
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Thank you for considering this.

James and Judith Spencer
Kenneth Drive, Cambria
424 California Terrace, Pasadena 91105



SCALE: 1/4" = 10'-00"



March 25, 2015

Clyde Warren
Rancho San Simeon LLC
P.O. Box 528
Murphy, OR 97533
541-660-4364

Ms. Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, CA 92618

Re: Draft Environmental Impact Report for the Cambria Emergency Water Supply Project

Dear Ms. Garcia,

Thank you for the opportunity to express my concerns regarding the Cambria Emergency Water Supply Project (EWS Project).

My family, as well as our renters, have several concerns with the EWS Project that we would like included in the Draft Environmental Impact Review (DEIR) for the EWS Project. I have also discussed these issues with numerous owners and residents of neighboring properties and they share many of the concerns I have detailed below.

Aesthetics (section 1(d) on Environmental Checklist)

The EWS Project creates substantial glare to my residence at 1012 San Simeon Creek Road and impacts the view shed by looking at the pond and blowers. I have attached a photo of the view from our residence. I request that this impact be included and analyzed in the DEIR.

Noise (section 12 on Environmental Checklist)

I am concerned that the operation of the EWS Project will impact our quality of life by exceeding the County Code's limit of 55 dbi during the day and 45 dbi during the night. I request that this impact be included and analyzed in the DEIR. Requiring that EWS Project operations comply with the County limit should satisfy our concerns.

RWQCB Permit Requirement re Brine Mist

The terms and conditions of the EWS Project's permit issued by the Regional Water Quality Control Board (RWQCB) prohibit the brine mist created by the blowers from leaving the pond area. I am concerned because, under the project's current operations, this brine mist is regularly blown across my property by the wind. I have attached photos (which also include my wind sock) that I took in sequence over a two minute period that show that it only took a little breeze while the blowers were in operation to carry the mist in several

directions, including onto my property. I request that this impact be included and analyzed in the DEIR.

One suggestion I have could help resolve (at least to some extent) my concerns with impacts to aesthetics, noise and the brine mist. I planted Leland Cypress trees around my property to help with the view shed from the County Roads. Planting similar trees around the brine pond could help lessen the impacts I have listed above. As you can see by the photographs that I have attached, these trees do a good job of screening. Additionally, these trees grow fast and I only had them on drip irrigation for three years.

Hydrology and Water Quality (section 9(b) on Environmental Checklist)

Section 9(b) of the Environmental Checklist identifies the substantial depletion of groundwater supplies such that "the production rates of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted" as a potentially significant impact of the EWS Project. I am concerned because I believe my well will be significantly impacted. I have been trying to meet with Mr. Gruber over the last couple of weeks to voice my concerns. He stated on March 11 that he wanted to meet with the Water Permitting Ad-hoc Committee before speaking with me. I am still looking forward to meeting with him to discuss and resolve this issue, however, I also request that this impact be included and analyzed in the DEIR.

Sincerely,



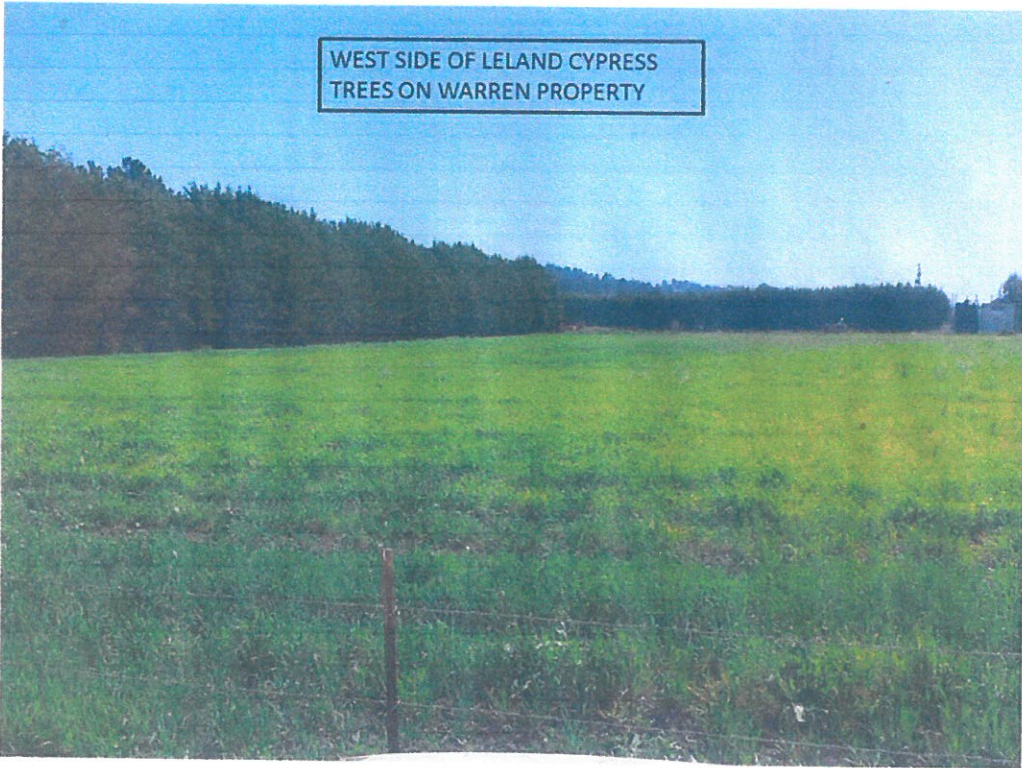
Clyde Warren

Rancho San Simeon LLC

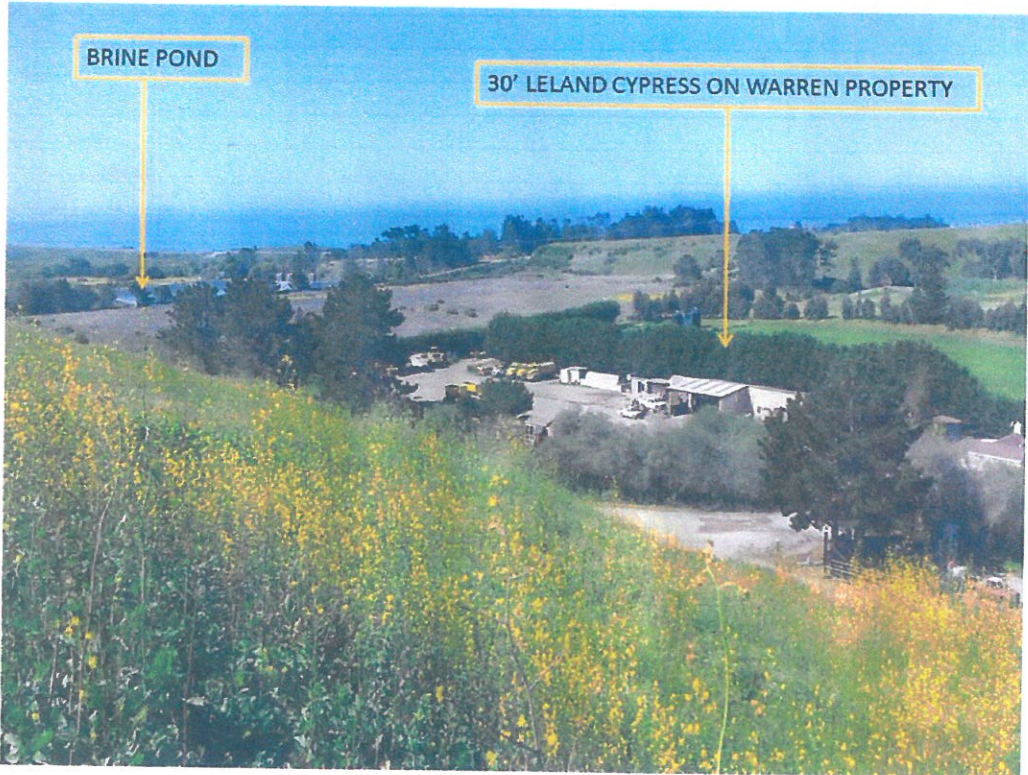
VIEW OF BRINE POND LINER FROM 1012 SAN
SIMEON CREEK ROAD RESIDENCE

BRINE PONE LINER





WEST SIDE OF LELAND CYPRESS
TREES ON WARREN PROPERTY



BRINE POND

30' LELAND CYPRESS ON WARREN PROPERTY



3-16-2015 Second photo in series at 3:28 PM of the CCSD EWS blower.



3-16-2015 Fifth photo taken in series of the CCSD EWS blower.



3-16-2015 First photo taken in series at 3:28 PM of one CCSD EWS blower.



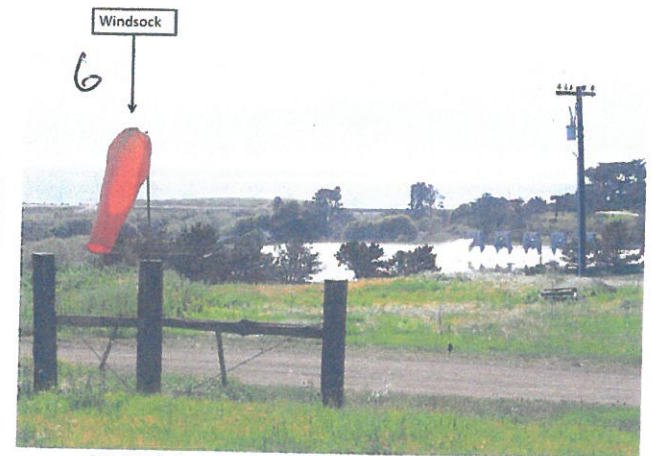
3-16-2015 Forth photo taken in series at 3:28 PM of the CCSD EWS blower.



3-16-2015 Seventh photo taken in series at 3:30 PM of the CCSD EWS blower.



3-16-2015 Third photo taken in series at 3:28 PM of the CCSD EWS blower.



3-16-2015 Sixth photo taken in series at 3:29 PM of the CCSD EWS blower.

Steele, Noelle

From: usteach@verizon.net
Sent: Thursday, March 26, 2015 11:45 AM
To: Garcia, Rita
Subject: In support of the Cambria Emergency Water Supply project (EWS)

Steele, Noelle

From: Ron Crummitt <rcrummit@charter.net>
Sent: Thursday, March 26, 2015 1:02 PM
To: Garcia, Rita
Subject: SAVE CAMBRIA WITH THE EWS

Importance: High

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

March 26, 2015

Dear Ms. Garcia:

As a long term resident of Cambria, California, since 1980, My wife and I want to support the EWS because we are very concerned about the long-term availability of potable water for Cambria, including sustainable supplies of clean water for the purposes of drinking, hygiene, and fire protection. Having lived here for 35 years, we went through the long-term drought in the late 1980's, and we must never go through this situation again. Fire is also a pertinent concern, since a great percentage of our trees are dead, and will burn quickly and easily. Therefore, the EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages. All of California agencies involved must support Cambria's EWS.

Thank you for your attention.

Sincerely,

Ronald & Helga Crummitt
(rcrummit@charter.net)
PHONE:(805-927-3777)

Steele, Noelle

From: Chris Lewi <cclawi@gmail.com>
Sent: Thursday, March 26, 2015 1:42 PM
To: Garcia, Rita
Subject: Cambria EWS -- Letter in Support of Project
Attachments: 2015-03-26 Ltr to Rita Garcia re Cambria EWS.pdf

Please see the attached. Thanks.

Christopher C. Lewi, Esq.
Attorney & Counselor at Law
979 Osos St., Suite C1
San Luis Obispo, CA 93401
(805) 400-0703 (phone)
(805) 395-4887 (fax)
cclawi@gmail.com

CHRISTOPHER C. LEWI

DIANE G. LEWI

401 Orlando Dr.
Cambria, CA 93428
(805) 400-0703 (cell)
(805) 395-4887 (fax)
cclewi@gmail.com

Via Email:

rgarcia@mbakerintl.com

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Re: Support to EWS Project in Cambria

Dear Ms. Garcia:

On behalf of my wife Diane and myself, I write this letter to in support of the EWS Project in Cambria.

Diane and I, each 53, are full-time residents and have weathered the water supply crisis with I hope good humor and optimism and, like everyone in Cambria, we are good water conservationists. But I must say that when the EWS went online we both breathed huge sigh of relief. I list below some of the reasons why we support the EWS project and why the EWS project should be encouraged and applauded and not shuttered by ill founded fears.

One: Diane and I are concerned about the long-term availability of potable water for the town of Cambria including sustainable supplies of clean water for the purposes of drinking, hygiene and fire protection. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing extraordinary drought and the Central Coast's history of cyclical and severe water shortages (and I add that there is every reasonable probability that California's and Cambria's water supplies will be ever dwindling in this era of climate change.)

Two: We further support the EWS because we are concerned that, without the EWS, the town's potable water supply is not reliable but, instead, depends entirely on just two aquifers that fluctuate considerably depending on seasonal rainfall.

Three: While we have cut back on our water use, we support the EWS because Cambrians cannot assure adequate water supplies through additional conservation measures alone. On average, Cambrians use approximately 30 gallons of water per day compared to the average American who uses approximately 100 gallons of water per day. *EPA, Water Sense, An EPA Partnership Program.*

Four: We support the EWS because we are concerned that, without the EWS, during dry spells there will be harmful saltwater intrusion into the San Simeon Creek aquifer and the potential of soil subsidence over such aquifer. Similarly, we support the EWS because we are concerned that, without the EWS, the San Simeon Creek Lagoon habitats may be harmed or destroyed by salt water intrusion or drying up completely during the inevitable droughts that occur on the Central Coast.

Five: We further support the EWS because of our concern that the town's substantial need for a reliable supplemental potable water source should be balanced against environmental risks. The EWS achieves such balance by, among other things: (1) optimizing existing groundwater sources including brackish water and relatively small amounts of treated wastewater; (2) not disturbing ocean habitats by sourcing its water directly from the ocean or discharging waste streams directly into the ocean; and, (3) using relatively small amounts of energy to operate the plant compared to a traditional sea water desalination plant. On that same point, we support the EWS because of our concerns that the environmental risks of any supplemental water supply be mitigated. Through reasonable modification of the EWS and other means, such environmental risks can be mitigated.

Six: We further support the EWS because of our concern that, without the EWS, Cambria will no longer be able to serve as an attractive and reasonably priced tourist destination for the hundreds of thousands of tourists from around the World that visit our town each year in order to enjoy this part of California's beautiful Central Coast. No water, no town -- it's really that simple and if this were to occur, without robust tourism, which is Cambria's predominant industry, many service jobs will be lost which will disproportionately disadvantage individuals within the lower economic classes, many of which are Hispanic.

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Seven: And finally, we support the EWS because it Rocks!!! Nominated for desal project of the year, the EWS utilizes a state-of-the-art three stage reverse osmosis based water treatment technology that has been successfully used at other California water projects including the Carlsbad, California desalination plant and the recent expansion of the Anaheim wastewater treatment plant. This project is leading the charge and is a model for what is possible in many locations around the world. We are concerned that this should be applauded and encouraged and not shuttered from ill founded fears.

Sincerely,



Christopher Lewi

Steele, Noelle

From: Charlotte Reddish <creddish@charter.net>
Sent: Thursday, March 26, 2015 11:46 AM
To: Garcia, Rita
Subject: Cambria Emergency Water Supply

Dear Ms. Garcia,

We are writing to express our support for Cambria's Emergency Water Supply Project (EWS). The reasons for our support are numerous:

- to insure a long term potable water for drinking, hygiene and fire protection.
- to protect our natural aquifers from being permanently compromised.
- because Cambria cannot assure adequate water supplies for present residents through further conservation.

Current extreme conservation measures have already been almost universally embraced.

• because storage of rainwater, whether large or small scale is undependable, expensive, and would require a long time to implement. While we think that storage efforts could supplement the EWS, and encourage such efforts, the main focus must be the immediate implementation of the EWS.

I commend the CCSD for their forward thinking plan for EWS. With our entire state and region in distress from the drought, and with reservoirs at very low levels, it is obvious that new technology and thinking must be applied to the problem.

Gary and Charlotte Reddish
570 Ardath Drive
Cambria CA 92428re

Ms Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, CA 92618

March 26, 2015

Dear Ms Garcia,

We have reviewed the Project Information Packet and Environmental Checklist for the Cambria Emergency Water Supply Project and we have the following comments.

1. AIR QUALITY (Checklist Item 3e.)

The IS / MND document stated "The EWS generated waste stream, which would be disposed for evaporation at the evaporation pond, would not create objectionable odors." "No mitigation is required."

This matter needs further analysis. The water going into the EWS has a significant odor (we have used it for landscaping water). The EWS will concentrate the odor by a factor of 10. After reaching the evaporation pond, the waste water will be further concentrated by accelerated evaporation. The odor from the evaporation pond will affect nearby properties, even when the spray evaporators are turned off.

2. POPULATION AND HOUSING (Checklist Item 13a.)

The North Coast Area Plan (Pages 3-9 and 4-17) states "The CCSD's intent is to incorporate recommendations from the Buildout Reduction Program into the program level Environmental Impact Report as mitigations to offset the growth-inducing impacts of a new water supply."

Although the current permit application is for existing customers, the scope of the permit could be expanded to cover new water service connections in the future. The capacity of the EWS is larger than necessary for existing customers, which will increase the pressure to add new connections.

We recommend that the CDP permit application and Project EIR specify that when the permit is expanded to cover new connections, a Buildout Reduction Program is implemented as required by the North Coast Area Plan and the California Environmental Quality Act.

3. NOISE (Checklist Item 12a, 12d)

The IS / MND stated that "As the equipment would be fully enclosed in EWS containers, it would attenuate operational noise levels pursuant to CZLUO noise standards." There was a similar general statement about the spray evaporator noise levels.

Further analysis should be provided to clarify the type of sound insulation materials installed in the EWS and spray evaporator enclosures, and the measured noise levels outside the enclosures. The allowable night time noise levels above ambient levels are stringent, and require careful consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Crosby & Laura Swartz". The signature is written in a cursive, flowing style.

Crosby and Laura Swartz
2285 Sandown Place

Steele, Noelle

From: Jim Crescenzi <jcrescenzi@gmail.com>
Sent: Friday, March 27, 2015 10:52 AM
To: Garcia, Rita
Cc: Mark Rochefort; Tom Gray
Subject: Letter in support of the Cambria Emergency Water Project
Attachments: Crescenzi Cambria Water Statement.pdf

Dear Ms. Garcia,

Please note the attached letter by Elaine and Jim Crescenzi in support of the Cambria Emergency Water Project.

Jim Crescenzi
jcrescenzi@gmail.com
805 458-3331

E. James Crescenzi, Jr. & Elaine D. Crescenzi



640 Ashby Lane, Cambria, CA 93428
jcrescenzi@gmail.com

Ms. Rita Garcia,
Technical Manager
Rgarcia@mbakerintl.com

March 27, 2015

Dear Ms. Garcia

We are writing this letter to express support for the Cambria Emergency Water Project. We have lived at 640 Ashby Lane in Cambria for fifteen years, and strongly support this measure to assure the security of supply of potable water for Cambria. We, like many Cambrians, greatly reduced our water usage during the several years of drought. However, conservation alone cannot solve Cambria's need for potable water, if the severe drought were to continue. Frankly, our own conservation measures including "If it's yellow, let it mellow (minimal flushing of toilets)" and reducing the frequency of bathing are not advisable for health reasons. Other measures like carrying heavy containers of non-potable water down our property (on a steep hill) to water landscaping has additional risks. We also feel that porta-potties for use by tourists is not supportive of good public health. In other words, there is no reasonable rationalization that perpetuating a severe water shortage is not without consequences.

We were impressed by the thoroughness with which the CCSD examined water alternatives before initiating the current Emergency Water Project, and by the fact that this project is so protective of the environment. It is, in our view, clearly a minimum environmental impact, conservative approach to providing additional water for Cambria. Interestingly, it applies advanced technology in a manner that potentially helps our residents and the environment of the San Simeon Creek and Lagoon in times of severe drought. Properly executed, this project will actually increase the likelihood of fish survival in San Simeon Creek (and the lower lagoon). Surviving steelhead smolt (juveniles) migrate towards the lower elevation lagoon when the creek is de-watered by drought. Keeping the water level up in the San Simeon Creek lagoon is their last chance for survival, and we are encouraged that the Emergency Water Project will offer this benefit.

Sincerely,

Elaine D. Crescenzi and E. James Crescenzi Jr. PhD
805 927-2285 (jcrescenzi@gmail.com)

Steele, Noelle

From: Taylor Pat <ruhs56@charter.net>
Sent: Friday, March 27, 2015 10:08 AM
To: Garcia, Rita
Subject: Cambria EWS project

Dear Ms. Garcia,

I am writing to support the EWS project in Cambria. I am a 25 year resident and have been thru the drought in the 90's and that was not fun but this one is much worse. The community has spent a lot of money over the many years to come up with a source of potable water. We now have a source and I hope it will be permanent. I certainly have not enjoyed the extreme conservation we have been doing for a year but I am very concerned about water to fight a fire now that we have been designated an extreme fire danger area! The current CCSD has worked very hard to get this project going and they and the project have my full support.

Thank you,

Patricia Taylor

Steele, Noelle

From: Bonnie Brockman <mb90266@yahoo.com>
Sent: Saturday, March 28, 2015 2:43 PM
To: Garcia, Rita
Subject: Cambria EWS Project

Dear Ms. Garcia,

I would like to express my full support for the Cambria EWS Project. My parents lived in Cambria from 1979 until they passed away. My father was the first veterinarian in town where he eventually built a clinic. Even before moving permanently to Cambria, he was involved in the community by doing veterinary house calls for residents for several years. My brother lived in Cambria for nearly twenty years, and we have a home there. My brother served on the CCSD at the time that the Board came close to bringing a desalination plant to fruition, when people who, in my opinion, were misinformed, voted them out of office.

During the long history of my family in Cambria, water has always been a topic of conversation and concern. At one point, water was in such short supply that my parents were considering renting an apartment in Paso Robles in order to take showers.

I recount this history in order to point out the ongoing issues with water in this town. This is not just an issue brought up by the terrible drought that we are suffering now, but is a reoccurring theme in Cambria. The danger to the economy of this town is extreme. The restaurants, stores, and the motels will not survive, and the jobs of many hardworking people will be lost. It will no longer be a place where people can come to visit, or enjoy their homes. Even more frightening is the lack of water to fight a fire, as the trees get drier and drier.

I am also concerned that the San Simeon Creek Lagoon Habitats will be harmed by the lack of a dependable water source because of salt water intrusion or just drying up. This system will prevent damage to the precious ecology of our beautiful California coastline. It is energy efficient and does not disturb the ocean habitats.

My husband and I fully support the EWS Project, as it will provide a reliable source of water for a town that we have loved for many years, regardless of the inevitable droughts that we endure. Cambrians have conserved water to a degree unknown by the rest of the state, but conservation will not save us from the lack of a dependable, environmentally sound, and technologically advanced system to obtain water when we need it because of lack of rain.

I hope that we can count on your support for the EWS Project.

Sincerely yours,

Bonnie and Gary Brockman

Richard Hawley
Post Office Box 1631
Cambria, Ca 93428

Rita Garcia
RBF Consulting
14723 Acton Drive
Irvine, CA 92618

March 28, 2015

RE: NOP DRAFT EIR (Emergency Water Project (EWP, CAMBRIA, CA))

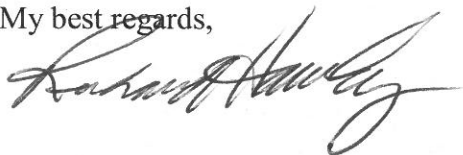
Dear Consultants:

Thank you for the opportunity to submit comments on a project that appears to be not a legal project or, for that matter, a temporary water project or an emergency water project. I say this because the so-called emergency water project has not produced a drop of water during last year's emergency. So what is it? An Emergency Water Project that does not produce water or a Permanent Water Project that was built without complying with many federal and state laws? I also find it disturbing that the Emergency Water Project is portrayed now as a Permanent Water Project. You are asking the community to perpetuate a fraud by responding to this NOP. I think any reputable consulting firm might ask themselves serious questions as to the integrity of who they work for and being potentially culpable to fraudulent activity perpetuated by your client.

Even more alarming is the fact the project was built without answering nearly any questions of concern by responsible agencies and the public. Your client stone walled everyone on this issue. In other words, no oversight and the EWP, as built, likely did not comply with acceptable environmental standards and have intentionally avoided building standards that might cause irreparable harm to the public and the public trust. I make this judgment based on the many frightful incidences that are documented including illegal discharge of toxic chemicals into waterways containing federal and state protected animal and plant species, noise levels that exceed known safety standards, aeration of unknown chemicals that drift beyond the toxic catchment basin, excavating and burying pipes and other apparatus in sensitive habitat areas, likely taking species of concern and/or eliminating habitat without any mitigation, and storing hazardous chemicals in floodways and in sensitive riparian and wetland areas.

Lastly, the so-called EWP has the potential to harm animals and humans based on the proximity of the EWP to recreation areas that include beaches, hiking trail, and campgrounds. There is documentation concerning dead fish, waterfowl and a dead horse that might be directly linked to this project.

My best regards,



CC: Tom Luster, Coastal Commission; RWQCB; CDF&W; USFWS; CDSP&R (VIA EMAIL)

Steele, Noelle

From: jerry wagner <gf.wagner@yahoo.com>
Sent: Sunday, March 29, 2015 5:26 PM
To: Garcia, Rita
Cc: Gerald Wagner; Yvonne Wagner
Subject: re-Cambria's EWS

Ms. Garcia,

We have followed and have been impacted by the water situation here in Cambria since 1985 when we first purchased our property on Marine Terrace. I want to assure you that we are elated, along with many of our neighbors, that the present CCSD Board has listened to legitimate water constraint concerns of the community and has moved forward with the EWS project. There has been an unnecessarily higher level of stress in the community, do to the lack of a sustainable water source for a number of years. The EWS will provide relief in many areas other than just personal consumption. It should be noted that the Boards planning, development and implementation of the EWS project is being highly recognized not only within Cambria but many other communities and agencies looking at alternative water sources.

Additionally we have every confidence in the CCSD board and district management to continue to diligently work through completing the regulatory requirements necessary in meeting the needs of the community in a timely and transparent fashion.

A concern is that we understand, after bring up and initial testing, the EWS may be shut down for a few months until aquifer levels start to drop. A suggestion is to keep the EWS operational, maybe at a lower output level, but continue recycling the community water usage to maintain full capacity as long as possible. We were lucky this year that we have water to recycle. Why take any risk on having the same next season. With a 60 day percolation cycle it makes sense that water recycled in April, May and part of June be available for the July, August and September dry months. If by chance, but highly unlikely, we have excess water capacity, install additional fire prevention water tanks in the hills and open up the landscape watering constraints, which may also help in our fire prevention planning.

Sincerely,
Gerald and Yvonne Wagner

880 W 1st Street #506
Los Angeles, CA 90012
March 30, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Dear Ms. Garcia:

I am writing to you regarding the Project Information Packet issued by the Cambria Community Services District (CCSD) of Cambria, CA and wish to express my support for Cambria's Emergency Water Supply (EWS) project and the need for a regular coastal development permit (CDP) for the project.

My husband and I have been part-time Cambria residents for some years and hope to become full-time residents there within the next couple of years. We have always been well aware of the need to conserve water, even when no drought has been declared, because the town's water supply is not reliable and depends on only two aquifers whose levels fluctuate considerably depending on seasonal rainfall.

You might be aware that the residents of Cambria have been especially prodigious in their efforts to conserve water since January, 2014, but this effort on its own is insufficient when California is in the midst of a multi-year drought, the end of which cannot be forecast. The long-term availability of potable water, including sustainable supplies of clean water for the purposes of drinking, hygiene, and fire protection, is an ongoing concern. I support the EWS because it provides insurance that Cambria will have such a reliable supplemental source of clean water during the current drought and in future severe water shortages.

I am concerned that Cambria's need for this potable water source should be balanced against environmental risks. The CCSD has addressed these risks, and I support the EWS because it achieves environmental balance by, among other things, optimizing existing groundwater sources (including brackish water and relatively small amounts of treated wastewater); not disturbing ocean habitats by sourcing its water directly from the ocean or discharging waste streams directly into the ocean; and using relatively small amounts of energy to operate the plant compared to a traditional sea water desalination plant.

Cambria's largest industry is tourism. I support the EWS because of my concern that without the EWS, we will no longer be an attractive and reasonably-priced destination that allows American and foreign tourists to become acquainted with our part of California's Central Coast. The loss of our robust tourist industry would of course result in the loss of many service jobs in our hotels, inns, restaurants, and shops. A regular CDP for the EWS will be instrumental in ensuring that this scenario does not become a reality.

Sincerely yours,



Karen S. Chrisman

/ksc

Steele, Noelle

From: Tom Hamlin <kthamlin@gmail.com>
Sent: Monday, March 30, 2015 4:04 PM
To: Garcia, Rita
Subject: Support for Cambria EWS

Tom & Terri Hamlin

2166 Sherwood Dr., Cambria, CA

kthamlin@gmail.com

March 30, 2015

Ms. Rita Garcia

Technical Manager

Rgarcia@mbakerintl.com

Dear Ms. Garcia:

We are writing this letter to you because we support the EWS and are concerned about the long-term availability of a sustainable potable water supply for the town of Cambria. The EWS is an important part of Cambria's potable water supply system in light of California's ongoing drought and the history of severe water shortages on the central coast.

We have owned homes in Cambria since 1996 and have experienced many dry spells during the last 19 years. The town's ability to have sustainable water for drinking and fighting fires has always been a major concern. We support the EWS because we are worried that, without the EWS, the town's potable water supply depends entirely on just two aquifers that fluctuate considerably depending on seasonal rainfall.

Cambrians have done a wonderful job conserving water in the last year, with average per person consumption at approximately 30 gallons of water per day. We personally have installed 4 new 1.28 gpf toilets (replacing 1.6 gpf models), low-flow showerheads, faucet aerators, a hot water recirculation pump and an HE washing machine in the last year. But there is only so much that conservation can do. We support the EWS because Cambrians cannot assure adequate water supplies through additional conservation measures alone. The EWS provides a safe and reliable source of potable water in addition to conservation measures.

We ask that everything possible be done to ensure that the EWS project becomes a long-term reality for Cambria. The reliable source of water that the EWS provides will ensure Cambria survives for future generations to enjoy.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Hamlin". The signature is written in a cursive style with a long horizontal stroke at the end.

Tom Hamlin

Steele, Noelle

From: gvhunter@aol.com
Sent: Wednesday, April 01, 2015 8:26 PM
To: Garcia, Rita
Subject: Letter to support EWS
Attachments: Hunter Letter to support EWS.docx

Dear Rita,

Please find attached our letter in support of the EWS for inclusion in the EIR process.

Thank you for you assistance in helping Cambria.

Greg Hunter

Greg and Linda Hunter
6393 Charing Lane
Cambria, CA

Via Email

April 1, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Dear Ms. Garcia,

Linda and I have lived in Cambria for the past 5 years but have been property owners for much longer. We are well aware of the battles over adding a reliable and sustainable water supply that have gripped our community for over twenty years. That is why we have taken an active role in organizing the citizens to support the CCSD Board's efforts to get the EWS built and operating.

Here are a few reasons we believe that the success of this project is so important to our community:

- Our two aquifers are relatively small. The years of drought have put a tremendous burden on the citizens of Cambria to conserve water. We personally use on average 2 units per month, or 1,400 gallons. Overall, Cambrians have cut their usage 40% this past year, but that's off of what was already conservative usage. The EWS will assure us of a dependable water source for consumption, hygiene and fire protection for the foreseeable future, and restore us to a more normal life style.
- Environmentally we believe the EWS provides three really important benefits. First, it preserves a water barrier to prevent saltwater intrusion into our existing San Simeon aquifer by re-injecting processed water back into the aquifer. If the drought continues it is unlikely that the fresh water flowing into the aquifer will be sufficient to push back the salt water having a devastating impact on Cambria's main source of water. Secondly, the EWS will pump 100 gpm of fresh clean water into the lagoon. Under normal conditions during the summer, fresh water from up stream ceases to flow into the lagoon. The water stagnates and stresses the inhabitants of the lagoon. Fresh water from the EWS will help to offset the negative impacts of normal seasonal fluctuations and during extended drought periods. Lastly,

the plant purifies treated effluent from our wastewater treatment plant into potable water.

- We also believe that strict water conservation efforts have had a negative economic impact upon our community. To conserve water, the many homes that are regularly rented out to tourists have had to cut back or cease renting altogether because they receive only half of the water allocation that full time residents receive. Over usage by renters can result in substantial billing penalties to landlords. Commercial enterprises such as motels and restaurants have also had to cut back. This has resulted in reduced tourism and negatively impacted Cambria's economy. If the drought was to perpetuate tourism could cease altogether without the EWS to supplement supplies.

We strongly support the EWS because it is a state-of-the-art facility using the best technology available. It is being used as a model for other communities to address their drought needs and it is one of four projects being considered for a prestigious international award. The EWS is good for Cambria and good for the environment and we are proud to have it in our community.

Sincerely,

Greg Hunter

Steele, Noelle

From: Susan Johnson <susanmejiajohnson@gmail.com>
Sent: Wednesday, April 01, 2015 1:19 PM
To: Garcia, Rita
Cc: Bob Gresens
Subject: Attached EIR Comment Form
Attachments: EIR Comment Form.pdf

Ms Garcia,

Please find attached a PDF version of my husband and my Comment Form. If you need a hard copy, please let me know.

If possible, will you confirm receipt, please.

Thank you,

Susan Mejia Johnson

I'm sorry you left before I spoke at the Scoping Meeting last Thursday. I apologize; I didn't get a chance to introduce myself.

I have a question.

When will the results of your company's Noise Survey be made public?

Ms. Garcia, Project Manager CEWSP, please accept the following in lieu of the official "Comment Form."

**CAMBRIA EMERGENCY WATER SUPPLY PROJECT EIR
PUBLIC SCOPING MEETING
COMMENT FORM**

Name and Address of commentor:

Kenneth and Susan Johnson
Property Owners: San Simeon Creek Rd- Schoolhouse Property
12264 Alta Panorama
Santa Ana CA 92705

Comments:

Aesthetics:

The project in its current state negatively impacts the visual character of the site and of my property. The tall baffled turbines, strands of wire, flying Mylar, and a surrounding fence covered with "green plastic shade cloth" are incongruent with the pristine beauty of the area. Leaving scenic Highway 1, residents and visitors alike, walk, ride or drive past the State Campground and then quickly are introduced to the industrial-like "pond" and its new machinery. The project's unsightliness impacts my property both financially and emotionally. I bought the schoolhouse property December 26, 2013, when the pond actually was a pond where birds alighted.

At no time was I, as an impacted property owner (whose property sits one-half a mile from the pond), asked (by either the County, the water company or your consulting firm) to participate in the community input segment so often cited in the project's written history. That's wrong.

Agriculture and Forest Resources & Air Quality:

It's too early to tell what financial and or quality impact the pond and the brine overspray will have on my pasture, potential crops or farm animals.

Geology and Soils

Although I have not witnessed it first hand, my Schoolhouse tenant tells me that when the project's machines are running, the schoolhouse shakes and its windows and doors rattle. The extent is such that it awakens the Schoolhouse's residents from sleep.

Land Use and Planning:

The project changes the culture of the quiet and pristine region.

Noise:

The noise impact of the project's running machinery impacts the value of my property both financially and emotionally. When the machinery is run, especially when run throughout the night, sleeping residents of the schoolhouse are awakened, making the schoolhouse property less desirable and creating a "must disclose" item in any future real estate transaction- sale, lease or rental. *Day-sleeping* for night time workers is also negatively impacted.



Cambria Emergency Water Supply Project EIR

PUBLIC SCOPING MEETING COMMENT FORM

NAME AND ADDRESS OF COMMENTOR: (include group or public agency affiliation, as applicable)

Debby Mix

5855 San Simeon Creek Rd

Cambria

CA 93428

COMMENTS:

Please provide your comments on potential environmental issues/impacts that you feel should be addressed as part of the EIR. Attach additional pieces of paper, as needed.

This form and/or additional comments can be submitted to Cambria Community Services District at the Scoping Meeting or mailed to RBF Consulting, a Michael Baker International Company at 14725 Alton Parkway, Irvine, California 92618, Attention: Ms. Rita Garcia. Comments may also be emailed to rgarcia@mbakerintl.com.

Please note that comments are due by 5:00 p.m., April 6, 2015.

To Whom It May Concern:

Since the construction of the EWR system the black winged blackbirds have disappeared!

Birds are now landing in & drinking from the pond. The mylar tape is not keeping them out. Perhaps some kind of cover is needed.

There is concern that the overspray might get onto crops grown by local farmers. If any residual is found on the crops no one will buy them.

The wind sock should be out in the open where the wind flows freely - presently it is in the wrong place.

The noise has already disturbed neighbors and seems to be above allowable standards set by the

county!

When the plant is in full operation chemical deliveries and traffic will increase substantially!
There is a nitrate problem that is not caused by local ag people. Where is that coming from?

Steele, Noelle

From: Monique Madrid <mmadrid@cambriacsd.org>
Sent: Thursday, April 02, 2015 11:20 AM
To: Garcia, Rita
Cc: Bob Gresens
Subject: CEQA Comments from Lou Blanck
Attachments: Blanck CEQA Comments 3 30 2015.pdf

Hi Rita,

Attached please find attached the comments from Lou Blanck related to the CEQA EIR process.

Bob, Would you please put these in our electronic file?

Thank you,

Monique Madrid
Administrative Services Officer
Cambria Community Services District
805-927-6117

March 30, 2015 Comments on Cambria CSD "Emergency" water PROJECT MARCH 4, NOP by Eugene (Lou) Blanck, CA Professional Geologist and Geophysicist and Certified Engineering Geologist and Hydrogeologist

NOTE: The March 4, 2015 checklist answers are so inaccurate and deceptive it should be abandoned, any submitted comments should be accepted, but the public should have an opportunity to also comment on a corrected and recirculated checklist.

MAR 30 2015

1. Aesthetics. The spray from the snow blower evaporators in the evaporation impoundment is visible from Highway 1, potentially out of compliance with the LCP. Also, this facility does not provide a pleasing sight or sound experience for visitors to the San Simeon Creek State Campground.

2. AGRICULTURE AND FOREST RESOURCES. The un-disinfected spray with concentrated pathogens from the snow blower evaporators in the evaporation impoundment blows outside the impoundment limits and impacts farming and cattle that is a potential impact on the food supply and health & safety of humans and the environment.

3. AIR QUALITY. The un-disinfected spray with concentrated pathogens from the snow blower evaporators in the evaporation impoundment blows outside the impoundment limits and impacts farming and cattle that is a potential impact on the food supply and health & safety of humans and the environment and come in direct contact with humans. Visitors to the San Simeon campground could become vectors to carry pathogens they are 2015

exposed to at the campground to the 4 corners of the earth creating an epidemiological nightmare. This waste liquid being sprayed into the air is likely to contain methylated metals (e.g., mercury, lead, arsenic, etc.) due to bacteriological activity mixing with metals from the natural environment and plumbing from Cambria. In addition, this wastewater is likely to contain asbestos from the natural rocks (serpentine) and that could become friable by spraying the wastewater into the air for evaporation.

Regional Water Board staff has questioned (e.g., droplet size) proposed enhanced spray evaporation of un-disinfected wastewater. What is the name address and phone number and specialization of the medical doctor that will be signing off on the spraying or misting of infectious waste into the naturally foggy Central California Coast?

The project extraction well will be pumping a significant percentage of sewage wastewater from the adjacent wastewater discharge into the RO. There is no disinfection of the influent to the RO, so the brine discharge will include pathogens. The evaporation pond (toxic pit) is undersized (particularly during our foggy summer days) so mechanical evaporators are planned to noisily operate for 12 hours/day. Pathogens from aerosolized evaporators will waft into the wetland, campground and prevailing downwind farmland. The CCSD has a track record of regular spills from its' wastewater treatment plant, storage tanks and piping system, so spills (overflows) from the evaporation pond (toxic pit) into the coastal wetland should be expected. These impacts have not been considered.

4. BIOLOGICAL RESOURCES.

The project is home to at least the following threatened and endangered (T&E) species:

tide water gobys, steelhead trout, California Condors, peregrine falcons, red legged frogs, two striped garter snakes, snowy plovers, black oyster catchers, Western pond turtles, Bald eagles, Least terns, likely unique plant life in the coastal wetland and probably others?

Operations as simple as driving a truck on the project site could result in a take of one of these species by driving over it. As former staff of the Central Coast Regional Water Quality Control Board, I attended a training at this very site that was used as a location to train US Fish & Wildlife and the then California Department of Fish & Game staffs about T&E species and their habitats.

The bromide used for the tracer study may impede tidewater gobies from "sensing" salinity changes in the estuary, resulting in a massive take. The CCSD previously proposed tracer, boric acid, included boron that is toxic to plants in this sensitive wetland environment and the "acid" component would have freed heavy metals from natural sediments into the aqueous environment.

The "new" pumping of Well 9P7 at a million gallons per day will draw down the naturally occurring water around the well in the shape of a cone. The environment of the plants and critters in that cone (in a sensitive coastal wetland) will be permanently changed and will not support many of the species that are now there. Often the area around pumping municipal wells is dead zone with no vegetation.

Also, the project description indicates they expect the pumping of this well will dewater the fresh water lagoon and are going to throw some window dressing discharge at the hole they are making in the water table at the lagoon. It should be obvious that 144,000 gallons per day at the lagoon does not replace the 1 million gallons per day being extracted. This should be a fatal flaw to this project for State Parks, State and Federal Fish & Wildlife. Even the "tracer" test being run July 2014 will pump this well so severely, that a take of T&E species may occur. This is likely to result substantial adverse impact on federally protected wetlands.

The brine evaporation pond will likely become a "toxic pit" (banned in California since 1989) and will become a local version of the Kesterson environmental disaster that poisons birds and any critter that crawls, slithers or hops into the pit as a result of the double concentration methods of Reverse Osmosis RO brine discharge and subsequent evaporation. Toxic heavy metals are likely to concentrate in the evaporation pit from naturally occurring metals (e.g., arsenic, mercury) in Santa Rosa and San Simeon Creeks and metals derived from dis-similar metals (copper, chromium, steel, lead, etc.) in Cambria plumbing that is sacrificed into solution by the anode battery effect. Also, maintenance of the RO includes use of toxic chemicals (e.g., anti-scale chemicals, biocides, etc.).

How can this liquid contaminant pond be continue to be operated at a coastal tidal wetland without becoming a Kesterson like death zone for the plethora of threatened and endangered species (e.g., two striped garter snake) that live there?

Intakes for the snow blower "enhanced" evaporators have already been observed digesting and killing ducks that have already been landing on the pond water.

Substantial adverse impact on riparian habitat has already been documented in the Central Coast Regional Water Quality Control Board February 27, 2015 Notice of Violation.

The spray from the evaporation pond enhanced evaporation snow blowers is documented blowing outside the impoundment and Federally protected wetlands (coastal marsh and vernal pools) are likely impacted by the pathogen rich concentrated wastewater and likely methylated metals as well as naturally occurring asbestos that could become friable as a result of spraying it into the air.

5. CULTURAL RESOURCES.

Are known to be prevalent in the area.

6. GEOLOGY AND SOILS. *Would the Project:*

In addition, the March 4, 2015 packet & checklist states:

a) 1) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Checks No**

Impact.

However the 2011 San Luis Obispo County Safety Element to the General Plan shows:

the site is close to if not on an "Earthquake Fault Zone"

**a) 2) Strong seismic ground shaking?
Checks "Less than significant impact".**

And the reference to "Less than significant" ignores the potential capability of the Hosgri-San Simeon-Sur-San Gregorio-(Northern San Andreas) fault system linking as faults linked in the Landers earthquake.

