1.0 Executive Summary

1.0 EXECUTIVE SUMMARY

In compliance with California Environmental Quality Act (CEQA) Guidelines Section 15123, *Summary*, this section provides a brief summary of the proposed Project, identifies each significant Project effect with proposed mitigation measures to reduce or avoid that effect, and summarizes the Project alternatives. The areas of controversy and issues to be resolved are also included in this section. This summary is intended as an overview and should be used in conjunction with a thorough reading of this Subsequent Environmental Impact Report (SEIR). This SEIR's text, figures, tables, and appendices serve as the basis for this summary.

1.1 PROJECT LOCATION

Cambria is located in central California's coastal region, in the northwest portion of San Luis Obispo County (SLO County). 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 Creek State Park (State Park) campground. 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. The approximately 96-acre Project site involves two parcels (APNs 013-051-024 and 013-051-008) owned by the Cambria Community Services District (CCSD). Access to the Project site is provided along the northern site boundary, via San Simeon Monterey Creek Road.

1.2 PROJECT SUMMARY

The Project involves construction and operation of sustainable 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 groundwater using advanced treatment technologies, in order to augment Cambria's potable water supply in response to the area's epic drought. Issuance of a regular CDP, which this SEIR is to support, will allow the CCSD to operate the SWF to operate the SWF to avoid future water shortage emergencies while also utilizing the SWF's ability to make the best use of the local groundwater supply through the SWF's improved efficiency and indirect reuse features. By using advanced technologies, brackish groundwater is treated to produce high quality water meeting State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) standards for indirect potable reuse of recycled water via groundwater recharge. Also, micro-filtered effluent and/or de-chlorinated and oxygenated product water is surface discharged

near the upstream end of the San Simeon Creek lagoon to protect San Simeon Creek Lagoon during dry weather conditions. The Project facilities are outlined below.

- Extraction Well;
- Advanced Water Treatment Plant (AWTP);
- Recharge Injection Well (RIW-1);
- Evaporation Pond and Evaporators;
- Lagoon Surface Discharge;
- Monitoring Wells; and
- Pipelines (five interconnecting).

CCSD's Board of Directors approved proceeding with the Project, which the Board determined was statutorily exempt from CEQA under the emergency exemption provisions of CEQA, on January 30, 2014. The County of San Luis Obispo issued an Emergency Coastal Development Permit (ECDP) to CCSD on May 15, 2014, permitting CCSD to proceed with the construction and operation of the Project. Construction began on May 20, 2014. One of the conditions of the ECDP was that CCSD apply for a regular Coastal Development Permit for the emergency project. The CCSD submitted an application for a regular CDP on June 13, 2014. The timeline for completing follow up information to support this original application has been extended by the County to allow additional time for completion of the supporting environmental analyses described within this SEIR. Following completion of the SEIR's CEQA process, the CCSD will update its June 13, 2014 regular CDP application to include the project modifications described within this SEIR.

1.3 GOALS AND OBJECTIVES

CEQA Guidelines Section 15124, *Project Description*, requires that the Project Description contain a statement of the objectives sought by the proposed project. The statement of objectives, which specifies what the CCSD seeks to accomplish, should also include the underlying purpose of the project, that is to say the reason behind the Project. The Project goals and objectives are to:

- Provide a reliable water supply facility to serve existing development, which can be operated to maximize local water use efficiencies, address any current water shortages, and avoid future water shortages.

- Provide a reliable water supply, which would serve no more than 4,650 existing and future residential units (CCSD wait list) at full buildout, pursuant to the North Coast Area Plan (NCAP) and mitigation set forth in the CCSD's certified Water Master Plan Program Environmental Impact Report (WMP PEIR).

- Provide a permanent water supply facility that can be operated to meet water demands during drought conditions and improve overall supply reliability.

- Safeguard Cambria against existing and future water shortages.

- Provide for the indirect potable reuse of recycled water, as part of the CCSD's efforts towards implementing sustainable practices for resilience to climate change impacts.

- Augment Cambria's water supply during shortages by recharging the San Simeon well field aquifer.

- Prevent the migration of secondary wastewater effluent into the San Simeon well field production wells.

- Prevent seawater intrusion into the San Simeon well field production wells.

- Avoid potential ground subsidence.

- Maintain adequate groundwater levels at the San Simeon well field to ensure proper production well operations (no loss of suction).

- Minimize the loss of fresh water to the ocean while also conserving the amount of freshwater remaining in aquifer storage by avoiding the need to pump groundwater (particularly during the late dry season), into the Van Gordon Creek to maintain a positive gradient between the up-gradient potable well field and the treated wastewater percolation ponds.

- Protect the down-gradient lagoon by the Project's design feature, which provides a surface water discharge into the lagoon when the facilities are in operation during the dry summer season, when there is no surface flow into the lagoon.

- Reduce salts and nutrients from the lower San Simeon groundwater basin by processing the water through reverse osmosis (RO) and disposing of RO concentrate, which would contain salts and nutrients.

