

*Cindy Cleveland
Senior Biologist
Cleveland Biological
535 Cuesta Place
Arroyo Grande, CA 93420
805.234.3759*

May 22, 2018

*Bob Gresens P.E.
District Engineer
Cambria Community Services District
P.O. Box 65
Cambria, CA 93428
805.927.6119*

Proposal for Environmental Consultations for the Sustainable Water Facility for the Cambria Community Service District

Dear Mr. Gresens,

This proposal is for environmental consultation and related services for the Sustainable Water Facility (SWF) for the Cambria Community Service District, San Luis Obispo County, California (Project). We have discussed the history of the SWF, previous permits obtained and possible permits that are needed for the SWF.

This proposal outlines the plan for the successful attainment of U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration (NOAA), U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) permits for the SWF. Also included are my qualifications to complete this project, a cost estimate for the project, and a cost estimate for the Annual Adaptive Management Plan (AMP) Monitoring Report update. Below is a discussion of general and specific permit application content.

1.0 General Permit Application Content

1.1 Project Background

A project background will be written with the coordination of CCSD and based on information included in the *Cambria Sustainable Water Facility Project (SEIR 2017)* and the *Cambria Sustainable Water Facility Project Adaptive Management Plan (AMP 2017)*.

1.2 Project Description

A project description will be written with the coordination of CCSD staff and descriptions taken from the SEIR 2017. The project description will be divided into four parts:

- 1. the completed SWF**
- 2. the project described in the CCSD Board certified SEIR including: modifications to the existing surface water impoundment basin for groundwater storage, a revised pipeline for lagoon water discharge, a future surface water treatment facility, and facilities for off-hauling of RO concentrate**
- 3. the January 2017 Governor-declared flooding emergency which resulted in the completed drainage swale and ditch at the impoundment basin**
- 4. future maintenance**

Each Project section will have a detailed project description and will describe physical and biological characteristics, and special status species and critical habitats that may be present. To complete this section maps and information may be requested from CCSD staff.

1.3 Project Impacts and Mitigations

All Project actions will be analyzed for direct, indirect, and cumulative impacts to special status species and critical habitats that may occur at the "action area" or Project site and will include mitigations for these impacts. For USFWS and NOAA permits there will be a Section 7 finding of: *no effect* or *may affect, but not likely to adversely affect* or *may affect, and is likely to adversely affect*. For the USFWS and NOAA permits there will also be an analysis of cumulative effects.

1.4 CCSD Staff Coordination

I will coordinate with CCSD to identify CCSD staff who may assist with the background description and project description and related maps. Identified CCSD staff will be contacted per their preference either through phone calls, texts, or email. All permit documents will be reviewed by CCSD before any release to the permitting agencies. All correspondence with the agencies, once cleared by the CCSD, will be also copied to the proper CCSD staff. Wet signatures on permit applications and permit fee payments will be provided by the CCSD.

1.5 Coastal Commission Staff Coordination

I will work with a California Coastal Commission staff ecologist on identifying environmentally sensitive habitat areas affected by the project.

2.0 Specific Permit Application Content

2.1 U.S. Fish and Wildlife Service Section 7 consultation

The Biological Assessment for the USFWS permit will be the first written document. All subsequent permits will use the same general information that is prepared for the USFWS. The Project Description will be written before informal consultations begin with the USFWS. After an informal consultation meeting and based on USFWS feedback the rest of the BA will be written.

A second informal meeting will be held with the USFWS once the BA is complete. This meeting will bring up any concerns that the USFWS might have with the BA. Informal meetings will allow revision of the BA without having to receive a formal letter from the USFWS about their concerns, which can delay the permitting process. Once the BA is complete, formal consultation will be initiated and the service has 135 day from initiation of formal consultation (this can be extended by the USFWS) to issue a Biological Opinion.