Please note section 2.1 in the following testimony regarding multiple faults linking up to cause larger earthquakes (e.g. 1992 Landers earthquake).

<http://www.cpuc.ca.gov/NR/rdonlyres/40694F1B-FE69-478E-860D-16AAD1411ADA/0/IPRPRReportNo2.pdf>

http://www.cpuc.ca.gov/NR/rdonlyres/3EEC4808-87B9-42FF-8947-AAC105554326/0/IPRPRReport_No5.pdf

SLO tribune Article says at least 0.60g, CDM Smith used a lower seismic acceleration.

<http://www.sanluisobispo.com/2014/09/10/3238090/diablo-canyon-earthquake-assessment.html>

Doug Hamilton confirms the Hosgri M(max) earthquake is >M7.5 (on page 29) "The San Gregorio–Hosgri fault system is the name commonly used for the series of large faults along the coast of central California that together form the only major west side branch of the San Andreas fault in this region (Figures 1, 2). This fault system splays southward from the San Andreas fault in the vicinity of Bolinas Lagoon, north of the Golden Gate, and continues for a distance of some **400 km**, finally dying out in folds and thrust faults between Pt. Sal and Pt Arguello, a few km north of the Western Transverse Ranges."

Hamilton comparing to the Christchurch earthquake states, "The **M6.3** aftershock was a shallow event on a smaller and also unknown fault centered approximately 5 km south of the center of Christchurch. The pga (peak ground acceleration) in Christchurch was around 1.0g on rock, and over 1.0g on many soil sites."(page 34) CDM Smith used a lower acceleration.

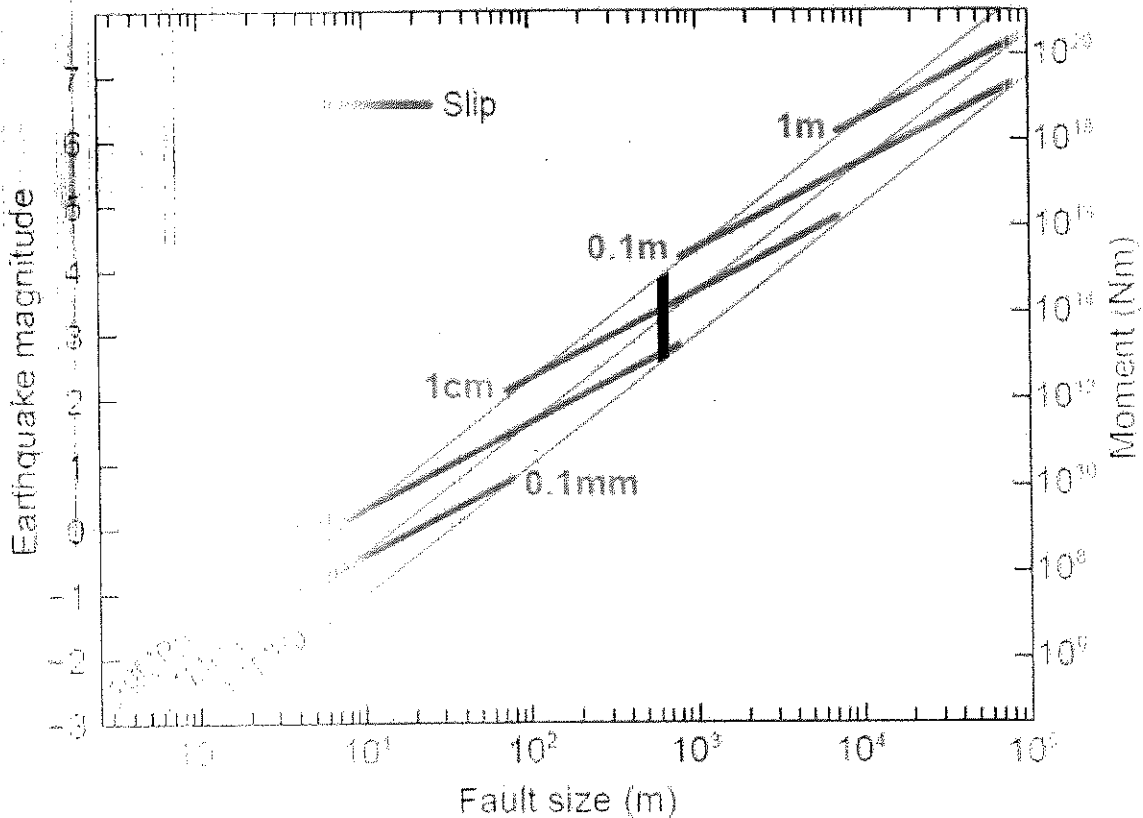
<http://a4nr.org/wp-content/uploads/2012/02/021012-Hamilton-testimony-014-Full.pdf>

But during a **presentation earlier this spring at the USGS headquarters in Menlo Park**, Johnson laid out a scenario showing the Hosgri Fault stretching 250 miles from Point Conception all the way to Bolinas just north of San Francisco – far longer than its current official length of 105 miles.

The longer the fault, the more powerful the rupture. Johnson's scenario shows the Hosgri Fault connecting in a system with the San Simeon and San Gregorio faults to the north of the nuclear plant.

“If the fault were to run from Point Conception to Bolinas, that would be close to an 8.0,” said Johnson. **“That would be a big concern.”**

S Stein, and M Wyssession, *An Introduction to Seismology, Earthquakes and Earth Structure*. Blackwell, Oxford; 2002



This report has been reviewed and is included for approval as part of the Central Coast Regional Water Quality Control Board November 15 meeting as shown as Item 21 on the following link:

http://www.waterboards.ca.gov/centralcoast/board_info/agenda/2007/Agenda/agenda_nov_revised.shtml

CCR Title 27 section 20370 and Table 4.1 (Construction Standards for Units) indicate the Class II Impoundment "shall be designed to withstand the maximum credible earthquake (MCE) without damage to the foundation ... Page 2 of the CDM Smith Report claims an MCE "magnitude as high as 7.3" and "The peak ground acceleration ... of 0.52g was estimated for MCE." Independent Peer Review Panel, A multi-agency panel of seismic hazard specialists established by the California Public Utilities Commission regarding the Hosgri-San Simeon-Sur-San Gregorio fault system, that is immediately offshore of the San Simeon Creek mouth, found the fault system capable of a magnitude 8 earthquake and cited accelerations above 1.0g for soil sites in the smaller 6.3 magnitude Christchurch earthquake. Why was CDM Smith allowed to use less than the regulatory

requirement of maximum credible earthquake for impoundment design criteria (particularly in the liquefaction and slope stability analysis)?

Additionally, the potential for seismic seiche of waste liquids in the impoundment has never been addressed.

Also, the 2011 San Luis Obispo County Tsunami Response Plan, page 47 states regarding the San Simeon State Park Campground that is adjacent to the CCSD project:

San Luis Obispo County Tsunami Response Plan

TSUNAMI EAS WARNING MESSAGE #2

EVACUATION, NORTH COAST AND SAN SIMEON

08/2011

Attention, attention ... this is an Emergency message for the public along the coast of San Luis Obispo County. The National Weather Service has issued a Tsunami Warning. This could cause major flooding and risk to life in low lying areas along the coast. The County Office of Emergency Services is advising residents, visitors and businesses in any low lying areas along the coast to evacuate to high ground immediately. This includes areas of San Simeon, Cambria, Cayucos, Morro Bay, Los Osos/Baywood Park, Avila Beach, Shell Beach, Pismo Beach, Grover Beach and Oceano. Evacuate immediately.

AREAS THAT NEED TO EVACUATE OR MOVE TO HIGHER GROUND IMMEDIATELY INCLUDE:

ALL LOW LYING AREAS OF THE NORTH COAST, HWY 1, BEACHES AND OCEAN VISTA POINTS, ALL AREAS OF SAN SIMEON STATE

**BEACH AND PIER AREA, SAN SIMEON ACRES,
SAN SIMEON STATE PARK CAMP GROUND AND
ALL PRIVATE RESIDENCES WEST OF HWY I.**

Repeating, all low lying areas of the north coast, Hwy 1, beaches and ocean vista points, all areas of San Simeon State Beach and Pier area, San Simeon Acres, San Simeon State Park Campground and all private residences west of Hwy 1.

**MOVE TO HIGH GROUND NOW OR LEAVE THE
AREA USING HWY 1 NORTH TO THE HEARST
CASTLE VISITORS CENTER OR SOUTH TO HWY
46. IF YOU ARE LOCATED IN THE SAN SIMEON
STATE PARK CAMPGROUND YOU MAY
RELOCATE ON FOOT TO WASHBURN
CAMPSITES.**

Approximately, 1996, Unocal historian Darwin Sainz mentioned the newly built Union Oil "Oilport" refinery in what is now Shell Beach (between Pismo & Avila Beaches and at 50 to 100 feet elevation) was destroyed by a tsunami in the early 1900's. July 2009, George Plafker reported, "a bigger earthquake and a more destructive tsunami than the 1964 event are possible in the future". The 1812 Santa Barbara Channel earthquake produced 5 tsunami waves approximately 50 feet in height to the front of the Santa Barbara Presidio based on a Franciscan Father's journal. A book on "Shipwrecks, Smugglers, and Maritime Mysteries" by Wheeler & Kallman reports the largest wave was 48-50 feet estimated by the USGS west of Santa Barbara near Goleta. The "History of San Luis Obispo County, California" by Thompson & West (1883) reports 12 feet tsunamis occurred on August 13, 1868 (Peruvian earthquake) and April 16, 1877. On November 22, 1878, turbulent water in the absence of wind produced tsunamis that broke over the Morro Bay sand spit (current quad sheet high elevations 66 to 97 feet N to S), destroyed Avila & Pt. Sal piers, damaging Cayucos pier. A Japanese earthquake resulted in a tsunami at 12:40 PM December 9, 1907, near high tide and in already heavy seas, that stood out from the rest of the storm due to its' enormous height. It wrecked the Ventura pier (12-13- 1907, SLO Tribune) and the Oilport pier (12-13-1907, SLO Tribune & 12-6-1976 also 12-14-1907, Santa Maria Times & amp; 12-10-1907 SLO Telegram) at Shell beach and destroyed the Oilport refinery (Darwin Sainz, personal communication). Before 7 AM on November 26, 1913, tsunamis wrecked the Monterey area including waves 10 to 15 feet above the Del Monte wharf. At Seaside, "Immense domes of water and foam shot up above the general height" ... "appearing from here to be higher than the highest sandhills along the shore." (12-2-1913, SLO Tribune) Current quad sheet high elevations are 120 feet. These reports of historic tsunamis represent wave elevations significantly higher than the 1964 Alaska earthquake tsunami that is typically used for emergency planning for tsunami inundation in California. Since it appears 4 much larger tsunamis occurred in the Central Coast area in 1812, 1878, 1907 and 1913; it appears we may have become complacent during

this recent period of tsunami quiescence. Emergency planning for Central Coast tsunamis should be anticipating tsunami waves in the 50 to 100 feet elevation range.

The project is in the tsunami inundation zone and the flood inundation zone and the sediments it is on may be subject to liquefaction during an earthquake based on the San Luis Obispo County Safety Element to the General Plan.

CCR Title 27 section 20370 and Table 4.1 (Construction Standards for Units) indicate the Class II Impoundment "shall be designed to withstand the maximum credible earthquake (MCE) without damage to the foundation ... Page 2 of the CDM Smith Report claims an MCE "magnitude as high as 7.3" and "The peak ground acceleration ... of 0.52g was estimated for MCE." Independent Peer Review Panel, A multi-agency panel of seismic hazard specialists established by the California Public Utilities Commission regarding the Hosgri-San Simeon-Sur-San Gregorio fault system, that is immediately offshore of the San Simeon Creek mouth, found the fault system capable of a magnitude 8 earthquake and cited accelerations above 1.0g for soil sites in the smaller 6.3 magnitude Christchurch earthquake. Why was CDM Smith allowed to use less than the regulatory requirement of maximum credible earthquake for impoundment design criteria (particularly in the liquefaction and slope stability analysis)?

a) 3) Seismic-related ground failure, including liquefaction?
Checks "No Impact".

However, the 2014 San Luis Obispo County Safety Element to the General Plan, Figure 4.6-4 finds the confluence area of San Simeon Creek and Van Gordon creek has a "High Potential Liquefaction Hazard".

Cambria CSD Title 27 Impoundment liquefaction analysis. CCR Title 27 section 20370 and Table 4.1 (Construction Standards for Units) indicate the Class II Impoundment "shall be designed to withstand the maximum credible earthquake (MCE) without damage to the foundation ...

CDM Smith Inc. prepared the "Cambria Emergency Water Supply Project Geotechnical Evaluation" report dated July 31, 2014 and signed and stamped by Osman Pekin, P.E., G.E.

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000006221

Then click site maps/documents tab

Then click: REPORT OF WASTE DISCHARGE APPENDICES 4A - 4H
Liquefaction report is pages 1-7 through 181

Page 2 of the CDM Smith Report claims an MCE "magnitude as high as 7.3" and "The peak ground acceleration for site rock conditions was estimated using the ground motion prediction equation based on the attenuation relationships from the NGA West2 models. A shear wave velocity (V_s) of 560 m/s was used to simulate the site condition for soft rock. A peak ground acceleration of 0.52g was estimated for MCE."

Although site borings confusingly describe underlying soils correctly as alluvium, not "soft rock".

Please note section 2.1 in the following testimony regarding multiple faults linking up to cause larger earthquakes (e.g. 1992 Landers earthquake).

<http://www.cpuc.ca.gov/NR/rdonlyres/40694F1B-FE69-478E-860D->

16AAD1411ADA/0/IPRPRReportNo2.pdf

http://www.cpuc.ca.gov/NR/rdonlyres/3EEC4808-87B9-42FF-8947-AAC105554326/0/IPRPRReport_No5.pdf

SLO tribune Article says at least 0.60g, CDM Smith used a lower seismic acceleration.

<http://www.sanluisobispo.com/2014/09/10/3238090/diablo-canyon-earthquake-assessment.html>

Doug Hamilton confirms the Hosgri M(max) earthquake is >M7.5 (on page 29) "The San Gregorio–Hosgri fault system is the name commonly used for the series of large faults along the coast of central California that together form the only major west side branch of the San Andreas fault in this region (Figures 1, 2). This fault system splays southward from the San Andreas fault in the vicinity of Bolinas Lagoon, north of the Golden Gate, and continues for a distance of some **400 km**, finally dying out in folds and thrust faults between Pt. Sal and Pt Arguello, a few km north of the Western Transverse Ranges."

Hamilton comparing to the Christchurch earthquake

states, "The **M6.3** aftershock was a shallow event on a smaller and also unknown fault centered approximately 5 km south of the center of Christchurch. The pga (peak ground acceleration) in Christchurch was around 1.0g on rock, and over 1.0g on many soil sites."(page 34) CDM Smith used a lower acceleration.

<http://a4nr.org/wp-content/uploads/2012/02/021012-Hamilton-testimony-014-Full.pdf>

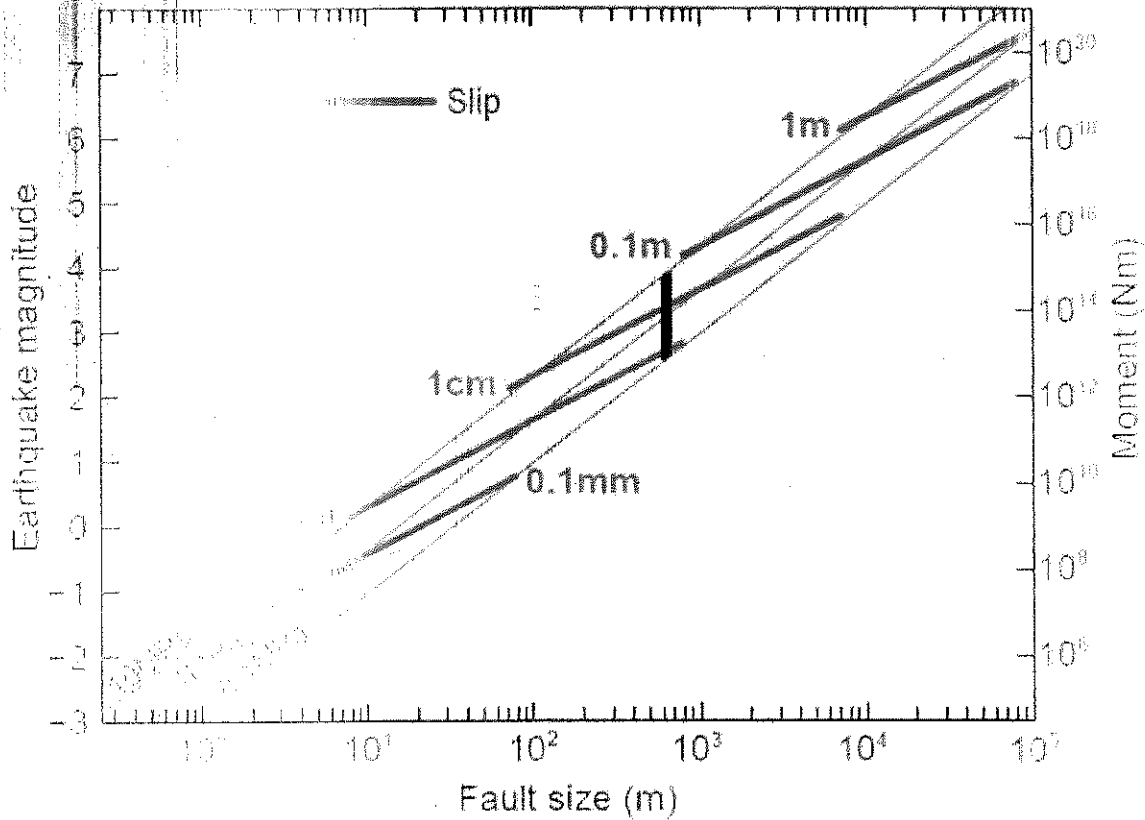
But during a **presentation earlier this spring at the USGS headquarters in Menlo Park**, Johnson laid out a scenario showing the Hosgri Fault stretching 250 miles from Point Conception all the way to Bolinas just north of San Francisco – far longer than its current official length of 105 miles.

The longer the fault, the more powerful the rupture. Johnson's scenario shows the Hosgri Fault connecting in a system with the San Simeon and San Gregorio faults to the north of the nuclear plant.

"If the fault were to run from Point Conception to Bolinas, that would be close to an 8.0," said Johnson. "That would be a big concern."

S Stein, and M Wyession, An Introduction to Seismology,

Earthquakes and Earth Structure. Blackwell, Oxford; 2002



This report has been reviewed and is included for approval as part of the Central Coast Regional Water Quality Control Board November 15 meeting as shown as Item 21 on the following link:

http://www.waterboards.ca.gov/centralcoast/board_info/agenda/2004/11/Agenda/agenda_nov_revised.shtml

CCR Title 27 section 20370 and Table 4.1 (Construction Standards for Units) indicate the Class II Impoundment "shall be designed to withstand the maximum credible earthquake (MCE) without damage to the foundation ... Page 2 of the CDM Smith Report claims an MCE "magnitude as high as 7.3" and "The peak ground acceleration ... of 0.52g was estimated for MCE." Independent Peer Review Panel, A multi-agency panel of seismic hazard specialists established by

the California Public Utilities Commission regarding the Hosgri-San Simeon-Sur-San Gregorio fault system, that is immediately offshore of the San Simeon Creek mouth, found the fault system capable of a magnitude 8 earthquake and cited accelerations above 1.0g for soil sites in the smaller 6.3 magnitude Christchurch earthquake. Why was CDM Smith allowed to use less than the regulatory requirement of maximum credible earthquake for impoundment design criteria (particularly in the liquefaction and slope stability analysis)?

a) 4) Landslides?

As with the liquefaction analysis, (see a) 3) above) It does not appear that the appropriate seismic loading was used when calculating the slope stability of the surface impoundment, including the synthetic liner stability.

**b. Result in substantial soil erosion or the loss of topsoil?
checked: "Less Than Significant Impact"**

However, the Central Coast Regional Water Quality Control Board February 27, 2015 Notice of Violation documents:

The CCSD has violated the following sections of NPDES Order No. R3-2011-0223 and the CCSD-specific MRP:

2. NPDES Order Section B.7 Discharge Prohibitions: "The discharge shall cause no scouring or erosion at the point of discharge into the receiving waters."

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

See 6. a) 1), 6. a) 2), 6. a) 3) and 6. a) 4) above

7. GREENHOUSE GAS EMISSIONS.

More environmentally sensitive (and less expensive) alternatives to this CCSD "emergency" project, that would produce as much or more water and use much less energy, have not been adequately considered. For example, during previous droughts, the CCSD has successfully made arrangements with upstream farmers to fallow their fields and access water from their wells (1970s from Taylors in Santa Rosa creek and late 1990s from Jon Pedotti in San Simeon creek).

At essentially no cost to Cambria ratepayers, the District could apply for a temporary (6 month) permit to pump additional water from SR4 inland from the Cambria fault groundwater barrier and be using that essentially free water within 30 days according to the Supervisor of the State Water Resources Control Board Coastal Water Rights Unit. Subsequently, the District could petition for an extension of time for the "Permit Development Period" for Santa Rosa creek water rights, and if they don't mismanage their responsibilities again, they could permanently increase the District's water rights.

A dry side canyon was offered by rancher Clyde Warren for the district to build a 600-700 acre-feet off-stream diversion reservoir (that could be filled with excess Winter runoff from CCSD wells), would enhance the adjacent wetland environment, would provide Cambria with fire flow to fight wildfires and is estimated to cost half the emergency project construction costs and miniscule operating costs by comparison.

Bill Gates has developed a wastewater reuse and sewage sludge mitigation system that generates some of its' own electricity that can provide for a town of 100,000 people for \$1.5 million while this project for a town of approximately 6000 costs ten times as much.

The tracer study results indicate a 2% (.3/16) recovery of injected water from water supply wells. Since this represents an approximate 5 acre-feet of net annual water for an energy intensive facility, doesn't the water degradation from the needed energy generation for this facility negate the benefits of this project?

A dry side canyon diversion reservoir could provide 700 acre-feet of annual water for a small fraction of the energy.

8. HAZARDS AND HAZARDOUS MATERIALS.

The brine evaporation pond will likely become a "toxic pit" (banned in California since 1989) and will become a local version of the Kesterson environmental disaster that poisons birds and any critter that crawls, slithers or hops into the pit as a result of the double concentration methods of Reverse Osmosis RO brine discharge and subsequent evaporation. Toxic heavy metals are likely to concentrate in the evaporation pit from naturally occurring metals (e.g., arsenic, mercury) in Santa Rosa and San Simeon Creeks and metals derived from dissimilar metals (copper, chromium, steel, lead, etc.) in Cambria plumbing that is sacrificed into solution by the anode battery effect. Also, maintenance of the RO includes use of toxic chemicals (e.g., anti-scale chemicals, biocides, etc.).

Proper handling, storage and secondary containment of the toxic maintenance chemicals used with the RO have not been specified, nor has their compatibility to be stored together.

How will heavy metals that accumulate and concentrate above the Soluble Threshold Limit Concentration (STLC) be removed from the evaporation pond sludge without damaging the liner/leachate collection system? And where will they be properly disposed? What route will this hazardous waste be hauled on?

Then there is the actual health & safety risk from a "Toilet-to-Tap" project, not permitted like any other similar project in California, but rushed through the permitting process under the scam of being an "emergency". And when was the change of the project from "brackish seawater" to a "Toilet-to-Tap" project ever discussed at a public meeting?

Aerosolizing infectious waste and potentially methylated metals and friable asbestos. (See section 3 above).

The un-disinfected spray with concentrated pathogens from the snow blower evaporators in the evaporation impoundment blows outside the impoundment limits and impacts farming and cattle that is a potential impact on the food supply and health & safety of

humans and the environment and come in direct contact with humans. Visitors to the San Simeon campground could become vectors to carry pathogens they are exposed to at the campground to the 4 corners of the earth creating an epidemiological nightmare. This waste liquid being sprayed into the air is likely to contain methylated metals (e.g., mercury, lead, arsenic, etc.) due to bacteriological activity mixing with metals from the natural environment and plumbing from Cambria. In addition, this wastewater is likely to contain asbestos from the natural rocks (serpentine) and that could become friable by spraying the wastewater into the air for evaporation.

Regional Water Board staff has questioned (e.g., droplet size) proposed enhanced spray evaporation of un-disinfected wastewater. What is the name address and phone number and specialization of the medical doctor that will be signing off on the spraying or misting of infectious waste into the naturally foggy Central California Coast?

The project extraction well will be pumping a significant percentage of sewage wastewater from the adjacent wastewater discharge into the RO. There is no disinfection of the influent to the RO, so the brine discharge will include pathogens. The evaporation pond (toxic pit) is undersized (particularly during our foggy summer days) so mechanical evaporators are planned to noisily operate for 12 hours/day. Pathogens from aerosolized evaporators will waft into the wetland, campground and prevailing downwind farmland. The CCSD has a track record of regular spills from its' wastewater treatment plant, storage tanks and piping system, so spills (overflows) from the evaporation pond (toxic pit) into the coastal wetland should be expected. These impacts have not been considered.

Seismically induced failure of the waste impoundment has not been ruled out (See section 6 above).

8. h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are

intermixed with wildlands?

By not building a reservoir to allow wildfires to be fought instead of this "toilet-to-tap" project, **People and structures are being exposed to a significant risk of loss, injury or death involving wildland fires**, including where wildlands are adjacent to urbanized areas and where residences are intermixed with wildlands (reference San Luis Obispo County Grand Jury report).

9. HYDROLOGY AND WATER QUALITY.

See 6 above re: Geology & soils. Flooding is a potential hazard from failure of the evaporation impoundment due to liquefaction, slope failure, erosion and seismic seiche.

The project has already violated the Central Coast Regional Water Quality Control Board requirements, as documented in the February 27, 2015 Notice of Violation, which documents it has already degraded water quality.

The "new" pumping of Well 9P7 at a million gallons per day will draw down the naturally occurring water around the well in the shape of a cone. The environment of the plants and critters in that cone (in a sensitive coastal wetland) will be permanently changed and will not support many of the species that are now there. Often the area around pumping municipal wells is dead zone with no vegetation.

Also, the project description indicates they expect the pumping of this well will dewater the fresh water lagoon and are going to throw some window dressing discharge at the hole they are making in the water table at the lagoon. It should be obvious that 144,000 gallons per day at the lagoon does not replace the 1 million gallons per day being extracted. This should be a fatal flaw to this project for State Parks, State and Federal Fish & Wildlife. Even the "tracer" test being run July 2014 will pump this well so severely,

that a take of T&E species may occur.

Since the existing Cambria sewage treatment plant discharge to San Simeon creek and lagoon is causing nitrate and nutrient pollution, why isn't this Reverse Osmosis system required to take input directly from the sewer plant? Shouldn't this be a fundamental water quality requirement?

Since certain pharmaceuticals and pathogens (e.g., mycoplasmas) are known to penetrate human membranes and cell walls, shouldn't the product water from the Reverse Osmosis system be monitored for these constituents and pathogens of special concern? Shouldn't the system be verified to not allow transmission of these membrane traversing constituents and pathogens before allowing its' use?

The existing CCSD wastewater discharge and spray ponds have already significantly created a groundwater mound that has caused San Simeon creek to migrate away from the mound. Extraction and injection from this project should be expected to have similar impacts to creek flow. Erosion is a normal process associated with stream location migration. Note: this could impact property ownership boundaries.

Surface waste impoundment failure as discussed in 6 above (e.g., liquefaction, landslide, surface fault rupture or seismic seiche) could substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. This could expose campers visiting the San Simeon State Park campground or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

The at least a portion of this project is identified as part of the flood plain in the San Luis Obispo County Safety Element to the General Plan.

Tsunami of the area is likely to occur at some time and the potential for a catastrophic seismic seiche of the surface waste impoundment is seismically possible and has not been properly evaluated.

10. LAND USE AND PLANNING.

The siting of this industrial project, its' location adjacent a coastal tidal wetland based on an emergency permit issued by San Luis Obispo County, the visibility of the project from Highway 1

(especially when snow blowers are operating), the potential impairment of threatened and endangered species is inconsistent with the LCP, the Endangered Species Act and common sense.

11. MINERAL RESOURCES.

The project covers known alluvial sand and gravel resources adjacent an operating sand and gravel operation and directly impacts the cost of building and construction as sand and gravel resources have to be hauled from more distant regions.

12. NOISE.

The evaporation pond (toxic pit) is undersized (particularly during our foggy summer days) so mechanical evaporators are planned to noisily operate for 12 hours/day.

Noise from snow blower operation is already documented at nuisance levels, and has reportedly resulted in the death of a spooked horse. This is a substantial change to the environmental setting of the adjacent coastal tidal wetland and the San Simeon State Park campground in addition to local residents.

In addition, this project is within the vicinity of a private airstrip (on the Clyde Warren ranch) and does expose people residing or working in the Project area to excessive noise levels.

13. POPULATION AND HOUSING.

It is obvious that the true agenda of the CCSD Board and the County Supervisor is for this project to induce substantial population growth in the area by being the "water project" to

invalidate the building moratorium based on inadequate water resources. Unfortunately, less drinking water and more waste water are ultimately generated by this project (since all the CCSD wastewater was previously available to San Simeon creek water supply wells in drought years, now a significant portion of that is being discharged to the surface wastewater impoundment) and NO additional water resources exist because no change in water rights for CCSD wells has occurred. In addition this project only makes the potential wildfire emergency worse, by not providing water in storage for the community, so it should result in another moratorium for Cambria based on the wildfire hazard.

14. PUBLIC SERVICES.

The CCSD emergency water project provides NO benefit to the community since it continues to supply water to the community by pumping existing water supply wells and no increase in water rights has been obtained for the use of these wells even though the project is already operating.

More environmentally sensitive (and less expensive) alternatives to this CCSD "emergency" project, that would produce as much or more water and use less energy, have not been considered. For example, during previous droughts, the CCSD has successfully made arrangements with upstream farmers to fallow their fields and access water from their wells (1970s from Taylors in Santa Rosa creek and late 1990s from Jon Pedotti in San Simeon creek).

At essentially no cost to Cambria ratepayers, the District could apply for a temporary (6 month) permit to pump additional water from SR4 inland from the Cambria fault groundwater barrier and be using that essentially free water within 30 days according to the Supervisor of the State Water Resources Control Board Coastal Water Rights Unit. Subsequently, the District could petition for an extension of time for the "Permit Development Period" for Santa Rosa creek water rights, and if they don't mismanage their responsibilities again, they could permanently increase the District's water rights.

I have been told by staff at several regulatory agencies that this CCSD "emergency" wastewater RO treatment project is complicated and involved and should take years to permit and not months.

Bill Gates has developed a wastewater reuse and sewage sludge mitigation system that generates some of its' own electricity that can provide for a town of 100,000 people for \$1.5 million while this project for a town of approximately 6000 costs ten times as much. Not only does this unreasonable cost take away from other needed public service improvements (e.g., infrastructure rebuilding), it also does not provide water storage necessary for the REAL Cambria emergency, wildfire.

The tracer study results indicate a 2% (.3/16) recovery of injected water from water supply wells. Since this represents an approximate 5 acre-feet of net annual water for an energy intensive facility, doesn't the water degradation from the needed energy generation for this facility negate the benefits of this project? A dry side canyon diversion reservoir could provide 700 acre-feet of annual water for a small fraction of the energy.

Water supplied at an estimated cost of \$10.00/gallon is NOT AFFORDABLE and NOT SUSTAINABLE.

A dry side canyon was offered by rancher Clyde Warren for the district to build a 600-700 acre-feet off-stream diversion reservoir (that could be filled with excess Winter runoff from CCSD wells), would enhance the adjacent wetland environment, a reservoir would provide Cambria with fire flow to fight wildfires and is estimated to cost half the emergency project construction costs and miniscule operating costs by comparison. This project provides NO relief from the emergency of potential wildfire devastation of Cambria (reference San Luis Obispo Grand Jury).

This project results in substantial adverse physical impacts to the San Simeon State Park as described in Sections 1,3,4,6, 7, 8, 9, 10, 12 and 14 above.

15. RECREATION.

Substantial physical deterioration of the San Simeon State Park would occur or be accelerated as described in Sections 1,3,4,6, 7,

8, 9, 10, 12 and 14 above.

16. TRANSPORTATION/TRAFFIC.

The large spray dome from the enhanced evaporation pond snow blowers has already caused a traffic slow down with congestion on Coast Highway 1, particularly when the sun angle generated a rainbow in the mist dome and tourist traffic started pulling over to photograph the phenomenon.

17. UTILITIES AND SERVICE SYSTEMS.

The project has already violated the Central Coast Regional Water Quality Control Board requirements, as documented in the February 27, 2015 Notice of Violation, which documents it has already degraded water quality.

These new wastewater treatment facilities have already caused significant environmental effects.

The evaporite deposits in the project surface wastewater evaporation impoundment will ultimately require solid waste disposal that is likely to require Class I solid waste disposal. Class I solid waste disposal capacity is limited.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

Each of sections a., b. and c. under Mandatory Findings of Significance have likely and unmitigatable impacts for this inadvisable project that could better

serve the community had it been the side canyon reservoir alternative recommended by a community group as listed above. And for adverse effects on human beings Section c., in addition to the direct health impacts from inhaling the pathogen rich, bio-available heavy metals and friable asbestos from the evaporation pond spray; ingestion of farm products subject to the same spray could result in indirect human health hazards. Also, the reverse osmosis-UV peroxide treatment process does not guarantee pathogens (e.g., mycoplasma that may pass through the membranes) or a membrane tear or seal failure can't find their way into the community water supply.

Steele, Noelle

From: Christine Heinrichs <christine.heinrichs@gmail.com>
Sent: Thursday, April 02, 2015 9:25 AM
To: Garcia, Rita
Subject: NOP Comments

2 April 2015

Ms. Rita Garcia, Technical Manager

RBF Consulting, a Michael Baker International Company

14725 Alton Parkway

Irvine, California 92618

Email rgarcia@mbakerintl.com

Cambria Community Services District Board

P.O. Box 65

Cambria, CA 93428

To the Board :

This Notice of Preparation of a Draft Environmental Impact Report on the Cambria Emergency Water Supply Project is confusing. The plant is already built. An EIR by definition describes the impact a project **WOULD HAVE** on the environment. The project is built. Shall we evaluate what might have been? What can be left to evaluate? The blasting fans, the heavy equipment moving the soil around, the creeks diverted and re-routed. This process can only evaluate the remains.

The Project Information Packet & Environmental Checklist notes many areas of Potentially Significant Impact. Those impacts have already occurred, since the plant has been constructed. The plant has already been found spilling chlorinated water into a creek that is habitat to at least two protected species and all its additional wildlife, whether it has the legal status of protection as Endangered or not.

While any attention to the many problems this plant has already caused is welcome, this process is disingenuous. Many protests have been filed by individuals and agencies. The district has built the plant in defiance of the law and all agencies' oversight.

The title of 'Emergency' is also misleading. The emergency, if it ever existed, is past. The plant is operating outside any emergency needs.

Sincerely,

Christine Heinrichs

1800 Downing Ave.

Cambria, CA 93428

Steele, Noelle

From: Connie Gannon <connie@greenspacecambria.org>
Sent: Friday, April 03, 2015 12:18 PM
To: Garcia, Rita
Subject: NOP Comments on Cambria EWSP
Attachments: NOP Comments Final.docx

Dear Ms. Garcia:

Please find attached comments from Greenspace - The Cambria Land Trust on the impacts of the Cambria CSD's Emergency Water Supply Project which must be addressed in the forthcoming Environmental Impact Report.

Thank you for soliciting these comments. Please let me know if you need additional information.

Sincerely,
Connie Gannon

Constance Higdon Gannon
Executive Director
Greenspace - The Cambria Land Trust

To cherish what remains of the Earth and to foster its renewal is our only legitimate hope of survival.
-- Wendell Berry



April 3, 2015

Response to Notice of Preparation Project Information Packet and Environmental Checklist Prepared by Cambria CSD for RBF Associates

Greenspace – The Cambria Land Trust offers the following comments and recommendations on the information prepared by the Cambria Community Services District (CCSD) for the benefit of RBF Associates as you prepare the Environmental Impact Report (EIR) required for statutory permitting of the so-called “Emergency Water Supply Project” (EWSP) as a permanent water utility for the Cambria unincorporated area.

First, there is no current water shortage in the Cambria area and the EWSP clearly was never intended to be an “emergency” project. Rainfall in the upper watersheds of San Simeon and Santa Rosa Creeks and conservation on the part of local residents have maintained our well levels at historic medians, despite the ongoing severe drought. As of the end of March, the project has supplied no water to the Cambria area.

The CCSD has tried for several years to construct a desalination plant, but plans have been challenged by the California Coastal Commission, Fish and Wildlife and other federal, state and regional agencies due to improper siting, and lack of adequate planning and capacity to mitigate environmental impacts. The District has rejected other water management strategies, including local reservoirs and pipelines from major reservoirs which would have been far less costly than the EWSP turns out to be. Please review the abundance of local, state and federal agency documentation of CCSD’s previous attempts to implement desalination as you prepare the current EIR, to understand the full scope of Cambria’s water issues.

In response to the current checklist prepared by District Engineer Robert Gresens, we note the following:

1a. The project has a significant adverse effect on scenic vistas, including Scenic Highway One and CA State Parks campgrounds. A large cloud of aerosolized waste water and chemicals blowing across the lower reaches of San Simeon Creek can be seen from many points.

1d. The evaporation pond creates significant glare during the day and lights at the plant at night have completely changed the rural character of the lower valley, as noted by at least three neighboring residents and by State Parks personnel and visitors to the Hearst San Simeon campground.

2. Section 23.08.288(d) allows public utility uses on sensitive areas such as on prime agricultural soils, Sensitive Resource Areas, Environmentally Sensitive Habitats, or Hazard Areas only when there the permitting agency finds there is no other feasible location on or off-site the property. It also requires that applications for public utility facilities in the above sensitive areas include a feasibility study, prepared by a qualified professional approved by the

Environmental Coordinator, that includes a constraints analysis and analysis of alternative locations. Please include in the EIR a description the analyses the District has done to provide consistency with this provision.

2b, 2e. Residual chemicals and organisms are being released through aerosolization of evaporation pond contents and may be precipitating onto pea fields east of the plant. Residents of the lower watershed are complaining of a white material covering their cars that never saw before the plant began operating in January. Chemicals released in this manner have the potential to make agricultural products unmarketable, damaging agricultural livelihoods and usable farm land.

3a. As noted by the San Luis Obispo Air Quality Board, the release of chemicals and biological materials in the evaporator spray conflicts with implementation of local air quality regulations.

3e. Anecdotal reports from area residents and visitors include significant odors present at San Simeon State Campgrounds when evaporative blowers were running and surfers reporting an odor like detergent when surfing at the mouth of San Simeon Lagoon in January-February timeframe. Odors could become more acute as brine waste becomes more concentrated and as temperatures rise.

4a.-4f. Although CCSD finds that the project probably has significant impacts on biological resources, including endangered and threatened species, their pending Adaptive Management Plan is wholly insufficient to mitigate these impacts and protect resources, according to a number of agencies. In October 2014, the Coastal Commission wrote to the CCSD, “Please identify when the District will present its proposed Adaptive Management Program (AMP) meant to address the project’s impacts. Please also identify the baseline data expected to be included in this AMP, the proposed performance standards, any proposed mitigation measures to be included, etc. Please also respond to the July 22, 2014 USFWS statement that the AMP cannot ensure protection of listed species, including any assurances the District can provide that its proposed AMP will result in no “take” of listed species.” (Emphasis added.)

5a-d. It is unknown whether significant cultural resources have been sufficiently protected, according to Salinan tribal members who had a presence at the site during construction, because many changes to the initial project have been made without public notice or third party oversight.

6a. This heading should be checked potentially significant impact unless mitigated. Please see NOP comments by geologist and hydrologist Lou Blanck.

6b. Substantial soil erosion into Van Gordon Creek has already occurred in the construction and testing phases of the project. If the evaporation pond should fail, massive erosion will occur. Construction using heavy equipment during the wet season caused significant soil erosion.

6c. The ground on which the project is built is a known liquefaction hazard and would probably fail in a major earthquake. The site is also at risk of severe flooding from 100-year storms, tsunami and long-term anticipated sea level rise (again, see NOP comments by geologist and hydrologist Lou Blanck)

7a-7b. According to CCSD billings from PG&E, the District used substantially more energy than was used before the plant went online. Since PG&E is still dependent on natural gas for much of its electrical generation, the plant does in fact have a significant greenhouse gas impact. Its continued operation will increase rather than reduce the production of greenhouse gases in California. The full impact of energy use for this project on greenhouse gas emissions has not been calculated and independently verified.

8a-8b. The brackish water desalination plant uses several hazardous chemicals in its reverse osmosis process and in maintaining the equipment against saline corrosion. These include oil, chlorine, sodium hypochlorite, sodium hydroxide, sulfuric acid, calcium chloride, hydrogen peroxide and ammonia. The project has already experienced one spill of unknown duration that released an unknown quantity of chlorine into Van Gordon Creek. The long-term impact of chemical releases on the creek and lagoon habitats of the endangered goby and threatened red-legged frog (both especially susceptible to chlorine), and on the nearby homes and agricultural lands of area residents has not been publicly reviewed, nor has the CCSD responded to questions asked by agencies including US Fish and Wildlife about chemical and biological material hazards.

8g. A hazardous materials plan listing chemicals, storage and handling, number of truck deliveries expected, evacuation plans and their relation to other emergency response plans was unavailable at the time of chemical deliveries in the fall of 2014. Chemicals are known to be highly flammable and toxic to wildlife and people. The chemicals are stored very near State Parks Camp sites. An independent analysis and inspection of chemical pipelines already installed should be conducted and publicly reviewed.

8h. The problem of electrical shortages and arc at the plant has not been addressed. With surrounding brush and tree stands extremely dry from the ongoing drought, the issue of fire is potentially significant.

9a. The Central Coast Regional Water Quality Control Board's recent TMDL Report describes the CSD wastewater percolation ponds as failing. Pollutant sources of nitrate, dissolved oxygen, sodium and chloride, along with land application of treated wastewater through spray irrigation/percolation ponds adjacent to San Simeon Creek. WDR No. 01-100 and NPDES #R3-2011-0223. All waste waters must comply with the Clean Water Act. This is a significant impact that has not been corrected and will require a mitigation plan.

9c. The project testing crew altered the drainage plan of the area by rerouting an outflow pipe to Van Gordon Creek, in violation of San Luis Obispo County's emergency permit regulations for the EWSP. While the pipe was subsequently moved back to its original drainage location, there is no guarantee that such repositioning will not happen again, significantly altering outflow and drainage patterns. In addition, the current rate of flow designated for San Simeon lagoon replenishment is less than the pre-project average flow.

9d. It is unknown what the long term effects of this project will be on Van Gordon and San Simeon Creeks but affects could be significant and are currently unmitigated. Failure of the brine pond berm would result in major and catastrophic erosion, altering the Van Gordon and San Simeon creek juncture with the lagoon and the lagoon itself.

9h. The brine pond, positioned as it is within the flood plain, may cause potentially significant flood issues in the event of a hundred-year creek flood or a significant tsunami. Overtopping of the pond with its constituent chemical and biological residues could release an unknown mix of materials into the entire lower watershed. If it does not collapse, the pond berm could prevent movement of large trees and objects down the creek, worsening flooding upstream.

9i. Flooding of the brine reservoir or toppling of chemical tanks in a major flood event, causing leakage, could be disastrous for downstream campers and recreational users of Hearst San Simeon Creek State Park and Beach.