- Respond in a timely and efficient manner by providing the existing Cambria community with an adequate and permanent water supply to meet drinking and sanitary needs.

- Reuse and repurpose existing CCSD infrastructure where feasible to minimize the Project's footprint, its potential impacts, and facilitate its timely completion.

- Protect habitats for wildlife species by avoiding impacts to these resources, and protecting San Simeon Creek Lagoon during dry weather conditions.

- Making the most efficient use of the area's water supplies, including the Indirect Potable Reuse (IPR) of water.

- Meeting all regulatory agency permitted conditions, including those of SLO County and the State Water Board.

- Improving the quality of life for local businesses and residents who often resort to extraordinary measures to obtain the necessary water supply, such as manually hauling water in buckets and other make shift containers. This practice includes efforts by the community's elderly, retired population, who are limited in their physical capabilities and subject to injury from such efforts.

- Repurpose the SWF's evaporation pond to address potential environmental impacts while also providing approximately 6 to 7 million gallons of raw potable water that could be used for supply (following surface water treatment), as well as for fire-fighting helicopters during a wildland fire.

- Minimizing economic hardship and losses to local residences and businesses, including tourism.

1.4 ENVIRONMENTAL ISSUES/ MITIGATION SUMMARY

Pursuant to CEQA Guidelines Section 15123, the following table summarizes the significant impacts, mitigation measures, and unavoidable significant impacts identified and analyzed in Section 5.0, *Environmental Analysis*. Refer to the appropriate SEIR Section for detailed information.

Impacts	Mitigation Measures	Level of Significance With Mitigation
Aesthetics		
***Impact 5.1-1*: Construction-Related Impacts To Visual Character/Quality** *Would the Project result in short-term visual impacts to scenic vistas or the existing visual character/quality of the site and its surroundings?*	**AES-1** Prior to commencement of construction activities for the Mitigation Measures (Project modifications), the CCSD shall confirm that the plans and specifications stipulate that, Project construction shall implement standard practices to minimize potential adverse impacts to the site's visual character, including the following: • Construction staging areas shall be located as far as practicable from sensitive receptors; and • Construction areas shall receive appropriate routine maintenance to minimize unnecessary debris piles.	Less Than Significant With Mitigation Incorporated

Impacts	Mitigation Measures	Level of Significance With Mitigation
Impact 5.1-2: Operational Impacts To Visual Character/Quality *Would the Project substantially degrade the existing visual character/quality of the site and its surroundings?*	**AES-2** Within one year of completion of the SEIR process and completion of all necessary regulatory agency permits, the CCSD shall remove the five mechanical spray evaporators along with their enclosures. The evaporation pond shall be repurposed as a potable water supply storage basin. The AWTP RO concentrate shall be discharged to four (4) Baker tanks for storage prior to offsite disposal, instead of the evaporation pond. **AES-3** Within one year of completion of the SEIR process and completion of all necessary regulatory agency permits, the CCSD shall color treat the Advanced Water Treatment Plant (AWTP), where reasonable, such that the facilities blend into the surrounding area. Color treatments shall be recommended by a licensed Landscape Architect and by the County. Prior to installation, the Surface Water Treatment Plant (SWTP) shall be color treated, where reasonable, consistent with the AWTP. **AES-4** Within one year of completion of the SEIR process and completion of all necessary regulatory agency permits, the CCSD shall hydroseed areas where native vegetation has been removed, where feasible. The County shall confirm that all species selected for hydroseed are indigenous to the area.	Less Than Significant With Mitigation Incorporated
Impact 5.1-3: Scenic Vistas/Corridors *Would the Project have a substantial adverse affect on a scenic vista or corridor?*	Refer to Mitigation Measures AES-2, AES-3, and AES-4.	Less Than Significant With Mitigation Incorporated
Impact 5.1-4: State Scenic Highways *Would the Project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?*	Refer to Mitigation Measure AES-2.	Less Than Significant With Mitigation Incorporated
Impact 5.1-5: Light and Glare *Would the Project create a new source of light or glare, which would adversely affect day or nighttime views in the area?*	Refer to Mitigation Measures AES-2.	Less Than Significant With Mitigation Incorporated
Cumulative Impacts *Would the Project, combined with other cumulative development causing related impacts, result in significant cumulative aesthetic/light and glare impacts?*	Refer to Mitigation Measures AES-1 through AES-4.	Less Than Significant With Mitigation Incorporated