2.2 National Oceanic and Atmospheric Administration Section 7 consultation

If the completed BA reveals any detrimental or beneficial impacts to any waters of San Simeon Creek, consultation with NOAA may be required. This proposal assumes two agency meetings with NOAA. The consultation will follow USFWS guidelines as described above and the same BA written for USFWS will be used for NOAA, but the analysis will include species covered by NOAA.

2.3 U.S. Army Corps of Engineers 404 Permit

The proposed San Simeon Lagoon discharge will require a USACE permit. It may fall under a Nationwide 404 permit. That permit would require the completion of an application and would include additional analysis of impacts to San Simeon Creek from the proposed discharge. This proposal assumes two agency meetings with USACE.

2.4 Regional Water Quality Control Board 401 Permit

The proposed San Simeon Lagoon discharge will require a 401 permit from the Central Coast Regional Water Quality Control Board. The 401 permit includes additional analysis of impacts to San Simeon Creek from the proposed discharge. This proposal assumes two agency meetings with Central Coast Regional Water Quality Control Board.

2.5 California Department of Fish and Wildlife Lake or Streambed Alteration 1602 Permit

Possible impacts to riparian habitats for the proposed San Simeon Lagoon discharge and project activities will require a Lake or Streambed Alteration Permit 1602 permit. The 1602 permit application will be adapted from the USFWS BA and will also include analysis of impacts to special status species and habitats.

3.0 Update to AMP and Annual AMP Monitoring Report

The AMP will be updated with information from the BA and from consultations with permitting agencies. There may be additional reporting requirements or a modification of current requirements based on permitting agency comments. Every effort will be made to simplify the required monitoring.

4.0 Qualifications and Insurance

For over 20 years I have successfully completed consultations for both Federal, State, and private clients and never had a permit denied or a project delayed due to permitting issues (see Attachment 2: Resume). In addition, while employed at the USFWS I wrote Biological Opinions and was trained on NEPA compliance and conferencing.

I live locally and will promptly respond to CCSD concerns and agency communications. Since 2014 I have worked with the CCSD with field surveys and report writing.

Cleveland Biological is a California LLC and is in the process of becoming an S corporation which holds both general liability (each claim: 1,000,000 and aggregate: 2,000,000) and professional liability (each claim: 1,000,000 and aggregate: 2,000,000). In addition, I hold a USFWS Section 10(a)(1)(A) recovery permit for California red-legged frogs.

5.0 Cost Estimate and Deliverables

The cost estimate presented below is based on an hourly rate of \$95 per hour for all activities. The cost estimate assumes two meetings with each of the five agencies; if more meetings are required, a scope and budget amendment may be necessary. In addition, due to the intense public interest in this project, if there are significant changes to the project description, a scope and budget amendment may be necessary. This proposal covers:

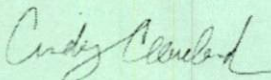
Activity	Hours	Total
USFWS Consultation Includes two agency meetings	150	\$14,250
NOAA Consultation Includes two agency meetings	125	\$11,875
USACE Permit	125	\$11,875

Included two agency meetings		
RWQCB Permit	100	\$9,500
Includes two agency meetings		
CDFW Permit	125	\$11,875
Includes two agency meetings		
BA for USFWS	175	\$16,625
BA for NOAA	125	\$11,875
Total		\$87,875

Update to AMP	75	\$7,125
Annual AMP Monitoring Report	100	\$9,500
Total		\$16,625
Total Consultations, Permits, and AMP Update and Annual AMP Monitoring Report	1,100	\$104,500

I look forward to a speedy and efficient permitting process. Please call me at (805) 234-3759 if you need further information or have any questions.

Sincerely,



Cindy Cleveland
Principal Biologist

Enclosures:

Attachment 1: Citations

Attachment 2: Resume

Attachment 1

Citations

Adaptive Management Plan (AMP) 2017 for the Cambria Sustainable Water Facility Project. Prepared by Michael Baker International, June 2017.

Subsequent Environmental Impact Report (SEIR) 2017 for the Cambria Sustainable Water Facility Project. Prepared by Michael Baker International, July 2017.

Attachment 2

Resume