9j. The project is located in an identified tsunami run-up area.

10b-c. Significant CA Coastal Commission staff issues regarding conflicts with coastal land use planning were raised 7-22-14 in a letter to CSD as follows: “REQUIRED LCP CONFORMITY The proposed project appears to be inconsistent with several provisions of the County’s certified Local Coastal Program and Coastal Zone Land Use Ordinance. Please describe the District’s understanding of how its proposed project is consistent with relevant policies, including the following (Note: this is not a complete list of applicable policies): ESHA, Wetland, Coastal Stream, and Riparian Buffer policies (e.g. Policy 1, 2, 3, 7, 11, 12, 13, 16, 17, 18, 20, 21, 22, 23, 25, 26, 28) Coastal Watershed Policies (e.g. 1, 2, 3, 7, 11) Hazards (e.g. 1, 2, 3, 7)

“When the CCSD applied earlier this year to the County of San Luis Obispo for an emergency coastal development permit (“CDP”) to address the current severe drought situation, we advised you to use that emergency permit process is to implement a short-term and immediate solution rather than construct long-term major infrastructure that raises significant LCP and Coastal Act policy concerns.”

“The Draft IS/MND does not adequately address a myriad of LCP and Coastal Act policy concerns, as it insufficiently identifies the project’s expected adverse effects and incorrectly and incompletely applies the policies and requirements relevant to the proposed project and the affected coastal resources. We therefore believe the project needs substantial design and operational modifications in order to be found consistent with the LCP and Coastal Act.”

“The project is likely to adversely affect coastal wetlands, streams, and sensitive habitat areas in a manner not consistent with the LCP or the Coastal Act.” (Emphases added.)

12a-d. The noise issue is significant. If allowed to continue, it will ruin the rural character of lower San Simeon Creek and the quality of life of its residents and visitors. Extreme noise levels, particularly at night, have already caused the death of a horse at an equestrian center and such trauma to the center’s other equine stock that the owner, Leslie Richards, has had to close her business, causing her extreme financial hardship.

Other area residents must keep their windows closed when the aerosolizing blowers are on because of the extreme noise levels. Efforts to mitigate the noise, measured at decibels well above legal limits, have not reduced it to a tolerable level in this rural quiet valley. Campers at Hearst San Simeon State Park campground and SP personnel have filed numerous noise complaints. It is not known if there have been tests conducted of ground-borne noise impacts, so

the basis for Gresens' determination that ground-borne noise has a "less than significant" impact is unknown.

13a-c. Significant unmitigated impacts are expected from a new long-term water supply for the village of Cambria and surrounding areas. Those impacts must be publicly addressed and it is critical that mitigations, such as a Build-Out Reduction Program, be funded and implemented prior to development.

SLO Land Conservancy, in their letter of July 22, 2014 to the CSD, stated: "the CSD is asserting that the current build out reduction program (BRP) would serve as mitigation for any growth inducing impact. The BRP and the Land Conservancy's TDC/Lot retirement program which are being offered as mitigation have been inactive for several years, owing largely to failure by the CSD to honor their agreement with Land Conservancy and the State Coastal Conservancy. Consequently the Land Conservancy has not been actively retiring lots despite a continued supply and desire to do so from lot owners. Until the lot retirement program is renewed and the CSD honors their agreement with the State and the Land Conservancy it is disingenuous to offer the BRP /Lot Retirement programs as a viable mitigation strategy."

In Greenspace-the Cambria Land Trust's July 22, 2014 letter to CSD and Agencies, we noted the following: "Habitat Conservation Plan is needed on San Simeon and Santa Rosa Creeks, but not funded. Instream Flow studies needed for both San Simeon and Santa Rosa Creeks [are] not funded. The North Coast Area Plan (NCAP) includes standards and findings required for any new public water supply project that will assure CCSD water withdrawals are limited to protect adequate in-stream flows to support sensitive species and riparian/wetland habitat within the reach of streams effected by CCSD pumping. This leads to an in-stream flow management study objective to determine the sustainable amount of withdrawals for new development that may be accommodated, which will not adversely affect riparian and wetland habitat or agricultural activities. Cambria Forest Management Plan approved but not funded. Build Out Reduction (BRP) program approved but not funded."

13c. A catastrophic chemical aerosolization or other release could have the effect of displacing nearby residents and necessitate emergency shelter elsewhere. While this risk is small, it would have some potential impact.

14a.1-4. Impacts from the growth-inducing effects of any long term water supply project must be fully and independently analyzed and addressed in the EIR. Certainly the plant already has an adverse impact of the scenic value and ambiance of Hearst San Simeon State Park. The cloud of aerosolized waste water, the noise levels of the blowers and the nighttime lights have all received complaints from park visitors. To say there is no impact is disingenuous at best.

15a-b. Impacts from the growth inducing effects of any long term water supply project must be fully and independently analyzed and addressed.

16a-b. Impacts from the growth inducing effects of any long term water supply project must be fully and independently analyzed and addressed.

17a-g. Impacts from the growth-inducing effects of any long term water supply project must be fully and independently analyzed and addressed. It is now confirmed from a April 1, 2015 California Water Boards/Central Coast RWACB presentation that significant upgrades are needed at Cambria's Wastewater Treatment Plant to eliminate polluted effluent waters that are degrading the San Simeon Creek watershed at the new project site. These upgrades will be costly, and will require significant study and analyses to determine how they will affect the new project. Any expansion of Cambria's Waste Water Treatment Plant facilities must be thoroughly analyzed for cumulative impacts in both Cambria and San Simeon.

18a. No pre-project impact studies were done, despite the obvious intent of creating a permanent water treatment project. Past public agency challenges to CCSD's desalination plant indicate indicates the probability of significant harm to both humans and the coastal ecosystem. Within the last month, dead marine birds have been found in the brine pond and the SS lagoon. Area residents have noted the disappearance of native animals and birds since operation of the facility began in January.

18b. The size of pre-project populations of red-legged frogs, gobies and other endangered/threatened resident or visiting species is uncertain. To say that there is no presence of these species now does not indicate historic absence. The presence of these species is well-documented anecdotally and in earlier studies. Please see all documented presence of CA Red Legged Frog, Pacific Pond Turtle, tidewater goby and other species at these locations as documented by Galen Rathbun (Greenspace Archives).

18c. The project clearly has a major significant impact on human beings. One nearby resident has lost her livelihood as a result of the environmental impacts of the project on the horses at her equestrian center. Another who farms peas may lose his pea crop if the aerosolized material which is precipitating on his plants turns out to be potentially hazardous. A third individual experienced cardiovascular effects from the constant noise levels in January and February. Visitors to the adjacent State Park are complaining about noise and light pollution. It is hard to imagine a scenario—other than a disaster—that would have more impact on human populations.

The upcoming EIR must address these numerous and very significant issues. We ask that the preparers carefully read the questions and directives submitted by the California Coastal Commission, U.S. Fish and Wildlife, the Central Coast Regional Water Quality Control Board and many other regulatory agencies (see the list, below, for some of these documents). Many of these questions were never answered by the CCSD, despite repeated requests. They bear directly on the impacts of this project.

Thank you,

Staff and Board of Directors, Greenspace – The Cambria Land Trust

Constance Higdon Gannon, Executive Director
Greenspace – The Cambria Land Trust
PO Box 1505
Cambria, CA 93428
805-927-2866

Key Public Documents and Communications

1. US Department of the Interior, Fish and Wildlife Agency. Letter of July 22, 2014 to Bob Gresens, PE. Re: Initial Study Negative Declaration for the Cambria Emergency Water Supply Project, Cambria, San Luis Obispo County, California
2. California Water Boards, Central Coast Regional Water Quality Control Board. Letter of July 22, 2014 to Mr. Robert Gresens, District Engineer
3. State of California Natural Resources Agency, Department of Parks and Recreation. Letter of July 22, 2014. Re: Comments on Initial Study Mitigated Negative Declaration for “Cambria emergency Water Supply Project” State Clearing House No. 201461073
4. Peter Brede, Technical Advisor. Memo of August 8, 2014, Comments on the CDM Smith Title 22 Engineer’s Report Draft, 201440703
5. California Coastal Commission. Email Memo of July 22, 2014. Comments on June 2014 Public Review of Draft Cambria Emergency water Supply Project Initial Study/Mitigated Negative Declaration, State Clearing House No. 2014061073
6. San Luis Obispo County Air Pollution Control District. Letter of July 18, 2014 to Robert C. Gresens, PE. Subject: APCD Comments Regarding Cambria Community Services District Emergency Water Supply Project
7. California Natural Resources Agency, Fish and Wildlife. Memo of August 22, 2014 to Robert Gresens. Subject: Cambria Emergency Water Supply Project, Cambria Community Services District, San Simeon Creek and Lagoon, Santa Rosa Creek and Lagoon, Van Gordon Creek, San Luis Obispo County, State Clearing House No, 2014 061073
8. California Water Boards, Central Coast Regional Water Quality Control Board. Letter of October 3, 2014 to Cambria Community Services District. Notice of Incomplete Application.
9. California Water Boards, Central Coast Regional Water Quality Control Board Letter of November 3, 2014.
10. San Luis Obispo Department of Planning and Building, Land Use Authorization. Project ZON2013-00589: Emergency Permit With Conditions of Approval (Please note the Conditions)
11. California Water Boards, Central Coast Regional Water Quality Control Board. February 27, 2014 Notice of Violation and Water Code 13267 Request for Information, to Jerry Gruber, General Manager and Bob Gresens, District Engineer, Cambria Community Services District

Steele, Noelle

From: Sharkey <sharkwarr@aol.com>
Sent: Friday, April 03, 2015 5:44 PM
To: Garcia, Rita
Subject: Support for Cambria's Emergency Water System

VIA Email to RGarcia@mbakerintl.com

April 3, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Re: Cambria's Emergency Water System

Dear Ms. Garcia;

We are writing to express our urgent support for the EWS that Cambria needs to assure our survival as a community. It must be emphasized that, unlike most California communities, Cambria relies exclusively on two shallow fresh water aquifers that need annual rainfall for replenishment. Our watershed is much too small and the altitude too low to furnish snowmelt. In periods of extended drought our ground water source effectively disappears. Further, we have no access to state water assets such as pipelines or reservoirs.

We are already under severe restrictions as to use of this valuable resource. Our family has used no more than 62 gallons per day for the past year. We have built a water capture cistern system to store rainwater with a capacity of over 21,000 gallons of water. Our cistern provides a source for limited plant irrigation, provides a cushion to fight a fire should we have one, and can be used for household purposes including drinking and cooking if boiled and chlorinated. Unfortunately, when it does not rain our cistern cannot be replenished.

The restrictions we are experiencing include showering only twice a week, flushing toilets infrequently, and recirculating shower and dishwasher to the yard for plants. We have long been cautious of our use of water-we installed the cistern system 12 years ago when we built our house since we anticipated extended periods of water shortage. That has been true to some extent throughout California's history.

Now we have encountered a record shortfall of snow and rain and the likelihood of many more years of this shortage. Governor Brown has finally taken serious steps to limit water usage throughout the state. It is constantly on everyone's mind throughout the state. You cannot turn on the news without urgent entreaties for conservation, a practice we in Cambria have long exercised.

Our Community Services District has moved aggressively to help solve our problem and allow life to continue in our precious town by purchasing and installing our Emergency Water Supply system. As you know, it takes briny and no-potable water, filters and treats it to a state that can be injected into our production fields and drawn into our village's water system. We have obtained permits to operate under very limited conditions and are working hard to obtain the permits for operation of our system when needed. We are convinced that our District can meet the demands of the various agencies and satisfy all environmental and other issues.

Please do everything possible to ensure that our EWS can be used on a long term basis. We have taken steps that many more communities will be following if the drought continues as everyone expects.

A little aside-I am a woodworker and frequently have obtained old-growth redwood with visible growth rings. I had a single board salvaged from a water tower in Northern California that was probably growing 700-800 years ago. I counted one eight-inch piece that had over three hundred very tight growth rings. That tree had been exposed to several drought periods of more that 60 years where it grew no more that the thickness of a pencil mark each year! That is the history of our wonderful state! We can expect it to repeat.

Thank you for your consideration.

Sincerely,

Stuart and Nancy Warrick
6543 Buckley Drive
Cambria, CA 93428
(805) 927-0756

Hard copy sent by USPS

Steele, Noelle

From: Elizabeth Bettenhausen <elizabethbettenhausen@gmail.com>
Sent: Sunday, April 05, 2015 3:14 PM
To: Garcia, Rita
Cc: Elizabeth Bettenhausen
Subject: Scoping comments for CCSD EWSP draft EIR
Attachments: EAB ON IS.pdf; Water Extraction and Injection.pdf

DATE: 5 April 2015

TO: Rita Garcia, Technical Manager

RBF Consulting

FROM: Elizabeth Bettenhausen

RE: Scoping comments for the Cambria Emergency Water Supply Project's Draft EIR

Ms. Garcia:

1. My concerns with the Project's potential environmental effects begin with the source water. Both the Title 22 Engineering Report and the Operations Manual refer to the **limited recharge of the deep basin brackish water**.

"The source water for the Emergency Water Supply Project is the brackish groundwater from the San Simeon Creek Basin, two miles north of the Cambria Township. The water will be extracted from the aquifer at CCSD Well 9P7, located between the existing Effluent Percolation Ponds. The location of this well is shown on Figure 1-2. Groundwater models indicate that the water in the basin near the extraction well is a blend of infiltrated secondary effluent from the Cambria WWTP, natural underflow from inland groundwater, and deep basin brackish water with limited recharge. As the well is pumped for extended periods of use, it is anticipated that the contribution from secondary effluent will increase substantially" (*Operations, Maintenance and Monitoring Plan for the Cambria Emergency Water Supply Project, REVISED FINAL*, prepared by CDM Smith, Section 2, SOURCE WATER AND SUMMARY OF FLOWS. See also *Cambria Emergency Water Supply Title 22 Engineering Report* (CDM Smith July 2014, Source Water and Summary of Flows, 2.1).

1.1 Since "deep basin brackish water with limited recharge" is in the blend, what are the environmental effects of withdrawing water from this "deep basin," given its limited recharge?

1.2 How does withdrawing the water from this deep basin affect the recharge?

1.3 Since "it is anticipated that the contribution from secondary effluent will increase substantially," what underground movement of secondary effluent is anticipated in relation to the withdrawal pump, the original basin of the brackish water, and the lagoon?

1.4 What are the anticipated environmental consequences of these movements and their effect?

2. How will the blend of the three components of water extracted from CCSD Well 9P7 be controlled?

2.1. What criteria and variables will be used to determine the right blend?

2.2. My response to the IS/MND is attached to this e-mail. I cannot find any answers to my concerns about the extracted water in any of the documents subsequent to the IS/MND. Thus the absence of base data poses a grave environmental risk when the Advanced Water Treatment Project is run. My response to the IS/MND comprises part of these scoping comments and questions.

3. How much water will be injected into the San Simeon Creek Lagoon after membrane filtration only. As you will see in the Table of Water Extraction and Injection that I prepared in November 2014 (2 pages, attached as part of my comments now) the numbers from official documents and permits do not agree. If the CCSD intends to inject 100 gpm into the Lagoon, the Plant process must be set to produce more than the legally required maximum of 400 gpm of treated potable water. At the meeting of the Board of Directors of the Cambria Community Services District on Nov. 20, 2014, I asked them to state officially to you which process and production you would investigate.

3.1 What level of production at each stage of the process are you investigating to determine the environmental effects on San Simeon Creek and the lagoon?

3.2 How much water will actually be injected into the lagoon when the plant is running?

3.3 By what criteria are the environmental consequences of this injection quantity evaluated?

3.4 Are the criteria the same as those used to claim in 2014 that 100 gpm is an environmentally satisfactory injection into the San Simeon Creek Lagoon? If so, why? If not, why not? Please state the two sets of criteria explicitly.

4. Commenting in July 2014 on the IS/MND I raised questions about the **evaporation pond**. When I got out of a car on San Simeon Creek Road adjacent to the evaporation pond when the evaporators were running in January 2015, I was stunned by the sound level of the mechanical

spray evaporators. It was like living near a subway grate in New York City or next to the Interstate running into Boston (the comparison comes from living in those cities for decades).

4.1. **How will the noise be mitigated** so that it has **no negative effect** on farm animals, wildlife, residents of San Simeon Creek Valley, and the San Simeon State Park campground occupants and staff? The three-sided enclosures that were added **amplify** the sound, not mitigate it. How will the alarming sound be mitigated?

4.2. How will the **mist** from the mechanical evaporators be kept within the borders of the pond horizontally and vertically? How does relocating the weather station make it in fact more sensitive to coastal conditions?



8 Jan. 2015

4.3 How will the chemicals in the brine deposited into the pond affect wildlife?

What criteria and monitoring are required to protect against salinity toxicity affecting birds? How will it be mitigated? If bird netting is stretched over the pond, how will entrapped birds be freed?



21 Feb. 2015

4.4. What are the effects of **fencing on the red-legged frogs**?

4.5 What is the score in the competition between **pond liners and pocket gophers**?

5. What monitoring is actually in place to protect the wildlife from any harm produced by this Plant, whether within the Plant components or in the wetland, creek, and surrounding environs? The answer depends in part on the availability and training of CCSD staff in operating and maintaining the Plant and monitoring its effects. Are the availability and training adequate, and what California agencies make that decision? I consider this integral to an EIR.

I also submit and attach my original response to the Initial Study/Mitigated Negative Declaration and my analysis of Water Extraction and Injection as part of my comments. My comments do not exhaustively state my concerns.

A final request: please indicate in the draft EIR's Introduction which version of the CCSD Cambria Emergency Water Supply Project is being evaluated and provide all pertinent documents with the

draft EIR when it is submitted to state and federal agencies and to the public for our informed comment.

Elizabeth Bettenhausen

Cambria

elizabethbettenhausen@gmail.com

Which extraction and injection numbers will be actual, since they do not all agree?

1. Numbers in yellow are from each the data source. Numbers not in yellow have been calculated from the data source number, based on the percentage distribution of the extracted water in the most recent document, the *Staff Report for Items 20 (p. 2) and 21 (p. 3)*, Regional Water Quality Control Board Agenda, Nov. 14, 2014.
2. California State Water Quality Control Board, Division of Drinking Water, Nov. 12, 2014 letter to Jerome D. Gruber from Kurt Souza, P.E. in response to Cambria Emergency Water Supply *Tracer Test Summary Report*, October 2014, p. 45. The Potable Available numbers are derived from
<http://www.cambriacsd.org/Library/PDFs/PROJECTS/LONG%20TERM%20WATER%20SUPPLY/Tracer%20Test%20Summary%20Report20141017FinalClean.pdf>
3. CCSD Emergency Water Supply Project, *Questions and Answers*, November 3, 2014, p. 2
<http://www.cambriacsd.org/Library/PDFs/PROJECTS/LONG%20TERM%20WATER%20SUPPLY/EWS%20update%2011-3-14.pdf>
4. Public Review Draft, Cambria Emergency Water Supply Project, *Initial Study/Mitigated Negative Declaration* June 2014, prepared by RBF Consulting; p. 53
http://www.cambriacsd.org/Library/00%20Cambria%20Emergency%20Water%20ISMND_Draft%20June%202014%20and%20appendices.pdf
This Initial Study/MND was never approved by the Board of Directors. The Agenda for Nov. 20, 2014, contains an item recommending "that the Board of Directors authorize the General Manager to execute a consulting services agreement with RBF Consulting (RBF) in an amount not to exceed \$168,540, for purposes of completing an environmental impact report (EIR) and associated CEQA support services for the Emergency Water Supply Project, in a form approved by District Counsel" (Agenda packet, Nov. 20, 2014, p. 63). Production numbers to be used in the EIR for the Emergency Water Supply Project are not known at this time.
5. Development Plan/Coastal Development Permit, SLO County Dept. of Planning and Building, DRC 2013-00112, June 14, 2014
<http://agenda.slocounty.ca.gov/agenda/sanluisobispo/3802/SXRIbSBEB2N1bWVudCAoUHVibGljKSA=/14/n/33467.doc>
6. Land Use Authorization, SLO County Dept. of Planning and Building, Project: ZON 2013-00589, Emergency Permit, 05/15/2014
<http://www.cambriacsd.org/Library/PDFs/PROJECTS/LONG%20TERM%20WATER%20SUPPLY/SLO%20Co%20Emergency%20CDP%20re%20CCSD%20EWSP%205%2015%2014.pdf>

Elizabeth Bettenhausen, B.A., Ph.D., IPO
345 Plymouth Street
Cambria, California 93428
elizabethbettenhausen@gmail.com

21 July 2014

Re: PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
CAMBRIA EMERGENCY WATER SUPPLY PROJECT

This Initial Study of the proposed Advanced Water Treatment Project (AWTP) is premature. Why? Because the Cambria Emergency Water Supply Project Description (PD; CDM Smith, June 2014), the Cambria Emergency Water Supply, Title 22 Engineering Report (T22ER; CDM Smith, July 2014), and the Initial Study/Mitigated Negative Declaration of the Cambria Emergency Water Supply Project (ISMND; RBF Consulting, a company of Michael Baker International, June 20, 2014) conflict in their specification of key elements of the Advanced Water Treatment Project proposed and some elements are substantively incomplete and at times misleading.

- The definitions of source water and brackish water are inconsistent, and the quantity of the individual elements of the extracted brackish groundwater for each definition is unknown.
- The connections among groundwater and the surface water in San Simeon Creek, San Simeon Lagoon, and the water flowing in from the Pacific Ocean are unknown.
- Membrane filtration removes particulates and biological elements that “foul” the equipment, but ecological analysis of them before and after treatment and disposal is not given.
- The composition of the brine is vaguely defined, and the off-site location for the disposal of the “super-concentrated waste” is unspecified. The description of the evaporation pond assumes that a 6.0 or 7.5 earthquake would not slop the slurry over the edges of the berm. It assumes that a tsunami originating along the fault lines immediately off the coast would not disrupt the berm or the contents of the pond.
- The description of the mechanical spray evaporators’ effects assumes that sound operates unaffected by hills and the Santa Lucia Range. It assumes that the AWTP components—factory—can be hidden from view from San Simeon State Park and the residents of San Simeon Creek

Road. It assumes that only safe air will be evaporated from the waste pond.

- Operating and maintaining the AWTP will be done by automation and two CCSD employees will check daily. The CCSD water department is currently understaffed, and additional staff will have to be hired for the AWTP, unless maintenance and repair of the CCSD infrastructure are given even less staff time.
- The reach of the Project is represented in the Figures simulating the extent of the tracer movement. While the machinery, pond, and pipes occupy less space, the chemical/fluids flow moves far beyond the borders of the CCSD property. Ecological and environmental effects do not stop at boundaries sketched by humans on property maps.

I find that the proposal may indeed have significant effects on the environment, and an environmental impact report is required. While the Adaptive Management Plan might amplify the understanding of the ecological systems affected by the AWTP, such understanding might well be gained only at the expense of the well-being of those very systems. The Army Corps of Engineers paid CDM Smith for at least two years of work on this water source, so a NEPA EIR report is also required.

Project source water and the proportionality of its components.

The Project Description describes the source water as follows.

Project Source Water - The extracted groundwater that will feed the advanced water treatment plant (AWTP) will be a blend of the percolated secondary effluent from the CCSD's WWTP, fresh native basin groundwater, and deep aquifer brackish water. The degree to which this groundwater source is impaired will depend on the ultimate contribution of secondary effluent in the extracted water and the level of treatment achieved for this water through soil aquifer treatment and aquifer travel time. The potentially impaired groundwater will be extracted from the San Simeon Creek Basin, treated, and then injected back into the basin downstream of the existing CCSD potable well field, providing additional potable water supply to the Cambria community. (PD 2.0)

The Initial Study defines brackish water as follows: "The emergency Project is needed to treat brackish water and fully recharge the San Simeon Creek coastal stream aquifers with advance treated water The brackish water contains a combination of creek underflow, percolated wastewater treatment

plant effluent, and a mixture of freshwater with saltwater that has migrated inland within an underground saltwater wedge” (ISMND 1.0; 2.2.1; 2.2.3; 2.2.5).

The description of the water at the 9P7 source well in the Title 22 Engineering Report reads,

The extracted groundwater that will feed the AWTP will be a blend of the percolated secondary effluent from the CCSD’s WWTP, fresh native basin groundwater, and deep aquifer brackish water. The degree to which this groundwater source is impaired will depend on the ultimate contribution of secondary effluent in the extracted water and the level of treatment achieved for this water through soil aquifer treatment and aquifer travel time (1.1.5)

The July 10, 2014, billing insert from the CCSD states, “The EWS project will be treating brackish ground water--a mix of freshwater, underground seawater and treated wastewater.”

The documents do not agree on the definition of brackish water, even though its treatment is the central purpose of the AWTP. Even the nature of the components of the water to be treated is uncertain.

At the special CCSD meeting (7/14/14) a member of the audience asked how much of each component would be in the combination. The CDM Smith answer said that in a drought probably more wastewater would be used, but the proportion of the components is not known.

Since the source well, 9P7, now draws drinkable water (PD 2.1.2; IS 2.5.1), the Project treatment must draw more than the same water from this well. The groundwater is not now “impaired,” so what would make this happen? What potential components will be actual components, how will they be mixed, and in what proportion?

- percolated secondary effluent from the CCSD’s WWTP
- fresh native basin groundwater
- deep aquifer brackish water
- creek underflow
- a mixture of freshwater with saltwater that has migrated inland within an underground saltwater wedge
- freshwater
- underground seawater
- treated wastewater

If it is only the percolated secondary effluent--because of its potential, possible quantity-- that might impair the groundwater and so make it need treatment (PD 2.0), then none of the other potential components of the water-to-be-treated would need such treatment. This strong conclusion is not self-evident.

If 9P7 source water is now of "drinking water quality," why does it need to be treated? If 9P7 is the only source well for the AWTP, would the water quality go down because so much water will be drawn out, therefore pulling in more effluent water and brackish water, i.e., seawater and freshwater, from below? Thus if you take more, you have to treat more.

Then, putting 100-150 gpm back into the lagoon is the proposed MND solution. But 400 gpm of water is being drawn out for reinserting 300 gpm upstream to get more potable water, and **no contemporary research has been done to show the ecological import of all this.**

Is the depth of 9P7 staying the same? Then it is not going lower in order to suck up elements, i.e., effluent and seawater, not drawn out now? Does drawing out more mean drawing out more components? Simply put, does drawing out more gallons suck in more treated sewer water and seawater? I suspect the designers don't know the proportions of elements of source water, because they don't know what will factually happen when the increased pumping gets going.

Connections among groundwater, surface water, and ocean.

The need for the AWTP is called an emergency by the Cambria Community Services District. Speedy design means a necessary base foundation of information is unavailable. The IS/MND states, "The Project's hydrologic model primarily addresses the potential for Project-related groundwater impacts; see Section 4.9. However, it is unknown what specific connection there is between groundwater and the surface water in San Simeon Creek, San Simeon Lagoon, and the water flowing in from the Pacific Ocean" (IS 4.4-15).

Instead of obtaining solid information about the ecological and hydrological connections among the groundwater, surface water, and the ocean before manipulation of the connections, the construction will begin with modeling. But they do make then this statement: "The modeling suggests that the Project's effects to the water budget would be limited. However, given the uncertainty that exists regarding the possible effects these actions may

have on the supply of surface water to in San Simeon Creek and San Simeon Creek Lagoon, monitoring is recommended to track changes in groundwater, surface water, and instream [sic] and riparian habitats” (IS 4.4-15). This is called the Adaptive Management Program (AMP).

Volunteering with 1st and 2nd graders in the local grammar school, I bring treasures for the beach and ocean each week. What if I brought 20 blue plates from chiton that washed up on the beach and asked, “How many chiton plates are on the beach now?” Rather soon a 6 or 7 year old would say, “We can’t know that.” Another would quickly add, “That’s a silly question. We don’t have the numbers.”

I’d respond, “Yes, but here are 20 blue plates. So there are 20 fewer on the sand.”

A math fan would look at me, shaking her head. “But we don’t know how many before you took some. You didn’t tell us the biggest number.”

The students and I could make up an Adaptive Management Program. But it could not give us an answer to this question, “What was the situation before Elizabeth arrived at the beach?”

Has anyone ever done a study over a period of months and years to discover the connections among San Simeon Creek, San Simeon Lagoon, the sewage percolation ponds, the aquifer, and the Pacific Ocean in different seasons? If so, the designers of the AWTP are ignorant of it. Their section 4.3 Boundary Conditions in Appendix D Groundwater Modeling Report provides a good example of how modeling is used to draw speculative conclusions about the ecological effects of AWTP in operation. But they still don’t know how many chiton shells were on the beach at the start.

Membrane Filtration

The water that will be discharged to San Simeon Creek fresh water lagoons will have been run only through the Membrane Filtration Systems, not through the Reverse Osmosis and subsequent treatments (Project Description, Section 2). “The MF system provides pretreatment for the RO system to reduce the particulate and biological fouling of the RO membranes” (PD Sect. 2.2.3.1.)

Source water includes “creek underflow, percolated wastewater treatment plant effluent, and a mixture of freshwater with saltwater that has migrated inland within an underground saltwater wedge” (IS/MND p. 11) How was each component of the source water separately tested before any treatment to determine its biological and particulate components?

What biological components are in the freshwater component of the brackish water? What biological components are in the saltwater, i.e., water from the ocean? How about the water from the “creek underflow”? What are the particulates in each of these kinds of water?

What is the effect on the ecological systems, e.g., San Simeon Creek and the fresh water lagoons, of returning to them water that has had the particulates and biological elements removed? “Fouling” is a term from engineering’s perspective in the project. **But where is the study of possible ecological fouling?**

The membrane filtration does not remove salinity (IS 2.5.2). The Reverse Osmosis does that only partially. So what is the ecological effect of removing particulates and biological elements but not the salinity in terms of proportionality within the discharge?

Yet another aspect of the discussion of Membrane Filtration Systems is confusing.

The microfilter backwash associated with AWTP operations would be returned to the existing percolation ponds adjacent to the AWTP.

Membrane Filtration Break Tank. The membrane filtration break tank would serve as a flow equalization reservoir for the membrane filtration filtrate prior to being pumped to the RO system (IS 2-15).

The distinction between membrane filtration filtrate and backwash is not explained. The filtrate will go into the lagoons and the backwash will go into the CCSD wastewater (sewage) percolation ponds. What does the phrase “prior to being pumped to the RO system” mean, since the filtrate was said to be discharged to the lagoons, not to the RO system?

In addition the Project Description refers to “MF backwash waste” and says it “will be returned to the secondary effluent ponds by gravity flow, without additional treatment or flow equalization” (PD 2.2.3.6). Are backwash and backwash waste two different composites?

Brine Disposition

What is the brine produced by this AWTP? According to the Project Description (PD 2.2.3.6), it is “Reverse Osmosis concentrate, chemical cleaning waste, and analytical waste flows.” It will be “sent to Van Gordon Evaporation Pond for disposal via evaporation” (PD 2.3.1). Then, “[t]he super-concentrated

waste, whether liquid or solid, will eventually be removed from the site for disposal” (PD 2.3.2) at a “licensed disposal site” (IS 4.8-1).

Neither the Project Description nor the Initial Study/Mitigated Negative Declaration ever says what offsite means. I have a sinking feeling it is near Kettleman City, California. But since a plethora of earthquakes has been happening there in the past few months, and since the impoverished residents of Kettleman City are organizing around environmental justice...maybe offsite means somewhere else.

Where? That depends on what’s in the brine. Whatever is in it, it’s serious enough to require following Title 27 for disposal of waste to prevent it absolutely from entering California’s surface, coastal, or ground waters.

But at the special CCSD meeting on July 14, 2014, CDM Smith said that the solids left in the pond after evaporation would basically be salt. So, all that’s left after evaporation is salt? Does that mean “RO concentrate, chemical cleaning waste, and analytical flow waste” will simply evaporate into the air? If so, how do we know they will be harmless?

At the Special CCSD meeting on July 14, 2014, a local resident pointed out that the design does not deal with new regulations about design to prevent tsunami damage. The design does not pay any attention to potential tsunami effects on the equipment or ponds.

But it does say this: “The pond would be designed to withstand the maximum credible earthquake⁷ and the 100-year flood. Based on the FEMA map of the 100-year flood plain, the water surface elevation would rise to approximately the bottom of the exterior berm around elevation” (IS 2-18). The footnote refers to an earlier CDM Smith Project description: “Based on a recent geotechnical investigation, the existing embankments appear to be able to withstand the maximum credible earthquake” (PD, p. 20). Would the waste liquid or slurry in the evaporation pond stay within the berm if a 6.5 earthquake happened again along the San Simeon fault, as it did in 2003, or along other nearby faults? That does not seem credible.

Finally, I saw no reference in any of the documents to a serious threat to the evaporation pond. Pocket gophers chew rather readily through thick, solid plastic pots for plants. I suspect they are looking forward to the challenge of the “impermeable liner.”

Mechanical spray evaporators and other AWT structures

Every 4th of July in Cambria the fireworks draw crowds. As I watched and listened for a year or two after moving here, I thought about the speed of light and sound. When a big fireworks rocket is ignited on Shamel Beach,

carrying the display high into the air, it should be, “Boom.....Sparkle-Crackle!” But then I realized that’s not quite how it goes in Cambria. Here’s how it goes. When one rocket is ignited, it goes BOOM, BOOM, BOOM, BOOM.. Sparkle-Crackle! Nothing in town or in the San Simeon State Park makes only one sound. All sound bounces and echoes and reverberates off the hills and Santa Lucia Mountains. Sound is repetitiously amplified here.

So I had to laugh when reading the descriptions of the noise that the mechanical spray evaporators will make. “Those designers sure haven’t lived here!” I said to myself.

I thought of the pleasures of camping when I was growing up, including the sounds of lake, river, and forest in Manitoba. No “busy” noise for a change. Come to San Simeon State Park Campgrounds, listen to the orioles, the squirrels, the creek...and four huge fans, or as they say, “mechanical spray evaporators.” They will be covered on three sides, of course, but that throws the initial sound more directly at the Santa Lucia and nearby hills.

Hiking up into the Monterey Pine Forest on San Simeon State Park, people will be able to look down on the water factory. Five 40 ft. by 8 ft. trailers will contain treatment facilities, the evaporation pond will gleam in the sun or mist in the fog, the 8 inch and 6 inch and 4 inch pipes will create hundreds and hundreds of feet of straight and angled lines, and the source water pump will thank the few trees covering it a bit (Task Order 2 [sic], in CCSD Board of Directors Agenda, April 24, 2014; p. 72).

<http://www.cambriacsd.org/Library/PDFs/BOARD%20F%20DIRECTORS/AGENDAS/2014/Regular%20Board%20Meeting%20Agenda%20Packet%202014-04-24%2012-30ABCD.pdf>

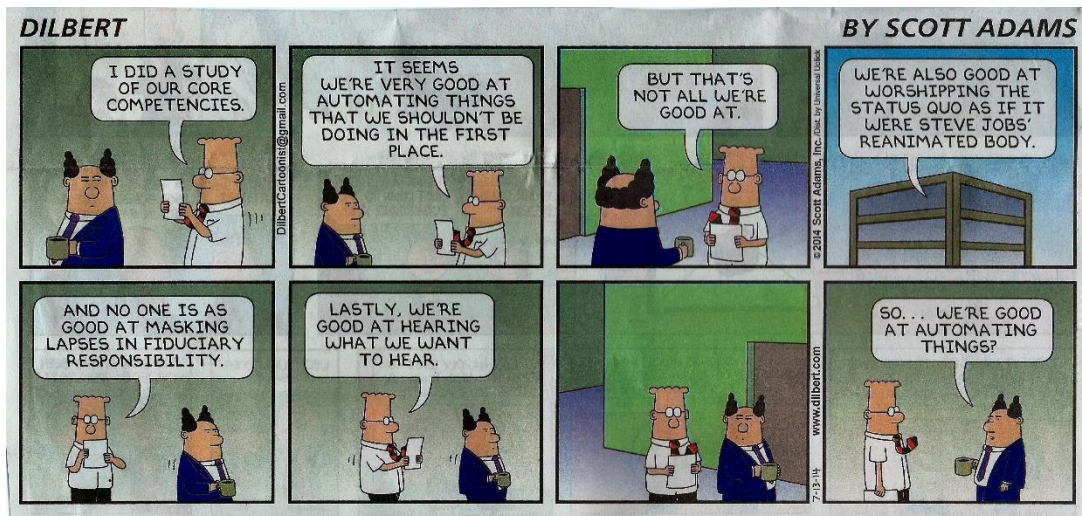
Will this Advanced Water Treatment Project have a significant impact on the aesthetics of San Simeon State Park and surrounding countryside? Of course, and the impact is not positive. My negative declaration relies on Vivaldi, Mary Oliver, Frederick Law Olmsted, Gaia, Ed Ricketts, Rachel Carson, and Richard Rosenblum, among others. In *Art of the Natural World: Resonances of Wild Nature in Chinese Sculptural Art* Rosenblum writes, “Nature is not only the beginning, but also integral in the end. Nothing is lost” (MFA Publications, 2001, p. 23). We could learn from this Chinese perspective and so also disagree with the CDM Smith representative at the July 14, 2014, meeting who said that in the tracer study water that runs to the ocean is “lost.”

Long-Term Operations

ISMND Section 2.5.7 PROJECT OPERATIONS reads:
 Operating and maintaining the equipment would not require onsite full-time staff, since the AWTP would be designed to operate automatically with no operators onsite. However, up to two employees would visit the site daily to visually inspect and maintain the AWTP. The AWTP operation information would be connected to CCSD's WWTP control room for off-site monitoring and control. Because the AWTP will be more expensive to operate than the current use of groundwater wells, it is anticipated that the Project may not operate during wet or normal rainfall periods. During such periods of inactivity, the AWTP would be maintained in a ready state, which may include routinely exercising equipment and valves, as well as pickling of the RO elements.

What do “exercising equipment and valves” and “pickling of the RO elements” entail? I do note that the Project Description adds, “CCSD’s operations and maintenance staff will not change as a result of the proposed treatment plant” (PD 4-1).

Automation rules. I yield to the temptation to add a recent Dilbert cartoon strip, with gratitude to Scott Adams.



The CCSD water department is currently understaffed, and additional staff will have to be hired for the AWTP, unless maintenance and repair of the CCSD infrastructure are given even less staff time.

When rain falls, how will the exercising and pickling be automatic?

Where should we draw the lines?

The reach of the Project is represented in the Figures simulating the extent of the tracer movement. Look at Figures 6-6 to 6-12 , simulated tracer maps in Appendix D and also at the Tracer Extent Figures in the Power Point presentation at the July 14, 2014, meeting.

<http://www.cambriacsd.org/Library/PDFs/PROJECTS/LONG%20TERM%20WATER%20SUPPLY/CDM%20Smith%20PowerPoint%20Presentation%207%2014%2014.pdf>

While the machinery, pond, and pipes occupy less space, the extracted/injected waters, chemicals, other fluids, and affected organisms move far beyond the borders of the CCSD property. Ecological and environmental effects do not stop at boundaries sketched by humans on property maps.

Since the CCSD has been vague and inconsistent about the amount of potable water available in the aquifers of San Simeon Creek and Santa Rosa Creek, inconsistent about the permissible use of potable water for irrigation, and less than a year ago unwilling to consider the drought serious enough to stop further development of houses and businesses, the meaning of the word “emergency” is a mystery here in Cambria. Also mysterious is the meaning of the word “temporary.” The western pond turtle mentioned in Sect. 4-4 of the ISMND will know all too soon what the mysteries mean and how they are being addressed for more than \$8 million.



Photo by Elizabeth Bettenhausen

Steele, Noelle

From: mahala burton <mahala1@charter.net>
Sent: Sunday, April 05, 2015 2:24 PM
To: Garcia, Rita; Bob Gresens
Subject: comments for MND August 2014 CCSD ATWP
Attachments: comments for MND August 2014 CCSD ATWP.pdf

Dear Ms Garcia and Engineer Gresens,
Please reply by -mail when you receive my 2014 MND comments. I'm sending them because some of the content is still relevant to the proposed draft EIR .
My phone is 805 927-1802 if necessary.

Mahala Burton
Cambria, Ca ~

MAHALA BURTON

6425 Cambria Pines Rd., Cambria CA 93428 mahala1@charter.net

July 22, 2014,

Thank you for the opportunity to comment on the Initial Study/ Mitigated Negative Declaration (IS/MND) for the Cambria Community Services District (CCSD) Emergency Water Supply Project (EWS).

While this project began as an emergency supply project and received an emergency Coastal Development Permit (CDP) the IS/MND is for a permanent project and there is no longer the immediacy for action as we are approaching fall and the start of the rainy season .The water supply for Cambria ;wells on two creeks are at normal levels. There is no longer the pronounced urgency to issue a regular CDP. There is time to gather all the current data and analyze the effects of the EWS to a degree of certainty that no adverse effects will impact the environment. It is a perilous venture to proceed in haste.

The CCSD has failed to gather the relevant data to support the IS/MND findings of no significant impacts, and substantial evidence continues to demonstrate that the EWS is likely to cause significant, adverse impacts. Therefore, the California Environmental Quality Act (CEQA) requires the CCSD to prepare a full EIR to inform the public and decision makers of the potentially significant impacts, to consider alternatives to the EWS, and to consider mitigation measures to reduce those impacts.

I urge the CCSD Board to reject the IS/MND and the project as described below and in its place vote yes to undergo a full EIR.

The EWS involves construction and operation of emergency water facilities at the CCSD's existing San Simeon well field and percolation pond system property, located at 990 San Simeon -Monterey Creek Road. The Project proposes to construct and operate: one extraction well (existing Well 9P7) an Advanced Water Treatment Plant (AWTP); an injection well (RIW) to the groundwater basin at San Simeon well field; an evaporation pond for brine and chemicals (rehabilitate/modify an existing storage pond); three injection wells (LIWs), which would serve as mitigation to protect San Simeon Creek and downstream lagoon; and four monitoring wells. As an option to the three LIWs, the existing Well 9P7 discharge pipeline and discharge structure may be utilized to discharge directly into Van Gordon Creek adjacent to the AWTP.

Tiering from outdated information.

The CCSD's IS/MND relies on outdated EIR's as the foundation for their IS/MND arguments of insignificant effects. The CCSD has based the majority of their project analysis on CEQA tiering. Tiering from outdated information.

Tiering is a method to streamline EIR preparation by allowing a lead agency to focus on the issues that are ripe for decision and exclude from consideration issues already decided or not yet ready for decisions (CEQA Guidelines Section 15152 and 15385). According to CEQA Guidelines Section 15152 (a), "tiering" is defined as:

Tiering refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

The CCSD has found that there will be no significant effect that cannot be mitigated on the environment based on their IS/MND. "Such determination can be made only if there is no substantial evidence in light of the whole record before the Lead Agency that such impacts may occur (Section 21080(c), Public Resources Code)."

It is my opinion that the current EWS cannot be examined at a sufficient level of detail based on and tiered from prior long ago dated EIR's to enable the current effects of the project to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the project.

The CCSD is using the following list of timeworn documents (in lieu of actual real time and current information as the basis for their conclusions).

- Draft EIR for Cambria County Water District Water System Improvements. This Draft EIR (Coastal Valley Engineering, Inc., (May **1976**) was prepared as part of a feasibility report within the formal application for Davis-Grunsky Act funds.
- Preliminary Draft EIR for Proposed Van Gordon Creek Effluent Reservoir for Cambria Community Services District. The project analyzed in this EIR (Boyle Engineering Corporation,

(June 1979) was part of a larger project involving expansion and modification of wastewater treatment and disposal facilities serving Cambria.