Impacts	Mitigation Measures	Level of Significance With Mitigation
Air Quality		
***Impact 5.2-1*: Construction-Related Emissions** *Would the Project result in violations of air quality standards or contribute substantially to existing or projected air quality violations during construction?*	**AQ-1** The following measures shall be incorporated into the construction phase of the Project and shown on all applicable plans: a. Maintain all construction equipment in proper tune according to manufacturer's specifications; b. Fuel all off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors, auxiliary power units, with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road); c. Maximize to the extent feasible, the use of diesel construction equipment meeting the ARB's 1996 or newer certification standard for off-road heavy-duty diesel engines; d. Install diesel oxidation catalysts (DOC), catalyzed diesel particulate filters (CDPF) or other APCD approved emission reduction retrofit devices (determination of the appropriate CBACT control device(s) for the Project must be performed in consultation with APCD staff). Additional Construction Equipment Measures: e. Electrify equipment where feasible; f. Substitute gasoline-powered for diesel-powered equipment, where feasible; g. Use alternatively fueled construction equipment on site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel; h. Use equipment that has Caterpillar pre-chamber diesel engines; i. Implement activity management techniques as follows: i. Develop of a comprehensive construction activity management plan designed to minimize the amount of large construction equipment operating during any given time period; ii. Schedule of construction truck trips during non-peak hours to reduce peak hour emissions; iii. Limit the length of the construction work-day period, if necessary; iv. Phase construction activities, if appropriate. Fugitive PM_{10} Mitigation Measures. All required PM_{10} measures shall be shown on applicable grading or construction plans. In addition, the	Less Than Significant With Mitigation Incorporated

Impacts	Mitigation Measures	Level of Significance With Mitigation
	developer shall designate personnel to insure compliance and monitor the effectiveness of the required dust control measures (as conditions dictate, monitor duties may be necessary on weekends and holidays to insure compliance); the name and telephone number of the designated monitor(s) shall be provided to the APCD prior to construction/ grading permit issuance. j. Reduce the amount of the disturbed area where possible; k. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (nonpotable) water should be used whenever possible; l. All dirt stock-pile areas should be sprayed daily as needed; m. 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; n. 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 native grass seed and watered until vegetation is established; o. 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; p. 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; q. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site; r. 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. (E-CDP Condition 9)	
***Impact 5.2-2*: Operational Emissions** *Would the Project result in violations of air quality standards or contribute substantially to existing or projected air quality violations during operations?*	No mitigation is required.	Less Than Significant Impact

Impacts	Mitigation Measures	Level of Significance With Mitigation
***Impact 5.2-3*: Exposure To Odorous Emissions** *Would the Project create objectionable odors affecting a substantial number of people?*	No mitigation is required.	Less Than Significant Impact
***Impact 5.2-4*: Localized Air Quality Impacts** *Would the project expose sensitive receptors to substantial pollutant concentrations?*	No mitigation is required.	Less Than Significant Impact
***Impact 5.2-5*: Air Quality Plan Consistency** *Would construction-related and operational criteria pollutant emissions conflict with or obstruct implementation of the applicable air quality plan?*	No mitigation is required.	Less Than Significant Impact
Cumulative Impacts *Would the Project, combined with other cumulative development causing related impacts, result in significant cumulative air quality impacts?*	No mitigation is required.	Less Than Significant Impact
Biological Resources		
***Impact 5.3-1*: Special-Status Plant and Wildlife Species** *Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species?*	**BIO-1** Special-Status Plants. Prior to commencing site disturbing activities, a County-approved biologist/botanist shall conduct a botanical survey for special-status plants, including, but not limited to, the Cambria morning glory, Carmel Valley bush mallow, compact cobwebby thistle, most beautiful jewel-flower, Obispo Indian paintbrush, and woodland woollythreads. The CCSD shall make every effort to avoid the removal of identified special-status plants during construction activities. If the removal of such plants cannot be avoided, the CCSD shall transplant them on the subject property. (E-CDP Condition 23) **BIO-2** Upland Vegetation. Prior to Project completion, whichever occurs first, disturbed areas within the Project boundaries shall be revegetated with an assemblage of native riparian, wetland, and upland vegetation suitable for the area. Locally collected plant materials shall be used to the extent practical. Invasive, exotic plants shall be prohibited. This measure shall apply to all disturbed areas unless determined not practical or feasible by the County. (E-CDP Condition 18) **BIO-3** Within one year of SEIR certification, and within 90 days following the completion of all regulatory approvals necessary to allow for the extension of the lagoon water discharge (whichever occurs last), and to avoid biasing Well 16D1 water quality samples (as requested by the RWQCB) and more efficiently deliver surface water into San Simeon Creek to maintain water levels at San Simeon Creek Lagoon, the CCSD shall remove the surface discharge structure and relocate the surface	Less Than Significant With Mitigation Incorporated

Impacts	Mitigation Measures	Level of Significance With Mitigation
	discharge point further south to the San Simeon Creek bank. At the discharge point, articulating concrete block (ACB) (Armorflex or similar) lining shall be installed to protect the northern San Simeon Creek channel bank from erosion. The lining shall allow for the continued growth of riparian vegetation, further protecting the channel from any potential erosion and avoiding/reducing any sedimentation within the water bodies. **BIO-4** Trash and Construction Debris. During construction/ground disturbing activities, all trash that may attract CRLF predators shall be properly contained, removed from the work site, and disposed of regularly. Prior to Project completion, all trash and construction debris shall be removed from work areas. (E-CDP Condition 16) **BIO-5** Construction Equipment. During construction/ground disturbing activities, all refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from riparian habitat or water bodies and not in a location from where a spill would drain directly toward aquatic habitat. The monitor shall ensure contamination of habitat does not occur during such operations. Prior to commencement of grading/ construction activities, the monitor shall ensure that a plan is in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and appropriate measures to take should a spill occur. (E-CDP Condition 17) **BIO-6** Construction-Related Water Quality. Best Management Practices (BMPs) shall be implemented during construction to minimize sediment from entering nearby water bodies or prominent drainage courses. During/after construction/ground disturbing activities, if these BMPs are ineffective, the CCSD shall work with the monitor/biologist and resident engineer, in consultation with USFWS, to install effective measures prior to the next rain event. (E-CDP Condition 20) **BIO-7** Adaptive Management Plan. The CCSD shall develop and implement an Adaptive Management Program (AMP) for post construction operations upon commencement of SWF operations. The AMP shall be incorporated while the SWF is operating and indefinitely until the SWF is no longer in use or until deemed no longer necessary by applicable regulatory agencies. The AMP is intended to monitor and protect the lagoon, creek, and riparian habitats adjacent to the Project site and, by extension, protect the species that inhabit it. The AMP's primary goal shall be to	

Impacts	Mitigation Measures	Level of Significance With Mitigation
	monitor the response of the lagoon, creeks, and riparian habitats to SWF operations. This shall include, but not be limited to, the following: • Regular monitoring of groundwater levels, surface water levels, surface water flow, in-stream and riparian habitat extent and health, available in-stream and fish habitat, and water quality; • Surveys for tidewater goby, steelhead, CRLF, western pond turtle, and/or two-striped garter snake a minimum of two times per year to measure population levels over time; and • Monitoring of riparian vegetation in the water bodies and in their upland extents. Based on the results of the biological monitoring and any noted adverse changes in these habitats, SWF operations shall be adjusted such that the amount of treated water that is injected or discharged back into the system, is either increased or decreased to restore affected habitat features. It is expected that the minimum amount of water returned at any time would be 100 gpm. **BIO-8** Construction Fencing. Sturdy and highly visible protective fencing shall be placed around all existing trees and riparian vegetation within 50 feet of the Project site. Plan notes shall indicate this fence shall remain in place for the duration of Project construction. (E-CDP Condition 12) **BIO-9** CRLF Pre-Construction Survey. Prior to commencement of grading activities, a USFWS-approved biologist shall survey the Project site 48 hours before the onset of work activities. If any life stage of the California Red-legged Frog (CRLF) is found and these individuals are likely to be killed or injured by work activities, the biologist shall be allowed sufficient time to move them from the site before work activities begin. The biologist shall relocate the CRLF the shortest distance possible to a location that contains suitable habitat and shall not be affected by activities associated with the proposed Project. The biologist shall maintain detailed records of any individuals that are moved (e.g., size, coloration, distinguishing features, digital images, etc.) to assist in determining whether translocated animals are returning to the original point of capture. (E-CDP Condition 13) **BIO-10** Construction Personnel Training. Prior to commencement of grading activities, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the CRLF and	

Impacts	Mitigation Measures	Level of Significance With Mitigation
	its habitat, the specific measures that are being implemented to conserve the CRLF for the current Project, and the boundaries within which the Project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions. (E-CDP Condition 14) **BIO-11** CRLF Monitor. A USFWS-approved biologist shall be present at the work site until all CRLF have been removed, workers have been instructed, and disturbance of habitat has been completed. After this time, the County shall designate a person to monitor onsite compliance with all minimization measures. The biologist shall ensure that this monitor receives the training outlined above and in the identification of CRLF. If the monitor/biologist determine CRLF impacts are greater than anticipated or approved, work shall stop until the issue is resolved. The monitor/biologist shall immediately contact the resident engineer (the engineer overseeing and in command of the construction activities), where the resident engineer shall either resolve the situation by eliminating the effect immediately, or require that all actions which are causing these effects be halted. If work is stopped, the County/ USFWS shall be notified as soon as is reasonably possible. (E-CDP Condition 15) **BIO-12** Site Topography. Prior to Project completion, whichever occurs first, to the extent practical, contours shall be returned to as close to original, unless it is determined by the biologist that the new contours provide greater benefit for the CRLF. (E-CDP Condition 19) **BIO-13** Water Impoundment. Unless approved by the USFWS, water shall not be impounded in a manner that may attract CRLF. (E-CDP Condition 21) **BIO-14** Project Completion Report. Prior to Project completion, the CCSD shall submit to the County and USFWS, a Project completion report form, completed by the USFWS-approved biologist. The report form shall identify any recommended modifications or protective measures, if additional stipulations to protect CRLF are warranted, or if alternative measures would facilitate compliance with the provisions of this consultation. (E-CDP Condition 22) **BIO-15** Groundwater Pumping – Biological Monitoring. Ongoing during SWF operations, the CCSD shall continue with its existing efforts to monitor the creek habitat adjacent to, and downstream from the Project area, as required by	