- Draft Supplemental EIR for Proposed Van Gordon Creek Reclaimed Water Reservoir for Cambria Community Services District. This Supplemental EIR (Boyle Engineering Corporation, May 1980) was part of the larger project, analyzed in the 1975 EIR.
- Groundwater Recharge Project Environmental Impact Report. This EIR (Robert Bein, William Frost & Associates, (December 1991) analyzes environmental impacts resulting from recharging the San Simeon Creek groundwater basin by discharging reclaimed water extracted from the Van Gordon [effluent storage] Reservoir.
- Draft Environmental Impact Report and Appendices Effluent Disposal Field and Stream Restoration Improvements Project. The project analyzed in this EIR (Robert Bein, William Frost & Associates, August 1993) consisted of two components.

The CCSD has failed to gather current relevant data to support its findings of no significant impacts, and substantial evidence continues to demonstrate that the EWS is likely to cause significant, adverse impacts to the environmental setting, to the habitat and ecosystem of many species and to the species themselves. The site is of relatively pristine character, physical complexity, and resultant biological diversity. There are unique communities of plant life. There are many areas of undeveloped native habitat to support the following threatened and endangered species:

Steelhead Trout, Tidewater Gobies, Western Pond Turtles, Red Legged Frogs, Two Striped Garter Snakes, Snowy Plovers, California Condors, Peregrine Falcons, Bald Eagles. And many other fish and animals, birds and insects.

The project is located adjacent to two creeks; San Simeon and Van Gordon and the upper most reaches of the San Simeon Lagoon (also described in the IS/MND as a still water wetland) that terminates on the EWS site. The Lagoon is also part of the San Simeon Preserve. Both creeks and lagoon are classified as Environmentally Sensitive Habitat Areas (ESHA) in the Coastal Act and Local Coastal Program. The Coastal Act provides a definition of “environmentally sensitive area” as: “Any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in

an ecosystem and which could be easily disturbed or degraded by human activities and developments” (Section 30107.5).

The EWS is located adjacent to a state campground and it is the only public campground for 35 miles north and 30 miles south.

Areas in the IS/MND where the effects of the EWS are not fully analyzed or too many unknowns.

Biological Impacts

The pumping of Well 9P7 at a 400 gpm per day will draw down the naturally occurring water around the well in the shape of a cone. The environment of the plants and species in that cone of depression will be permanently changed and will not support many of the species that are now there. The backwash from the AWTP will be discharged into the CCSD existing percolation ponds to eventually make its way into the aquifer, creeks, lagoon and ocean.

Impacts and drawdown and hydrology of San Simeon Creek and Lagoon are "unknown, and uncertain" as stated in the CDM Smith Technical reports

The IS/MBND states the water quality pumped from 9P7 is of drinking water quality now. Water at 9P7 is pure drinking water, with no wastewater evident. However, once this project begins, the pumps will draw down the wastewater; maybe even actually draw in some brackish water. This could pollute the ground water at 9P7.

The MND state it is expected that the pumping of well 9P7 will dewater the fresh water lagoon and creek.

What is the effect on the ecological systems of San Simeon Creek and Lagoon and Van Gordon Creek of returning to them water that has had the particulates and biological elements removed and chlorine and ammonia remnants from the backwash process added? Will the expected concentration level of these chemicals in this water harm such things as the BMI (benthic macro-invertebrates)?

What is the harm to steelhead trout and smolts? Tidewater gobies that live in the muddy areas of the lagoon?

To all the species and habitat dependent on water that is now the quality of drinking water.

Fish and Wildlife Streambed Alteration permit

Has F and W been consulted?

Critical Habitat Consultation

There is a possible federal nexus due to the CCSD's prior funding from the Army Corps of Engineers preparation of the 2012 EIR which included the brackish water concept this current project is based on.

Van Gordon Creek Brine Pond

The brine concentrate produced by the AWTP will be sent to Van Gordon Creek brine evaporation pond for disposal. According to the IS/MND the reverse osmosis concentrate is composed of not only brine but chemical cleaning waste, and analytical waste flows.

To aid in evaporation of the pond contents mechanical evaporators (five in number, one at rest) will spray the pond contents 150 ft. into the air. There will be aerosolization of the chemicals. The evaporators will run 365 days a year for 12 hours each day.

The EWS brine pond near the eastern edge of San Simeon Campground will create an exponential danger to the campground and nearby creeks and riparian zones that are ESHA due to threats from earthquakes, overflows, tsunamis and human error in manning the controls.

What is the effect of the chemical concentrate to humans, to wildlife, birds flying nearby or landing on the pond? Seemingly the only mitigation is a weather station to shut down the evaporators when the winds blow from a certain direction— hope that no natural disaster occurs.

NOISE

Will the proposal result in Increases in existing noise levels? Yes

The Brine Pond mechanical evaporators and aerators are to be enclosed however there is no mention of any real time testing to determine decibel levels when the enclosures are in place. A State Park campground is adjacent to the Brine Pond. The evaporators will operate 365 days a year 12 hours each day except for windy days. No mention of the diesel generators that will automatically start when there is a frequent power outage.

All the water pumps and the AWTP and evaporators will have back- up generators. What is the decibel levels of the generators and effects to the near- by campground?

Aesthetics

Will the EWS result in the obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view? YES

The site of the EWS Advanced Water Treatment Plant (AWTP) and complex of huge cargo containers , pumps ,above ground pipes ,trailers and parking lots is currently a rural agricultural landscaper of former farmland, open fields vegetated with ruderal , with near-by creeks and a lagoon This bucolic setting will be forever changed by the industrialization of the site and the size which is approximately 17000 sq. ft. . Apparently the only mitigation for destroying the view from the Washburn campground, and road and north of the site ranches is to plants trees.

What is the landscape plan? How large will the trees be when first planted to block the AWTP? Will lighting for the AWTP be directed onto the structures and away from surrounding properties?

Tree grows slowly. How will you mitigate the industrial effects in the short term?

Growth -inducing impacts of project

The IS/MND is silent on what will trigger the use and operation of the AWTP. Will it be a mandatory stage 3 declaration? What determines the need? Will a stage of drought be mandatory and if yes determined by what objective criteria? Will the CCSD request a change in the SS Creek extraction permit to allow more processing of water for growth? Will a build out reduction or open space program to buy up lots be mandated? Will the CCSD use the product water from the AWTP to be new or supplemental water in order to lift the California Water Code 350 moratorium and request an amendment to the County Growth management limit from zero to a number to allow growth?

The IS/MND states the CCSD is pursuing the EWS to meet the needs of the existing community. It states there is no growth inducing impacts from the project. However in the summer of 2013 the CCSD embarked on an ambitious program to issue new intent to serve letters based on “new water” created only by residential conservation. Without conditions and safeguards placed on this project in clear language we will in the end have another deficit of water due to over- building and water connections exceeding water availability.

Zoning

The project site is zoned Agricultural. The CCSD should obtain an amendment to the County of San Luis Obispo Land Use Element and Local Coastal Plan in order to change the land use designation on the project site from AG (Agricultural) to PF (Public Facilities).



Last night a high pitched wail / screech awoke me at 1 AM— sounding like a boisterous hawk at first. It was still and warm. With high powered flashlight I looked into the woods and gold and green eyes looked back. It was a silvery fox about 12 lbs. — did not look like a baby. It might have been a mating call. A mother looking for a child, a mate or just a warning call.

I watched with awe and interest for 15 minutes while the fox stood in the darkness not fearful of the light and with one last glance in my direction disappeared into the woods.

Steele, Noelle

From: mahala burton <mahala1@charter.net>
Sent: Sunday, April 05, 2015 2:20 PM
To: Garcia, Rita; Bob Gresens
Subject: Comments CCSD NOP 2015
Attachments: Comments CCSD NOP.pdf

Dear Ms Garcia and Engineer Gresens,
My comments for the CCSD NOP. Please reply to me by e-mail when you receive this document.
If necessary my number is 805 927-1802.

Please send your written comments to the contact specified below, and include your name, address, and contact information in your correspondence.

Ms. Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company 14725 Alton Parkway
Irvine, California 92618
Email rgarcia@mbakerintl.com

DOCUMENT AVAILABILITY:

Mahala Burton
Cambria, Ca ~

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April 6, 2015

Ms. Rita Garcia, Technical Manager
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Mr. Robert C. Gresens, P.E., District Engineer
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Cambria, California 93428

Comments on Notice of Preparation of a Draft Environmental Impact Report for the Cambria Emergency Water Supply Project.

Please find my preliminary comments on the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Cambria Community Services District's (CCSD) Water Supply Project (Project), in accordance with the California Environmental Quality Act (CEQA), CEQA Guidelines, and local implementation procedures.

The Cambria Water Supply Project is built, commissioned and in operation. The proposed EIR will be an after the fact document. Planners should be aware the preparation could result in modification of the project to mitigate adverse impacts or even removal of the project altogether.

Alternatives to the Current Project

Desalination whether seawater or brackish water is a massively expensive and environmentally impactful way to provide for additional water supplies. CEQA requires you to try to find feasible and reasonable alternatives to this proposed approach. CEQA requires a genuine, good faith effort to identify and analyze alternatives that could meet identified water supply needs without constructing a brackish water/ desalination plant.

The Army Corp of Engineers is currently preparing an Environmental Impact Statement on a broad range of alternative water supply projects for Cambria. Whalerock reservoir exchange of water is a viable alternative to the current project. Other viable alternatives are seasonal water storage in off creek reservoirs, water conservation, water use efficiency measures, and storm water and reclaimed wastewater supply options treated to a tertiary level and used for irrigation which is 60% of total water use in Cambria in the dry season.

The Whole Project

The Draft EIR should consider the “whole” project proposed. This, again, is a CEQA requirement. The “whole project” is not simply the so-called Advanced Water Treatment Project which is typically presented as a way to provide much needed water emergency supplies within the community during drought periods.

In fact, the CCSD has plans to work with the Army Corp of Engineers and convert the temporary facility into permanent buildings and increase the water produced which will be used for growth.

Because the CCSD is definitively planning a “Phase Two” project, as well as a “Phase I” project, the draft EIR must provide a comprehensive analysis of all of the environmental impacts, including growth inducing impacts, associated with the whole project.

Growth and Water rights

On October 2014 the CCSD filed with the State Water Resources Control Board Division of Water Rights in Sacramento California a petition for an extension of time for the water extraction permits on San Simeon and Santa Rosa Creeks. Earlier in the year the water board reduced the amount of water allocated in the permits due to a lack of beneficial use of the water permitted. CCSD’s two water rights permits expired before it had “perfected” the full requested amounts, and that it did not apply for extensions or new permits.

Review of the applications will likely include CEQA review and a determination of needed bypass flows for fish. It’s not yet clear at this point how the reduced volumes will affect expected production from the proposed project, how the lesser amounts would affect the CCSD’s overall pumping regime, or how these volumes affect the upcoming required studies on instream flow studies and species effects.

The CCSD lists reasons why use of water was not completed within time previously allowed.

“The community of Cambria is still in the process of achieving full build out on said permit, which is expected to take another 20 years. Approval of this petition would allow Cambria to achieve full build out. The environmental impacts of full build out have been analyzed in Cambria’s operative general plan and the EIAs offered in support of Permits 17287 and 20387 and, therefore, there are no new environmental impacts associated with an extension on the time to perfect Permit 17287.

Concurrent with a short-term emergency water supply project in response to the current drought emergency, the CCSD is completing a long-term water supply project as part of a federal Water Resources Water Development Act authorized project. To date, several long-term project alternatives have been analyzed, including seasonal water storage that would require full use of the appropriate water amount under permits 20387 and 17287

(518 acre-feet annually from the Santa Rosa aquifer, 1230 acre-feet annually from the San Simeon aquifer, and a maximum annual diversion from both aquifers of 1230 acre-feet per 1981 Coastal Development Permit 428-10).

Progress on the CCSD's long-term project has been slowed in recent years due to the lack of federal appropriations, and the need to complete the project's environmental review process. Cambria remains engaged in the long-term water supply project planning and intends to make full use of Permits 20387 and 17287.”

What is the mitigation for the future growth planned? The growth inducing impacts of this project are significant. The Cambria Build Out Reduction plan is not funded and basically in moth balls. 3000 vacant lots in Cambria are clamoring for water. All Cambria resources such as roads, air quality and noise will be impacted. Growth will consume any resources made available from this project.

Brine Pond

Submit further biological analysis describing the potential impacts of exposing wildlife to an open brine pond. Evaluate the potential impacts of the proposed brine evaporation pond on wildlife since recent violations have been reported to wildlife agencies and the Central Coast Water Board.

NOTICE OF VIOLATION AND WATER CODE SECTION 13267 REQUEST FOR INFORMATION: CAMBRIA COMMUNITY SERVICES DISTRICT 2-27-2015

The Central Coast Water Board regulates the Cambria Community Services District's (CCSD) Emergency Water Supply Project via several permits, most notably Waste Discharge Requirements and Water Recycling Requirements Order No. R3-2014-0050, the General Permit for Discharges with Low Threat to Water Quality (NPDES Order No. R3-2011-0223), and Waste Discharge Requirements for Class II Surface Impoundment Order No. R3-2014-0047. The Water Board has determined the CCSD violated numerous provisions of these three permits, as discussed below.

The pond is an attractive nuisance to waterfowl, turtles, snakes, bats, red legged frog's .Reports of migratory birds landing on the pond and reports of dead birds have been made to Fish and Wildlife. Submit analysis of the effects of netting as mitigation for birds landing on the pond and the potential trapping of bats in the netting. The effect of frog barriers and the frogs becoming trapped in the barrier edges.

Long-term evaporative concentration of salts in wastewater can create hypersaline conditions in the pond and pose risks to avian and other wildlife. Bird mortality due to salt crystallization in feathers and brine ingestion is known to occur in hypersaline industrial wastewater ponds.

Refer to the report “Evaporation Ponds Final Report February 1999 Evaporation Ponds Technical Committee The San Joaquin Valley Drainage Implementation Program And The University of California Salinity/Drainage Program.”

Excerpt from page 27

“Salinity Effects

Euliss *et al.* (1989) reported the occurrence of calcium carbonate accumulation on the feathers of ruddy ducks collected within evaporation basins. Accumulation of calcium carbonate on tail feathers adversely affects the bird’s ability to fly and avoid predators. Salt accumulation also contributes to a direct increase in the weight of a bird and therefore bioenergetic demand and energy expenditure for movement, which is expected to be reflected in reduced health and condition. Salt encrustation has also been found to structurally damage the integrity of the feathers. Although salt encrustation represents a risk of adverse effects on the condition and survival of individual ducks, the overall significance of adverse impacts is unknown.

Salinity levels observed within evaporation basins may contribute to reduced hatching success and increased juvenile mortality. Exposure to saline waters has been suggested as one of the causative factors contributing to low hatching success for eared grebes nesting at several evaporation basins. Consistent exposure of ducklings to saline waters has also been reported to result in physiological stress, reduced growth, and increased mortality. Availability of a source of freshwater shortly after hatching has been reported as an important factor in reducing sub-lethal and lethal effects on young ducks. Observations at TLDD evaporation basins during the spring and summer of 1992 showed a movement of ducks from areas having higher salinities to inlet areas where EC and TDS concentrations are reduced (TLDD unpublished data).”

Include a complete analysis of the effects of aerial brine drift on biological resources in the surrounding area. This is warranted due to complaints from adjacent ranchers of brine drift and mist landing on their crops and bodies. Salts and trace elements were found on vegetation and soil adjacent to the pond. Excessive salts deposited on adjacent land can kill vegetation and cause long-term damage to soil.

Noise from Evaporators

Identify expected noise levels from evaporators to adjacent state park and ranches. Numerous complaints have been lodged of noise from the evaporators exceeding county decibel levels.

Brine Pond Alternatives

Discuss all alternatives to the Brine pond with specificity. The CCSD 2014 abandoned Mitigated Negative Declaration (MND) for this project shows a photo of an existing pipeline on the CCSD flag lot that could be used to send brine left over from the water treatment to be discharged into the ocean.

The Army Corp of Engineers in the Environmental Impact Statement being prepared for Cambria water supply alternatives notes in the section for the brackish water concept ocean outfalls, connection to the San Simeon waste treatment plant outfall and deep injection wells along highway one near the lagoon as alternatives to the brine pond.

The project description in the MND does not include alternatives analysis or environmental analysis of discharging brine solution into the ocean or effects of any other alternative. If the Project description changes to include the discharge of brine solution to the ocean, significant impacts to marine aquatic resources would occur.

Salt Water Intrusion and Mitigation Water

According to the Groundwater Modeling Report, the proposed project would pump 710 gpm from the San Simeon Creek aquifer. Although a portion of this water would be injected back into the aquifer, this pumping could lower groundwater levels indirectly impacting riparian and wetland habitat, which are protected as Environmentally Sensitive Habitat Areas (ESHA) in the County's LCP. While the groundwater modelling evaluated the project's impacts on the lagoon, it does not evaluate impacts to riparian and wetland vegetation. Submit further Hydrogeological and biological analysis evaluating such impacts. Discuss the long term effects of pumping from well 9p7 and hydrological balance in the creek and CCSD well field

In-Stream Flow Study

The CDM Smith (contractor for the CCSD project) Engineering Technical Memorandum Water Supply Alternatives dated November 2013 Cambria, California states in part:

The North Coast Area Plan (NCAP) includes standards and findings required for any new public water supply project that will assure CCSD water withdrawals are limited to protect adequate in-stream flows to support sensitive species and riparian/wetland habitat within the reach of streams effected by CCSD pumping. This leads to an in-stream flow management study objective to determine the sustainable amount of withdrawals for new development that may be accommodated, which will not adversely affect riparian and wetland habitat or agricultural activities.

The California Coastal Commission has called for both in-stream flow studies on San Simeon Creek and a Habitat Conservation Plan. The Coastal Commission has stated that finding a solution to Cambria's water supply problems requires finding how much water needs to stay in the creeks.

Excerpt from the North Coast Area Plan:

Water Master Plan for Cambria. The Cambria Community Services District should avoid issuing intent to serve letters for new development which relies on additional water

supplied by San Simeon or Santa Rosa Creeks until the following tasks have been completed:

A. In-stream flow management study. An in-stream flow management study for Santa Rosa and San Simeon Creek should be conducted. The study should identify a sustainable amount of withdrawals for new development that may be accommodated which will not adversely affect riparian and wetland habitat or agricultural activities?

The Project may result in direct and cumulative adverse impacts to valuable fish and wildlife resources supported by the San Simeon, and Van Gordon Creeks and their associated riparian, upland, wetland, and lagoon/estuary habitats. These impacts include reducing instream flows needed to maintain fish and wildlife populations and habitat within and adjacent to these streams and the lagoon. How much water is there and how much is necessary for the continued survival of local endangered/threatened species.

Impacts may occur to steelhead trout (*Oncorhynchus mykiss irideus*) run in San Simeon Creek. The South-Central California Coast Steelhead (SCCCS) Distinct Population Segment (DPS) is a State Species of Special Concern (SSSC), listed as threatened under the Federal Endangered Species Act (FESA), and the San Simeon Creek is designated by FESA as critical habitat for the SCCCPS DPS. The federally endangered and SSSC tidewater goby (*Eucyclogobius newberryi*) is known to inhabit these San Simeon lagoon and some upstream reaches, and would be similarly affected by water diversions. Impacts from water diversions may adversely affect other special status species dependent upon the San Simeon creek and associated lagoon and riparian corridor, including the SSSC and federally-threatened California red-legged frog (*Rana draytonii*) and SSSC western pond turtle (*Emys marmorata*).

Dr. Starr, the University of Southern California historian, said the drought crisis would force California to do what was needed to carry on. “Our destiny is not just to be a fantasy place,” he said. “As much as we enjoy the good life in California, we have to come to terms with Mother Nature, with our arid environment.”

“Every time California has a problem — we ran out of electricity in the early 2000s, then we ran out of money, and now we are running out of water — people say California is over,” Dr. Starr said. “It’s not over. It’s too important a part of American culture to be over. But it will change itself.”



Steele, Noelle

From: Hart, Melinda R. <MHart@BHFS.com>
Sent: Monday, April 06, 2015 4:43 PM
To: Garcia, Rita
Cc: Shoaf, Jena R.
Subject: Comments on Notice of Preparation of DEIR for the Cambria Emergency Water Supply Project
Attachments: Warren - Ltr to Rita Garcia 040615 (12104812-1).PDF

Dear Ms. Garcia:

Attached please find correspondence from Jena Shoaf of today's date on behalf of Clyde Warren regarding the above-entitled matter. The original will follow by Federal Express.

Sincerely,

Melinda R. Hart

Legal Secretary

Brownstein Hyatt Farber Schreck, LLP

1020 State Street

Santa Barbara, CA 93101

805.882.1435 tel

MHart@BHFS.com

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April 6, 2015

Jena R. Shoaf
Associate
805.882.1427 tel
805.965.4333 fax
jshoaf@bhfs.com

VIA FEDERAL EXPRESS AND ELECTRONIC MAIL (RGARCIA @MBAKERINTL.COM)

Ms. Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, CA 92618

RE: Comments on Notice of Preparation of a Draft Environmental Impact Report for the Cambria
Emergency Water Supply Project

Dear Ms. Garcia:

Our office represents Clyde Warren ("Warren"), who resides at 1012 San Simeon Creek Road in an unincorporated area in the County of San Luis Obispo. In addition to being his residence, Warren also runs agricultural operations and a water supply business from his property.

This letter responds to the Notice of Preparation ("NOP") of a Draft Environmental Impact Report ("DEIR") for the Cambria Emergency Water Supply Project ("Project" or "EWS Project"). State law requires the Cambria Community Services District ("CCSD") to consider all information submitted by any person during the EIR process, including comments on an NOP. (Pub. Res. Code § 21082.1; 14 Cal. Code Regs. § 15084(c).) We have reviewed the NOP and believe that there are deficiencies in the CCSD's identification of potentially significant environmental impacts. In order to be sufficient, the DEIR must fully analyze these impacts. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. §§ 15126.2(a), 15128.)

I. THRESHOLD LEGAL OBJECTIONS

A. Faulty Project Description

State law requires that a notice of preparation provide the public with sufficient information concerning a project and its potential environmental effects to enable them to make a "meaningful response." (14 Cal. Code Regs. § 15082(a)(1).) An inaccurate or truncated project description is prejudicial error because it fails to "adequately apprise all interested parties of the true scope of the project." (See *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454-55.) A failure to adequately describe anticipated project operations can also result in a flawed impact analysis. (See *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645 [project description for mining project failed to describe increase in levels of production that would occur under new permit].) Based on the current NOP, it is unclear whether the proposed EWS Project is a continuation of the project currently in operation under Emergency Coastal Development Permit number ZON2013-00589 ("E-CDP") or whether changes are being proposed. If changes are being proposed, the project description should include a description of changes to both specific Project operations and to the Project as a whole. The NOP also does not include information on Project duration. Pursuant to section 15082 of the California Environmental Quality Act

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("CEQA") Guidelines ("CEQA Guidelines"), we urge the CCSD to redraft the project description and to recirculate the NOP in order to give both the public and other responsible and trustee agencies the opportunity to accurately and meaningful comment on the scope and content of the information to be included in the EIR. (14 Cal. Code Regs. § 15082(a)(1).)

B. No Basis for Determination of Probable Environmental Effects

The NOP does not provide an articulable or understandable basis for the CCSD's determination of the EWS Project's probable environmental effects. It appears that these determinations may have been based on the Cambria Emergency Water Supply Project Initial Study/Mitigated Negative Declaration ("Initial Study") prepared pursuant to the E-CDP in the summer of 2014. CEQA requires that an initial study's impact evaluation should extend to all potential impacts, including on-site and off-site impacts, project-level and cumulative impacts, direct and indirect impacts, and construction and operational impacts. (See CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.) The Initial Study, however, includes very little discussion and analysis of off-site or indirect impacts. Instead, the Initial Study bases its determinations of impact significance largely—and in many cases, solely—on an analysis of on-site and/or direct impacts. Such analysis is insufficient for the purposes of CEQA and does not provide the public with a fair opportunity to understand or consider the Project's real impacts. In order to satisfy CEQA's required scope of analysis we recommend that the CCSD comprehensively analyze the entire range of potential environmental impacts in the DEIR. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a); 14 Cal. Code Regs. § 15128.)

C. Proposal of Alternatives Necessary

A DEIR must propose and analyze a range of feasible project alternatives that will result in fewer significant impacts. (Pub. Res. Code § 21100(b)(4); 14 Cal. Code Regs. § 15126.6(a)-(e).) The NOP does not identify alternatives to be analyzed. The DEIR, therefore, should consider alternative sites for the EWS Project since operation of the Project at the existing site has already been determined to result in numerous potentially significant impacts. Additionally, the DEIR should also consider and analyze a comprehensive set of project design features in order to minimize the Project's numerous potentially significant impacts. (Pub. Res. Code § 21100(b)(3); 14 Cal. Code Regs. § 15126.4(a)(1).)

II. IMPACT ANALYSIS

The following section sets forth our concerns on CCSD's initial determination of potentially significant impacts. In addition to our specific concerns detailed below, we have a broader concern that both the NOP and the Initial Study do not satisfy CEQA requirements by failing to identify and/or analyze the full range of potential impacts resulting from the EWS Project. (CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.)

A. Significant Impacts on Aesthetics

We disagree with the CCSD's initial finding that the EWS Project will have a less than significant impacts on (1) the area's scenic vistas, and (2) creation of a new source of glare.

According to the San Luis Obispo County Conservation and Open Space Element, visual resources consist of open areas, scenic corridors, and the built environment. Open area visual resources are defined as "agricultural, natural, and undeveloped lands." In addition to being located in a largely undeveloped and agricultural area of San Luis Obispo County, the EWS Project site is also located in close proximity to both the San Simeon Creek and the Van Gordon Creek, which are central to the area's unique coastal vistas and character. Prior to construction of the EWS Project, views from the nearby properties provided a scenic

vista of some of the county's most picturesque agricultural land, including undulating hillsides, willow riparian forest, and stands of Monterey Pines. Construction of the EWS Project, however, has significantly changed the quality of the surrounding area and has created an industrial eyesore for both the local residents who moved to this area to get away from such development, and for the county's—and state's—residents who frequent the area for recreational purposes. Instead of being able to enjoy an uninterrupted view of the San Simeon Creek Valley, residents and visitors alike must share this view with the development of an industrial water project. These changes have significantly impacted the area's scenic vistas and substantially degraded the existing visual character and quality of the site and its surroundings. We therefore encourage CCSD to analyze the EWS Project's impacts to aesthetics.

Current operation of the EWS Project also impacts views in the area by creating a significant amount of glare. The Project's evaporation pond (and its industrial liner) and mechanical spray evaporators create substantial day-time glare to our client's residence. The glare is especially severe when the mechanical spray evaporators are in operation because the sun is reflected off of all of the water vapor being sprayed into the air as well as the water in the pond itself. This glare also increases the impacts to the view shed from our client's property. This is a potentially significant issue that should be included and fully analyzed in the DEIR.

B. Significant Impacts on Agricultural Resources

We disagree with the CCSD's initial determination that the EWS Project will have a less than significant impact on the area's agricultural resources. Although the EWS Project does not per se conflict with the current land use and zoning regulations, its operation has the potential to significantly impact agricultural resources, including (1) converting Prime Farmland (as defined in the San Luis Obispo County General Plan Agricultural Element) to non-agricultural use and (2) involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use.

CEQA requires that both on and off-site as well as direct and indirect impacts be analyzed. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a); see also CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.) We have reviewed the Initial Study and do not believe that the analysis sufficiently considers and analyzes the Project's off-site and indirect impacts. For example, operation of the EWS Project's mechanical spray operators creates a substantial amount of mist which allows the toxic and harmful contents of the evaporation pond to become airborne. Although the EWS Project's permit from the Central Coast Regional Water Quality Control Board ("RWQCB") requires that this mist be contained within the footprint of the evaporation pond, there are no mitigation measures currently in place to ensure that this happens. As can be seen in the attached photos (see Attachment A), as soon as there is even a slight breeze, the mist is blown onto agricultural land surrounding the EWS Project site, including property owned by our client. It also appears that this chemically-laden mist is transported off of the EWS Project site—and on to both our client's land as well as neighboring parcels—by fog, which commonly occurs throughout the valley. (See Attachment B.)

This transportation of brine and other chemicals from the evaporation pond may cause significant and adverse impacts to the surrounding agricultural operations, including harming existing crops and prejudicing farmers' ability to satisfy organic certification requirements. It is possible that over time the brine and other chemicals will accumulate in the soil, further impairing the area's continued viability for agricultural production and leading to a conversion of the surrounding land to non-agricultural uses. Our client is also particularly concerned about the effect of the brine on his metal farming and water production equipment. Failure to evaluate these off-site impacts to agricultural resources will result in a legally inadequate DEIR. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a); see also CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.) We therefore urge the CCSD to include

analysis of the EWS Project's potentially significant impacts to the surrounding area's important agricultural resources in its DEIR.

C. Significant Impacts on Air Quality

We acknowledge that the CCSD has recognized air quality to be potentially significantly impacted by the EWS Project. This issue is very important to our client because of the substantial amount of mist created by the mechanical spray operator and the close proximity of his residence and land to the Project. As seen in the attached photos (see Attachments A and B), the mist is easily transported onto our client's land (and other surrounding parcels) with a slight breeze or by fog. For analysis in the DEIR to be adequate, the DEIR must sufficiently analyze the off-site impacts associated with the mist and its impacts on both the area's human population and the environment as a whole. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).)

D. Geology and Soils

We disagree with the CCSD's initial finding that the EWS Project will have less than significant impacts on the area's geology and soils. CEQA requires the lead agency to analyze all potential impacts of a project—including impacts that may be indirect and occur offsite. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).) Mist from the EWS Project's mechanical spray operators leaving the Project site has been documented and provided to the CCSD. Potential impacts to the surrounding environment, however, were not analyzed in the Initial Study and appear to be left out of the NOP. As mentioned above, our client is concerned about the accumulation of salt and other chemicals—and the resulting impacts—in the soil on both his property and on surrounding parcels. The DEIR should also consider the possible impacts of the contents of the evaporation pond leaching into the soil both within and surrounding the Project site. Failure to recognize and analyze these potential impacts to the area's geology and soil resources will result in a deficient DEIR. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).) We urge the CCSD to analyze the EWS Project's potentially significant impacts to the area's soil resources, both on and off the Project site, and include such analysis in the DEIR.

E. Significant Impacts on Hydrology and Water Quality

We acknowledge that the CCSD has recognized the area's hydrology and water quality to be potentially significantly impacted by the EWS Project. Specifically, the NOP identifies the substantial depletion of groundwater supplies such that "the production rates of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted" as a potentially significant impact of the EWS Project. This issue is very important to our client because he has a right to receive water from Well 9P2 pursuant to a settlement agreement signed with the CCSD on November 6, 2006 ("2006 Settlement Agreement"). Well 9P7, which is located very close to Well 9P2, is identified in the NOP as the well that will supply the EWS Project with water. Aggressive pumping of the Well 9P7, as contemplated by the Project, may materially interfere with our client's permitted right to capture and divert water pursuant to both his permit and to the 2006 Settlement Agreement. We strongly urge the CCSD to comprehensively analyze—and mitigate—this issue in the DEIR in order to avoid legal challenges to both the adequacy of the CEQA document and our client's legitimate common law, statutory and contractual property right expectations.

Our client also has concerns regarding the potentially significant impacts to water quality resulting from the EWS Project. Pursuant to the 2006 Settlement Agreement, water provided to our client by the CCSD must meet specific water quality levels. The RWQCB also recently declared San Simeon Creek and the groundwater aquifer to be an impaired water body due to effluent from the EWS Project. For analysis in the

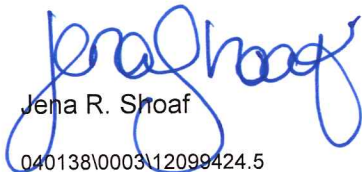
DEIR to be adequate, the DEIR must sufficiently analyze all of these impacts. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).)

F. Noise

We acknowledge that the CCSD has determined that the Project may have potentially significant impacts on noise. This issue is very important to our client because of the close proximity of his residence to the Project site, specifically to the mechanical spray operators. County ordinances prohibit noise levels generated from a project or activity exceeding 50 decibels (dBA) during the daytime (7 a.m. to 10 p.m.) and 45 dBA at night (10 p.m. to 7 a.m.). Prior to operation of the current Project, the San Simeon Creek Valley was filled with the sounds of nature—birdsong, wind in the trees, the buzz of insects. Since the mechanical spray operators went into operation, however, all of these sounds are drowned out by the deafening—and out of place—sound of industrial motors. Our client is concerned that the operation of the EWS Project will continue to violate the noise levels specified in the County ordinance and negatively impact his quality of life.

Thank you for considering the above comments for inclusion in the DEIR. Please add us to the distribution list for the DEIR and all notices associated with the EWS Project.

Sincerely,



Jena R. Shoaf

040138\0003\12099424.5

ATTACHMENT A



3-16-2015 First photo taken in series at 3:28 PM of one CCSO EWS blower.



3-16-2015 Second photo in series at 3:28 PM of the CCSO EWS blower.



3-16-2015 Third photo taken in series at 3:28 PM of the CCSO EWS blower.



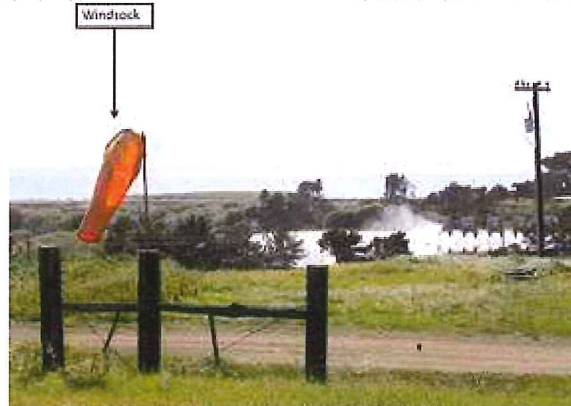
3-16-2015 Fourth photo taken in series at 3:28 PM of the CCSO EWS blower.



3-16-2015 Fifth photo taken in series of the CCSO EWS blower.



3-16-2015 Sixth photo taken in series at 3:29 PM of the CCSO EWS blower.



3-16-2015 Seventh photo taken in series at 3:30 PM of the CCSO EWS blower.

ATTACHMENT B



018122\0001\12103899.3

Steele, Noelle

From: Hart, Melinda R. <MHart@BHFS.com>
Sent: Monday, April 06, 2015 4:43 PM
To: Garcia, Rita
Cc: Shoaf, Jena R.
Subject: Comments on Notice of Preparation of DEIR for the Cambria Emergency Water Supply Project
Attachments: Richards - Ltr to Rita Garcia 040615 (12104806-1).PDF

Dear Ms. Garcia:

Attached please find correspondence from Jena Shoaf of today's date on behalf of Leslie Richards regarding the above-entitled matter. The original will follow by Federal Express.

Sincerely,

Melinda R. Hart

Legal Secretary

Brownstein Hyatt Farber Schreck, LLP

1020 State Street

Santa Barbara, CA 93101

805.882.1435 tel

MHart@BHFS.com

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April 6, 2015

Jena R. Shoaf
Associate
805.882.1427 tel
805.965.4333 fax
jshoaf@bhfs.com

VIA FEDERAL EXPRESS AND ELECTRONIC MAIL (RGARCIA @MBAKERINTL.COM)

Ms. Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, CA 92618

RE: Comments on Notice of Preparation of a Draft Environmental Impact Report for the Cambria
Emergency Water Supply Project

Dear Ms. Garcia:

Our office represents Leslie Richards ("Richards"), who operates her business, San Simeon Equestrian Facility, at 1501 San Simeon Creek Road in an unincorporated area in the County of San Luis Obispo.

This letter responds to the Notice of Preparation ("NOP") of a Draft Environmental Impact Report ("DEIR") for the Cambria Emergency Water Supply Project ("Project" or "EWS Project"). State law requires the Cambria Community Services District ("CCSD") to consider all information submitted by any person during the EIR process, including comments on an NOP. (Pub. Res. Code § 21082.1; 14 Cal. Code Regs. § 15084(c).) We have reviewed the NOP and believe that there are deficiencies in the CCSD's identification of potentially significant environmental impacts. In order to be sufficient, the DEIR must fully analyze these impacts. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. §§ 15126.2(a), 15128.)

I. THRESHOLD LEGAL OBJECTIONS

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opportunity to accurately and meaningfully comment on the scope and content of the information to be included in the EIR. (14 Cal. Code Regs. § 15082(a)(1).)

B. No Basis for Determination of Probable Environmental Effects

The NOP does not provide an articulable or understandable basis for the CCSD's determination of the EWS Project's probable environmental effects. It appears that these determinations may have been based on the Cambria Emergency Water Supply Project Initial Study/Mitigated Negative Declaration ("Initial Study") prepared pursuant to the E-CDP in the summer of 2014. CEQA requires that an initial study's impact evaluation should extend to all potential impacts, including on-site and off-site impacts, project-level and cumulative impacts, direct and indirect impacts, and construction and operational impacts. (See CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.) The Initial Study, however, includes very little discussion and analysis of off-site or indirect impacts. Instead, the Initial Study bases its determinations of impact significance largely—and in many cases, solely—on an analysis of on-site and/or direct impacts. Such analysis is insufficient for the purposes of CEQA and does not provide the public with a fair opportunity to understand or consider the Project's real impacts. In order to satisfy CEQA's required scope of analysis we recommend that the CCSD comprehensively analyze the entire range of potential environmental impacts in the DEIR. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a); 14 Cal. Code Regs. § 15128.)

C. Proposal of Alternatives Necessary

A DEIR must propose and analyze a range of feasible project alternatives that will result in fewer significant impacts. (Pub. Res. Code § 21100(b)(4); 14 Cal. Code Regs. § 15126.6(a)-(e).) The NOP does not identify alternatives to be analyzed. The DEIR, therefore, should consider alternative sites for the EWS Project since operation of the Project at the existing site has already been determined to result in numerous potentially significant impacts. Additionally, the DEIR should also consider and analyze a comprehensive set of project design features in order to minimize the Project's numerous potentially significant impacts. (Pub. Res. Code § 21100(b)(3); 14 Cal. Code Regs. § 15126.4(a)(1).)

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The following section sets forth our concerns on CCSD's initial determination of potentially significant impacts. In addition to our specific concerns detailed below, we have a broader concern that both the NOP and the Initial Study do not satisfy CEQA requirements by failing to identify and/or analyze the full range of potential impacts resulting from the EWS Project. (CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.)

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We disagree with the CCSD's initial finding that the EWS Project will have a less than significant impacts on (1) the area's scenic vistas, and (2) creation of a new source of glare.

According to the San Luis Obispo County Conservation and Open Space Element, visual resources consist of open areas, scenic corridors, and the built environment. Open area visual resources are defined as "agricultural, natural, and undeveloped lands." In addition to being located in a largely undeveloped and agricultural area of San Luis Obispo County, the EWS Project site is also located in close proximity to both the San Simeon Creek and the Van Gordon Creek, which are central to the area's unique coastal vistas and character. Prior to construction of the EWS Project, views from the nearby properties provided a scenic vista of some of the county's most picturesque agricultural land, including undulating hillsides, willow riparian forest, and stands of Monterey Pines. Construction of the EWS Project, however, has significantly

changed the quality of the surrounding area and has created an industrial eyesore for both the local residents who moved to this area to get away from such development, and for the county's—and state's—residents who frequent the area for recreational purposes. Instead of being able to enjoy an uninterrupted view of the San Simeon Creek Valley, residents and visitors alike must share this view with the development of an industrial water project. These changes have significantly impacted the area's scenic vistas and substantially degraded the existing visual character and quality of the site and its surroundings. We therefore encourage CCSD to analyze the EWS Project's impacts to aesthetics.

Current operation of the EWS Project also impacts views in the area by creating a significant amount of glare. The Project's evaporation pond (and its industrial liner) and mechanical spray evaporators create substantial day-time glare, which is especially severe when the mechanical spray evaporators are in operation because the sun is reflected off of all of the water vapor being sprayed into the air as well as the water in the pond itself. This glare also increases the impacts to the view shed. This is a potentially significant issue that should be included and fully analyzed in the DEIR.

B. Significant Impacts on Agricultural Resources

We disagree with the CCSD's initial determination that the EWS Project will have a less than significant impact on the area's agricultural resources. Although the EWS Project does not per se conflict with the current land use and zoning regulations, its operation has the potential to significantly impact agricultural resources, including (1) converting Prime Farmland (as defined in the San Luis Obispo County General Plan Agricultural Element) to non-agricultural use and (2) involving other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use.

CEQA requires that both on and off-site as well as direct and indirect impacts be analyzed. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a); see also CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.) We have reviewed the Initial Study and do not believe that the analysis sufficiently considers and analyzes the Project's off-site and indirect impacts. For example, operation of the EWS Project's mechanical spray operators creates a substantial amount of mist which allows the toxic and harmful contents of the evaporation pond to become airborne. Although the EWS Project's permit from the Central Coast Regional Water Quality Control Board ("RWQCB") requires that this mist be contained within the footprint of the evaporation pond, there are no mitigation measures currently in place to ensure that this happens. As can be seen in the attached photos (see Attachment A), as soon as there is even a slight breeze, the mist is blown onto agricultural land surrounding the EWS Project site, including property used by our client for her business. It also appears that this chemically-laden mist is transported off of the EWS Project site—and on to both our client's land as well as neighboring parcels—by fog, which commonly occurs throughout the valley. (See Attachment B.)

This transportation of brine and other chemicals from the evaporation pond may cause significant and adverse impacts to the surrounding agricultural operations, including harming existing crops and prejudicing farmers' ability to satisfy organic certification requirements. It is possible that over time the brine and other chemicals will accumulate in the soil, further impairing the area's continued viability for agricultural production and leading to a conversion of the surrounding land to non-agricultural uses. Failure to evaluate these off-site impacts to agricultural resources will result in a legally inadequate DEIR. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a); see also CEQA Guidelines Appendix G, Evaluation of Environmental Impacts, ¶ 2.) We therefore urge the CCSD to include analysis of the EWS Project's potentially significant impacts to the surrounding area's important agricultural resources in its DEIR.

C. Significant Impacts on Air Quality

We acknowledge that the CCSD has recognized air quality to be potentially significantly impacted by the EWS Project. This issue is very important to our client because of the substantial amount of mist created by the mechanical spray operator. The area's wind patterns often blow the mist directly onto the property where she runs her equestrian facility. For analysis in the DEIR to be adequate, the DEIR must sufficiently analyze the off-site impacts associated with the mist and its impacts on both the area's human population and the environment as a whole. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).)

D. Significant Impacts on Biological Resources

We agree with the CCSD's initial determination that the Project may have potentially significant impacts on the area's biological resources. This issue is very important to our client because the area's diverse and visible wildlife was one of the qualities initially attracting her to the area. Since the current Project began its operations in January, however, the noise of the mechanical spray operators has effectively scared all of the area's native wildlife into hiding, or worse, forced them to move away. In order to be adequate, the DEIR must sufficiently analyze all potential impacts on the area's biological resources. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).)

E. Geology and Soils

We disagree with the CCSD's initial finding that the EWS Project will have less than significant impacts on the area's geology and soils. CEQA requires the lead agency to analyze all potential impacts of a project—including impacts that may be indirect and occur offsite. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).) Mist from the EWS Project's mechanical spray operators leaving the Project site has been documented and provided to the CCSD. Potential impacts to the surrounding environment, however, were not analyzed in the Initial Study and appear to be left out of the NOP. As mentioned above, our client is concerned about the accumulation of salt and other chemicals—and the resulting impacts—in the soil on both her property and on surrounding parcels. The DEIR should also consider the possible impacts of the contents of the evaporation pond leaching into the soil both within and surrounding the Project site. Failure to recognize and analyze these potential impacts to the area's geology and soil resources will result in a deficient DEIR. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).) We urge the CCSD to analyze the EWS Project's potentially significant impacts to the area's soil resources, both on and off the Project site, and include such analysis in the DEIR.