Impacts	Mitigation Measures	Level of Significance With Mitigation
	the AMP. Should migrating steelhead reappear within the San Simeon Creek, the CCSD shall implement efforts to avoid potentially impacting their movement prior to the creek naturally running dry and flowing as subsurface flow during the dry season. Such efforts may include alternating the use of production wells between the San Simeon and Santa Rosa aquifers, discussing possible curtailments and/or coordination to pumping regimes being practiced by/with other riparian irrigators during such migration periods, invoking conservation/demand management measures, as well as operating the SWF to provide its lagoon water discharge. **BIO-16** Pre-Construction Bird Survey. No more than one week prior to construction, a qualified biologist shall conduct a preconstruction nesting bird clearance survey in all work areas and all areas within 500 feet of the general construction zone. Active nests shall be given an avoidance buffer, typically 300 feet for non-listed, non-raptor species, and 500 feet for listed or raptor species. This buffer shall remain in place until the young fledge or the nest otherwise becomes inactive, and may be reduced with approval from CDFW and/or USFWS. **BIO-17** Pre-Construction Bat Survey. If deemed necessary by the CDFW, a preconstruction roosting bat survey shall be conducted within one week prior to construction. Any bat roosts found in the Project vicinity shall be protected with coordination from CDFW.	
Impact 5.3-2: Riparian Habitat or Other Sensitive Natural Community *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game [Wildlife] or U.S. Fish and Wildlife Service?*	**BIO-18** The lagoon surface discharge structure shall be designed to avoid impacts to riparian habitat to the greatest extent feasible, while taking into account site and engineering constraints, including incorporating design revisions to relocate features and/or reduce water quality impacts. If riparian impacts cannot be avoided, the following measures shall be implemented within 180 days of SEIR certification (or Prior to Regular CDP issuance), to reduce identified impacts to less than significant: • The CCSD shall comply with all applicable local, state, and federal regulations concerning impacts to riparian habitat, including Clean Water Act (CWA) Sections 401 and 404, and/or California Fish and Wildlife Code Section 1602. Specifically, the CCSD shall obtain a Section 401 Permit under the federal CWA from the RWQCB, a Section 404 Permit under the federal CWA from ACOE, and a Section 1602 Permit under the FGC from the CDFW. All permit requirements shall be followed.	Less Than Significant With Mitigation Incorporated

Impacts	Mitigation Measures	Level of Significance With Mitigation
	• In support of the regulatory agency wetland permitting process described above, a wetland delineation shall be conducted for the Project modifications (filtrate pipeline extension and discharge structure) to determine the presence and extent of jurisdictional wetlands and other waters of the U.S., and the Project impacts. The wetland delineation shall be conducted according to the protocols set forth by the ACOE. • Impacted riparian habitat shall be mitigated at a 1:1 replacement-to-loss ratio; the final mitigation amounts shall be determined during the regulatory agency permitting process through the preparation of a Habitat Mitigation and Monitoring Plan (HMMP) by a qualified biologist. It is expected that the riparian mitigation site can occur within the Project boundaries. The HMMP shall include but not be limited to a planting plan, success criteria, monitoring protocols to determine if success criteria have been met, adaptive management protocols in the event success criteria are not met, and funding assurances. **BIO-19** The CCSD shall minimize to the extent possible the disturbance and removal of riparian vegetation in the vicinity of San Simeon Creek Lagoon during the construction and placement of the mitigation water pipeline. All efforts shall be made to avoid creating a permanent pathway through the vegetation while constructing the pipeline. The pipeline shall in addition contain an adequate velocity dissipation mechanism to avoid creating any scour or deterioration of the upland habitat.	
***Impact 5.3-3*: Wetlands and Jurisdictional Waters** *Would the Project have a substantial adverse effect on federally protected wetlands as defined by Clean Water Act Section 404?*	See Mitigation Measures BIO-4 through BIO-8, BIO-18, and BIO-19 above.	Less Than Significant With Mitigation Incorporated
***Impact 5.3-4*: Wildlife Movement** *Would the Project 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?*	See Mitigation Measures BIO-4 through BIO-8, and BIO-16 above.	Less Than Significant With Mitigation Incorporated
***Impact 5.3-5*: Consistency With Local Policies/ Ordinances – CZLUO & LCP** *Would the Project conflict with any local policies or ordinances (i.e., CZLUO and LCP) protecting biological resources?*	Refer to Mitigation Measures BIO-2 through BIO-19 above.	Less Than Significant With Mitigation Incorporated