F. Hazards and Hazardous Materials

We disagree with the CCSD's initial finding that the EWS Project will have a less than significant impact on creating a hazardous environment. Our client has had very adverse reactions to the mist, including a prolonged bloody nose and sever skin irritation and rashes after exposure. Although our client has notified CCSD of her concerns that the mist created from the Project's mechanical spray operators is unsafe, it does not appear that there has yet been a meaningful study of what chemicals are contained in the mist and what impacts those chemicals would have on the surrounding population and environment. Without such analysis, it is impossible to adequately notify the public of the Project's potential impacts and hazards and allow them the chance to meaningfully comment. Therefore, in order to be compliant with CEQA's comprehensive requirements, we strongly urge the CCSD to include analysis of the potentially significant hazard created by the mist from the mechanical spray operators. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).)


G. Noise

We acknowledge that the CCSD has determined that the Project may have potentially significant impacts on noise. Although County ordinances prohibit noise levels generated from a project or activity exceeding 50 decibels (dBA) during the daytime (7 a.m. to 10 p.m.) and 45 dBA at night (10 p.m. to 7 a.m.), our client has conducted sound tests at various times since the Project began operating and has clocked the Project's noise levels at above 90 dBA.

The Project's impacts on noise is very important to our client because she owns and operates the San Simeon Equestrian Facility, which is located less than half a mile from the Project's mechanical spray operators. This facility houses both Richards' own horses and horses owned by paying clients. The noise created by the mechanical spray operators is so loud that it disturbs and scares all of the horses at our client's facility. One of Richards' horses had to be euthanized because of wounds caused a month earlier when the animal bolted in reaction to the loud noise caused by the spray operators coming online. In addition to this personal tragedy, the deafening noise made by the mechanical spray blowers is prejudicing Richards' ability to continue operating her business because it disturbs the horses boarding at her facility and has caused other negative impacts to their health and continued well-being. For analysis in the DEIR to be adequate, the DEIR must sufficiently analyze both the direct and indirect impacts associated with the noise resulting from the EWS Project. (See Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs. § 15126.2(a).)

Thank you for considering the above comments for inclusion in the DEIR. Please add us to the distribution list for the DEIR and all notices associated with the EWS Project.

Sincerely,


Jena R. Shoaf

ATTACHMENT A



3-16-2015 First photo taken in series at 3:28 PM of one CCSO EWS blower.



3-16-2015 Second photo in series at 3:28 PM of the CCSO EWS blower.



3-16-2015 Third photo taken in series at 3:28 PM of the CCSO EWS blower.



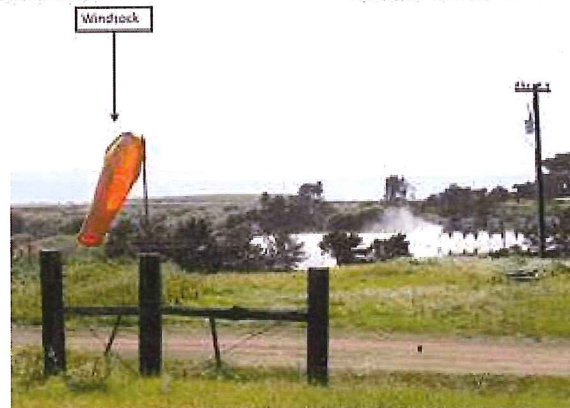
3-16-2015 Fourth photo taken in series at 3:28 PM of the CCSO EWS blower.



3-16-2015 Fifth photo taken in series of the CCSO EWS blower.



3-16-2015 Sixth photo taken in series at 3:29 PM of the CCSO EWS blower.



3-16-2015 Seventh photo taken in series at 3:30 PM of the CCSO EWS blower.

ATTACHMENT B



018122\0001\12103899.3

Steele, Noelle

From: Luster, Tom@Coastal <Tom.Luster@coastal.ca.gov>
Sent: Monday, April 06, 2015 4:41 PM
To: Bob Gresens; Garcia, Rita
Cc: Airlin Singewald -- SLO County; Barker, Doug@Parks; Tenneboe, Annette@Wildlife; Paul, Margaret@Wildlife; Harris, Ken@Waterboards; Kolb, Howard@Waterboards; Lodge, Ryan@Waterboards; Packard, Harvey@Waterboards; Tryon, Thea@Waterboards; Adair, Chris@Waterboards; McCarthy, Matthew@Waterboards; Moody, Mitchell@Waterboards; Croyle, William@DWR; Francis, Wendy@DWR; Matt McGoogan -- NMFS; Jacob Martin -- USFWS; 'Lena Chang' (lena_chang@fws.gov); Kathleen Anderson [Kathleen.S.Anderson@usace.army.mil] (Kathleen.S.Anderson@usace.army.mil)
Subject: Comments on Cambria water supply project NOP
Attachments: Comments on CCSD NOP April 6 2015.pdf

Hi all,

I've attached our comments. Please let me know if you have questions.

Tom Luster

Tom Luster

California Coastal Commission
45 Fremont Street #2000
San Francisco, CA 94105
415-904-5248

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
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April 6, 2015

Mr. Robert Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Ms. Rita Garcia, Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

VIA EMAIL: bgresens@cambriacsd.org

VIA EMAIL: rgarcia@mbakerintl.com

RE: Comments on Notice of Preparation/Project Information Packet (NOP/PIP) for Draft Environmental Impact Report (EIR) on the Cambria Emergency Water Supply Project – Cambria Community Services District (CCSD)

Dear Mr. Gresens and Ms. Garcia:

Thank you for the opportunity to comment on the above-referenced document. As we have discussed with you a number of times, we are acutely aware of the severity of Cambria's water supply issues and we remain supportive of the CCSD developing appropriate emergency and environmentally sustainable long-term responses to address these issues. We are also aware of the exceptional response many Cambria residents have shown to reduce their water use and increase their conservation efforts and the CCSD's commitment to finding suitable short- and long-term solutions to its water supply problems. We welcome working closely with you now to develop a water supply project that will fully address, and be consistent with, the water planning, resource protection, and growth management requirements of the Local Coastal Program (LCP) and Coastal Act, as well as the requirements of other involved agencies and provisions of the Governor's recent Executive Order B-29-15 responding to the state's drought.

GENERAL COMMENTS

To the extent possible, we have organized our comments to first provide several general and overarching comments and recommendations and to then provide comments on the various subject area sections identified in the NOP/PIP. Please note that in some sections, our comments on one topic area will overlap with those in another topic area.

The EIR should clearly identify the scope of its review and the project purpose. Is the purpose of the project to provide water to existing development in Cambria during declared Stage 3 Emergencies only or is it meant to provide a permanent addition to the CCSD's baseload water supply portfolio? We recommend the EIR clarify these elements and that its evaluations be based on a clear project scope and purpose.

The EIR should use pre-project conditions as its baseline. We recommend that the EIR use the pre-project conditions at the site and in the surrounding area as the baseline conditions for its analyses. This is particularly important for reviewing the project for conformity to the LCP and Coastal Act, since the review needed for the CCSD's follow-up CDP is based on the conditions

that existed before issuance of the emergency CDP. An EIR that does not evaluate pre-project baseline conditions would have limited value in upcoming permit reviews and would likely result in the need for significant additional information and make for a less efficient review.

The EIR should consider a full range of project alternatives. The project as currently constructed and as proposed to be operated is likely to cause significant adverse impacts to a number of coastal resources, including adverse effects on coastal streams, wetlands, and sensitive habitat areas due to its proposed water withdrawals, on critical habitat for several listed species, on nearby public recreational areas, etc.

Given the likelihood of substantial impacts, we recommend the EIR evaluate several project alternatives that would avoid or minimize those impacts. As described below, several alternatives to the project as it is currently built and planned to be operated may result in fewer impacts and allow better consistency with relevant policies and requirements and be more in line with the state's drought response measures. Recommended alternatives include the following:

- **Repurposing the facility to directly treat CCSD wastewater:** The project is currently designed to extract and treat a varying mix of treated wastewater, intruded seawater, and groundwater. As noted in the project's Operations Manual, the majority of water extracted for the project may, at times, be treated wastewater originating from the CCSD's wastewater treatment system. With some minor changes to its pre-treatment and treatment systems, the facility would likely be able to treat direct discharges of treated wastewater from the CCSD system and inject that water into the upper aquifer. This alternative represents a minor conceptual change to the current project design and would provide about 500,000 gallons per day of source water year-round while avoiding impacts such as reduced streamflow and water quality, modified water regime in the estuary, etc., that result from the currently proposed project's extraction of water from the San Simeon Creek aquifer.
- **Removal of the evaporation basin and mechanical evaporators:** At current production levels, the project design appears to include an undersized evaporation basin and/or oversized mechanical evaporators, both of which are causing substantial effects to nearby habitat areas, species, and public uses, as described in our comments below. Given the relatively small volume of discharge to the basin, it appears that the basin could be replaced by five or six tanker trucks per day transporting the waste to a suitable offsite location. The expected discharge volume could be further reduced in response to some of the project limits described below – e.g., the CCSD having fewer water rights than needed, additional flows needed to support habitat functions, use for Stage 3 Emergencies only, etc. We recommend that the EIR evaluate an alternative to the project that includes, rather than an evaporation basin, a small detention basin that allows for daily or weekly discharge volumes to be transported to a suitable disposal site by tanker truck.
- **Combining offchannel storage opportunities with conducting project operations during high flow periods:** We understand the CCSD has received several offers for offchannel reservoir sites that, if combined with operating the project during periods of higher winter streamflows, could provide the expected volumes of water supply while avoiding the impacts associated with operating the project during low streamflow periods. We recommend the EIR describe these opportunities and evaluate the potential for a combination of water storage and high flow operations to provide an alternative to the proposed project.

- **Use of a temporary and “portable” solution:** The CCSD’s initial consideration last year to address its emergency situation was to bring in a temporary and portable facility that could be installed quickly and provide an immediate water supply. That solution was intended to be a limited and temporary response to abate the emergency situation and to provide water quickly, consistent with the purpose of the emergency permit. We recommend the EIR include a description and full analysis of this alternative, as it appears that it would result in fewer overall adverse effects and be more cost-efficient than the current project.

COMMENTS ON SPECIFIC SECTIONS OF THE NOP/PIP

Section 1.2 – Project Location

Property ownership: The NOP/PIP states that the project would involve two parcels – APN 013-051-024 and APN 013-051-008. However, the project description and the aerial view shown in the NOP/PIP’s Exhibit 2 are inconsistent with the County’s online parcel map and with the assessor’s maps of the area. The project boundary shown in Exhibit 2 appears to extend onto at least two other parcels – APN 013-061-004 and APN 013-381-007 – both owned by State Parks. Please provide an updated description of the project location that is consistent with the legal descriptions of all the involved parcels.

Parcel designations: We recommend that the EIR identify the land use designations and requirements of each of these parcels and describe how the project is consistent with these various designations and related requirements. The County’s online Parcel map system designates APN 013-051-024 as being within a Moderate Fire Hazard Area, Flood Hazard Area, Geologic Study Area, and Sensitive Resource Area, with Zoning and Land Use Elements that include a Coastal Zone Creek or Stream and Terrestrial Habitat. The Parcel map system designates APN 013-051-008 as being within a Mine Buffer Area and Moderate Fire Hazard Area and as zoned for Agriculture and Multi-Use Public. Parcel 013-061-004, owned by State Parks, is designated as both Moderate and High Fire Hazard, Coastal Zone Creek or Stream, Terrestrial Habitat, Flood Hazard Area, Geologic Study Area, Sensitive Resource Area, Seismic Safety, and Multi-Use Public. Parcel 013-381-007, also owned by State Parks, is designated as an Archaeologically Sensitive Area, both Moderate and High Fire Hazard, Coastal Zone Creek or Stream, Terrestrial Habitat, Wetland, FEMA Flood Hazard Area, Geologic Study Area, Sensitive Resource Area, Recreation, and Multi-Use Public. [Please also see our comments regarding LCP conformity in the Land Use and Planning section below.]

Section 1.4 – Project Characteristics

Baseline conditions: As noted above, the EIR should describe project characteristics as they relate to pre-project and pre-construction conditions.

Proposed and allowable project water volumes: Please clarify the project’s expected pumping, production, and mitigation flow volumes. As described below, it is currently unclear what volumes the proposed project is designed to produce and what volumes are available for the project. Based on a consistent and accurate assessment of available water volumes, the EIR should also describe the basis for the project’s proposed volumes – for example, it should describe how the CCSD selected the proposed production volumes for an emergency project, it should provide the basis for “up to 100 gallons per minute” of proposed mitigation flows, etc.

Our concerns about the project's proposed and allowable water volumes include the following:

- **Inconsistent project descriptions:** The NOP/PIP states that the project is expected to produce potable water at a rate of about 300 gallons per minute (gpm) over a period of up to six months (which would equal about 238 acre-feet), that it would pump up to 452 gallons per minute of treated water into a re-injection well, and that it would provide up to 100 gpm of mitigation water to San Simeon Creek Lagoon during project operations. These volumes, however, are not consistent with other project descriptions the CCSD has provided over the past year – for example, with production rates ranging up to 430 gpm, mitigation rates as low as about 70 gpm, etc.¹ We recommend the EIR's analyses be based on a consistent description of the project and its intended volumes.
- **Inadequate flows for critical habitat needs of listed species:** The project as proposed would withdraw water from the San Simeon Creek watershed during low flow periods, which would coincide with times that there may not be enough water in the creek to adequately support listed steelhead. The County has recently identified minimum needed flows for steelhead of about 0.5 cubic feet per second (or about 224 gallons per minute); however, the project as proposed would withdraw water at times when there may be little or no streamflow.² We recommend the EIR include an instream flow analysis to show the effects of the project operating at various streamflow rates and that it include a description of mitigation measures needed to provide the flow rates necessary to support the listed species. [See also our comments below on Land Use and Planning regarding the LCP requirement that the CCSD provide an instream flow study as part of any major water development.]
- **Inconsistent with available water rights:** The proposed water production volumes appear to be inconsistent with the CCSD's currently available water rights. We recommend that the EIR's project description and its associated analyses be based on the CCSD's currently authorized water rights, which are substantially less than the full amount of water the CCSD had been relying on for this proposed project and for its other ongoing operations.

As background, our understanding is that the CCSD applied some time ago for water rights of up to 798 acre-feet per year from the Santa Rosa watershed and up to 1230 acre-feet per year from the San Simeon watershed (which includes a maximum dry season diversion from San Simeon of no more than 370 acre-feet). We also understand, however, that the CCSD allowed those permits to expire several years ago without requesting a timely extension from the State Water Resources Control Board and that as a result, the CCSD is now authorized to use a total from both watersheds of less than half that amount.³ For the Santa Rosa watershed, the "perfected" amount is roughly 218 acre-feet per year instead of the CCSD's originally requested 518 acre-feet, and for the San Simeon watershed, the perfected amount is about 798 acre-feet per year, not the CCSD's originally requested 1230 acre-feet. Further,

¹ See, for example, descriptions in the CCSD's emergency CDP, its June 2014 Initial Study/Mitigated Negative Declaration, those provided to the Regional Water Quality Control Board during 2014 for the various required permits, etc.

² See, for example, *San Luis Obispo County Regional Instream Flow Assessment – Final Report*, by Stillwater Sciences, January 2014.

³ See the December 2010 letter and June 26, 2014 email correspondence from Division of Water Rights, State Water Resources Control Board to CCSD, both provided August 28, 2014.

the actual amount available in the San Simeon watershed appears to be somewhat less, based on the CCSD's contract obligation to provide approximately 200 acre-feet per year to a neighboring property.

We understand that the CCSD plans to file petitions with the State Board to request the necessary time extension to "perfect" the full amount of those previously requested water rights. However, those petitions are required to go through the State Board's public review process, which provides an opportunity for other water rights holders in the watershed to express any concerns, and includes a determination from relevant agencies as to whether the remaining instream flows are sufficient to protect habitat and wildlife species (included listed endangered and threatened species) in the San Simeon watershed. Available references show that both San Simeon and Santa Rosa Creeks are currently overdrafted and are unable to adequately support some species, including the federally-endangered steelhead.⁴ The Board's review may also result in development of mitigation measures that may be included as part of agency approved Adaptive Management Plans or Habitat Conservation Plans meant to protect those listed species.

Review of these petitions is likely to result in significant reductions not only to the CCSD's expected future water allocations, but to the amount of water the CCSD may be able to produce from its proposed project. This baseline question of how much water will be available affects several critical aspects of the project, and it appears premature to pursue a project that relies on water volumes from rights that apparently do not exist. We therefore recommend that the EIR analyses be based on no more than the current "perfected" water volumes available to the CCSD in both the Santa Rosa and San Simeon watersheds. Please note that the recommended alternative above regarding repurposing the project to directly treat the CCSD's wastewater may increase to some degree the water available for the project.

Project components – mitigation flows: The project, as currently designed and operated, discharges its stream mitigation flows to a point below grade more than 100 feet from the stream channel. It appears that some or all of those intended mitigation flows may not reach the stream channel, especially during dry periods when it is most critically needed and when it is more likely to sink into the lowered groundwater table. Please identify what proportion of the proposed mitigation flows are expected to contribute to stream flows and provide the basis for this evaluation. Please also identify what measures will be incorporated into the project to ensure that the full amount of needed mitigation flows contribute to stream flows. [See also our comments on the Hydrology Section below.]

Project components – evaporation basin and mechanical evaporators: Based on the facility's current layout and operations, the evaporation basin appears to be substantially undersized, as the basin is unable to fully contain the mist emitted from the evaporators, even during the relatively calm weather conditions the CCSD has identified as appropriate for evaporator operations. Please describe the considerations that led to this particular design and to the constructed size of the basin and evaporators, including the manufacturer's specifications regarding the appropriate design and use of these components – e.g., minimum sizes, maximum wind speeds, etc. As noted above, we have also recommended that the EIR describe project alternatives that do not include the existing basin and evaporators.

⁴ See, for example, the National Marine Fisheries Service's December 2013 *South-Central California Coast Steelhead Recovery Plan* and San Luis Obispo County's January 2014 *Final Regional Instream Flow Assessment*.

Additionally, we understand that the monitoring equipment used to identify whether wind speeds and temperatures allow for evaporator operation are in a location sheltered by trees. This likely results in the evaporators operating during higher wind speeds and different temperatures than intended. We recommend the EIR evaluate the effectiveness of the current monitoring as it affects operations and that it also consider more suitable and exposed locations for the weather monitors to provide more accurate data regarding those conditions.

Applicable permits/approvals/proof of legal interest: The EIR should describe all permits, approvals, and proof of legal interest required for the project. We recommend the EIR also describe the status of each permit or approval needed – e.g., whether it has been received, applied for, needs to be amended or modified, etc.

Section 2.0 – Environmental Checklist

To the extent possible, we have organized the comments below into the categories identified in the NOP/PIP’s Environmental Checklist. However, we have also noted that some of the project components and their associated impacts overlap into several categories, and we recommend the CCSD evaluate those components and impacts in each of the identified “overlap” categories.

1) Aesthetics: The NOP/PIP states that the project could substantially damage scenic resources and substantially degrade the existing visual character or quality of the site and its surroundings. The EIR should describe the pre- and post-construction visual qualities of the site and area, including two State Park campgrounds, a State Natural Preserve, two creeks and an estuary with their associated riparian and wetland habitats, and a scenic state highway. The EIR should also describe the visual effects on these areas expected during proposed project operations.

The NOP/PIP also states that the project would result in a “less than significant impact” as a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Given the project’s proximity to public recreation areas and sensitive habitat, it appears the project may cause significant impacts due to its additional lighting and due to glare associated with the evaporation pond and other components. We understand there have been several complaints about the views and glare, and we recommend the EIR include an analysis of the site and area lighting and glare under both pre- and post-construction conditions and during project operations. It should also describe all feasible mitigation measures available that would avoid or reduce the aesthetic impacts of the project, and please describe which of these are, or will be included in the project’s operating manual or Adaptive Management Plan.

2) Agriculture and Forest Resources: As noted above, at least one of the project parcels includes a designation for agricultural uses. We recommend the EIR describe the project’s consistency with that land use designation.

3) Air Quality: The NOP/PIP states that the project could result in a potentially significant impact due to violating an air quality standard or contributing to an existing or projected violation. The NOP/PIP also states that the project could result in a potential significant impact by contributing to a cumulatively considerable net increase of a criteria pollutant. Please describe the full range of the expected air emissions and releases and their relation to applicable air quality standards and potential violations. Please also provide a similar analysis of the air emissions that occurred during project construction, including emissions from heavy equipment, facility installation and testing, etc.

Additionally, and as noted earlier in this letter, it appears that the evaporation basin is too small to contain the mist generated by the project's mechanical evaporators. The EIR should describe the constituents in the facility's discharge to the basin and their concentrations, and should provide an assessment of known and potential effects of those constituents and concentrations on human health and on the area's ecological receptors.

4) Biological Resources: The project is currently sited in or near wetlands, riparian habitat, an estuary, and critical habitat for listed species, all of which suggests the project's continued presence and operations will have ongoing adverse impacts to those habitats and species unless properly mitigated. Overall, the EIR should include detailed descriptions of all sensitive habitats and species in and near the project site, the known and potential adverse effects to those habitats and species (e.g., due to noise, lights, toxics, the "attractive nuisance" of the evaporation basin, etc.) and evaluate all feasible mitigation measures and alternatives that would avoid or reduce those impacts. Specific examples include:

- **The project should ensure adequate streamflow to protect/maintain biological resources.** It appears that the project as currently proposed and operated will adversely affect fish and other aquatic species by further reducing the already significantly reduced flows in San Simeon Creek during critical flow periods. It is not apparent from the project's design or planning documents produced thus far whether the proposed project production and mitigation volumes recognized the biological needs in the creek and associated habitats. For example, the January 2014 San Luis Obispo County *Regional Instream Flow Assessment* identified the Environmental Water Demand for steelhead in San Simeon Creek as ranging from minimum flows of 1.5 to 1.6 cubic feet per second (cfs) in the spring to no less than 0.5 cfs in the summer. The proposed project would extract 400 to 690 gpm (0.891 to 1.537 cfs) while returning up to 100 gpm (0.223 cfs) as mitigation flows, which is less than half the minimum flow identified in this study. The EIR should describe how the project can contribute to or support the necessary adequate streamflows. As noted above, an alternative consisting of offchannel storage and operations during high flow periods may allow for the necessary streamflows.

We also recommend the EIR address the project's conformity to the December 2014 *South-Central California Steelhead Recovery Plan* published by the National Marine Fisheries Service. This Plan identifies the San Simeon Creek steelhead population as the highest priority area for recovery and also identifies groundwater extraction in the watershed as one of the highest threats to recovery. It may be necessary for the project to address and implement a number of provisions of the Plan in order to avoid "take" of this species.

- **The EIR should address the known and potential adverse effects to wildlife from exposure to discharges in and near the evaporation basin.** As noted above, the project's evaporation basin and mechanical evaporators appear to be causing several types of significant adverse impacts. Birds and other wildlife drawn to the "attractive nuisance" resulting from standing water in the basin may be exposed to toxic or hazardous levels of contaminants. We recommend the EIR describe those contaminants and their concentrations as they relate to published literature on toxic or hazardous effects on vegetation and wildlife, and that it evaluate all mitigation measures that would prevent exposure.

- **The EIR should identify project-generated noise levels and their effects on nearby avian breeding and nesting activities.** It appears that project-generated noise may exceed levels known to adversely affect avian breeding and nesting activities. The EIR should describe the project's noise levels as they relate to published literature on those effects and should describe alternatives or mitigation measures needed to avoid or reduce those effects, including, for example, non-operation of the mechanical blowers, non-operation during breeding/nesting seasons, etc. [See also our comments in the Noise section below.]
- **The EIR should include the CCSD's proposed Adaptive Management Plan.** We understand the CCSD is preparing an Adaptive Management Plan meant to address the project's known and potential effects on biological resources. We recommend the EIR include a draft version of this Plan, with a description of how implementation of the proposed measures is expected to avoid or minimize the various adverse effects on nearby species and habitats. We believe this is particularly important since the project is already operating and likely causing adverse effects – e.g., avian mortality noted in the evaporation basin, chlorinated discharges to surface streams, etc. – without having an approved Plan in place.

5) Cultural Resources: The NOP/PIP states that the project could have a potentially significant impact by causing substantial adverse changes to an historical or archaeological resource and by directly or indirectly destroy a unique paleontological resource. It also states that the project could have a less than significant impact due to its disturbance of human remains. As noted above, portions of the project site are designated as Archaeologically Sensitive Areas, and project construction to date has included grading and excavation that could have already resulted in disturbance or adverse impacts to these resources. The EIR should describe the measures that were in place during project construction to avoid or minimize these potential disturbances and should describe whether project construction was consistent with LCP policies related to cultural and archaeological resources. It should also describe any likely changes to the project as currently constructed and the potential for those changes to disturb these resources.

6) Geology and Soils: The project site is subject to high levels of seismic shaking, ground motion, and liquefaction. The EIR should identify the expected site-specific levels of each, and should describe how the project has been designed to provide stability and resist those forces. It should also describe the measures to be implemented should seismic activity cause spills, leaks, or other upsets. [See also our comments on Hazards and Hazardous Materials below.]

7) Greenhouse Gas Emissions: The NOP/PIP states that the project would have less than significant impacts related to direct or indirect greenhouse gas (GHG) emissions. The EIR should describe the project's expected electricity use and identify expected indirect greenhouse gas emissions that would result from the source of that electricity. It should also describe the volume of GHGs emitted during project construction and for each of the alternatives considered.

8) Hazards and Hazardous Materials: The NOP/PIP states that the project involves no impact or less than significant impacts related to hazardous materials. However, the project includes transport, storage, and use of a number of chemicals at the facility that could result in spills or releases, causing significant adverse effects to coastal resources. The EIR should describe the project's expected use of chemicals and other hazardous materials, including the maximum amounts of each that would be present on site and the methods of transport, storage, and handling that the CCSD will implement to prevent or minimize the risk of spills or upsets. The

EIR should also describe components of the facility's spill prevention plan, including methods of response, materials to be kept at the site to contain or clean up maximum possible spills, etc.

Our concerns about hazardous materials also include those related to the brine discharge and the mist generated by the mechanical evaporators. The EIR should describe both the pre-project maximum predicted concentrations of the discharge to the evaporation basin and the actual concentrations that have been identified through sampling and monitoring during recent project operations. It should also describe all measures implemented to avoid leaks or releases from the basin and the contingency measures in place should a leak occur. The contingency measures identified should be sufficient to address a release of the maximum possible volume and concentration of the discharge. As noted above, we also recommend that the EIR describe those concentrations as they relate to published literature on toxic or hazardous effects on vegetation and wildlife.

9) Hydrology and Water Quality: The NOP/PIP states that the project could result in several potentially significant impacts by violating water quality standards or waste discharge requirements, by substantially depleting groundwater or interfering with groundwater recharge, by creating or contributing to additional polluted runoff, and others. The EIR should include a detailed evaluation of each of these issues, particularly as they relate to maintaining the biological integrity of the nearby streams, wetlands, and estuary. This evaluation should also incorporate the concerns expressed above regarding the limited water volumes available to the CCSD due to species concerns and limited water rights.

We also recommend the EIR provide a detailed evaluation of potential project-caused changes to the San Simeon estuary. We have discussed this concern at our previous meetings and understand the CCSD is conducting studies to detail the expected hydrologic changes in the lower watershed and estuary – e.g., potentially creating a more saline baseline environment in the estuary, changes to water quality or flow conditions in the estuary, etc. This is particularly important since the estuary provides critical habitat for at least two listed species – the steelhead and tidewater goby – and this type of habitat modification could result in “take” of those species.

The NOP/PIP also states that several project components are likely to cause no impact or a less than significant impact; however, these do not appear to be accurate, as described below:

- **Little substantial alteration of the site's existing drainage pattern:** The project's evaporation pond represents several acres of new, non-permeable surface area within the project site that is likely to reduce surface and groundwater infiltration to nearby creeks, wetlands, riparian areas, and the San Simeon estuary. We recommend the EIR fully quantify the loss of this water to the nearby habitat areas.
- **Little risk of flood hazards:** The County has mapped portions of the project site as being within the 100-year or 500-year floodplain. The EIR should describe the extent of each area and their relation to the project components. It should also describe what mitigation measures are or will be included in project design and operation to avoid or minimize potential hazards due to these floods.
- **No risk of tsunamis and seiches:** Portions of the project site are subject to tsunami inundation as mapped on the 2009 California Geological Society Tsunami Inundation Map for this area. The site is also adjacent to San Simeon and Van Gordon Creeks, each of which

could allow seiches to travel into the project area. The EIR should describe the extent of the mapped tsunami inundation zone as it relates to project components, evaluate the potential for seiches to affect the project, and describe what mitigation measures are to be included in project location, design, and operation to avoid or minimize potential impacts due to tsunami runup and seiches.

10) Land Use and Planning: The NOP/PIP states that the project could have a potential significant impact due to its conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. We recommend that the EIR provide a full description of the applicable land use designations in and near the project area and the project's conformity or non-conformity to each. The EIR should also address the project's conformity or potential nonconformity with several applicable provisions of the County's LCP and Coastal Zone Land Use Ordinance (CZLUO), including the following:

- The County's North Coast Area Plan (NCAP) and its applicable provisions/standards and Combining Designations requirements, including those for *Geologic Study Area (GSA)* and *Flood Hazard (FH)* designations, Sensitive Resource Areas (SRAs), Environmentally Sensitive Habitat – Coastal Creeks (ESH-CC), and Terrestrial Habitat (TH).
- NCAP Planning Area Standards (Chapter 7) Community Wide Standards, including 2, 3, 4, and 5.
- NCAP Cambria Programs 11a, which requires the CCSD to prepare an instream flow study before proposing any major water supply project that relies on additional water supplied by San Simeon Creek.
- LCP Coastal Plan ESHA policies, including Policy 16, which requires development be sited away from wetlands and LCP ESHA Policy 21, which requires development be compatible with continuance of streams' habitat values.
- CZLUO, including Section 23.08.288, which requires that public utility facilities proposed for areas designated with prime agricultural soils, Environmentally Sensitive Habitats, Sensitive Resource Areas, or Hazard Areas must show that there are no on- or off-site feasible alternative locations, and must prepare a feasibility study that includes a constraints analysis and an analysis of alternative locations.

11) Mineral Resources: The NOP/PIP states that there are no expected impacts to mineral resources. However, as noted above, some of the project parcels are designated as being within a Mine Buffer Area. The EIR should describe the applicable requirements in that designated area and the project's conformity to those requirements.

12) Noise: The NOP/PIP states that the project would involve potentially significant noise impacts, including generation of noise above allowable levels and an increase in ambient noise levels. We recommend the EIR describe all project related noise as it relates to those allowable levels and as compared to pre-project levels. Because the project site is within critical habitat for several listed species and is adjacent to estuarine, riparian, forested, and other sensitive habitat types that may serve as breeding and nesting areas for various wildlife species, the EIR should evaluate the known or expected effects of project-generated noise on those species.

The EIR should also document any noise modeling conducted before or during project construction and project operations and any monitoring or sampling done to confirm the modeling. We recommend the noise data used in the modeling be collected from nearby sensitive receptors, including areas of riparian, wetland, and sensitive habitat types, as well as

nearby public use areas, including both nearby campgrounds. Finally, the EIR should describe all available mitigation measures that would avoid or reduce any noise-related effects – for example, either non-operation of the evaporators (as noted above) or conducting operations only outside of breeding and nesting season.

13) Population and Housing: The NOP/PIP states that the project would have no impact on inducing direct or indirect population growth. This would be consistent with the CCSD's statements that the project's long-term role in the CCSD's water supply portfolio is to provide water during Stage 3 Emergencies only. We recommend that the EIR evaluate this issue area consistent with the CCSD's selected project purpose and scope as described above.

The NOP/PIP also states that the project would have no impact on displacing existing housing. However, we understand there have been concerns expressed about the project's proximity to housing used by State Parks employees and the possible health effects caused by drift during use of the project's mechanical evaporators. Please describe the CCSD's involvement with State Parks regarding its nearby employee housing and any resolution of these concerns.

14) Public Services: Similar to the above, the project is not expected to change the necessary public services based on its purpose to provide an emergency water supply for existing development during Stage 3 Water Emergencies only. We recommend this issue be addressed consistent with the selected project purpose and scope.

We understand that the CCSD recently declared a Fire Emergency based in part on a County report identifying concerns about the large amount of dead or dying trees in the Cambria area, its relatively dense development pattern and water infrastructure that may not be fully available during large fires. We recommend the EIR describe what role the project might have in providing the community with additional fire response capability and that it describe any additional public service measures that may be needed to address that increased capability.

15) Recreation: The NOP/PIP states that the project would have no impact on increased recreational use and would not require construction or expansion of additional recreational activities. However, the project is adjacent to two State Parks campgrounds and other areas used for public recreation that are being adversely affected by the project's location and operations due to noise, brine drift, adverse visual effects, and other impacts. Project operations as currently proposed could require relocation or modification of those campgrounds or result in less public use of nearby recreational areas. As noted above, the project would also affect water quality and flows in San Simeon Creek and its estuary, which are used for public recreation. The EIR should describe the mitigation measures the CCSD will include or consider in response to these adverse project-caused effects on recreation.

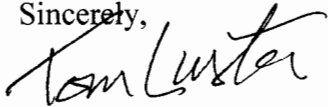
16) Transportation/Traffic: It appears that the project as currently proposed would have little effect on area traffic. However, as part of its Alternatives Analysis, the EIR should describe the amount of additional traffic that would result from the additional tanker truck traffic – i.e., up to five or six trucks per day – recommended as an alternative to use of the evaporation basin.

17) Utilities and Service Systems: Similar to the Population and Housing and Public Services sections above, we recommend the EIR base its analyses of utilities and services on the selected project purpose and scope.

CONCLUSION

Thank you for your attention to these comments. Please understand that we continue to support Cambria's efforts to plan for and implement both short-term and long-term solutions to its water supply issues, and we look forward to working with you on developing a project that is consistent with relevant Coastal Act and LCP policies. Please contact me at 415-904-5248 or tluster@coastal.ca.gov if you have any questions.

Sincerely,



Tom Luster
Senior Environmental Scientist

cc: Cambria Community Services District Board of Directors
San Luis Obispo County Planning Department – Airlin Singewald
State Parks – Nick Franco, Doug Barker, Vince Cicero, Mike Walgren
California Department of Fish & Wildlife – Annette Tenneboe, Vicki Frey, Margaret Paul
Central Coast Regional Water Quality Control Board – Ken Harris, Howard Kolb, Ryan Lodge, Harvey Packard, Thea Tryon, Chris Adair
State Board, Water Rights – Matthew McCarthy, Mitchell Moody
Department of Water Resources – William Croyle, Wendy Francis
National Marine Fisheries Service – Matt McGoogan
U.S. Fish & Wildlife Service – Jacob Martin, Lena Chang
Corps of Engineers – Kathleen Anderson

Steele, Noelle

From: Yoshioka, Janice@Wildlife <Janice.Yoshioka@wildlife.ca.gov>
Sent: Monday, April 06, 2015 11:46 AM
To: Robert Gresens (bgresens@cambriacsd.org)
Cc: Garcia, Rita; Jerry Gruber (jgruber@cambriacsd.org); Luster, Tom@Coastal; Barker, Doug@Parks; Matthew McGoogan (Matthew.mcgoogan@noaa.gov); Moody, Mitchell@Waterboards; McCarthy, Matthew@Waterboards; Cantrell, Scott@Wildlife; Connolly, Linda@Wildlife; Forsberg, Paul@Wildlife; Frey, Vicki@Wildlife; Marston, Dean@Wildlife; Paul, Margaret@Wildlife; Rosauer, James@Wildlife; Sanderson, Brandon@Wildlife; Single, Jeff@Wildlife; Vance, Julie@Wildlife; Tenneboe, Annette@Wildlife; Wilkins, Eric@Wildlife
Subject: Cambria Emergency Water Supply Project NOP, SCH 2014061073
Attachments: CCSD NOP, SCH 2014061073.pdf

Mr. Gresens:

Please see the attached letter. Hard copy to follow by mail.

If you have any questions, please contact Annette Tenneboe, Senior Environmental Scientist (Specialist), at (559) 243-4014, extension 231, or annette.tenneboe@wildlife.ca.gov.

Janice Yoshioka
Staff Services Analyst
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State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



April 6, 2015

Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, California 93428
E-mail: bgresens@cambriacsd.org

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Cambria Emergency Water Supply Project, Cambria Community Services District, San Simeon Creek and Lagoon, Van Gordon Creek, San Luis Obispo County, SCH No. 2014061073

Dear Mr. Gresens:

The California Department of Fish and Wildlife (Department) has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) on the Cambria Emergency Water Supply Project (Project). The Project is located at the Cambria Community Services District's (CCSD's) existing San Simeon well field and percolation pond system property (Assessor's Parcel Numbers (APNs) 013-051-008 and 013-051-024). The Project is designed and constructed to treat brackish water using advanced treatment technologies and recharge the CCSD's San Simeon well field aquifer with advance treated water. The brackish water source is a combination of diluted seawater that occurs from the subterranean dispersion of salts from a deeper saltwater wedge into an overlying freshwater interface zone, San Simeon Creek subsurface flow (creek underflow), and percolated treated wastewater effluent.

The Project is capable of pumping up to 452 gallons per minute (gpm) of advance treated water into a re-injection well located a minimum of two months travel time from existing potable production Wells SS-1 and SS-2. A 400 gpm maximum extraction rate from existing CCSD Well SS-1, SS-2, or a combination of both wells can occur during Project operations. The Project's net water production is approximately 300 gpm, or approximately 250 acre-feet over an assumed six-month dry season. The Project's operational period varies according to the amount and timing of seasonal rainfall and the water levels in the CCSD's well field. The Project proposes to provide up to 100 gpm of fresh water to San Simeon Creek Lagoon when operational.

Project operation is expected to provide water supply augmentation during dry periods, prevent both seawater intrusion into the groundwater aquifer and potential subsidence, and protect existing well pumps from losing suction.

Conserving California's Wildlife Since 1870

Potential Impacts: The Department believes that the Project has already resulted in direct and cumulative adverse impacts to fish and wildlife resources of the San Simeon Creek,, Van Gordon Creek, and the lagoon. These impacts include reducing instream flows needed to maintain fish and wildlife populations and habitat within and adjacent to these streams and lagoons. The implementation of the Advanced Water Treatment Plant to treat brackish water, the disposal of brine solution into the Evaporation Pond, and the disposal of treated brackish water into San Simeon Creek have exposed fish and wildlife to adverse chemicals and deleterious water quality. Project-site construction may have had additional impacts to fish and wildlife and their habitat.

These changes to flow and water quality may have substantially impacted the steelhead trout (*Oncorhynchus mykiss irideus*) in these streams. The South-Central California Coast Steelhead (SCCCS) Distinct Population Segment (DPS) is a State Species of Special Concern (SSSC), listed as threatened under the Federal Endangered Species Act (FESA), and the San Simeon Creek is designated by FESA as critical habitat for the SCCCPS DPS. The federally-endangered and SSSC tidewater goby (*Eucyclogobius newberryi*) is known to inhabit the lagoon and some upstream reaches, and would be similarly affected by water diversions. Impacts from water diversions and water quality changes may adversely affect other special status species dependent upon the San Simeon and associated lagoon and riparian corridor, including the SSSC and federally threatened California red-legged frog (*Rana draytonii*) and SSSC western pond turtle (*Emys marmorata*). The Department is concerned that the proposed Project may result in additional direct and cumulative adverse impacts to these and other valuable fish and wildlife resources supported by the San Simeon and Van Gordon creeks and their associated riparian, upland, wetland, and lagoon/estuary habitats.

The Environmental Impact Report (EIR) should address the following concerns and recommendations identified by the Department:

Prior California Environmental Quality Act (CEQA) Analysis: This Project has undergone prior environmental review and approval under CEQA for different permit processes by various agencies. On April 22, 2014, the CCSD submitted an application to the San Luis Obispo County (SLO County) for an Emergency Coastal Development Permit (E-CDP). A Mitigated Negative Declaration (MND)) for this Project was submitted to the State Clearinghouse (SCH# 2014061073) by CCSD on June 22, 2014. The purpose for the MND was to obtain a Regular Coastal Development Permit (R-CDP) as required by SLO County.

Pursuant to CEQA Section 21080(b) and CEQA Guidelines Section 15269(b)(c), CCSD submitted, on September 9, 2014, a Notice of Exemption – Emergency Project to the State Clearinghouse (SCH# 2014098136) which was approved by the Office of Planning and Research on September 12, 2014. CCSD was Lead Agency for the preparation of both the MND and Emergency Exemption.

The OPR's written concurrence with the Emergency Exemption stated that the Department had issued the necessary permits. This is incorrect. The Department had informed CCSD on multiple occasions that a Lake and Streambed Alteration Agreement (LSAA) would be necessary for the Project pursuant to Fish and Game Code Section 1600 et seq. However CCSD has not yet obtained an LSAA from the Department for any portion of the Project.

Recommendations:

The EIR should disclose all prior CEQA analysis for the Project including whether the MND was adopted by CCSD and a Notice of Determination was filed with the State Clearinghouse. The EIR should disclose all permits obtained by various Federal, State, and Local Agencies and whether a CEQA or a National Environmental Protection Act analysis was required for each of the permits.

The EIR should also disclose that the Emergency Exemption incorrectly stated that all necessary permits were obtained from the Department.

Flow Diversion and Analysis: The Project description proposes to withdraw 400 gpm (0.8912 cubic feet per second (cfs) or 645.6 acre-feet per year (afy)) from the San Simeon Creek aquifer via Well 9P7, plus additional water diversion in excess of 400 gpm to account for brine solution generated in the treatment process (page 4.9-8 of the MND). It is unclear what amount in excess of 400 gpm will be diverted from Well 9P7.

We recommend that the DEIR provide an accurate calculation of the actual subsurface flow extracted in excess of the 400 gpm for analysis of impacts to the San Simeon Creek and Van Gordon Creek surface and subsurface flows, Lagoon, and associated aquatic resources.

Water Rights: The State Water Resources Control Board's (State Water Board) Order dated October 22, 1996, approved a new development schedule and amended Permit 17287 to read: "Complete application of the water to the proposed use shall be made on or before December 31, 2005." It is our understanding from the State Water Board that CCSD did not fully develop the project and apply the water to the proposed use prior to December 31, 2005. It is also our understanding from the State Water Board that CCSD has not petitioned for another extension of time. Any petition for extension of time will require noticing and is subject to protest.

It is the Department's understanding from correspondence received from representatives for CCSD and discussions with State Water Board staff that a portion of the water that will be extracted from Well 9P7, treated, re-injected at Well RIW1, and subsequently diverted by CCSDs production Wells SS-1 and SS-2 is derived from

the subterranean flow of San Simeon Creek and will be extracted by Well 9P7 under the basis of a riparian right.

Recommendation:

Based on information we obtained from SLO County parcel maps, Well 9P7 appears to be located on APN 013-051-008 while Well RIW1 is located on APN 013-051-024 in close proximity to CCSD's production Wells SS-1 and SS-2. While APN 013-051-024 includes portions of San Simeon and Van Gordon Creeks, APN 013-051-008 is not adjacent to any watercourse and is therefore a non-riparian parcel.

The DEIR should clarify the location of the point of diversion, basis of right, place of use, and purpose of use for water diverted from Well 9P7. If that portion of water attributable to the subterranean flow of San Simeon Creek diverted by Well 9P7 is done so under the basis of riparian right, a Statement of Diversion and Use should be filed with the State Water Board pursuant to Water Code Section 5100 et seq. An accurate APN map overlay on an aerial map with Wells 9P7, RIW1, SS-1, SS-2 should be included with the DEIR.

San Simeon Creek Bypass Flows:

From the *Final Report January 2014 San Luis Obispo County Regional Instream Flow Assessment*:

Environmental Water Demand (EWD), using steelhead as target species.

	Spring	Summer	Notes
EWD estimate from field assessment (p. 16)	1.50 cfs	0.50 cfs	Additional flows may be needed to provide suitable lagoon habitat during closed sandbar conditions.
Modeled EWD (p. 24):	1.6 cfs	0.5 cfs	
From Alley, 1992:			Adult upstream migration requires 21 to 67.5 cfs; post-spawning downstream migration requires 7.2 to 19 cfs; downstream juvenile and smolt migration requires 3.5 to 11 cfs.
Van Gordon (p. 24):	0.4	0.2	

p. 21: "San Simeon Creek with a large drainage area, low gradient, and broad channel; it requires more flow to provide sufficient velocity to meet minimum habitat requirements."

CCSD proposed Water Supply Project:

- Would extract 400 (0.891 cfs).

- Would return 100 (0.223 cfs) as mitigation flows.

To meet Summer EWD minimum, CCSD would need to provide up to 0.5 cfs, or 224.416 cfs, assuming none of that 224 cfs is lost to subsurface flows. If flows are to be measured at the Highway 1 bridge (per San Luis Obispo County Flow Assessment report), CCSD would likely need to provide substantially more water to meet the recommended minimum flows.

CEQA Baseline Compliance/Tracer Study and Impacts to Santa Rosa Creek:

Although the Project has already been constructed, the EIR's impact analysis should be based on pre-project conditions and provide measures which fully avoid, minimize, or mitigate previous, current and future impacts to natural resources.

CEQA Guidelines Sections 15378(a) and (c) defines a Project as the whole of an action, including one subject to several discretionary actions by governmental agencies. One component of the Project's development was a tracer study for San Simeon Creek. The tracer study involved discontinuing well diversion by CCSD on San Simeon Creek while increasing well diversion on Santa Rosa Creek. However, CEQA analysis did not occur for the impacts of this action to Santa Rosa Creek and its associated fish and wildlife resources. Expected significant impacts to the Santa Rosa Creek and lagoon due to the tracer test included the drawdown of the surface and underground aquifer to the extent that the CCSD filed a temporary urgency change petition (TUCP) for a variance to Water Right Permit 20387 (Application 28158). The TUCP authorized a decrease in required minimum monitoring well levels in Santa Rosa Creek. Increased drawdown of the Santa Rosa Creek and lagoon can result in impacts to tidewater goby, red-legged frog, steelhead, and western pond turtle.

The Department had initially presumed that the TUCP variance would be addressed as part of the whole desalination project, in which placeholder language in the draft TUCP would have been updated when the CEQA document for that project was completed and approved.

Recommendation:

The EIR should clarify whether the above mentioned TUCP for Santa Rosa Creek was a stand-alone action that was not entirely dependent upon the larger desalinization project. If it was the result of the larger desalinization project then it should be included with the Project description.

Construction In Advance of CEQA Analysis: In addition to the tracer study described above, other Project components have been constructed in advance of CEQA review and approval. The NOP indicates that construction of the Project began

on May 20, 2014, and was completed on November 14, 2014. Testing and commissioning of the completed facility began on December 8, 2014, and was completed on January 20, 2015, when Project operations began.

Recommendation:

We recommend that the DEIR include an accurate description of all Project development activities, a discussion regarding pre-existing grading and structural development in connection with Project design plans (including but not limited to the construction of the injection and monitoring wells), and an appropriate discussion of all biological resources located within the Project area identified through biological surveys (including resources in Santa Rosa Creek).

We also recommend that the final MND include a Project description sufficient to accurately identify impacts to wildlife species and habitat, and measures which would mitigate impacts to such species to a less-than-significant level, including a discussion of potential impacts to sensitive species that may have already occurred as a result of previous unpermitted land disturbance activities in association with the Project.

Brine Discharge to the Ocean: The location of an existing pipeline that could be used to send unusable brine left over from the water treatment to be discharged into the ocean was disclosed in the MND (Photograph 8 of Appendix B). It is unknown whether this pipeline will be disclosed in the DEIR. The Department believes that if the Project description changes to include the discharge of brine solution directly into the ocean, significant impacts to marine aquatic resources would occur, warranting substantially different environmental analysis.

Recommendation:

The DEIR should disclose the existence of a pipeline that could be used to discharge to the ocean, and clarify whether or not discharge of brine solution into the ocean is being considered. If so, then the alternatives analysis section in the DEIR should include an analysis of discharging brine solution directly into the ocean.

Evaporation Pond: The Department believes the brine evaporation pond, as constructed, is an attractive nuisance to waterfowl and other avian species, bats, pond turtles, red-legged frogs, and general aquatic and terrestrial wildlife. Long-term evaporative concentration of salts in wastewater can create hypersaline conditions in the pond and pose risks to avian and other wildlife. Bird mortality due to salt crystallization in feathers and brine ingestion is known to occur in hypersaline industrial wastewater ponds (Meteyer et al. 1997, Sladky et al. 2004, Jehl et al. 2012). Aerial drift of wastewater can deposit salts and trace elements onto vegetation and soil adjacent to

the pond. Excessive salts deposited on adjacent land can kill vegetation and cause long-term damage to soils (Harris et al 2005).

Recommendations:

The DEIR should include an analysis of the effects of drift on biological resources in the surrounding area, and the effect of hypersaline water quality on wildlife.

We recommend that the Project description in the DEIR include the following measures to prevent access to the brine pond by both avian and terrestrial wildlife.

- The CCSD should retain the services of a wildlife hazing expert to coordinate with the Department and United States Fish and Wildlife Service (USFWS) to develop a plan to prevent birds and other wildlife from accessing and using the brine pond.
- The banks along the pond are currently gradual with shorebirds and other avian species observed walking and resting. The banks of the pond should be re-contoured to a much steeper slope to help prevent bird use.
- Frog fencing should be designed and constructed in consultation with and the approval of the USFWS and Department.
- A cable is strung across the pond which could be a perch for birds and a bird strike hazard. This cable should be removed.
- Five (5) floating dock-type structures, 3-feet by 3-feet, are currently in the pond that could be used for bird landing. These structures should be removed or measures implemented to prevent birds from landing on them.
- Algal blooms are a concern, and measures to prevent algal blooms in the pond should be implemented.
- One of the evaporation sprayers at the pond was observed spraying every few minutes and if birds were to be in spray zone they would be impacted in a deleterious way (salt encrustation). Measures to keep birds out of the salt spray zone should be developed and included in the DEIR.
- The design for the frog fencing around the perimeter of the brine pond was observed to be two (2) feet high with a mesh approximately 1/8-inch square. The DEIR should provide documentation that this fence was constructed with approval from the USFWS as an effective measure to prevent red-legged frogs from entering the pond.

Water Quality: The EIR should provide a list of all the potential chemicals of concern for ecological receptors that could be associated with the evaporation pond, waste water percolation ponds, or with any discharges and include anticipated concentrations

of the potential chemicals of concern. The ecological toxicity benchmarks for all the potential chemicals of concern should be researched and included in the EIR. Additionally, anticipated water quality parameters such as electrical conductivity, dissolved oxygen, and pH should also be evaluated for potential impacts to ecological receptors. The Department is specifically concerned with the potential for elevated salts in the evaporation pond (and potentially with the percolation ponds) and recommends use of electrical conductivity as a method to evaluate potential impacts to ecological receptors due to elevated salts. The Department is also concerned about the potential for algal blooms to form in the surface impoundment and/or percolation ponds and believe this should also be evaluated in the CEQA document.

The Department believes it is likely that chemicals of concern that exceed ecological toxicity benchmarks and poor water quality will exist in the surface impoundment and potentially in the percolation ponds such that wildlife hazing is necessary to help minimize wildlife use of these areas. As stated above, we recommend the DEIR evaluate wildlife hazing options and suggest a hazing expert be contracted by CCSD to coordinate with the Department and the USFWS to develop a plan to prevent wildlife from accessing the brine pond.

Department Jurisdiction

Responsible Agency Authority: The Department has regulatory authority over activities occurring in streams and/or lakes along with riparian habitat associated with and supported by watercourses, that could adversely affect any fish or wildlife resource, pursuant to Fish and Game Code Section 1600 et seq. If a Project could substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake; or deposit or dispose of debris, waste, sediment, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake; notification of Lake or Streambed Alteration to the Department is required.

Acquisition of a Lake and Streambed Alteration Agreement (LSAA) for this Project is required for water diversion and rediversion. For projects of this nature consultation with the Department is recommended well in advance of Project implementation. The Department recommends that CCSD submit a Notification of Lake or Streambed Alteration to the Department immediately; a substantial diversion of water from a jurisdictional feature is subject to Fish and Game Code (Code) Section 1600 et seq., and failure to notify is a violation of the Code. It is important to note that the Department is required to comply with CEQA in the issuance or extension of an LSAA. For this particular Project, the Department would be acting as a Responsible Agency and would need to rely upon the CEQA document prepared for the Project. If the CEQA document prepared by the Lead Agency (CCSD) is insufficient for the Department to make its own Findings or Notice of Determination, the Department might need to assume the role of

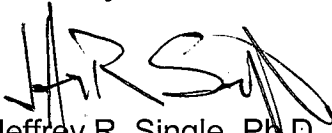
Robert Gresens
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Page 9

Lead Agency and prepare a subsequent CEQA document. The LSAA process is administered through the Central Region Office in Fresno and can be initiated by contacting the Lake and Streambed Alteration Program at (559) 243-4593.

Bird Protection: The Department has jurisdiction over actions which may result in the disturbance or destruction of active nest sites or the unauthorized "take" of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful "take," possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the "take," possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful "take" of any migratory nongame bird). In the event that Project-related vegetation removal will occur, it is advised that appropriate avoidance and minimization measures for raptors and other nesting birds potentially present in the Project site vicinity be addressed in the DEIR. Appropriate measures to prevent avian use of the brine evaporation pond should be incorporated into the DEIR and implemented by CCSD, in consultation with the Department.

If you have any questions regarding these comments, please contact Annette Tenneboe, Senior Environmental Scientist (Specialist), at (559) 243-4014 extension 231; annette.tenneboe@wildlife.ca.gov, or by writing to the California Department of Fish and Wildlife at 1234 East Shaw Avenue, Fresno, California 93710. Please feel free to forward this letter as appropriate.

Sincerely,



Jeffrey R. Single, Ph.D.
Regional Manager
California Department of Fish and Wildlife, Central Region

cc: Ms. Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, California 92618
E-mail rgarcia@mbakerintl.com

ec: See Page Ten

Robert Gresens
April 6, 2015
Page 10

ec: Jerry Gruber, General Manager
Cambria Community Services District
jgruber@cambriacsd.org

Tom Luster, California Coastal Commission
Tom.luster@coastal.ca.gov

Doug Barker, Department of Parks and Recreation
Doug.barker@parks.ca.gov

Matthew McGoogan, National Oceanic and Atmospheric Administration
Matthew.mcgoogan@noaa.gov

State Water Resources Control Board
Mitchell Moody, Mitchell.moody@waterboards.ca.gov
Matthew McCarthy, Matthew.mccarthey@waterboards.ca.gov

State Clearinghouse, state.clearinghouse@opr.ca.gov

California Department of Fish and Wildlife
Scott Cantrell
Linda Connolly
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Vicki Frey
Dean Marston
Margaret Paul
James Rosauer
Brandon Sanderson
Jeffrey Single
Julie Vance
Eric Wilkins

References:

Alley, D. W. 1992. Monitoring report, 1991-1992, Lagoon water quality for fish, streamflow measurements and sandbar conditions in San Simeon Creek, San Luis Obispo County, Calif. Report prepared for Cambria Community Services District by D.W. Alley & Associates, Brookdale, California. 47 pp.

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Sladky, KK, FJ Dein, P Ramirez and CF Quist. 2004. Investigation of migratory bird mortality associated with exposure to soda ash mine tailings water in southwest Wyoming. Unnumbered Final Report, Biological Resources Division, US Geological Survey, National Wildlife Health Center, Madison, WI. 46pp.

Steele, Noelle

From: Barker, Doug@Parks <Doug.Barker@parks.ca.gov>
Sent: Monday, April 06, 2015 7:58 PM
To: Luster, Tom@Coastal; Bob Gresens; Garcia, Rita
Cc: Airlin Singewald -- SLO County; Tenneboe, Annette@Wildlife; Paul, Margaret@Wildlife; Harris, Ken@Waterboards; Kolb, Howard@Waterboards; Lodge, Ryan@Waterboards; Packard, Harvey@Waterboards; Tryon, Thea@Waterboards; Adair, Chris@Waterboards; McCarthy, Matthew@Waterboards; Moody, Mitchell@Waterboards; Croyle, William@DWR; Francis, Wendy@DWR; Matt McGoogan -- NMFS; Jacob Martin -- USFWS; 'Lena Chang' (lena_chang@fws.gov); Gutierrez, Brooke@Parks; Kathleen Anderson [Kathleen.S.Anderson@usace.army.mil] (Kathleen.S.Anderson@usace.army.mil); Grennan, James@Parks; Cicero, Vince@Parks; Walgren, Mike@Parks; Andreano, Lisa@Parks
Subject: State Parks Comments on Cambria water supply project NOP
Attachments: Cambria Emergency Water Supply Project NOP DPR Comments 04-06-2014.pdf

Hello,

Attached are State Parks comments on the Cambria water supply project NOP.

Thank you for the opportunity to comment.



DOUG BARKER
District Services Manager
California State Parks
San Luis Obispo Coast District
750 Hearst Castle Rd.
San Simeon, CA 93452
Office: (805) 927-2119
Fax : (805) 927-2031
Cell : (805) 264-7475
e-mail: Doug.Barker@parks.ca.gov



Please note: State Parks e-mail addresses have changed. My new e-mail is Doug.Barker@parks.ca.gov. Thank you.

Our State Parks Mission:

To provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor education.



DEPARTMENT OF PARKS AND RECREATION
San Luis Obispo Coast District
750 Hearst Castle Road
San Simeon, CA 93452
(805) 927-2065 telephone
(805) 927-2031 fax

Lisa Ann L. Mangat, Acting Director

April 6, 2015

Ms. Rita Garcia, Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Re: NOP/NOI of Draft EIR/EIS for Cambria Emergency Water Supply Project
SCH #2014061073 - Comments Letter

Dear Ms. Garcia,

State Parks (DPR) is providing the following comments for an “after-the-fact” coastal development project that was constructed under an “emergency permit” from the San Luis Obispo County Planning Department. The Cambria Community Services District (CCSD) now seeks a regular coastal development permit (CDP) from the Coastal Commission and is preparing a Draft Environmental Impact Report (DEIR) required for the CDP. As will be documented below, the DEIR is insufficient due to the project’s federal nexus and a Notice of Intent for a Draft Environmental Impact Statement (DEIS) will also need to be prepared under the National Environmental Protection Act, as required by federal law.

In the latter half of 2014, the Project installed underground pipelines and other permanent infrastructure to operate an “advanced water treatment plant” (AWTP) including reverse osmosis (RO) filtration, a brine evaporation pond, new monitoring wells, and a discharge pipe adjacent to San Simeon Creek and its lagoon. As currently configured, the project’s supply well (#9P7) pumps essentially fresh water that will become brackish over time due to sea water intrusion and blends it with percolated secondary effluent and processes the blend through the AWTP for aquifer recharge upstream. CDM Smith, (the CCSD’s contracting engineer) acknowledged that the project would impair the fresh groundwater source [well #9P7], which in turn will require advanced treatment, as well as direct recharge of the anticipated depleted levels of the San Simeon Creek lagoon (Title 22 Engineering Report, CDM Smith, page 1-5). The project pumps up to 452 gallons per minute from the aquifer and in order to mitigate the lagoon draw-down, recharges the San Simeon Creek up to 100 gallons per minute when operational, The project reportedly produces 300 gallons per minute of treated water supply to CCSD customers when operational, or 250 acre feet over a six month dry season.

Ms. Rita Garcia, Technical Manager, RBF Consulting
April 6, 2015
Page 2

The original design called for brine disposal using an undersized brine pond and five blowers/vaporizers intended to remove moisture from the waste bi-product of the AWT plant. Solid waste removal was never considered. Following construction, the brine pond has become an attractive nuisance for migratory water fowl and California red legged frogs. It is well documented that the pond is a routinely used by migratory fowl as a stop-over. At least two avian mortalities have been documented. The blowers have not operated in accordance with permit requirements, and routinely result in mist drift off of CCSD property. During testing, the blowers have resulted in several noise complaints from State Parks campers, Rangers, and neighbors. Discussions with the manufacturer of the evaporator fans have indicated that the fans were never intended for use in a residential area or adjacent to a public-use area. Their uses have been limited to natural gas fracking ponds and similar industrial applications.

An alternate brine disposal method utilizing an off-shore brine discharge pipeline into the Monterey National Marine Sanctuary was disclosed in the prior Mitigated Negative Declaration (MND) and has been considered as an alternative. The DEIR/DEIS should fully disclose this alternative method of brine discharge and fully evaluate it.

In January, the San Simeon lagoon recharge [outfall] pipe was moved by CCSD or its contractors from the rocky apron adjacent to San Simeon Creek to Van Gordon Creek and was independently testing showed elevated levels of chlorine, in violation of Regional Water Quality Board (RWQCB) permit requirements. After a notice of violation was issued by the RWQCB, the CCSD moved its outfall pipe back to the required rocky apron, but then, high levels of Strontium were detected in the natural preserve. At least two fish mortalities have been documented in San Simeon Creek.

DPR operates Hearst San Simeon State Park and the Cambria State Marine Park and is statutorily designated as a trustee agency and is responsible for protecting the natural and cultural resources that are within units of the State Park System. Those resources are "held in trust for the people of the State of California." Title 14, California Code of Regulations, section 15386.

This trustee responsibility extends to all of the flora and fauna as well as the cultural resources within the parks under Public Resources Code section 5019.53. Because the project acknowledges impacts including depleted lagoon levels that require recharging, as well as impairment of the fresh ground water in the aquifer, there are direct impacts to resources that DPR as well as the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS), NOAA, and the National Marine Fisheries Service (NMFS) are responsible for protecting.

As noted in the prior IS/MND, the San Simeon Creek and Van Gordon Creek lagoon system contains a number of sensitive plant and animal species, including federally listed steelhead salmon, Tidewater goby, California red-legged frog, western pond turtle and the lagoon sandbar and adjacent beach are nesting sites for the western snowy plover.

As stated, this project has a clear and documented federal nexus. As of August 31, 2013, the U.S. Army Corps of Engineers (USACE) had provided \$3.9 million of federal funds for this project (see attached letter from the Department of the Army dated September 24, 2014 to Bob Gresens/CCSD. On August 7, 2017, CCSD engineer Bob Gresens stated that

“Prior to the start of the emergency water supply water, a considerable effort was spent in exploring various water supply alternatives for the community of Cambria, including preliminary engineering analyses and an extensive series of publicly facilitated workshops in 2012. These earlier project efforts were federally funded and completed through an existing Army Corps of Engineers Water Resources Development Act project. Results of the 2012 Army Corps workshops and preliminary design efforts were summarized in a [November 27, 2013 technical memorandum](#), which was commissioned directly by the Army Corps and is available at the Cambriacsd.org web site. This earlier design and workshop effort found that a brackish water supply alternative on the CCSD’s San Simeon Creek property would be the most technically feasible alternative (aka Alternative 5 of the.2013 Technical memorandum).

In response to the current drought emergency, the earlier Army Corps brackish water alternative was further modified to allow for it to be completed as a fast-tracked emergency water supply project. ... The CCSD plans to follow up in completing a permanent Army Corps project as future federal funding becomes available to the Corps. A future follow up permanent project may include: completion of a building to enclose and better protect the equipment; process modifications to make the Advanced Water Treatment plant more efficient; completing a discharge pipeline and treatment additions for the reverse osmosis reject water, which could then comply with surface water discharge requirements, thus relegating the current project’s evaporation pond to a backup role; and, installation of solar arrays to offset the project’s electrical demand and further mitigate for greenhouse gas emissions”.

Page ES-1 of the Executive Summary of the CDM Smith Technical Memo dated 11/17/2013 states that the Los Angeles District of the U.S. ACE entered into a partnership agreement with the CCSD to prepare, design, and provide construction assistance for a new seawater desalination facility for produce 602 acre feet of potable water for the CCSD over the dry months from May 1st to October 31st. The CCSD Board later decided to reduce the capacity from 602 acre feet to 250 acre feet. The CCSD Board selected one of eight “Tier 2 alternatives” (the “San Simeon Creek Road Brackish Water” alternative) listed in the CDM Smith Technical memo. CDM Smith received partial funding for the design and construction of the San Simeon Creek Road Brackish Water plant from a USACE national project fund. When a federal nexus exists between a federal agency and a state or local agency, compliance with NEPA is required. A federal nexus is present when a federal agency provides federal financial assistance for a specific project. See e.g. Historic Preservation Guild v. Burnley, 896 F.2d. 985 and Ramsey v. Kantor, 96 F.3d 494 (9th Circuit 1996).

With regard to the current NOP, and the cultural resources section 5 of the environmental checklist, the project area is known to contain multiple archaeological sites. In 2005, archaeological surveys and assessment reports were completed by Cultural Resources Management Services (CRMS) for Padre Associates, an environmental firm charged with completion an Initial Study Environmental Assessment to assess the impacts that may result from a Geotechnical and Hydrological Study for the proposed Cambria Desalination Plant. This report was completed to be in compliance with the California Environmental Quality Act (CEQA). It does not meet the requirements of Section 106 of the National Historic Preservation Act (36 CFR 800) as it must for this project due to the receipt of federal funding. The entire project in its current iteration must be reviewed for impacts to cultural resources under Section 106 of the National Historic Preservation act (36 CFR 800) which requires federal agencies to consider the effects of projects they carry out, approve, or fund on historic properties.

This should include minimally:

- The gathering of information needed to decide which properties in the area that may be affected by the project are listed, or are eligible for listing, in the National Register of Historic Places (referred to as "historic properties") to this end, the area should be re-surveyed for archaeological resources and all site boundaries clearly defined.
- In order to determine how those historic properties might be affected, the Area of Potential Effect (APE) must be clearly defined. This should include not only the construction sites and trenching locations, but also staging areas and access points and roads.
- Consultation with the appropriate local Native American tribes must be initiated as soon as possible and be on-going throughout the construction and post construction assessment phase.
- Additionally, federal agencies must provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on such projects prior to the agency's decision on them.

When a federal nexus exists, agencies are required to explore measures to avoid or reduce harm ("adverse effect") to historic properties and reach agreement with the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO) and in some cases, the ACHP on such measures to resolve any adverse effects to historic properties. In the case of this project, which has been completed under an emergency permit, grading in and among several archaeological sites occurred and damaged historic resources. In accordance with 36 CFR 800 the damages to the archaeological sites must be assessed and documented by a qualified archaeologist and a proper §106 consultation filed.

With regard to remaining sections of the NOP and environmental checklist:

1. AESTHETICS

- a. Disagree. The project carries potentially significant unless mitigated because Park users can now see the facilities and percolation pond from the lower and upper campground as well as along the trail between the two campgrounds and from Highway 1, the federally designated National Scenic Byway. See U.S. Department of Transportation designation.
- d. Disagree. The project carries potentially significant unless mitigated because glare from surface of pond impacts the views from the lower and upper campground as well as along the trail between the two campgrounds. Lights at night would disturb the tranquil country feel associated with camping.

3. AIR QUALITY

- a. Disagree. Potentially significant impact from the mist created by water fans using brine water. This mist contains several contaminants of concern that would reasonably be expected to be inhaled by campers, hikers, workers, residents, and travelers on San Simeon Creek Rd.
- b. Agree. Chemical constituents in the drift mist are unsafe for humans, wildlife and plant species.
- c. Disagree. Potentially significant impact. Park users and workers, which represent a substantial number of people, will likely be exposed to odors from pond and drift mist.

4. BIOLOGICAL RESOURCES

- a. Agree. There will likely be direct and indirect take of listed species (California red-legged frog, tidewater goby, Southern steelhead, southwestern pond turtle, San Simeon salamander, Western snowy plover, two-sided garter snake), and migratory birds. There may be impacts to the lagoon mouth and beach (Western snowy plover critical habitat and *Suaeda californica* habitat).
- b. Agree. There will likely be serious impacts to riparian habitats. Alteration of salt content within the aquifer is a concern as well as draw down of the fresh water and changes in flow. The chemical constituents of the water entering the riparian areas may impact the sensitive riparian, Monterey pine, and salt marsh communities.
- c. Agree. Draw down, intrusion, and chemical discharge events can be expected to substantially adversely effecting San Simeon Creek, lagoon, and salt marsh.

- d. Agree. Impacts to many species, resident and migratory, are likely to occur. Potentially impacted include, but aren't limited to: Southern steelhead, Tidewater goby, sticklebacks, Southwestern pond turtle, California red-legged frog, tree frogs, San Simeon slender salamander, Western snowy plover, benthic macro invertebrates, migratory and resident bird species. Nursery sites for fish and turtles, as well as wintering and nesting habitat for birds, etc. may be impacted. Additional impacts could occur without a plan to eliminate invasive species from the project. The project should have an invasive species control plan to prohibit the introduction of invasive species (bullfrogs, mosquito fish, carp, etc.).
- e. Agree. This violates many laws, policies, guidelines, management and recovery plans. The impacted lands are part of the San Simeon Preserve, which prohibits the extraction of resources for commercial uses, as this project proposes. The impacts also violate state, county, and federal regulation and laws protecting biological resources.
- f. Disagree. Potentially significant impact. This will likely violate the Local Coastal Plan, California Fish and Wildlife and US Fish and Wildlife habitat and recovery plans. This project violates recovery plans for steelhead trout, California red-legged frogs, and tidewater goby. The project may be contrary to the recovery plans and critical habitat of the Western snowy plover, as well as *Suaeda californica*. Finally, the project impacts a state park, as well as a state natural preserve, each of which have provisions for habitat conservation.

6. GEOLOGY AND SOILS

- a 1. Disagree. An active fault line occurs just off shore near the project site, the San Simeon Sector of the Hosgri Fault Zone. If there was an earthquake on the site, unconsolidated alluvial deposits (gravel, sand, clay, and silt) have the potential to be subject to liquefaction.

8. HAZARDS AND HAZARDOUS MATERIALS

- a. Disagree. Potentially significant impact. Accumulation of contaminants in impoundment pond will need to be removed from the site; brine constituents in air mist also pose a hazard.
- b. Disagree. Heavy metal and other constituents pose a potentially serious hazard to public safety. This has a potentially significant because of the possibility that the levee on the brine pond may become compromised by an earthquake (liquefaction), tsunami, or damage by rodents. There is no plan in place for removal of the sludge from the brine pond once it reaches capacity. Damage could occur to the brine pond lining during the cleaning process which could

- c. release toxic substances into the environment. There is no process in place to monitor the brine pond for leakage, and since there was no leak test performed to the whole liner area it is unknown if the liner is sound.
- d. The project is located on a site which **should** be on the list of hazardous materials site pursuant to Gov. Code 65962.5 because of documented high nitrate concentration due to the old unlined percolation pond used by CCSD
- h. Disagree. The project has a "potentially significant unless mitigated" impact on potential wildfire by placing an industrial facility and associated equipment, etc. adjacent to a diseased and senescing forest of Monterey pine. This forest is primed for fire and exists along the Wildland Urban Interface with the community of Cambria. Mitigation should include vegetation abatement, emergency firefighting equipment and proper signage.

9. HYDROLOGY AND WATER QUALITY

- b. Agree. Additionally, lower runoff during dry years may exacerbate salt water intrusion potentially affecting resources along the narrow, shallow ground water basing in the lower creek. The South-Central California Steelhead Recovery Plan (2013) states that groundwater withdrawal has the potential to adversely affect the groundwater table that contributes to and maintains estuarine water levels. This variation may potentially impact fisheries. Quantitative goals will need to be set for the distribution and abundance of steelhead. This information may not currently exist for the river/lagoon system. San Simeon Creek is classified as a Core 1 population in the recovery plan, the highest priority for species recovery.
- c. Disagree. The project has a potentially significant impact because the project has already caused erosion as documented in the RWQCB notice of violation report. The existing diffusion pit for the lagoon recharge water could easily transport silt into San Simeon Creek when it overflows. Overflow of the diffusion pit has already been observed causing silty water to flow towards San Simeon Creek. The illegal discharge of water into Van Gordon Creek resulted in substantial erosion and siltation into San Simeon Creek. Disagree. Given the lack of available data and appropriate studies, as well as a lack of a long sought in-stream flow study, potentially significant impacts are possible. Only through extensive analysis of appropriate data could this impact be shown to be less than significant This past action needs to be evaluated as potentially significant under the EIR/EIS.
- d. Disagree. The project has a potentially significant impact because water for the lagoon recharge which is released into the diffusion pit has substantially increased the rate and amount of surface run-off both onsite and offsite.

- g. Disagree. The project has a potentially significant impact because State Park housing **does** exist in the boundary of the Flood Hazard Map
 - i. Disagree. The project has a potentially significant impact because it would expose people to risk in the event of a levee failure. Campground is directly down stream of brine pond and during a high tide event the escaped pond water could flow into low lying camping sites.
 - j. Disagree. The project has a potentially significant impact because the project is in a tsunami flood zone and a tsunami could wash over or around the brine pond causing the levee to break. Tsunami inundation should be addressed since the area is within the inundation zone
12. NOISE
- a. Agree. The applicable standards of state parks require quiet hours between 10:00 pm and 9:00 am. The project as currently in existence violates county noise regulations on maximum day and night noise levels.
13. POPULATION AND HOUSING
- b. Disagree. The project has a potentially significant impact on growth. CCSD Board members have already referred to the Emergency Water Project as a new water source. Therefore, the development of a new water supply will result in the issuance of new building permits and will be growth inducing. Additional infrastructure will be required. This project EIR/EIS must address the potential for the new water source to influence a higher growth rate, new development, delivery of water to those on the wait list and with will-serve letters. The influence of this new water source on new development must be addressed on a parcel by parcel basis, as well as cumulatively
15. RECREATION
- a.. Disagree. The project has a potentially significant impact because it project creates substantial adverse physical impacts on park views, visitor experiences, noise, and hydrologic function in a state park as well as a state natural preserve.
 - b. Disagree. The project has a potentially significant impact because it creates noise, visual, and contaminant impacts on two adjacent state residences.
16. TRANSPORTATION
- c. Disagree. The project will have a potentially significant impact because the project has discussed alternatives for removing brine water, including transportation of brine discharge. 8 tanker trucks per day would be required to pump out and remove the brine water. This daily traffic on the rural San Simeon Cr. Rd. would increase noise and traffic.

- d. Disagree. The project will have a potentially significant impact because the transportation alternative of brine removal will increase daily traffic on the rural San Simeon Cr. Rd. and will increase noise levels.

17. UTILITIES AND SERVICE SYSTEMS

- a. Disagree. Potentially significant impacts. The project has already violated allowable chlorine levels in water discharged to San Simeon Creek. A number of contaminants of concern are located in the brine water and the injection water.
- b. Disagree. Potentially significant impacts. The CCSD has indicated that adequate amounts of water may not be available and that other water rights need to be explored. Until these issues are resolved the impacts must be considered potentially significant. Also, a discussion of other water projects currently being pursued by the CCSD, or on behalf of the CCSD, must be discussed in connection to the current project (i.e. Santa Rosa Cr. and any others).
- e. Disagree. Potentially significant impact. Until the project addresses the potential for new development in Cambria, the impact on wastewater treatment cannot be assumed to be less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE

- c. Disagree. Potentially significant impact. This project could have substantial direct and indirect impacts to public health and safety, from the direct impact of mist contaminants and creek contamination.

GENERAL COMMENTS AND CONCERNS

1. WATER QUALITY MONITORING

- a. Discharge should be monitored and sampled daily
- b. Daily DO and Flow data (permanently installed devices with downloadable data)
- c. Monthly water quality monitoring (DO, conductivity, sediment, stream flow, etc.) should be required
- d. Need for up and downstream monitoring data

2. DISCHARGE

- a. Chemical discharge events have already been documented.
- b. Need for a discharge management and monitoring plan.
- c. Monitoring of discharge should be done daily

3. SALT WATER INTRUSION. As stated above, lower runoff during dry years may exacerbate salt water intrusion potentially affecting resources along the narrow, shallow ground water basing in the lower creek.

4. IMPOUNDMENT POND

- a. Not large enough to catch and contain drift
- b. Chemical constituents are a threat to natural resources and public health
- c. Huge attraction for wildlife which will likely perish once in contact with the water
- d. Location is unsuitable
- e. Removal of toxic sediment accumulation?
- f. Birds can get sucked into blowers when they shut off
- g. Need for a pond monitoring and management plan

5. NOISE

- a. Noise has already documented impacts to and park visitors
- b. The project need for a noise management and monitoring plan

6. REVENUE IMPACTS

- a. Operations will likely impact state park campground revenue and visitor use. Project Conditions must include the cost of relocating the San Simeon Campground, presently estimated at a value of \$35,000,000.

7. PUBLIC HEALTH AND SAFETY

- a. Exposure to drift mist must be addressed.
- b. Exposure to discharge must be addressed.
- c. Diminished ability for state parks to provide for the health and inspiration of visitors must be mitigated.

8. WATER STORAGE RESEVOIRS

- a. The project must be required to include large above ground water storage reservoirs in addition to the fresh water extraction and treatment that is proposed.

9. AIR QUALITY

- a. The project must have an air quality management and monitoring plan, including analysis of contaminants, and not be merely limited to particulates.

Ms. Rita Garcia, Technical Manager, RBF Consulting
April 6, 2015
Page 11

10. IMPACTS TO A STATE LISTED PRESERVE – must be avoided, or mitigated by means of a habitat conservation plan.
11. IMPACTS TO VEGETATION - a. Water level and quality impacts to salt marsh, lagoon, and Monterey pine forest must be evaluated and addressed in the EIR/EIS.
12. IMPACTS TO WILDLIFE - must be avoided, or mitigated by means of a habitat conservation plan.
13. COMPLETE PROJECT DESCRIPTION - A clear description of all modifications from the original county "emergency" permit should be stipulated. Further alterations to the existing "emergency" permit should be stipulated. In addition, impacts of the operations from Day 1-onward, under the "emergency" permit, should be analyzed and discussed; mitigation of all violations and impacts should be provided to make these impacts fall below the threshold of "potentially significant impact."

The above impacts must be modified and accurately described as stated above, and evaluated in a joint EIR/EIS. Thank you for the opportunity to comment.

Sincerely,



Brooke Gutierrez
Acting District Superintendent

JACOB T. GUTIERREZ PUBLIC SAFETY SUPERINTENDENT
FOR

Enclosures

cc: DPLA Environmental Review Unit, California Department of Water Resources
Mr. Daniel J. Osanna, Manager, State Parks Acquisitions Resource Svcs. Section
Mr. Robert C. Gresens, District Engineer, Cambria Community Services District
Dr. Jeffrey Single, California Department of Fish and Wildlife
Mr. Tom Luster, California Coastal Commission.
Mr. Matthew McCarthy, State Water Resources Control Board
Mr. Roger Root, U.S. Fish and Wildlife Service
Ms. Lena Chang, U.S. Fish and Wildlife Service
Ms. Alecia Van Atta, NOAA
Ms. Bridgette Hoover, NOAA



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY

LOS ANGELES DISTRICT CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

September 24, 2013



Civil Works Branch

Mr. Bob Gresens
Cambria Community Services District
P.O. Box 65
Cambria, CA 93428

Dear Mr. Gresens:

The U.S. Army Corps of Engineers is providing a financial summary for the Cambria Seawater Desalination project. It is being provided to you for your review and records.

Cost Summary as of August 31, 2013:

	<u>Total Estimated Cost (\$)</u>	<u>Amount Received/ Verified (\$)</u>	<u>Amount To Complete (\$)</u>
Federal Funds	10,275,000.00	3,948,227.08	6,326,772.92
Cambria Community Services District	3,425,000.00	3,166,000.00	259,000.00
Cash	225,000.00	166,000.00	59,000.00
WIK	3,200,000.00	3,000,000.00	200,000.00
Total	13,700,000.00	7,114,227.08	6,585,772.92

Additionally, we are including the cost history for the project (see attached). We intend to provide these updates quarterly. If you have any questions related to this request or the information contained in this letter, please contact Ms. Kathleen Anderson, Project Manager, at (818) 776-9049.

Sincerely,

fol:

David M. Van Dorpe, P.E., PMP
Deputy District Engineer
for Project Management

**Cambria Seawater Desalination, CA CWIS#174734, P2#104804,CSCR #768/#790
Quarterly Financial Summary Report**

Total Project Cost/Funding	TOTAL	FEDERAL	SPONSOR		
			CASH	WIK*	LERRD
Total Project Cost & Proportionate Share	\$ 13,700,000.00	\$ 10,275,000.00 75%	\$ 225,000.00 2%	\$ 3,200,000.00 23%	\$ - 0%
Contributions to date					
Fiscal Year 2002		\$ 41,500.00			
Fiscal Year 2003		\$ 9,000.00			
Fiscal Year 2004		\$ 35,000.00			
Fiscal Year 2005		\$ 88,000.00			
Fiscal Year 2006		\$ (2,000.00)			
Fiscal Year 2007		\$ -			
Fiscal Year 2008		\$ 715,000.00			
Fiscal Year 2009 (ARRA CSCR 790)		\$ 950,600.00	\$ 166,000.00		
Fiscal Year 2010 (ARRA CSCR 790)		\$ 2,112,725.00			
Fiscal Year 2011		\$ -			
Fiscal Year 2012		\$ -			
Fiscal Year 2013		\$ (1,597.92)		\$ 3,000,000.00	
TOTAL Contributions to date		\$ 3,948,227.08	\$ 166,000.00	\$ 3,000,000.00	
REMAINING Balance to contribute		\$ 6,326,772.92	\$ 59,000.00	\$ 200,000.00	

Expenditures through 31 August 2013		
Expenditures	FEDERAL	SPONSOR
Labor	\$ 1,182,832.92	\$ 113,941.72
Contracts	\$ 2,176,841.25	\$ -
Work by other COE/other FED	\$ -	\$ -
CADD/GIS Support	\$ -	\$ -
Travel	\$ 10,012.13	\$ 2,938.23
Miscellaneous	\$ 477.00	\$ -
Total Expenditures to date	\$ 3,370,163.30	\$ 116,879.95
Balances		
Unexpended Obligations & Commitments	\$ 570,250.96	\$ 16,256.68
Remaining funds available to Obligate	\$ 7,812.82	\$ 32,863.37



WIK*An Integral Determination Report signed by the Assistant Secretary of the Army in August 2010 allows up to \$3,000,000 in-kind contributions subject to the Los Angeles District Commander's determination that the specific amount of credit afforded is reasonable, allowable, necessary, allocable and auditable. Documentation for work in kind from the Cambria Community Services District (CCSD) has been received and is being applied as a percentage of federal expenditures in accordance with the 75% federal and 25% nonfederal cost share formula specified in the Cambria Seawater Desalination Project Cooperation Agreement signed in 2006 and amended in 2010.

Steele, Noelle

From: Mark Rochefort <john.mark.rochefort@gmail.com>
Sent: Monday, April 06, 2015 5:41 PM
To: Garcia, Rita
Subject: Comments to Project Information Packet
Attachments: img105.pdf

Dear Ms. Garcia, please see the attached letter. Thank you. Mark Rochefort

Cambrians for Water "C4 H2O"

PO Box 484
Cambria, CA 93428-0484

April 6, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

VIA EMAIL
(rgarcia@mbakerintl.com)

Re: Comment on Project Information Packet

Dear Ms. Garcia:

Thank you for the opportunity to submit comments to the Project Information Packet that initiates preparation of the Environmental Impact Report under the California Environmental Quality Act for the CCSD's application for a regular coastal development permit for the Emergency Water Supply Project (EWS).

I am one of the co-founders of Cambrians for Water (C4 H2O), a grassroots organization with 800 members. The overwhelming majority of C4 H2O members are full-time residents of Cambria. However, C4 H2O also includes part-time residents, residential renters, business owners and operators, other who depend on Cambria businesses for their livelihood and lot owners. All the members of C4 H2O have two things in common: they have a personal relationship with Cambria and they support the EWS. Indeed, the substantial majority of all Cambrians support the EWS as demonstrated by last November's re-election of two CCSD Board incumbents and the hopelessly failed attempt by project opponents to cut off funding for the EWS by protesting necessary water rate increases.

The extraordinary and severe drought that threatens Cambria and nearly all of California and the decades of chronic water shortages that have plagued our town brought C4 H2O together to support the EWS, including the CCSD's application for a regular coastal development permit with reasonable and practical requirements and conditions. Therefore, as the regular permit application winds its way through the EIR and CEQA review process the paramount concern of C4 H2O, and all right-minded Cambrians, is for those involved in the process to keep clearly in mind that without a regular permit that allows the CCSD reasonable flexibility to meet the challenges of the ongoing current drought and future similar conditions, the town of Cambria could very well perish.

If Cambria is lost, or substantially impacted, thousands will suffer personally and economically. Moreover, a place where tourists come by the hundreds of thousands to enjoy our beautiful Central Coast will disappear. This is exactly the type of adverse consequence that the California Environmental Quality Act and the California Coastal Act are intended to prevent.

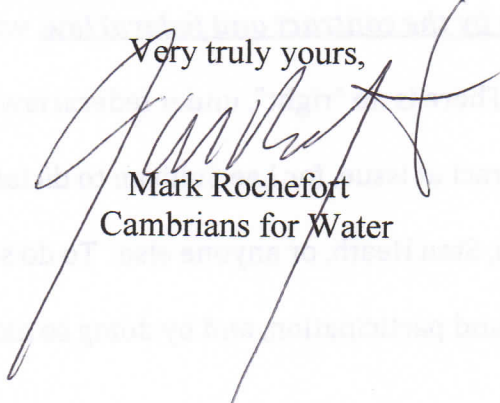
C4 H2O is concerned about the local environment. Most of our members moved to Cambria, or want someday to move here, because of the beauty of the area and our close proximity to local wildlife, which is varied and abundant. Those few individuals who oppose the EWS (and have opposed every previous project to alleviate our water shortage problem) believe that solving the town's chronic water crisis necessarily means harming the environment. Conversely, C4 H2O believes strongly that proven technology, thoughtfully applied will provide a stable, sustainable supplemental water supply for Cambria AND not only preserve, but improve, the environment.

The EWS applies advanced reverse osmosis technology in conjunction with other proven processes to produce sufficient supplies of clean fresh water for the town. In addition, because the project draws its water supply from existing groundwater sources, the EWS does not have the environmental and energy related challenges associated with traditional desalination plants that draw seawater directly from the ocean. Most importantly, the EWS returns significant amounts of clean water to the local lagoon which will benefit animal and plant habitats whenever the EWS is in operation, and certainly during prolonged dry periods such as the one in which we currently find ourselves.

Although not, technically, a concern C4 H2O urges RBF Consulting to use the CEQA review process to study and analyze the operation of the EWS in order to demonstrate its benefits to the local environment. Because the construction of the EWS has been completed and the plant is in operation, RBF Consulting and the District have a unique opportunity to gather supporting data to show other coastal communities how a right-sized project such as the EWS can also solve their water shortage problems.