Impacts	Mitigation Measures	Level of Significance With Mitigation
Cumulative Impacts *Would the proposed Project, combined with other cumulative development causing related impacts, result in significant cumulative impacts to biological resources?*	No mitigation is required.	Less Than Significant Impact
Cultural Resources		
Impact 5.4-1: Archaeological and Historical Resources *Would the Project cause a substantial adverse change in the significance of an archaeological/ historical resource pursuant to Section 15064.5?*	**CUL-1** The CCSD shall retain a qualified archaeological monitor, approved by the County Environmental Coordinator, to be present during all site disturbance activities. Monitoring reports shall be retained by the CCSD and shared with the Environmental Coordinator's Office upon request. **CUL-2** In the event archaeological resources are unearthed or discovered during any site disturbance activities, the CCSD, or the applicant's successor, shall be responsible to follow protocol and procedures described in Section 22.10.040 of the Land Use Ordinance. **CUL-3** Prior to the start of construction, earthmoving personnel shall receive a cultural and paleontological sensitivity training detailing the types of artifacts and fossils that may be encountered and procedures to follow if finds occur. **CUL-4** The CCSD shall retain a qualified archaeological monitor and Native American monitor, approved by the County Environmental Coordinator, to be present during all site disturbance activities within the boundaries of previously recorded sites. Monitoring reports shall be retained by the CCSD and shared with the Environmental Coordinator's Office upon request.	Less Than Significant With Mitigation Incorporated
Impact 5.4-2: Paleontological Resources *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*	Refer to Mitigation Measure CUL-3 above.	Less Than Significant With Mitigation Incorporated
Impact 5.4-3: Human Remains *Would the project disturb any human remains, including those interred outside of formal cemeteries?*	Refer to Mitigation Measures CUL-1 through CUL-4 above.	Less Than Significant With Mitigation Incorporated
Cumulative Impacts *Would the proposed Project, combined with other cumulative development causing related impacts, result in significant cumulative impacts to cultural resources?*	No additional mitigation is required.	Less Than Significant Impact

Impacts	Mitigation Measures	Level of Significance With Mitigation
Hydrology and Water Quality		
Impact 5.5-1: Water Quality – Construction-Related Impacts *Would the Project violate any water quality standards or waste discharge requirements?* *Would the Project otherwise substantially degrade water quality?*	No mitigation is required.	Less Than Significant Impact
Impact 5.5-2: Water Quality – Operational Impacts *Would the Project violate any water quality standards or waste discharge requirements?* *Would the Project otherwise substantially degrade water quality?*	No mitigation is required.	Less Than Significant Impact
Impact 5.5-3: Groundwater *Would the proposed Project substantially deplete groundwater supplies or substantially interfere with groundwater recharge?*	No mitigation is required.	Less Than Significant Impact
Impact 5.5-4: Drainage *Would the Project substantially alter the existing drainage pattern of the project site or area in a manner that would result in substantial erosion or siltation on- or off-site?* *Would the Project substantially alter the existing drainage pattern of the site or area, or substantially increase the rate or amount of surface run-off in a manner that would result in flooding on- or off-site?* *Would the Project create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provision of substantial additional sources of polluted run-off?*	No mitigation is required.	Less Than Significant Impact
Impact 5.5-5: Flood Hazard Area – Structures *Would the Project place a structure within a 100-year flood hazard area structures which would impede or redirect flood flows?*	No mitigation is required.	Less Than Significant Impact
Impact 5.5-6: Seiche, Tsunami, Or Mudflow *Would the Project result in inundation by seich, tsunami, or mudflow?*	No mitigation is required.	Less Than Significant Impact
Cumulative Impacts *Would Project implementation combined with other related cumulative projects result in increased run-off amounts, degraded water quality, and decreased groundwater supplies?*	No mitigation is required.	Less Than Significant Impact

Impacts	Mitigation Measures	Level of Significance With Mitigation
Land Use and LCP Compliance		
Impact 5.6-1: Compliance With California Coastal Act *Would the Project conflict with the California Coastal Act Policies adopted for the purpose of avoiding or mitigating an environmental effect?*	Refer to Mitigation Measures AES-2, AES-3, AES-4, BIO-2 through BIO-19, CUL-1 through CUL-4.	Less Than Significant With Mitigation Incorporated
Impact 5.6-2: Compliance With the North Coast Area Plan *Would the Project conflict with the North Coast Area Plan Standards adopted for the purpose of avoiding or mitigating an environmental effect?*	Refer to Mitigation Measure AES-2.	Less Than Significant With Mitigation Incorporated
Impact 5.6-3: Compliance With the Local Coastal Program Policy Document *Would the Project conflict with Local Coastal Program policy document policies adopted for the purpose of avoiding or mitigating an environmental effect?*	Refer to Mitigation Measures AES-2, AES-3, AES-4, BIO-2 through BIO-19, and CUL-1 through CUL-4.	Less Than Significant With Mitigation Incorporated
Impact 5.6-4: Compliance With the Coastal Zone Land Use Ordinance *Would the project conflict with the coastal zone land use ordinance adopted for the purpose of avoiding or mitigating an environmental effect?*	No additional mitigation measures beyond those identified in Sections 5.1 through 5.7 would be required.	Less Than Significant With Mitigation Incorporated
Cumulative Impacts *Would the proposed Project, combined with other cumulative development causing related impacts, result in significant cumulative land use and planning impacts?*	No additional mitigation measures beyond those identified above are required.	Less Than Significant With Mitigation Incorporated
Noise		
Impact 5.7-1: Construction-Related Impacts *Would Project construction activities result in significant temporary noise impacts to nearby noise sensitive receptors?*	No mitigation is required.	Less Than Significant Impact
Impact 5.7-2: Vibration Impacts *Would Project implementation result in significant vibration impacts to nearby sensitive receptors?*	No mitigation is required.	Less Than Significant Impact
Impact 5.7-3: Operational Impacts - Stationary Sources *Would the Project result in a significant increase in long-term stationary noise levels?*	Refer to Mitigation Measure AES-2.	Less Than Significant With Mitigation Incorporated
Impact 5.7-4: Operational Mobile Source Impacts *Would the Project generate traffic that could significantly contribute to existing traffic noise in the area or exceed the county's established standards?*	No mitigation is required.	Less Than Significant Impact