We believe the Project Information Packet sets forth a good protocol for the EIR process to go forward. To the extent that others have suggested reasonable additions or other changes, by all means, they should be adopted. We look forward to supporting the District and RBS Consulting as the process moves ahead.

Very truly yours,



Mark Rochefort
Cambrians for Water

Steele, Noelle

From: Steph Wald <steph@centralcoastsalmon.com>
Sent: Monday, April 06, 2015 1:05 PM
To: Garcia, Rita
Subject: CCSD EWS EIR Scoping Comments
Attachments: CCSD EWS EIR comment letter.pdf

Please find attached.

--
Stephnie Wald
Watershed Projects Manager
Central Coast Salmon Enhancement
(805) 473-8221 office
(805) 471-3789 cell
229 Stanley Ave.
Arroyo Grande, CA 93420

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Central Coast Salmon Enhancement, Inc.

229 Stanley Avenue, Arroyo Grande, CA 93420
Phone: (805) 473-8221 Fax: (805) 473-8167
www.centralcoastsalmon.com

Ms. Rita Garcia
14725 Alton Parkway
Irvine, CA 92618

Sending via email April 6, 2015

Re: Cambria Community Services District Emergency Water System EIR Scoping Comments

Dear Ms. Garcia,

Thank you for the opportunity to submit comments on the Cambria Emergency Water Supply Project. Central Coast Salmon Enhancement's (CCSE) interest is in protecting the Steelhead trout population of the San Simeon Creek watershed and working with stakeholders on voluntary watershed restoration projects to enhance watershed health for healthy fish and healthy communities.

In general, CCSE has the following comments regarding the route taken by the CCSD in implementing the Emergency Water Supply project as regards protection of listed species and watershed health.

The proposed Adaptive Management Program needs to be replaced by a Habitat Mitigation and Monitoring Plan (HMMP) for the life of the project. The purpose of a HMMP is to specify on-going actions for mitigation and monitoring by regulatory agencies through permitting to ensure impacts continue to be less than significant as the project operates. An HMMP would be developed and implemented by the district and monitored through reporting to regulatory agencies.

As the district determines mitigation measures for the temporary emergency operations of the plant, please consider:

- What emergency spill response procedures were developed for project facilities and releases of hydrogen peroxide from AWTP?
- What level of EPA safety does RO water meet? What constituents remain in RO treated water that would be introduced to the aquifer?
- What level of monitoring is done on evaporation pond lining to ensure containment of brine? Provide impact analysis on life-time of lining, replacement of lining and spill response procedures for lining failure.
- What studies have been done to ensure that lagoon surface discharge will not act as attractant flow for Steelhead trout?
- What has been done to ensure the Steelhead Recovery Plan's provisions are applied? Consider development of a Habitat Conservation Plan that would address protection against take for combined CCSD management of both Santa Rosa Creek and San Simeon Creek watersheds in provision of water source for community of Cambria. An HCP that covers CCSD's operation in

229 Stanley Avenue, Arroyo Grande, CA 93420

Phone: 805-473-8221

www.centralcoastsalmon.com

Fax: 805-473-8167

both watersheds would provide take protection while outlining district responsibilities for keeping Steelhead population in good condition.

- What riparian set-back will be used for project water pipeline? It appears the pipeline is within the CDFW 1602 top of creek bank jurisdiction and would therefore not be protective of riparian resources without adequate and full mitigation measures.

It is critical that mitigation measures for the *temporary* EWS operation only be considered. It is my understanding that a permanent facility EIR scoping would differ in approach and therefore CCSE's comments would differ if the CCSD is considering the EWS as a proposal to permanently operate the plant.

Thank you.

Sincerely,

Stephnie Wald
Watershed Projects Manager
steph@centralcoastsalmon.com
805-471-3789

Steele, Noelle

From: Matthew McGoogan - NOAA Federal <matthew.mcgoogan@noaa.gov>
Sent: Monday, April 06, 2015 4:45 PM
To: Garcia, Rita
Cc: Doug Barker; Boggs, Melissa@Wildlife; Luster, Tom@Coastal;
asingewald@co.slo.ca.us; Chang, Lena; Moody, Mitchell@Waterboards; Paul,
Margaret@Wildlife; bgresens@cambriacsd.org
Subject: Comments for NOP of DEIR for Cambria Community Services District Emergency
Water Supply Project
Attachments: 06APR2015_Comments on the NOP Brackish Water Treatment Plant_MM.pdf

Hello Ms. Garcia,

Please see NMFS attached letter for comments on the subject NOP. A hard copy will go out in the mail tomorrow.

Thank you.

Matt

Matthew R. McGoogan
Fisheries Biologist
National Marine Fisheries Service
California Coastal Area Office
501 West Ocean Blvd., Suite 4200
Long Beach, Ca 90802-4213
Phone: [\(562\) 980-4026](tel:(562)980-4026)
Fax: [\(562\) 980-4027](tel:(562)980-4027)
matthew.mcgoogan@noaa.gov



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213

April 6, 2015

Rita Garcia
Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, California 92618

Dear Ms. Garcia:

NOAA's National Marine Fisheries Service (NMFS) reviewed the March 4, 2015, Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) and associated project information packet (Packet) for the Cambria Community Services District's (CCSD) emergency water-supply project (Project) in San Luis Obispo County, California. In the NOP, CCSD requests NMFS provide information for developing the scope and content of the EIR. NMFS provides this information in the form of (1) general recommendations with regard to the scope of analysis of Project impacts on threatened steelhead (*Oncorhynchus mykiss*) and critical habitat for the species, and (2) specific comments and concerns based on NMFS' review of the Packet and the June 2014 Initial Study/Mitigated Negative Declaration (IS/MND) previously developed for the Project.

The Project involves the operation of a brackish water-treatment facility adjacent to lower San Simeon Creek and lagoon. The Project is of concern because San Simeon Creek is occupied by the threatened South Central California Coast (S-CCC) Distinct Population Segment of steelhead and is designated critical habitat for this species. Accordingly, the EIR should clearly identify and describe the Project including interrelated and interdependent actions to the extent that NMFS may develop an understanding of the potential effects (offsite, onsite, direct, indirect, temporary, permanent) of the Project on steelhead and critical habitat. The EIR should include a list of measures for avoiding and minimizing potential adverse effects of the Project on steelhead and their habitat. Unavoidable effects should be fully described according to life stage (i.e., spawning, rearing and migration) and features of this species' habitat. The manner in which the facility will operate (e.g., timing of operations, pumping schedules and rates, use of water storage facilities etc.) should be clearly described. The potential benefits of the Project for steelhead, including any compensatory-mitigation measures, should be described. Surface and ground water hydrologic and hydraulic analyses should be included in the EIR.

NMFS' review of the Packet included with the March 4, 2015, NOP and June 2014 IS/MND informs the following additional specific comments. Some of these comments were first relayed to CCSD in a letter dated August 8, 2014. All of these comments are related to the general comments above and should be addressed in the EIR.



- NMFS is aware that CCSD currently operates wells and a wastewater treatment facility in lower San Simeon Creek. In development of baseline information the EIR should disclose the effects of the current CCSD well and wastewater-treatment facility operations on steelhead and critical habitat (*e.g.*, the manner that operating these existing facilities is affecting the extent and amount of surface flow and water quality in San Simeon Creek and lagoon).
- The IS/MND seemed to consider mainly the Project's effects on steelhead migration and how to minimize these effects. However, the lower portions of San Simeon Creek and its lagoon provide rearing opportunities for juveniles and over-summering habitat for adults that may hold over in this area. The EIR should discuss the manner and extent that Project operations will affect the stream and lagoon's ability to provide these habitat functions over time. Of particular concern is the impact of the Project on steelhead and critical habitat during periods of low stream flow, especially during the drier portions of the year and under drought conditions. In this regard, it is unclear how returning 100-gpm (proposed mitigation) to surface flows in Van Gordon Creek while extracting at a rate of 400-gpm (a deficit of 300-gpm) from the aquifer is expected to avoid adverse effects to steelhead and maintain habitat quality, availability, and function. It is also unclear from the available information whether the water quality of this return water is sufficient to satisfy the habitat requirements of steelhead, especially given the return water may contain residual chemicals from the treatment facility. These issues should be fully addressed in the EIR.
- NMFS is aware an adaptive management program (AMP) is being developed with the intent of guiding and adjusting operations of the Project such that adverse effects to S-CCC steelhead are avoided. To measure the level of impact the Project is causing from future surveys and monitoring, sufficient current baseline data is needed for steelhead populations, habitat quality, local hydrology, and the degree to which current CCSD operations may already impact steelhead and critical habitat on San Simeon Creek. The EIR should describe the extent this baseline information exists, will be gathered, and will be incorporated into implementation of the AMP. The EIR should fully describe all aspects of the AMP including proposed surveys, benchmarks, and/or criteria that will be used. If steelhead surveys are proposed, details should be provided to describe the type of survey and manner in which it will be conducted, and whether the survey will result in ("take"¹) of S-CCC steelhead.
- NMFS is aware that a variety of chemicals may be used during operations associated with the Project. The EIR should fully disclose the type of chemicals used, the toxicity of each chemical and associated risk to aquatic species in the event these chemicals are released into San Simeon Creek, the likelihood these chemicals will come into contact with aquatic habitats and S-CCC steelhead, and the measures proposed to prevent release or spill of these chemicals.

¹ The definition of "take" includes to harass, harm, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct. A notable component of this definition is the definition of "harm." "Harm" in the definition of "take" means an act that actually kills or injures protected wildlife. Such acts may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavior patterns, including breeding, feeding, or sheltering (50 CFR 17.3).

- The EIR should consider and discuss strategies (*e.g.*, development of water-conservation plans, utilization of water-saving technologies, and construction of off-channel storage reservoirs) for reducing water consumption and/or increasing water-use efficiency as alternatives to, or in conjunction with, the Project.
- Finally, the EIR should describe the relationship of the Project to Section 7 or Section 10 of the U. S. Endangered Species Act (ESA). As part of this discussion, the EIR should disclose whether consultation with NMFS is necessary prior to commencing operations of the brackish water-treatment facility, in accordance with Section 7 or Section 10 of the ESA.

NMFS appreciates this opportunity to provide information that will assist CCSD in developing the EIR for the subject Project. Please contact Matthew McGoogan at 562-980-4026 or via email at Matthew.McGoogan@noaa.gov if you have a question concerning this letter or if you require additional information.

Sincerely,



Alecia Van Atta
Acting Assistant Regional Administrator
California Coastal Area Office

cc: Margaret Paul, CDFW, San Luis Obispo
Roger Root, USFWS, Ventura
Mitchell Moody, SWRCB, Sacramento
Tom Luster, CCC, San Francisco
Administrative File: 10012WCR2014CC00201

Steele, Noelle

From: asingewald@co.slo.ca.us
Sent: Monday, April 06, 2015 4:39 PM
To: Garcia, Rita
Cc: Bob Gresens
Subject: NOP Response Letter
Attachments: CCSD_EWSP_Scoping_Letter.pdf

Please see attached.

Also, can you tell me exactly what areas you want the cumulative projects list to cover? Cambria URL and rural areas between Cambria and San Simeon?

Airlin Singewald
San Luis Obispo County
Department of Planning and Building
(805) 781-5198
asingewald@co.slo.ca.us

[Scanned @co.slo.ca.us]



DEPARTMENT OF PLANNING AND BUILDING

Promoting the Wise Use of Land – Helping to Build Great Communities

April 6, 2015

Ms. Rita Garcia, Technical Manager
RBF, a Michael Baker International Company
14725 Alton Parkway
Irvine, CA 92618
(sent via email)

Subject: NOP Comment Letter for Cambria Emergency Water Supply Project

Dear Ms. Garcia:

Thank you for this opportunity to comment on the District's Notice of Preparation (NOP) for the Cambria Emergency Water Supply Project. We have reviewed the NOP and respectfully submit the following comments:

Project Description

1. On May 15, 2014, the County issued an emergency permit (ZON2013-00589) authorizing construction of an emergency brackish water supply project intended to provide up to 250 acre-feet of water to serve existing water connections only (i.e. to abate the emergency), within the CCSD's service area (i.e. not to serve new development). For consistency with the emergency permit approval, the project description should be revised to affirm that the proposed facility is intended to serve existing development only.
2. The project description should also be revised to clarify whether it is a temporary facility to abate the current drought situation or is intended to be a permanent back-up water supply.

Biological Resources

3. The proposed project may result in potentially significant impacts on several threatened or endangered wildlife species, including the Tidewater Goby, Steelhead, and California red-legged frog. However, the District's CDP application lacks evidence showing the District has consulted with the National Marine Fisheries Service, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife and that these agencies concur that the proposed mitigation plan is sufficient to avoid a take of protected species. The EIR should include evidence showing that the District has consulted with these agencies.
4. The EIR should evaluate and describe the potential impacts of the proposed brine evaporation pond on wildlife. What are the estimated salt concentrations of the disposed brine material? Are these concentrations harmful to the health of birds and other wildlife that may come into contact with the pond? Are any measures proposed to prevent wildlife exposure to the brine pond?
5. The EIR should identify expected noise and light levels from project construction and operation at nearby sensitive receptors, including riparian areas, known and potential bird

besting sites, and the nearest public recreation sites, including the State Park campground. Identify all measures proposed to be implemented to reduce noise and light effects on these nearby receptors.

Noise

6. The EIR should evaluate the project for compliance with the County's Noise Standards in Coastal Zone Land Use Ordinance Section 23.06.040. In particular, the analysis should evaluate noise levels generated by the mechanical evaporators and how this noise impacts surrounding sensitive receptors including the San Simeon State Park Campground and nearby residences on the Clyde Warren Ranch.

Growth Inducing Impacts

7. The EIR analysis should consider the growth inducing impact of installing a new water supply infrastructure project in a community where water availability is a significant obstacle to growth. Although the Cambria Emergency Water Supply Project is proposed as a back-up water supply for existing water connections only, it would install infrastructure that could be adapted in the future to serve new development. Further, the existence of such infrastructure could create a community expectation for the facility to be adapted to serve new development.

Environmental Baseline


8. Typically the environmental baseline for evaluating impacts under CEQA is comprised of the existing environmental conditions when the NOP is issued. In this case, however, the existing environmental conditions already include the Cambria Emergency Water Supply Project, since it was constructed under an emergency permit prior to issuance of the NOP. The EIR should therefore use pre-project (i.e. not existing) environmental conditions as the baseline for evaluating environmental impacts.

Other

9. The EIR should provide justification for the 250 acre-foot / year capacity. Is this the minimum capacity necessary to abate the emergency? How was this capacity determined?

If you have any questions concerning these comments, please contact me at (805) 781-5198 or asingewald@co.slo.ca.us.

Sincerely,



Airlin M. Singewald
Senior Planner

Steele, Noelle

From: Jane Tough <jane_tough@fws.gov>
Sent: Monday, April 06, 2015 3:58 PM
To: Garcia, Rita; Doug.Barker@parks.ca.gov; melissa.Boggs@wildlife.ca.gov; thomas_dietsch@fws.gov; Tom.Luster@coastal.ca.gov; matthew.mcgoogan@noaa.gov; asingewald@co.slo.ca.us; Ryan.Lodge@waterboards.ca.gov
Cc: Lena Chang; Douglass Cooper
Subject: Copy of Comments NOPfor DEIR Cambria Community Services District Emergency Water Supply
Attachments: SLO, Comments on NOP of DEIR for Cambria Emergency Water Project.pdf

The original document will be surface mailed today April 6, 2015

Thank you



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003



IN REPLY REFER TO:
08EVEN00-2015-CPA-0056

April 6, 2015

Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, California 92618

Subject: Comments on the Notice of Preparation for a Draft Environmental Impact Report for the Cambria Community Services District Emergency Water Supply Project, Cambria, San Luis Obispo County, California

Dear Ms. Garcia:

We are responding to the Cambria Community Services District's (District) notice of preparation of a draft environmental impact report (EIR) for the Cambria Emergency Water Supply Project (project) located in Cambria, San Luis Obispo County, California. We received your letter, dated March 4, 2015, in our office on March 6, 2015. The District has released this notice in accordance with the California Environmental Quality Act (CEQA), CEQA guidelines, and local implementation procedures. The District is seeking the views and specific concerns related to the project and its effects on the environment.

The U.S. Fish and Wildlife Service's (Service) responsibilities include administering the Endangered Species Act of 1973, as amended (Act), including sections 7, 9, and 10. Section 9 of the Act and its implementing regulations prohibit the taking of any federally listed endangered or threatened species. Section 3(19) of the Act defines take to mean to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Service regulations (50 CFR 17.3) define harm to include significant habitat modification or degradation which actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. Harassment is defined by the Service as an intentional or negligent action that creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns, which include, but are not limited to breeding, feeding, or sheltering. The Act provides for civil and criminal penalties for the unlawful taking of listed species. Exemptions to the prohibitions against take may be obtained through coordination with the Service in two ways: (1) if a project is to be funded, authorized, or carried out by a Federal agency, and may affect a listed species, the Federal agency must consult with the Service pursuant to section 7(a)(2) of the Act; and (2) if a proposed project does not involve a Federal agency but may result in the take of a listed animal species, the project proponent should apply to the Service for an incidental take permit pursuant to section 10(a)(1)(B) of the Act.

The federally endangered tidewater goby (*Eucyclogobius newberryi*) and the federally threatened California red-legged frog (*Rana draytonii*) are present in the project area. The project area includes designated critical habitat for both species. Our concerns relate to the project's effects on these species and migratory birds. Below, we outline our history of involvement with the project and our concerns to date.

On July 22, 2014, we sent a letter to the District, commenting on the notice of availability for the Initial Study/Mitigated Negative Declaration for the project (Service 2014). In that letter, we discussed that construction and operation of the facility may cause adverse effects to tidewater gobies and California red-legged frogs, including reduction of surface flows in the estuary. We encouraged the District to thoroughly analyze the effects of the project on federally listed species prior to project initiation. We informed the District that reduction in flows may result in take of listed species and that any such take would require either (a) exemption from the prohibitions against take in section 9 of the Act pursuant to section 7 or (b) take authorization pursuant to section 10(a)(1)(B) of the Act.

On February 12, 2015, we issued a letter to the District, expressing our concerns regarding project-related impacts to federally endangered and threatened species and the District's lack of compliance with the Act (Service 2015). In this letter, we discussed a section 7 consultation for the project that was initiated and subsequently withdrawn, concerns that the project's brine pond is providing a potential attractive nuisance for migratory birds and California red-legged frogs, a frog exclusion fence that could be resulting in take of California red-legged frogs, and the District's adaptive management plan that the Service has not reviewed. We requested the District describe how they have avoided take of federally listed species to date and avoidance measures planned during operations of the project. In addition, we requested the District allow time for our review and comments on the proposed adaptive management plan prior to implementing the plan.

On February 27, 2015, the Central Coast Regional Water Quality Control Board (Water Board) issued a notice of violation to the District for violating numerous provisions of permits under which the Water Board regulates the District's project (Water Board 2015). The notice includes a number of violations, including but not limited to: discharge into in an unauthorized location in Van Gordon Creek containing excessive levels of chlorine, brine drift outside of the surface impoundment lined area, and extensive erosion at the point of discharge.

On February 20, 2015, we learned that a duck of unknown species was found dead at the project's brine pond (M. Boggs, California Department of Fish and Wildlife, Office of Spill Prevention and Response, in litt. 2015). On March 11, 2015, we were notified of a dead killdeer (*Charadrius vociferus*) found at the brine pond on March 10, 2015 (C. Cleveland, Cleveland Biological, in litt. 2015). The cause of death of these two birds is unknown. There has been concern that a cable strung across the pond is a hazard for bird strikes; the District has since added reflective mylar tape to the cable to deter bird strikes. The District has also proposed to add masted floats throughout the pond to provide additional deterrents (B. Gresens, Cambria Community Services District, in litt. 2015).

All of the above concerns remain. We expect the District to address these in the draft EIR, particularly how impacts to listed species and critical habitat has been and will continue to be avoided in the absence of take exemptions and compliance with the Act; and how impacts to migratory birds will be avoided and minimized. We recommend the District work to develop a bird and bat conservation strategy to establish an adaptive management framework to respond to avian mortality issues. For specific questions regarding migratory birds, please contact Tom Dietsch with our Office of Migratory Birds at (760) 431-9440, extension 214. For any other questions, please contact Lena Chang of my staff at (805) 644-1766, extension 302.

Sincerely,



Stephen P. Henry
Field Supervisor

cc:

Doug Barker, California State Parks
Melissa Boggs, California Department of Fish and Wildlife, OSPR
Thomas Dietsch, U.S. Fish and Wildlife Service, Migratory Birds
Ryan Lodge, California Water Boards
Tom Luster, California Coastal Commission
Matthew McGoogan, National Oceanic and Atmospheric Administration
Airlin Singewald, County of San Luis Obispo Department of Planning and Building

REFERENCES CITED

- [Service] U.S. Fish and Wildlife Service. 2015. Endangered Species Act compliance for the Cambria Community Services District Emergency Water Project, San Luis Obispo County, California. Ventura Fish and Wildlife Office, Ventura, California. Dated February 12, 2015.
- [Service] U.S. Fish and Wildlife Service. 2014. Comments on the initial study/mitigated negative declaration for the Cambria emergency water supply project, Cambria, San Luis Obispo County, California (2014-CPA-0163). Ventura Fish and Wildlife Office, Ventura, California. Dated July 22, 2014.
- [Water Board] Central Coast Regional Water Quality Control Board. 2015. Notice of violation and water code section 13267, request for information: Cambria Community Services District. Central Coast Regional Water Quality Control Board, San Luis Obispo, California. Dated February 27, 2015.

In litteris

- Boggs, M. 2015. California Department of Fish and Wildlife, Office of Spill Prevention and Response. Electronic mail regarding the notice of violation and other concerns at the Cambria Emergency Water Project site. Received February 20, 2015.
- Cleveland, C. 2015. Cleveland Biological. Electronic mail reporting a dead killdeer at the Cambria Emergency Water Project site. Received March 11, 2015.
- Gresens, B. 2015. Cambria Community Services District. Electronic mail regarding the addition of bird deterrents at the Cambria Emergency Water Project site. Received March 20, 2015.

Steele, Noelle

From: Verlinda Bailey <verlinda@charter.net>
Sent: Monday, April 06, 2015 10:33 AM
To: Garcia, Rita
Subject: Cambria's Emergency Water Supply
Attachments: EWS SupportLetter3.31.15.docx

Dear Ms. Garcia:

Please see the attached letter in support of Cambria's Emergency Water Supply project.

Thank you,
Verlinda Bailey
verlinda@charter.net

354 Lancaster St.
Cambria, CA 93428

April 5, 2015

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, CA 92618

Dear Ms. Garcia:

I am writing in support of Cambria's Emergency Water Supply (EWS) Project. I have owned a home in Cambria since 1984, and have been a permanent resident since 2002. Cambria's water shortage problems have troubled our community since the 1990's, and of course this issue has been of great concern to me for many years; thankfully, at last, we have addressed the problem: a new and innovative EWS has been built and is producing the essential water Cambria so desperately needs.

As you know, California's continuing drought has put all Cambrians, and indeed all Californians, in dire straits. In Cambria we rely upon just two aquifers for our potable water—two aquifers which depend upon seasonal rainfall and fluctuate considerably as a result. Droughts can leave our aquifers dangerously low and the dual threats of salt-water intrusion and soil subsidence over the aquifers could cause irreversible damage, endangering our only source of water. The EWS mitigates the drought's effects and provides us with a reliable, long-term supply of potable water.

While launching the EWS is a much-needed and welcome move toward solving Cambria's water problems, I am not alone in my worry that the community's use of this water supply is contingent upon emergency conditions. The water the EWS provides can only be accessed if the Community Services District (CSD) Board declares a *level three emergency*.

Cambrians are unsurpassed in their efforts to conserve water, reducing their average per-person water use to just 30 gallons per day, as compared to the average American who uses approximately 100 gallons a day. (Source: *EPA, Water Sense, An EPA Partnership Program*) Even so, we know that when we experience low seasonal rainfall and extended droughts, conditions that are endemic to the central coast, our CSD board must declare a level three emergency in order to keep our aquifers recharged and protected. This means we are faced with a paradox: In order to access the water available through the EWS, we must implement draconian, water-saving procedures. A few of these include: saving and hauling buckets of gray

water in order to keep some of our landscaping alive; flushing toilets sporadically; and bathing and washing clothes less frequently—all of which, at the very least, present hygiene concerns, as well as difficulties for an aging population, and in the case of dying landscaping, add to the risk of wildfires. So... when a level three emergency is declared, Cambrians cannot use the EWS water they need unless they use even less of that which is already in short supply—a classic Catch-22 situation.

In light of this anomaly, it is imperative that we be issued a Regular Coastal Development Permit. For Cambria to maintain a safe, reasonable standard of living and provide a consistent, potable water supply for our existing population, we must be able to use the EWS, as needed, and on a regular basis. By so doing we can safeguard our valuable and fragile aquifers and avoid the requirement that we implement drastic, water-conservation measures. A Regular Coastal Development Permit will secure our water future by protecting the only water source we have.

Thank you for your time and consideration.

Sincerely,

Verlinda Bailey

Steele, Noelle

From: Arthur Chapman <artsee9660@gmail.com>
Sent: Monday, April 06, 2015 7:38 PM
To: Garcia, Rita
Subject: Cambria EWS

We have owned property since 1983, have been permanent residents of Cambria since 1999 and have lived in the home we built since 2000. Now that the EWS is operational, we can begin to breathe a sigh of relief. But, our water security will not be assured until the EWS receives a permanent operating permit. We strongly support this effort.

We agree with the conclusions of the Water Master Plan that a reliable water source is critical to Cambria's survival. Although we are committed to continuing our water conservation efforts, we cannot conserve our way out of an extreme multi-year draught. We need the EWS to assure that Cambria survives and thrives.

Sincerely,

Arthur and Trudy Chapman
660 Ashby Lane
Cambria, CA 93428

Steele, Noelle

From: neilhavlik@aol.com
Sent: Monday, April 06, 2015 3:27 PM
To: Garcia, Rita
Subject: Cambria EWS NOP

Ms. Garcia:

As a property owner and Cambria resident, I have been concerned by the current water situation in the community. While I agree with many others that an emergency water supply was needed, I was, and still am, concerned that the system that has been constructed is in fact a permanent facility, capable of being easily converted into a regular part of the community's "normal" water supply. In fact, recent statements by the General Manager have struck me as suggesting that a conversion of the "emergency" system into part of the "regular" system may in fact be a goal of the proposed EIR. I believe that this is not how the system was explained to the community, and put forward without proper environmental analysis and deliberation, and, should such conversion be made, it would result in the ultimate loss of whatever safety margin for water supply the facility represents, which would leave us in the same situation as we were when the current drought reached a point where the CCSD Board was forced to declare a Stage 3 emergency.

For these reasons, I request that the EIR include discussion of the impacts that a change in the "emergency supply" status to one of being part of the community's regular supply could have on the community. These might include new housing being permitted, and the need to find a new "emergency" water supply, to name but two. This is in addition to the site-specific impacts of the currently operational emergency system.

Thank you.

Neil Havlik
Cambria, CA.

Steele, Noelle

From: Kathy Hutchison <kathutch@sbcglobal.net>
Sent: Monday, April 06, 2015 1:16 PM
To: Garcia, Rita
Subject: Re: Public Comments: Cambria Project Information Packet
Attachments: CCSD Letter.pdf

Rita: Please find a copy of the letter in PDF format attached. I also sent a hard copy to your attention last week. Thank you, Kathy Hutchison 650-245-8176

On 4/6/15, 11:42 AM, "Garcia, Rita" <RGARCIA@mbakerintl.com> wrote:

Kathy- We are unable to open your attachment. Please, could you attach as a PDF and resend? Thank you. RG

From: Kathy Hutchison [<mailto:kathutch@sbcglobal.net>]
Sent: Tuesday, March 31, 2015 11:10 AM
To: Garcia, Rita
Cc: donhutchison@earthlink.net; Kathy Hutchison
Subject: Public Comments: Cambria Project Information Packet

Ms. Garcia: Please find attached a letter in support of the Cambria Emergency Water Supply Project as the Project Information Packet is reviewed to include public comments due by 4/6/15. A signed letter will be posted today as well.

Thank you,

Kathy & Don Hutchison
4845 Windsor Blvd.
Cambria, CA 93428

805 924-1812

Cell: 650-245-8176 (KH) or 650-868-0870 (DH)

Ms. Rita Garcia
Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, Ca 92618

March 30, 2015

Dear Ms. Garcia:

This letter is written in response to the CCSD request for public comments in conjunction with their Project Information Packet in preparation of an Environmental Impact Report. This is also written in support of Cambria's Emergency Water Supply Project, (EWS).

Having discovered Cambria with our young sons in 1997, we purchased a family home in 1999 and have enjoyed this spectacular respite near the sea with countless family and friends from near and far over the years. The dedication to water conservation and exploration of alternative water reclamation sources has been and is extraordinary. As the State continues to deal with the extended drought, this community has taken the extra steps necessary with the EWS to ensure continued sustainability of water for ALL to enjoy, residents & visitors alike. The EWS will ensure potential fire fighting capability which will have a long term positive impact on ALL who live, work, and rest here, on animal life and environmental concerns.

We also support approval of the operation of the EWS, a few of many reasons:

1. Long term availability of potable water for consumption, health, & fire protection
2. Lack of natural precipitation and extended drought has compromised the reliability of water from the existing aquifers that sustain potable water
3. The extraordinary diligence of the majority of Cambrians to conserve is still inadequate
4. The continued viability of the community depends on an alternative source of water
5. Without EWS there appears to be potential danger of saltwater intrusion in to the San Simeon Creek aquifer, which will likely have harmful environmental repercussions.

The EWS is operational, not without challenges or environmental concerns. But the challenges and concerns are being addressed & rectified expediently. The positive impact of the EWS on the lives of all Cambrians, and the surrounding forests, habitats & animals, will be maintained and quite possibly improved as time goes by.

Sincerely,

Kathy and Don Hutchison 4845 Windsor Blvd. Cambria, Ca.93428

Steele, Noelle

From: DUANE KANNBERG <dekannberg@aol.com>
Sent: Monday, April 06, 2015 1:42 PM
To: Garcia, Rita
Subject: Cambria Emergency Water Supply Project EIR

Ms Garcia

I believe we Cambrians dodged a bullet last year solely because the CCSD board of directors had the guts to do a very controversial thing which was deciding to spend money to build an emergency water plant. The fact that we have a sustainable source of water that can be used when we Cambrians are in need has lifted quite a mental burden on us. No more unsafe hygiene issues to save water. No more wondering if we should sell our homes, before it was too late.

I know this really helped my outlook on living here. I was ready to leave.

This water plant needs to be permanent for our survival as I have lost trust in our shallow coastal aquifers.

This water plant appears to be thought out very well as to design and location as it does not draw directly from the ocean and does not put back into the ocean. And from the testing period it has been able to go thru, appears to be giving us what we expected and what we are paying for.

That makes me feel optimistic for my future in Cambria

Duane Kannberg
598 Cambridge St
Cambria Ca 93428

Carol Kannberg
same

Steele, Noelle

From: Deryl Robinson <derylrobinson@outlook.com>
Sent: Monday, April 06, 2015 1:43 PM
To: Garcia, Rita
Subject: Cambria EWS - NOP comments
Attachments: CCSD EIR NOP Comments - 4.6.15.pdf

Ms Garcia,

Please find attached our response to the NOP.

Regards,

Deryl Robinson
949-637-2607

United Lot Owners of Cambria
“UnLOC”



April 6, 2015

Rita Garcia, Technical Manager
RBF Consulting
14725 Alton Pkwy
Irvine, CA 92618

Re: Notice Preparation, Cambria CSD Emergency Water Supply Project

Ms. Garcia and Project Team:

Thank you for this opportunity to provide our comments on the EIR scoping for the referenced project. Our comments are as follows:

Section 10.b. – Land Use and Planning

The overarching adopted Land Use Plan for Cambria is the North Coast Area Plan as of 2008 (NCAP). The proposed project does not conflict with that plan and therefore has no impact. The NCAP took many years to complete and received a great deal of public input. There is no need to re-litigate it.

Section 13.a. – Population and Housing

We agree with the agency’s assessment that there is no growth inducing impact from the proposed project. Under its Growth Management Ordinance, the County of SLO envisions 2.3% annual growth county wide. The number of new homes envisioned in Cambria’s Water Master Plan is already accounted for in the NCAP. There has been zero to negative growth in Cambria over the last 15 years, due to the CCSD emergency water shortage declaration. So even if Cambria was allowed to go back to 2.3% growth the long term growth rate will still be far less than the countywide allowance. Additionally, the proposed project does not allow for extension of service lines to new areas, nor does it propose to expand the CCSD service area. Both are prohibited by CCSD ordinance.

Thank you again to the project team and the community of Cambria for this opportunity to be heard. We look forward to future participation.

Best regards,

Deryl Robinson
President
United Lot Owners of Cambria

Protecting the entitlements and value of vacant lots in Cambria

UnLOC.org
718 Main St, Cambria, CA 93428

Steele, Noelle

From: Don Sather <satherarchitect@charter.net>
Sent: Monday, April 06, 2015 5:35 PM
To: Garcia, Rita
Cc: Cambrians For Water
Subject: Cambria Community Services District EWS
Attachments: EWS.docx

Dear Ms. Garcia,

Please include the attached letter in support of the CCSD EWS Thank you, Don Sather and Lee Oliphant

Donald G. Sather
Lee Ann Oliphant
889 Northampton St.
Cambria, CA 93428
805-927-1819

5 April 2015

Ms. Rita Garcia
Technical Manager
M Baker International Inc.
Rgarcia@mbakerintl.com

Dear Ms. Garcia,

We are writing in support of the Cambria Community Services District
Emergency Water Supply project.

With the fourth year of extreme drought forecast for California, we feel it is imperative that this project be permitted to operate as the District directors feel necessary to provide a permanent, continuous potable water supply for our community, as well as an adequate supply of water to fight domestic and wildfires in our drought and age stressed Monterey Pine forests.

The Herculean conservation efforts of this community attest to the fact that the residents will not waste one drop of water when this project is fully operational after having met all of the necessary technical and environmental requirements. Cambria residents have always been committed to maintaining and sustaining our unique environment – the reason most of us are now residents.

We are now on the forefront of drought solutions. In order to retain and maintain our well-being and environment, we must have a long-term reliable source of water. This project will be an immense help.

Sincerely,

s/

Don Sather and Lee Ann Oliphant

Steele, Noelle

From: Mary <webb.mary599@gmail.com>
Sent: Monday, April 06, 2015 2:38 PM
To: Bob Gresens; Garcia, Rita
Subject: NOP comments
Attachments: NOP M. Webb questions.pdf; GS Initial Study July 2014 copy.pdf

Attached are comments from July of 2014 that were never answered and new questions. Please address both letters.
Thank you,
Mary Webb

April 6, 2015

Mr. Robert C. Gresens, P.E., District Engineer Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, California 93428
Tel. 805.927.6223; Fax 805.927.5584; Email bgresens@cambriacsd.org

Ms. Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company 14725 Alton Parkway
Irvine, California 92618
Email rgarcia@mbakerintl.com

**Notice of Preparation of a Draft Environmental Impact Report for the Cambria
Emergency Water Supply Project**

Please provide all construction and project change orders with a detailed cost analysis since this project began last May of 2014.

Please provide a new project description that incorporates all past change orders and analysis of changes.

Please analyze the Whale Rock Water exchange using accurate numbers with water going one way rather than two ways.

Please analyze a off stream reservoir scenario that holds about 700 acre feet.

We will be waiting for an actual project description which does not exist today, in order to make more relevant comments. For now there are more questions than comments.

A deep pondlike structure lies south of the waste pond and no one has been able to identify its purpose.

- What is the purpose of the deep pond that lies to the south of the waste pond?
- What does that pond contain?
- If it contains liquids what agency is monitoring the discharges, and how much does it hold?

I'm concerned about the level of oversight that was given to the construction of the pipelines containing chemicals that are now buried. Please provide documents showing that pipeline construction successfully passed inspections.

- What government agency inspected the installation of chemical tanks and pipelines

- When did inspections take place?
- When were chemicals delivered?
- Are chemical pipelines designed to be permanent or temporary?
- Were materials used for a permanent project or were the materials only rated for short term use?
- Is secondary containment for chemicals appropriate at this sensitive location or do the tanks need a third level of containment?

I'm especially concerned about the pipelines containing chemical waste that were buried underneath Van Gordon Creek via the horizontally drilling in October 2014.

- If those pipelines leak how would anyone leaks were occurring or the source of the chemical leak until it is too late?

The Lagoon Mitigation Water pipeline demands constant monitoring at the place where it discharges into the creek system, rather than from the plant itself. Mistakes can be made (as happened in February) with operator errors. The Cambria CSD deliberately sent RO water containing Chlorine to the lagoon to mix with mitigation water for unknown reasons.

- Why did the CSD sent RO water to the Lagoon?
- Was the AWTP pumping regimen affecting creek drawdown?
- How was chlorine treated water added to the lagoon mitigation water - thru the pipelines or some other way?
- Are there two pipes going to the Lagoon rather than one?
- Is there a separate RO pipe to the Lagoon?
- Is water quality testing now occurring at the Lagoon Mitigation water discharge site?
- Will this testing be continued as part of the CSD's regular monitoring program?
- What precautions have been taken to prevent chlorine contamination or any other contamination of lagoon water in the future?
- What agency will be responsible for setting chlorine limits for a creek that contains endangered species?

Supposedly to protect species, the Project provides up to 100 g.p.m of fresh water near the head of where the lagoon occurs during the dry season.

- Is the 100 g.p.m. Lagoon Mitigation water designed to protect species or was it put in place for some other reason?
- Please give details on how 100 g.p.m. lagoon mitigation water is sufficient to protect species?
- By what analysis was 100 g.p.m. determined to be enough water to protect species?
- Is this mitigation water to be provided at all times when the plant is running?
- Please describe when mitigation will or will not be provided.

I have not seen any documentation on the temperature of this lagoon mitigation water and how it may be affecting the lagoon.

- Is the temperature the same as, or compatible with receiving water temperatures?
- Does the temperature of the Lagoon mitigation water vary?
- What agency is regulating, overseeing and testing the water temperature to be protective of wildlife especially endangered fish and amphibian populations?

An elaborate rock revetment system was initially installed to disperse the Lagoon Mitigation water from the mitigation pipeline into the creek system. Recently the Lagoon Mitigation water system was abandoned in favor of burying the pipeline directly into the dirt.

- What prevents turbidity into the lagoon from erosion caused by this new system?

The CSD did not pass the tracer test last fall, which is to make sure the treated Reverse Osmosis water travels for 2 months before traveling to the production wells for consumption. The 2014 Test was not representative of actual conditions as San Simeon Creek was offline for drinking water use during the test. A legitimate tracer test has not yet been conducted. January and February 2015 production reports (not released until March of 2015) show Cambrians are drinking from San Simeon Creek wells therefore might be drinking AWTP water (if 2 months travel time is correct).

- Are Cambrians drinking water from San Simeon Creek since this project started running January 20, 2015?
- If so, what agency is responsible for health problems that may ensue from drinking water that has not successfully passed a legitimate 2 month tracer test?

Cambria CSD spent millions of dollars unnecessarily and without fully disclosing their intent to build a long term public works project under a false 'emergency' scenario, that provided no water in a drought emergency. The CSD does not have the skills needed to operate a complicated project such as this one, and there is no redundancy within the CSD staff to operate it even if we manage to get one person fully trained. We have already experienced a lack of enforcement, lack of sufficient oversight, and lack of monitoring resulting in harms to fish, wildlife, agriculture, and people.

Mary Webb
1186 Hartford
Cambria, CA 93428



July 22, 2014

Bob Gresens District Engineer
President Bahringer and Cambria Community Services District Board
Post Office Box 65
Cambria, CA 93428

bgresens@cambricsd.org

RE: Cambria Emergency Water Project on San Simeon Creek (IS/MND)

The Cambria Community Services District has spent more than 20 years and an unknown total amount of capital pursuing seawater desalination as a water supply source for Cambria and surrounds, with no results other than what seems to be an ongoing attempt to combat and challenge State and Federal environmental laws (Attachment A).

The lure of the ocean as an unlimited and free water storage reservoir for humans is enticing and hard to resist. However, negative impacts to humans and to all the plants and animals that live in and near it, have been dismissed or ignored as if checking a box entitled 'no impact' magically solves the problem. The impacts to humans are considerable especially energy cost and its contribution to overall greenhouse gas emissions and climate change, population growth inducement to this very sensitive and undeveloped region of the North Coast of San Luis Obispo County, and the problems of waste disposal whether seawater desalination or brackish water desalination remain unresolved.

Greenspace welcomed the introduction of Sava Nedic and CDM Smith to this equation because, for the first time in 20 years, there seemed to be at least a recognition of the challenges this project must overcome in order to be viable. Upon reading CDM Smith reports one can easily surmise that energy costs are high; Instream flow studies are needed and have not been completed; the chemical waste produced is larger than the the disposal site; noise and lights will be an issue for State Parks campgrounds; additional staff will need to be hired; operation and maintenance will be at least \$400,000 per year. CDM also outlines that

"The permeability of the lagoon deposits is unknown, so it may be necessary to provide increased discharge to the wells or directly to the channel if the drought persists for an extended period. If additional mitigation flow are required, then additional pumping from well 9P7 would be required. (Appendix D pg. 114-115.)

“If emergency operations were to continue into the future with no runoff in San Simeon Creek, then this higher TDS water and eventually sea water would be induced to the area of 9P7.” (Appendix D pg. 21)

“Factors such as the lateral boundary inflow, connection with the ocean, configuration of the aquifer west of the shoreline and other factors are uncertain and have no direct field data for their characterization....” and

“The model should be refined in the future when significant changes in water use in the basin occur after implementation of the selected emergency water supply alternative to refine operational parameters.” (Title 22 5.5 Model Uncertainties and Limitations)

This new ‘temporary and portable’ project that proposes to desalinate brackish water rather than ocean water seems to recognize that ocean desalination is not the way forward for Cambria, yet this project is close enough to the ocean that future steps could easily be taken in a westward direction, thru the entrance to the Hearst San Simeon Natural Preserve, and onward to the Monterey Bay National Marine Sanctuary, the CA Sea Otter Refuge and the newly acquired Cambria State Marine Park.

Definition of Brackish Water

Upon further investigation it appears that an acceptable and detailed definition of Brackish Water is needed. CCSD recently applied for Prop. 50 Grant funds (but was denied) so by using those guidelines the following has come to light. According to the 2013 Water Desalination solicitation package for Prop 50 funds, found at the Department of Water Resources as outlined in AB1747 (Statutes of 2003, Water Code Section 79547.2(c)),

“ Saline water is water with a salinity that exceeds normally acceptable standards for municipal, domestic, and irrigation uses. For the purpose of this grant program, only projects with water sources containing Total Dissolved Solids (TDS) concentration exceeding 1,000 milligrams of salt per liter will be considered for funding.”

INELIGIBLE PROJECTS

“The following types of projects will not be considered for this round of funding:

Wastewater treatment, and the potable water treatment of impaired waters and agricultural drainage water intended primarily for the removal of chemicals other than salinity generally are not eligible for funding, even if the technology employed is one that is commonly used for water desalination.”

“Projects intending to desalinate water containing TDS concentration of less than 1,000 milligrams of salt per liter are not eligible for funding”

Feasibility studies of seawater desalination

“If during the execution of a project, project conditions are found to be substantively different from those anticipated during the grant application process, the grantee will consult with DWR to determine an appropriate course of action. For example, if an awarded grantee discovers actual feed water conditions are less saline than 1,000 mg/L, then the grantee must inform the DWR project administrator and await instructions on how to proceed.”