Impacts	Mitigation Measures	Level of Significance With Mitigation
Cumulative Impacts *Would the Project, combined with other cumulative development causing related impacts, result in significant cumulative noise impacts?*	No mitigation is required.	Less Than Significant Impact

1.5 SUMMARY OF PROJECT ALTERNATIVES

In accordance with CEQA Guidelines Section 15126.6, this section is a summary of the alternatives to the Project, which could feasibly attain most of the Project's basic objectives, while avoiding or substantially lessening the its significant effects. The evaluation considers the comparative merits of each alternative. The analysis also focuses on alternatives capable of avoiding or substantially lessening the Project's significant environmental effects, even if the alternative would impede, to some degree, the attainment of the proposed Project objectives. The following alternatives are considered in this SEIR:

- "No Project" Alternative;
- "SWF Without Project Modifications" Alternative; and
- "RO Concentrate Ocean Outfall Disposal" Alternative.

Throughout Section 7.0, *Alternatives to the Proposed Project*, the alternatives' impacts are analyzed for each environmental issue area, as examined in Sections 5.1 through 5.7 of this SEIR. In this manner, each alternative was compared to the Project on an issue-by-issue basis. Table 7-1, *Comparison of Alternatives*, outlines the alternatives analyzed and provides a summary comparison of each alternative's impacts in relation to the Project. The following is a summary description of each of the alternatives evaluated in Section 7.0.

"NO PROJECT" ALTERNATIVE

The No Project Alternative assumes the Project site would be in the same condition as it was prior to construction of the SWF. This represents a theoretical scenario that retroactively analyzes alternative conditions at the time the SWF's Notice of Preparation (NOP) was circulated in March 2015. With this Alternative, the site's water and wastewater facilities as they existed prior to the SWF would remain and continue operating. Under the No Project Alternative, the SWF water facilities would not be constructed, including the Advanced Water Treatment Plant (AWTP), Recharge Injection Well, Monitoring Well, Evaporation Pond and Evaporators, and associated pipelines. This alternative evaluates the potential environmental impacts associated with the No Project Alternative, as compared to impacts from the SWF without implementation of identified Project modifications.

"SWF WITHOUT PROJECT MODIFICATIONS" ALTERNATIVE

The "SWF without Project Modifications" Alternative assumes a current environmental baseline with the Project site as it exists as of the writing of this SEIR (i.e., with the SWF constructed and operational). Under this SWF without Project modifications Alternative, none of the Mitigation Measures (Project modifications) as analyzed within this SEIR would be implemented/ constructed. Under this scenario, the evaporation pond and mechanical spray evaporators would continue to operate in their current condition, that is used to store and evaporate the reverse osmosis (RO) concentrate. Additionally, the Surface Water Treatment Plant (SWTP) would not be constructed, and no new/modified pipeline facilities or ancillary facilities proposed as part of the Project modifications would be constructed, and offsite RO concentrate disposal would not occur.

"RO CONCENTRATE OCEAN OUTFALL DISPOSAL" ALTERNATIVE

With implementation of the Project Modifications, RO concentrate would be stored in Baker tanks on-site and then transported by truck to Kettleman Hills. Under the RO Concentrate Ocean Outfall Disposal Alternative, RO concentrate would instead be transported by truck to a wastewater treatment plant, or similar facility, equipped with a permitted ocean outfall disposal system. The RO concentrate would be combined with the permitted facility's existing ocean outfall effluent before being discharged into the ocean.