According to the above definition, this project is not treating ‘brackish water’. Below are the most important paragraphs from the Title 22 report to describe the source water of Well 9P7 for treatment. CDM Smith reports that water drawn from well 9P7 is in fact drinking water: “**The water quality measured in source well 9P7, supplying the AWTP, is high quality before treatment, already complying with every drinking water MCL and secondary MCL. A**” (Title 22 Report Section 7.2)

However, CDM Smith then also goes on to state that the source water is ‘brackish’ although they do qualify that statement by saying ‘from the basin’, not specifically from Well 9P7:

Title 22 2.1 Overview

“The source water for the Emergency Water Supply Project is the brackish groundwater from the San Simeon Creek Basin, two miles north of the Cambria Township. The water will be extracted from the aquifer at CCSD Well 9P7, located between the existing Effluent Percolation Ponds. The location of this well was shown on Figure 1-2. Groundwater models indicate that the water in the basin near the extraction well is a blend of infiltrated secondary effluent from the Cambria Wastewater Treatment Plant (WWTP), natural underflow from inland groundwater, and deep basin brackish water with limited recharge. As the well is pumped for extended periods of use, it is anticipated that the contribution from secondary effluent will increase substantially. Due to the possibility that the well water will become primarily influenced by infiltrated secondary effluent, the post-extraction treatment facility has been designed to comply with 2014 CDPH regulations for groundwater replenishment of recycled water.”

Title 22 7.2 AWTP Product Water

“The water quality measured in source well 9P7, supplying the AWTP, is high quality before treatment, already complying with every drinking water MCL and secondary MCL. A complete analysis from this well, showing regulated parameters is included in Appendix D. Table 7-2 is a summary table including parameters that were measured in the source water at levels above the detection limit or were assumed to be higher in the AWTP source water after prolonged operation of the Well. Without comprehensive data for the AWTP influent, the process design was performed after adding 10% additional ionic constituents to assumed Source Water conditions in Table 7.2. RO projections are performed with TDS of 1370 ppm to meet ionic charge balance. Please refer to Appendix C3 for RO projection. The AWTP product water is expected to meet all drinking water and recycled water quality limits and guidelines, and will be monitored periodically to confirm the quality of this product water. The proposed monitoring program is included in Section 8.”

WELL 9P7 is shown to have a TDS level of 1110 according to Table 7-2 chart. However that same table refers readers to Section 2 Table 2-1. **In Table 2-1 The TDS of the Source Water at 9P7 is only 425 (note 1) with a Maximum of 510 (note1).**

notes:

1. Based on Annual Report Summary from Cambria WWTP for 2012 through 2013
2. Based on April 7, 2014 sampling event. No maximums are included as only single data point is available
3. Based on April 21, 2014 sampling event. No maximums are included as only single data point is available.

The TDS level of 1110 is assumed condition because the project will by itself induce salt water intrusion and pull the wastewater from the percolation pond thru the aquifer which pollutes the perfectly drinkable groundwater that exists at Well 9P7 today. The project causes the pollution.

This is not a brackish water project. It is using fresh groundwater to mix with wastewater, and induce salt water intrusion into an area that has not suffered from it.

And

“If emergency operations were to continue into the future with no runoff in San Simeon Creek, then this higher TDS water and eventually sea water would be induced to the area of 9P7. If this extreme drought condition were to occur, the steady-state TDS would be a blend of the percolated waste water, return flows from injection at RIW1 and sea water, with minor basin flow from up-gradient after several years. Under this extreme condition, the TDS could rise as high as 8,500 mg/L when this equilibrium is reached after several years of no stream flow recharging the system. (Appendix D pg. 21)

In addition - wastewater is not currently affecting Well 9P7 as shown here:

Title 22 2.4 Water Quality section:

*“Table 2-1 presents a summary of historical water quality data. Projections of water quality have been based on both historic effluent quality from the Cambria WWTP and limited data from production of CCSD Well 9P7. It should be noted that the sucralose levels measured in the well after 2.5 hours of continuous pumping were approximately one percent of the levels in the secondary effluent (see Table 2-1). Since sucralose is an artificial organic compound known to degrade slowly in natural systems, the **low concentration in the well water suggests that the contribution of young wastewater in 9P7 was quite low, and the well may ultimately prove to not be under the direct influence of wastewater.** In spite of these findings, the facility design has been based on a conservative assumption that the primary contributor to water in the extraction well will be percolated secondary effluent.”*

The above inconsistencies and statements are designed to confuse and cleverly mislead the reader, rather than inform. It is not helpful and does not promote serious and intelligent review of a project that requires the utmost clarity. There is no doubt that Cambria's wastewater should be treated directly and recycled or used as groundwater recharge rather than being dumped onto the surface of a percolation pond near San Simeon Creek.

Instead, based on all indications from the Title 22 report, and Appendix D, this project is purposefully inducing salt water intrusion in order to reduce it, and drawing in wastewater in order to treat it. Wouldn't it be less costly and more efficient to just tertiary treat the wastewater, never dump it on the ground, and reinject the treated wastewater after all environmental hurdles are overcome? At the same time the CSD could be applying for permits to use Well 9P7 for supplemental drinking water rather than polluting it.

Agency Review and Timelines (see Attachment A - NEPA/CEQA Timeline)

1. The Cambria CSD is proposing to complete enough tasks by August of 2014 to provide safe and reliable drinking water for the community of Cambria by October 1, 2014. CCSD has requested that all permits are emergency permits which would allow fast tracking including exemptions for CEQA to avoid a full EIR. The emergency permit is not appropriate for this project as timelines for produced water have been moved into the 2014-15 rainfall season. No drinking water from this project is expected to be available until 2015. Goals will not be met.

2. Fast Tracking of permits is not justifiable at this location.
3. The CSD will not be able to complete the necessary studies and all regulatory requirements within the 180 day timeframe mandated by the Central Coast Water Board November 2014.
4. In letter dated June 11, 2014 the Central Coast Water Board warned that the CSD had not started the process for obtaining permits from the CA Department of Fish and Wildlife, the US Fish and Wildlife, the Section 404 or Section 401 applicability from the Army Corps of Engineers, the California Dept. of Public Health, the CA Coastal Commission, or other agencies.
5. Same letter describes incomplete processes for CSD to apply for permits for ocean discharge or storm water discharge alternatives for waste disposal.
6. In Title 22 report, Photograph 8 states: "*Facing east. A second alternative for disposing of unusable brine left over from the water treatment is to send it via an existing pipeline to be discharged into the ocean.*"
7. This location contains a number of threatened and endangered species. San Simeon Creek empties into the Monterey Bay National Marine Sanctuary and the Cambria State Marine Park. Agencies with oversight include, but are not limited to, the US Fish and Wildlife Service, National Marine Fisheries Service, National Oceanic and Administration, CA State Parks, CA Fish and Wildlife, CA Coastal Commission, the CA Dept. of Public Health, the State Water Resources Control Board, the Regional Water Quality Control Board and others.
8. Section 404 of the US Environmental Protection Act required yet not begun.
9. Section 7 of the CA Endangered Species Act required yet not begun.

Staffing Issues

1. Cambria CSD is currently operating without a level 3 Certified Waste Water systems manager, or senior wastewater operator, or utilities manager as a result of the resignation of Mike Finnigan effective June 18, 2014.
2. The district has experienced a sharp loss in institutional knowledge in the past year or so, with resignations of former District Clerk Kathy Choate, Water Department Supervisor Jim Adams, Finance Officer Alleyne LaBossiere, Finance Clerk Kathy Frye and others. Several employees have taken medical leaves to deal with stress.
3. A lack of confidence in the CSD ability to perform exists based on past history with hefty fines paid for recent sewage spills. Water leaks and infrastructure problems continually need attention.
4. A lack of confidence in the CSD to monitor water adequately to protect public health and safety exists demonstrated by the pumping of Santa Rosa Creek well SR1 before Mtbe case is closed.
5. CSD Org charts and staffing have been rearranged and reordered so many times that few know who is working at what level of expertise at present.

Alternatives

1. Lack of independent review of alternatives and 'laser focus' on desalination as the sole project due to Federal funding limitations for desalination and Army Corps involvement.
2. "*The lack of long-term storage is a significant concern to CCSD and agricultural pumpers, because during droughts, groundwater basins may not be completely filled during the wet season, and as a result, water level drawdown from dry season pumping poses a greater risk of causing seawater intrusion in San Simeon Creek or land Subsidence in the Santa Rosa Creek watershed.*" (Appendix B Need for Instream Flow Study pg 228)

3. CSD continues 30 year failure to create an unbiased community 'stakeholder' process to arrive at water decision.
4. The CSD is pumping non potable water from Santa Rosa Creek well SR1, that could be used for drinking water with slight filtration.
5. The Cambria community has basically taken the idea of building tank farms into their own hands, creating individual residential tank farms to water landscaping.
6. CSD still has the capability of extracting in the 2014 dry season from Santa Rosa Creek SR4 which may not impact the WBE monitoring wells as quickly as extracting from SR1.
7. Threat of running out of water -Ranchers provided water to CSD in the past.
8. Ranchers can be paid to fallow fields - has offer been made?
9. Swimming pools are being filled - why is there water for pools but not people?
10. Hotels/motels have been allowed more water and a monetary break on water use.
11. Utilizing above ground water bladders to store water were not analyzed in the technical memo.
12. Reducing water use thru limiting the intensity of commercial summertime lodging, or reducing the number of tourism events during the summer and fall have not been analyzed in the technical memo.
13. Reducing overall water consumption in Cambria has been accomplished thru a Stage 3 Water shortage emergency banning all outdoor water irrigation with potable water and has reduced water use 40% or more.

Costs and Funding

1. CCSD Minutes and timeline indicate continuing and recent US Army Corps of Engineers involvement in this long term project. (Attachment)
2. A Prop. 84 CA State grant for \$3,750,000 is being sought at the same time the Army Corps of Engineers has been working on Cambria's EIR/EIS for desalination alternative. (Attachment)
3. The project was originally envisioned to rent and operate a temporary, portable brackish water Reverse Osmosis Unit, costing approximately \$100,000 not a permanent project.
4. Giving away SR1 water negatively impacts water and wastewater enterprise funds. The exact amount of water removed from SR1 is unpublished and CSD production reports claim those wells are 'shut down' when in fact they are pumping water out of the creek.
5. Cost for entire project unknown for ratepayers at this point estimated at \$8-\$11 million
6. Cost per acre foot for Operation and Maintenance alone is \$1400 per acre foot (for 2 new operators) \$350,000 per year for 250 acre feet.
7. CDM Smith reported the plant requires **5 new operators** (with high levels of experience) therefore per acre foot cost much higher than \$350,000 annually for Operation and Maintenance.
8. Costs continue to escalate due to lack of public support and refusal to conduct an independent community stakeholder process.

Environmental Issues

1. Habitat Conservation Plan never funded.
2. Instream Flow studies for both San Simeon and Santa Rosa Creeks never funded." *The North Coast Area Plan (NCAP) includes standards and findings required for any new public water supply project that will assure CCSD water withdrawals are limited to protect adequate in-stream flows to support sensitive species and riparian/wetland habitat within the reach of streams effected by CCSD pumping. This leads to an in-stream flow management study objective to determine the sustainable amount of withdrawals for new development that may*

be accommodated, which will not adversely affect riparian and wetland habitat or agricultural activities.” (Appendix B Need for Instream Flow Studies)

3. Cambria Forest Management Plan never funded.
4. Will growth be allowed and the moratorium lifted in Cambria or San Simeon with this ‘temporary’ project or if this becomes a permanent facility? What mitigations for growth are being conditioned in this temporary or long term project?
5. Impacts and drawdown and hydrology of San Simeon Creek and Lagoon are "unknown, and uncertain" as admitted by CDM Smith in the Technical report.
6. Area recently mowed in the Spring without checking for nesting of endangered species such as Western Pond Turtle.
7. Given the very high cost to produce this water and the financial impacts it would place on the water utility and ratepayers, other less expensive and environmental sound water management options would not be funded.

Mitigation and Growth

1. A Cambria buildout reduction program, costing 38 million and never funded, was required mitigation for Cambria’s past desalination efforts.
2. CSD continues to issue Intent to Serve Letters requiring additional water diversions under a 2:1 retrofit model that is obviously not protecting human or coastal resources.
3. SLO County continues to approve development relying on CSD water assurances thereby jeopardizing Cambria residents right to water.

Emergency Ordinance Policy considerations

1. CSD made discriminatory application of mandatory water use restrictions and fines.
2. CSD failed to carry out the phase one, two or three mandatory restrictions of use by commercial and public customers as required by ordinance.
3. CSD failed to consider and cement purchase of water from ranchers.
4. CSD continues to allow public events at CSD owned Vet’s Hall facilities.
5. CSD continues to use SR1 well water at Santa Rosa Creek for landscape watering rather than for drinking water.

Supply

1. Tracer studies are now expected to use 134 Acre Feet of water (pumping 60 Af per month) in the critically dry season. What are the effects of drawdown on sensitive species?
2. The 134 AF will not necessarily be recaptured for drinking water and what is recaptured must travel 2 -3 months before we can drink it. That means 134 acre feet is immediately unavailable to Cambria when we need it the most. *“The percentage of recovery would increase for longer durations under more extreme drought conditions, as basin inflow decreases. If the emergency alternative is only operated for 3 months all the water would be pumped from the basin and not from the project.” (Emergency alt 4 p6-4)*
3. CSD is unwisely giving away an unlimited amount of water supplies at SR1 in Santa Rosa Creek for landscaping purposes.
4. Palmer Flats stopped running May 16 therefore we have 370 Acre Feet, if we are careful, until rains.

Waste Discharge and Brine Containment

1. Van Gordon Creek may have been altered without permits. Wastewater discharges are occurring to Van Gordon Creek that may be affecting endangered species.

2. What is contained in the current wastewater percolation ponds and what agency is monitoring for safety?
3. The current percolation ponds are producing algae blooms in both the ponds and lagoons. (see Attachment)
4. Waste discharges are located at the intersections of Van Gordon and San Simeon creeks within 100 feet of creeks containing endangered species.
5. A list of chemicals and amounts contained in the waste products needs clarity.
6. 65,000 gallons per day (36 acre feet) of waste discharge will be created “over a six month period” to be disposed of in a lined evaporation pond near Van Gordon Creek which appears to be too small (22 acre feet) to contain the waste. What if plant runs more than a six month period?
7. 5 mechanical evaporators are being introduced to evaporate the waste at an accelerated rate which increases the energy use (therefore cost), increases noise levels, and introduces the problem of aerosol overspray of chemically laden waste into neighboring areas and the campground.
8. The mechanical evaporators will run 12 hours per day for 365 days per year near the campground. Please listen <http://www.youtube.com/watch?v=5Mxg03yarAc>
9. Idea for an ocean outfall or “stormwater outfall” alternative has now been introduced into the Monterey Bay National Marine Sanctuary, the Cambria State Marine Park and the CA Sea Otter Refuge due to brine pond inadequacies. This is a fatal flaw.

Other issues

1. Impacts to cultural resources are significant and not addressed sufficiently to protect them. Archeology report from 1991 and 1994 may not be sufficient to protect cultural resources, but should be included. Which tribes were contacted? Has a formal consultation begun?
2. Noise, Lights, and industrialization of this sensitive area and campground.
3. Extraction at SR1 can seriously impact the WBE monitoring well at Windsor Bridge, causing the CSD to shut down all water extractions from Santa Rosa Creek when we need the water the most.

Thank you for your consideration,

Mary Webb VP for the Board of Directors
Greenspace -the Cambria Land Trust

Steele, Noelle

From: Denker, Sharon@Waterboards <sharon.denker@waterboards.ca.gov>
Sent: Tuesday, April 07, 2015 8:44 AM
To: Garcia, Rita
Cc: Bgresens@cambriacsd.org; asingewald@co.slo.ca.us; Densmore, Jeff@Waterboards; rlichtenfels@co.slo.ca.us; Luster, Tom@Coastal; jason.goeckler@ksoutdoors.com; Robinson, Daniel@Coastal; Rokke, Jon@Waterboards
Subject: COMMENTS ON NOTICE OF PREPARATION, CAMBRIA EMERGENCY WATER SUPPLY PROJECT, CAMBRIA COMMUNITY SERVICES DISTRICT
Attachments: NOP response.pdf

COMMENTS ON NOTICE OF PREPARATION, CAMBRIA EMERGENCY WATER SUPPLY PROJECT, CAMBRIA COMMUNITY SERVICES DISTRICT

The Central Coast Regional Water Quality Control Board is increasing its efforts to transmit correspondence and other information electronically, reducing the amount of paper used, and increasing the speed of which information is distributed. Therefore, you are receiving the attached correspondence for the subject site from the Central Coast Water Board in a Portable Data Format (PDF). You will not receive a hard copy unless documents are also required to be sent by Certified Mail.

If you need help opening this document please refer to the link below:

<http://www.adobe.com/products/acrobat/readstep2.html>

Central Coast Regional Water Quality Control Board

April 7, 2015

Ms. Rita Garcia, Technical Manager
RBF Consulting
rgarcia@mbakerintl.com

Dear Ms. Garcia:

COMMENTS ON NOTICE OF PREPARATION, CAMBRIA EMERGENCY WATER SUPPLY PROJECT, CAMBRIA COMMUNITY SERVICES DISTRICT

The Central Coast Regional Water Quality Control Board received the Cambria Community Services District's notice of preparation of a draft EIR for its emergency water supply project. The Water Board is especially interested in the project's effects on hydrology and water quality, but we encourage the district to thoroughly evaluate all potential effects and possible project alternatives.

As you know, operation of the Title 27 impoundment has had its share of problems. The non-water-quality environmental impacts of the impoundment identified in the EIR may affect how the district operates the impoundment or push the district to consider alternatives to the impoundment. The district should consider all possible alternatives, including covered temporary tanks, off-site disposal by trucking, and piping and disposal at San Simeon's wastewater treatment plant.

The EIR should also thoroughly analyze impacts to groundwater and whether project alternatives, such as direct treatment of wastewater, would have lesser impacts.

We look forward to reviewing the EIR. If you have any questions, please contact **Jon Rokke at (805) 549-3892** or by email at jon.rokke@waterboards.ca.gov.

Sincerely,

Kenneth A. Harris Jr.
Executive Officer

cc: bgresens@cambriacsd.org
Jeff.Densmore@waterboards.ca.gov
rlichtenfels@co.slo.ca.us
Tom.Luster@coastal.ca.gov
Jason.Chance@wildlife.ca.gov
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bill.struble@noaa.gov
Daniel.Robinson@coastal.ca.gov
asingewald@co.slo.ca.us

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response.docx
ECM: 809684

April 2, 2015

Ms. Rita Garcia

Technical Manager

RBF Consulting

14725 Alton Parkway

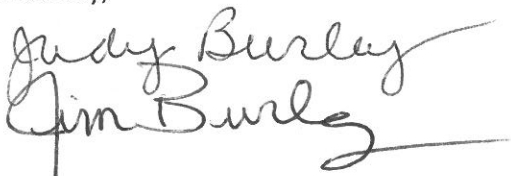
Irvine, Ca. 92618

Dear Ms. Garcia,

We continue to support the EWS recently installed in Cambria. Our past and present concerns are related to Cambria's efforts to supply a reliable water supply for our town. . Because of the drought in California we realize the hard work of the community to provide this water supply must be continued. It is our hope the EWS will help protect the habit and allow fire protection for the community to continue.

We are committed to conserving water in our home. We hope that adding the EWS to these efforts will allow all the residents of Cambria to live in a safe environment.

Sincerely,

The image shows two handwritten signatures in black ink. The top signature is 'Judy Burley' and the bottom signature is 'Jim Burley'. Both signatures are written in a cursive, flowing style.

Jim and Judy Burley

314 Gaine St.

Cambria, Ca. 93428

April 1, 2015
Ms. Rita Garcia, Technical Manager
RBF Consulting
14725 Alton Parkway
Irvine, Ca

Dear Ms. Garcia,

In light of the upcoming EIR for the Cambria Emergency Water Project, I would like to express my concerns.

In recent weeks the final stages of development of Cambria's "emergency water project" have been characterized by an erosion of the public's trust in the responsible agencies as revelations about the potential toxic waste produced by the project have begun to surface. I am not among those opposed to Cambria's growth or development of water resources, quite the contrary. However, it is now time to pause and take another look at this.

In the EPA's "Guidelines for Water Reuse," for which the primary consultant was CDM Smith (coincidentally, the contractors who built Cambria's emergency water project), Chapter 8 is entitled, "Public Outreach, Participation, and Consultation." It advises ways to frame the benefits of water reuse projects, rather than focus on the risks.

So with that in mind I'd like to talk about an issue that most locals seem to know little about, because it has not been widely reported.

As we all know by now, the District began operating the plant under an "emergency" designation without having completed its application for a permanent coastal development permit.

This means that there are several critical questions that have not been answered. I will set aside the issues concerning the integrity of the San Simeon creek and lagoon, and the effects of the chemicals used in the extraction process for others to address, and focus here on the evaporation pond

RWQCB PERMIT RE BRINE MIST: In one phase of the plant's process, brine wastes are discharged into an evaporation pond. The pond is filling with potentially toxic wastes that have been removed from the extracted water (which concentrates partially-treated sewage water including pathogens) during the treatment process. The pathogen-rich brine waste includes salts and other contaminants. To aid in the evaporation of the brine waste, 5 spray evaporators are being used to accelerate the evaporation from the pond, shooting the mist hundreds of feet into the air, including testing yesterday during which the mist was blown well outside the impoundment limits and digested ducks through the intakes. (The District has proposed running them 12 hours a day, 350 days/year.)

Thus the project's brine evaporation pond and spray evaporators are exposing nearby campers and residents to this aerosolized brine waste.

The chemical constituency of the aerosolized brine is believed to contain pathogens (viral, bacterial, mycoplasma or protozoa, according to the EPA Guidelines, Chapter 4) as well as the

potentially methylated bioavailable metals copper, chromium, steel, lead, mercury, and arsenic, all harmful or toxic when airborne.

The potential for adverse health, recreational and aesthetic impacts on people living and working nearby, as well as agricultural crops, is very real. Yet these potential impacts have not been evaluated since the District has not conducted the required environmental review. In addition, since prior State Health Department review has been delegated to the Regional Water Quality Board, no medical doctor has reviewed the human health impacts.

Back to the EPA's Guidelines, Chapter 8: it is noted that the water industry's vocabulary and means of communicating with the public are not well understood or well received. To remedy that, the report cites survey results revealing that people are most reassured by the term "very high quality water," and that the least reassuring terms are those that include the "re" prefix, as in, reuse, reclaimed, etc.

The EPA Guidelines also mentions people's visceral aversion to human waste and the difficulty of overcoming a "perception" of contamination. Perhaps that's why we rarely hear the term "Toilet to Tap" applied to this project, even though it is an apt description of the process employed at Cambria's emergency water project.

Of course at this point, the CCSD and NCAC do not know if it is only a "perception" of contamination that we are facing.

NOISE, SECTION 12 on Environmental Checklist:

And then there is the matter of noise pollution. For the past 10 years, I have lived on Clyde Warren's ranch across the road from the plant. Those of us in proximity to the plant have been listening to the test runs of the evaporator engines that began in early January. During the week of February 9, the fan engines ran at 110% capacity 24/7, for 4 days causing a substantial increase in noise levels that kept us awake at night.

I called the CCSD offices three times, beginning in early January to express concern about the noise and to ask what the proposed operation schedule would be. To this day I have not received the courtesy of a reply.

I found something else in those EPA Guidelines most relevant to our situation (when I say "our" I mean those of us living and working in the immediate vicinity of the plant), also in Chapter 8, under the heading "Environmental Justice."

One such environmental justice issue is that of geographic inequity. This is when one portion of the community perceives that it is required to share a majority or disproportionate share of the impact from the project siting.

The guiding principle of environmental justice is that no group of people should bear an unbalanced share of negative environmental impacts of a project or program, including not only health hazards and noise pollution, but also potential decreases in property values and a substantial reduction in quality of life.

One might wish that in the rush to get the plant online, while circumventing the permitting process, that someone in a position of responsibility in our town or county had shown a

modicum of concern for those people who are most at risk from the negative impacts of the plant...because ultimately, if this system is as deeply flawed as early indications suggest, all the town's residents will bear the burden for decades to come.

Sincerely,



Denise P. Hearst
Cambria, CA

Cc. RWQCB



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Central Region
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4005
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



April 8, 2015

Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, California 93428
E-mail: bgresens@cambriacsd.org

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Cambria Emergency Water Supply Project, Cambria Community Services District, San Simeon Creek and Lagoon, Van Gordon Creek, San Luis Obispo County, SCH No. 2014061073 Corrected Copy

Dear Mr. Gresens:

The California Department of Fish and Wildlife (Department) is submitting a corrected copy of our NOP comment letter dated April 6, 2015. The correction is on page six (6), the first sentence of the second paragraph under Recommendation. We are replacing "final MND" with "DEIR". Attached is a copy of the corrected letter.

If you have any questions regarding this corrected copy, please contact Annette Tenneboe, Senior Environmental Scientist (Specialist), at (559) 243-4014, extension 231; annette.tenneboe@wildlife.ca.gov, or by writing to the California Department of Fish and Wildlife at 1234 East Shaw Avenue, Fresno, California 93710.

Sincerely,

Jeffrey R. Single, Ph.D.
Regional Manager
California Department of Fish and Wildlife, Central Region

Attachment

cc: See Page Two

Robert Gresens
April 6, 2015
Page 2

cc: Rita Garcia, Technical Manager
RBF Consulting, a Michael Baker International Company
14725 Alton Parkway
Irvine, California 92618
E-mail rgarcia@mbakerintl.com

ec: Jerry Gruber, General Manager
Cambria Community Services District
jgruber@cambriacsd.org

Tom Luster, California Coastal Commission
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Doug Barker, Department of Parks and Recreation
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California Department of Fish and Wildlife
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Eric Wilkins



State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



April 6, 2015

Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, California 93428
E-mail: bgresens@cambriacsd.org

**Subject: Notice of Preparation of a Draft Environmental Impact Report for the Cambria Emergency Water Supply Project, Cambria Community Services District, San Simeon Creek and Lagoon, Van Gordon Creek, San Luis Obispo County, SCH No. 2014061073
Corrected Copy**

Dear Mr. Gresens:

The California Department of Fish and Wildlife (Department) has reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) on the Cambria Emergency Water Supply Project (Project). The Project is located at the Cambria Community Services District's (CCSD's) existing San Simeon well field and percolation pond system property (Assessor's Parcel Numbers (APNs) 013-051-008 and 013-051-024). The Project is designed and constructed to treat brackish water using advanced treatment technologies and recharge the CCSD's San Simeon well field aquifer with advance treated water. The brackish water source is a combination of diluted seawater that occurs from the subterranean dispersion of salts from a deeper saltwater wedge into an overlying freshwater interface zone, San Simeon Creek subsurface flow (creek underflow), and percolated treated wastewater effluent.

The Project is capable of pumping up to 452 gallons per minute (gpm) of advance treated water into a re-injection well located a minimum of two months travel time from existing potable production Wells SS-1 and SS-2. A 400 gpm maximum extraction rate from existing CCSD Well SS-1, SS-2, or a combination of both wells can occur during Project operations. The Project's net water production is approximately 300 gpm, or approximately 250 acre-feet over an assumed six-month dry season. The Project's operational period varies according to the amount and timing of seasonal rainfall and the water levels in the CCSD's well field. The Project proposes to provide up to 100 gpm of fresh water to San Simeon Creek Lagoon when operational.

Project operation is expected to provide water supply augmentation during dry periods, prevent both seawater intrusion into the groundwater aquifer and potential subsidence, and protect existing well pumps from losing suction.

Conserving California's Wildlife Since 1870

Potential Impacts: The Department believes that the Project has already resulted in direct and cumulative adverse impacts to fish and wildlife resources of the San Simeon Creek,, Van Gordon Creek, and the lagoon. These impacts include reducing instream flows needed to maintain fish and wildlife populations and habitat within and adjacent to these streams and lagoons. The implementation of the Advanced Water Treatment Plant to treat brackish water, the disposal of brine solution into the Evaporation Pond, and the disposal of treated brackish water into San Simeon Creek have exposed fish and wildlife to adverse chemicals and deleterious water quality. Project-site construction may have had additional impacts to fish and wildlife and their habitat.

These changes to flow and water quality may have substantially impacted the steelhead trout (*Oncorhynchus mykiss irideus*) in these streams. The South-Central California Coast Steelhead (SCCCS) Distinct Population Segment (DPS) is a State Species of Special Concern (SSSC), listed as threatened under the Federal Endangered Species Act (FESA), and the San Simeon Creek is designated by FESA as critical habitat for the SCCCPS DPS. The federally-endangered and SSSC tidewater goby (*Eucyclogobius newberryi*) is known to inhabit the lagoon and some upstream reaches, and would be similarly affected by water diversions. Impacts from water diversions and water quality changes may adversely affect other special status species dependent upon the San Simeon and associated lagoon and riparian corridor, including the SSSC and federally threatened California red-legged frog (*Rana draytonii*) and SSSC western pond turtle (*Emys marmorata*). The Department is concerned that the proposed Project may result in additional direct and cumulative adverse impacts to these and other valuable fish and wildlife resources supported by the San Simeon and Van Gordon creeks and their associated riparian, upland, wetland, and lagoon/estuary habitats.

The Environmental Impact Report (EIR) should address the following concerns and recommendations identified by the Department:

Prior California Environmental Quality Act (CEQA) Analysis: This Project has undergone prior environmental review and approval under CEQA for different permit processes by various agencies. On April 22, 2014, the CCSD submitted an application to the San Luis Obispo County (SLO County) for an Emergency Coastal Development Permit (E-CDP). A Mitigated Negative Declaration (MND)) for this Project was submitted to the State Clearinghouse (SCH# 2014061073) by CCSD on June 22, 2014. The purpose for the MND was to obtain a Regular Coastal Development Permit (R-CDP) as required by SLO County.

Pursuant to CEQA Section 21080(b) and CEQA Guidelines Section 15269(b)(c), CCSD submitted, on September 9, 2014, a Notice of Exemption – Emergency Project to the State Clearinghouse (SCH# 2014098136) which was approved by the Office of Planning and Research on September 12, 2014. CCSD was Lead Agency for the preparation of both the MND and Emergency Exemption.

The OPR's written concurrence with the Emergency Exemption stated that the Department had issued the necessary permits. This is incorrect. The Department had informed CCSD on multiple occasions that a Lake and Streambed Alteration Agreement (LSAA) would be necessary for the Project pursuant to Fish and Game Code Section 1600 et seq. However CCSD has not yet obtained an LSAA from the Department for any portion of the Project.

Recommendations:

The EIR should disclose all prior CEQA analysis for the Project including whether the MND was adopted by CCSD and a Notice of Determination was filed with the State Clearinghouse. The EIR should disclose all permits obtained by various Federal, State, and Local Agencies and whether a CEQA or a National Environmental Protection Act analysis was required for each of the permits.

The EIR should also disclose that the Emergency Exemption incorrectly stated that all necessary permits were obtained from the Department.

Flow Diversion and Analysis: The Project description proposes to withdraw 400 gpm (0.8912 cubic feet per second (cfs) or 645.6 acre-feet per year (afy)) from the San Simeon Creek aquifer via Well 9P7, plus additional water diversion in excess of 400 gpm to account for brine solution generated in the treatment process (page 4.9-8 of the MND). It is unclear what amount in excess of 400 gpm will be diverted from Well 9P7.

We recommend that the DEIR provide an accurate calculation of the actual subsurface flow extracted in excess of the 400 gpm for analysis of impacts to the San Simeon Creek and Van Gordon Creek surface and subsurface flows, Lagoon, and associated aquatic resources.

Water Rights: The State Water Resources Control Board's (State Water Board) Order dated October 22, 1996, approved a new development schedule and amended Permit 17287 to read: "Complete application of the water to the proposed use shall be made on or before December 31, 2005." It is our understanding from the State Water Board that CCSD did not fully develop the project and apply the water to the proposed use prior to December 31, 2005. It is also our understanding from the State Water Board that CCSD has not petitioned for another extension of time. Any petition for extension of time will require noticing and is subject to protest.

It is the Department's understanding from correspondence received from representatives for CCSD and discussions with State Water Board staff that a portion of the water that will be extracted from Well 9P7, treated, re-injected at Well RIW1, and subsequently diverted by CCSDs production Wells SS-1 and SS-2 is derived from

the subterranean flow of San Simeon Creek and will be extracted by Well 9P7 under the basis of a riparian right.

Recommendation:

Based on information we obtained from SLO County parcel maps, Well 9P7 appears to be located on APN 013-051-008 while Well RIW1 is located on APN 013-051-024 in close proximity to CCSD's production Wells SS-1 and SS-2. While APN 013-051-024 includes portions of San Simeon and Van Gordon Creeks, APN 013-051-008 is not adjacent to any watercourse and is therefore a non-riparian parcel.

The DEIR should clarify the location of the point of diversion, basis of right, place of use, and purpose of use for water diverted from Well 9P7. If that portion of water attributable to the subterranean flow of San Simeon Creek diverted by Well 9P7 is done so under the basis of riparian right, a Statement of Diversion and Use should be filed with the State Water Board pursuant to Water Code Section 5100 et seq. An accurate APN map overlay on an aerial map with Wells 9P7, RIW1, SS-1, SS-2 should be included with the DEIR.

San Simeon Creek Bypass Flows:

From the *Final Report January 2014 San Luis Obispo County Regional Instream Flow Assessment*:

Environmental Water Demand (EWD), using steelhead as target species.

	Spring	Summer	Notes
EWD estimate from field assessment (p. 16)	1.50 cfs	0.50 cfs	Additional flows may be needed to provide suitable lagoon habitat during closed sandbar conditions.
Modeled EWD (p. 24):	1.6 cfs	0.5 cfs	
From Alley, 1992:			Adult upstream migration requires 21 to 67.5 cfs; post-spawning downstream migration requires 7.2 to 19 cfs; downstream juvenile and smolt migration requires 3.5 to 11 cfs.
Van Gordon (p. 24):	0.4	0.2	

p. 21: "San Simeon Creek with a large drainage area, low gradient, and broad channel; it requires more flow to provide sufficient velocity to meet minimum habitat requirements."

CCSD proposed Water Supply Project:

- Would extract 400 (0.891 cfs).

- Would return 100 (0.223 cfs) as mitigation flows.

To meet Summer EWD minimum, CCSD would need to provide up to 0.5 cfs, or 224.416 cfs, assuming none of that 224 cfs is lost to subsurface flows. If flows are to be measured at the Highway 1 bridge (per San Luis Obispo County Flow Assessment report), CCSD would likely need to provide substantially more water to meet the recommended minimum flows.

CEQA Baseline Compliance/Tracer Study and Impacts to Santa Rosa Creek:

Although the Project has already been constructed, the EIR's impact analysis should be based on pre-project conditions and provide measures which fully avoid, minimize, or mitigate previous, current and future impacts to natural resources.

CEQA Guidelines Sections 15378(a) and (c) defines a Project as the whole of an action, including one subject to several discretionary actions by governmental agencies. One component of the Project's development was a tracer study for San Simeon Creek. The tracer study involved discontinuing well diversion by CCSD on San Simeon Creek while increasing well diversion on Santa Rosa Creek. However, CEQA analysis did not occur for the impacts of this action to Santa Rosa Creek and its associated fish and wildlife resources. Expected significant impacts to the Santa Rosa Creek and lagoon due to the tracer test included the drawdown of the surface and underground aquifer to the extent that the CCSD filed a temporary urgency change petition (TUCP) for a variance to Water Right Permit 20387 (Application 28158). The TUCP authorized a decrease in required minimum monitoring well levels in Santa Rosa Creek. Increased drawdown of the Santa Rosa Creek and lagoon can result in impacts to tidewater goby, red-legged frog, steelhead, and western pond turtle.

The Department had initially presumed that the TUCP variance would be addressed as part of the whole desalination project, in which placeholder language in the draft TUCP would have been updated when the CEQA document for that project was completed and approved.

Recommendation:

The EIR should clarify whether the above mentioned TUCP for Santa Rosa Creek was a stand-alone action that was not entirely dependent upon the larger desalinization project. If it was the result of the larger desalinization project then it should be included with the Project description.

Construction In Advance of CEQA Analysis: In addition to the tracer study described above, other Project components have been constructed in advance of CEQA review and approval. The NOP indicates that construction of the Project began

on May 20, 2014, and was completed on November 14, 2014. Testing and commissioning of the completed facility began on December 8, 2014, and was completed on January 20, 2015, when Project operations began.

Recommendation:

We recommend that the DEIR include an accurate description of all Project development activities, a discussion regarding pre-existing grading and structural development in connection with Project design plans (including but not limited to the construction of the injection and monitoring wells), and an appropriate discussion of all biological resources located within the Project area identified through biological surveys (including resources in Santa Rosa Creek).

We also recommend that the DEIR include a Project description sufficient to accurately identify impacts to wildlife species and habitat, and measures which would mitigate impacts to such species to a less-than-significant level, including a discussion of potential impacts to sensitive species that may have already occurred as a result of previous unpermitted land disturbance activities in association with the Project.

Brine Discharge to the Ocean: The location of an existing pipeline that could be used to send unusable brine left over from the water treatment to be discharged into the ocean was disclosed in the MND (Photograph 8 of Appendix B). It is unknown whether this pipeline will be disclosed in the DEIR. The Department believes that if the Project description changes to include the discharge of brine solution directly into the ocean, significant impacts to marine aquatic resources would occur, warranting substantially different environmental analysis.

Recommendation:

The DEIR should disclose the existence of a pipeline that could be used to discharge to the ocean, and clarify whether or not discharge of brine solution into the ocean is being considered. If so, then the alternatives analysis section in the DEIR should include an analysis of discharging brine solution directly into the ocean.

Evaporation Pond: The Department believes the brine evaporation pond, as constructed, is an attractive nuisance to waterfowl and other avian species, bats, pond turtles, red-legged frogs, and general aquatic and terrestrial wildlife. Long-term evaporative concentration of salts in wastewater can create hypersaline conditions in the pond and pose risks to avian and other wildlife. Bird mortality due to salt crystallization in feathers and brine ingestion is known to occur in hypersaline industrial wastewater ponds (Meteyer et al. 1997, Sladky et al. 2004, Jehl et al. 2012). Aerial drift of wastewater can deposit salts and trace elements onto vegetation and soil adjacent to

the pond. Excessive salts deposited on adjacent land can kill vegetation and cause long-term damage to soils (Harris et al 2005).

Recommendations:

The DEIR should include an analysis of the effects of drift on biological resources in the surrounding area, and the effect of hypersaline water quality on wildlife.

We recommend that the Project description in the DEIR include the following measures to prevent access to the brine pond by both avian and terrestrial wildlife.

- The CCSD should retain the services of a wildlife hazing expert to coordinate with the Department and United States Fish and Wildlife Service (USFWS) to develop a plan to prevent birds and other wildlife from accessing and using the brine pond.
- The banks along the pond are currently gradual with shorebirds and other avian species observed walking and resting. The banks of the pond should be re-contoured to a much steeper slope to help prevent bird use.
- Frog fencing should be designed and constructed in consultation with and the approval of the USFWS and Department.
- A cable is strung across the pond which could be a perch for birds and a bird strike hazard. This cable should be removed.
- Five (5) floating dock-type structures, 3-feet by 3-feet, are currently in the pond that could be used for bird landing. These structures should be removed or measures implemented to prevent birds from landing on them.
- Algal blooms are a concern, and measures to prevent algal blooms in the pond should be implemented.
- One of the evaporation sprayers at the pond was observed spraying every few minutes and if birds were to be in spray zone they would be impacted in a deleterious way (salt encrustation). Measures to keep birds out of the salt spray zone should be developed and included in the DEIR.
- The design for the frog fencing around the perimeter of the brine pond was observed to be two (2) feet high with a mesh approximately 1/8-inch square. The DEIR should provide documentation that this fence was constructed with approval from the USFWS as an effective measure to prevent red-legged frogs from entering the pond.

Water Quality: The EIR should provide a list of all the potential chemicals of concern for ecological receptors that could be associated with the evaporation pond, waste water percolation ponds, or with any discharges and include anticipated concentrations

of the potential chemicals of concern. The ecological toxicity benchmarks for all the potential chemicals of concern should be researched and included in the EIR.

Additionally, anticipated water quality parameters such as electrical conductivity, dissolved oxygen, and pH should also be evaluated for potential impacts to ecological receptors. The Department is specifically concerned with the potential for elevated salts in the evaporation pond (and potentially with the percolation ponds) and recommends use of electrical conductivity as a method to evaluate potential impacts to ecological receptors due to elevated salts. The Department is also concerned about the potential for algal blooms to form in the surface impoundment and/or percolation ponds and believe this should also be evaluated in the CEQA document.

The Department believes it is likely that chemicals of concern that exceed ecological toxicity benchmarks and poor water quality will exist in the surface impoundment and potentially in the percolation ponds such that wildlife hazing is necessary to help minimize wildlife use of these areas. As stated above, we recommend the DEIR evaluate wildlife hazing options and suggest a hazing expert be contracted by CCSD to coordinate with the Department and the USFWS to develop a plan to prevent wildlife from accessing the brine pond.

Department Jurisdiction

Responsible Agency Authority: The Department has regulatory authority over activities occurring in streams and/or lakes along with riparian habitat associated with and supported by watercourses, that could adversely affect any fish or wildlife resource, pursuant to Fish and Game Code Section 1600 et seq. If a Project could substantially divert or obstruct the natural flow of any river, stream or lake; substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake; or deposit or dispose of debris, waste, sediment, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, notification of Lake or Streambed Alteration to the Department is required.

Acquisition of a Lake and Streambed Alteration Agreement (LSAA) for this Project is required for water diversion and rediversion. For projects of this nature consultation with the Department is recommended well in advance of Project implementation. The Department recommends that CCSD submit a Notification of Lake or Streambed Alteration to the Department immediately; a substantial diversion of water from a jurisdictional feature is subject to Fish and Game Code (Code) Section 1600 et seq., and failure to notify is a violation of the Code. It is important to note that the Department is required to comply with CEQA in the issuance or extension of an LSAA. For this particular Project, the Department would be acting as a Responsible Agency and would need to rely upon the CEQA document prepared for the Project. If the CEQA document prepared by the Lead Agency (CCSD) is insufficient for the Department to make its own Findings or Notice of Determination, the Department might need to assume the role of

Lead Agency and prepare a subsequent CEQA document. The LSAA process is administered through the Central Region Office in Fresno and can be initiated by contacting the Lake and Streambed Alteration Program at (559) 243-4593.

Bird Protection: The Department has jurisdiction over actions which may result in the disturbance or destruction of active nest sites or the unauthorized "take" of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful "take," possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the "take," possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful "take" of any migratory nongame bird). In the event that Project-related vegetation removal will occur, it is advised that appropriate avoidance and minimization measures for raptors and other nesting birds potentially present in the Project site vicinity be addressed in the DEIR. Appropriate measures to prevent avian use of the brine evaporation pond should be incorporated into the DEIR and implemented by CCSD, in consultation with the Department.

If you have any questions regarding these comments, please contact Annette Tenneboe, Senior Environmental Scientist (Specialist), at (559) 243-4014 extension 231; annette.tenneboe@wildlife.ca.gov, or by writing to the California Department of Fish and Wildlife at 1234 East Shaw Avenue, Fresno, California 93710. Please feel free to forward this letter as appropriate.

Sincerely,



Jeffrey R. Single, Ph.D.

Regional Manager

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