A specific ocean outfall for the RO concentrate has not been identified by CCSD at this time. This alternative reviews a range of potential outfall locations within the Central Coast Regional Water Quality Control Board (RWQCB). However, research to date has found that the South San Luis Obispo County Sanitation District does have a permitted program in place, which may accept certain treatment facility residual discharges provided they are with acceptable limits. The use of such a disposal method would be subject to inter-agency negotiations, as well as various permits that may be required from various regulatory resource agencies to ensure that significant impacts to the marine environment would not occur.

As previously noted, research to date has found that the South San Luis Obispo County Sanitation District is a viable and potential outfall location. However, for the purposes of this alternatives analysis, it is conservatively assumed that the outfall location furthest from the Project site (within the jurisdiction of the Central Coast RWQCB) would be carried forward under this Alternative. In this instance, the location furthest from the site is the Santa Cruz Wastewater Treatment Plant, located 169 miles north of the Project site. As such, the analysis compares impacts of disposal of RO concentrate via the outfall at the Santa Cruz Wastewater Treatment Plant, as opposed to the Project Modifications (i.e., disposal at Kettleman Hills). It is noted that all other aspects of the SWF and Project Modifications would remain the same.

"ENVIRONMENTALLY SUPERIOR" ALTERNATIVE

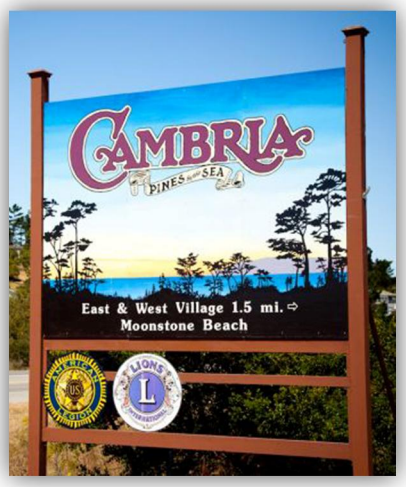
According to CEQA Guidelines Section 15126.6(e), *"No Project" Alternative*, "if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." The "No Project" Alternative is the environmentally superior alternative, because it would avoid most impacts associated with development of the SWF and Project Modifications. Therefore, in compliance with CEQA requirements, an environmentally superior alternative among the other alternatives is identified below.

Among the other alternatives, the environmentally superior alternative is the "RO Concentrate Ocean Outfall Disposal" Alternative. While the RO Concentrate Ocean Outfall Disposal Alternative would be environmentally inferior to the Project Modifications in a number of topical impact areas (i.e., air quality, biological resources, hydrology/water quality, and noise), it provides a feasible means of alternatively disposing of the RO concentrate from SWF operations. In addition, the RO Concentrate Ocean Outfall Disposal Alternative analysis uses a highly conservative assumption concerning the location of the ocean outfall to be utilized by the SWF, assuming the location furthest away from the site (Santa Cruz Wastewater Treatment Plant). There are a number of other outfalls located substantially closer to the Project site that would be feasible options for RO concentrate disposal (and thus reducing associated air quality and noise impacts due to trucking distance). The "RO Concentrate Ocean Outfall Disposal" Alternative would also accomplish all of the identified Project objectives.

The SWF without Project Modifications Alternative was reviewed and determined not to be the environmentally superior alternative. Although this alternative is considered environmentally superior in a number of topical issue areas (i.e., air quality, cultural resources, and land use and planning), it is also environmentally inferior to the Project concerning aesthetics, biological resources, hydrology and water quality, and noise. Moreover, the SWF has already been constructed, and this SEIR analyzes the effects of incorporating the proposed Project Modifications. Thus, analyzing an alternative where the SWF is constructed but the Project Modifications are not is essentially an alternate version of a "No Project" Alternative based upon site conditions as they stand today. Thus, the RO Concentrate Ocean Outfall Disposal Alternative has been identified as the environmentally superior alternative.

1.6 AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

According to the CEQA guidelines, the EIR is required to contain a brief summary that identifies: areas of controversy known to the lead agency, including issues raised by agencies and the public (section 15123(b)(2)); and issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects (section 15123(b)(3)).



Areas of potential controversy were raised during the Project's scoping process, which is described in Section 2.3, *Notice of Preparation/Early Consultation (Scoping)*. The NOP was released on March 6, 2015 for a 30-day public review period that concluded on April 6, 2015; see as Appendix A, *Notice of Preparation, Project Information Packet/ Environmental Checklist, and NOP Comment Letters*. Comment letters, as well as the comments received during the March 26, 2015 Public Scoping Meeting were used to determine the areas of potential controversy, which are addressed within Sections 5.1 through 5.7 of this SEIR and outlined below.

- Per CEQA Guidelines, only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. As discussed throughout Section 5.0, *Environmental Analysis*, the Project would not result in any significant and unavoidable impacts to the environment.

Additionally, the impacts and mitigation measures are summarized in Section 1.4, *Environmental Issues/Mitigation Summary*, and discussed in detail in Sections 5.1 through 5.7 of this SEIR. These discussions also constitute the identification of issues to be resolved and areas of controversy, as required for compliance with CEQA Guidelines Section 15123.