



12.3.2 PERSONS AND ORGANIZATIONS COMMENTS AND RESPONSES

Following are the comments on the DSEIR received from persons and organizations, along with the Cambria Community Services District's (CCSD) responses to significant environmental points raised by those comments.



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Received via Email 9/25/2016

Michael Boland
211 DeVault Place
Cambria, CA 93428

25 September 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 211 DeVault Place. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

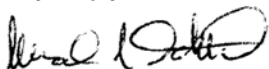
The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Michael Boland

Received via Email 9/25/2016

Your Name

Date

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2526 Pierce Ave. Cambria
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/ Tamara L. Corbet

Print name

Tamara L. Corbet

Received via Email 9/25/2016

Your Name

Date

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Tamara L. Corbet
/signature

Print name

Tamara L. Corbet

Bob Gresens

From: Igor Fedoroff <chezfed@att.net>
Sent: Sunday, September 25, 2016 11:03 AM
To: Bob Gresens
Subject: In Support of the SEIR

Received via Email
9/25/2016

Igor V. Fedoroff

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 5580 Sunbury Avenue. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians, assure economic viability for our town and provide water for fire protection when needed.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

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Very truly yours,

IGOR V. FEDOROFF 

Sent from my iPad

Joseph Korpiel

Date 9/25/2016

Received via email
9/25/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2211 Sherwood Drive, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph Korpziel". The signature is fluid and cursive, with a large initial "J" and "K".

Joseph Korpziel

Bob Gresens

From: Rick Rentler <rentler88@gmail.com>
Sent: Sunday, September 25, 2016 5:55 PM
To: Bob Gresens
Subject: Sustainable Water Facility

Richard R. Rentler
 2421 Glenside Lane
 Camarillo, CA 93012

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Richard R. Rentler
CCSD Water Wait List #70 (Since 1988)

Received via Email 9/25/2016

Alvin and Claudia Solomon

Date 9-25-16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are full time residents of Cambria. Our address is: 3225 Bradford Circle _____ . We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

Print names

Alvin and Claudia Solomon

Bob Gresens

From: Jim Douglass <jamesdouglass@charter.net>
Sent: Monday, September 26, 2016 2:03 PM
To: Bob Gresens
Subject: SWF Subsequent EIR

9/26/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 686 Canterbury Ln, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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Very truly yours,

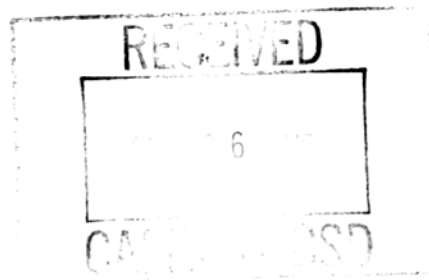
James Douglass

James Douglass

Brian Griffin

Date: Sept 26,2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 315 Weymouth Street. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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Very truly yours,

A handwritten signature in black ink that reads "Brian Griffin". The signature is written in a cursive, flowing style.

Brian Griffin

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2190 Benson Ave.
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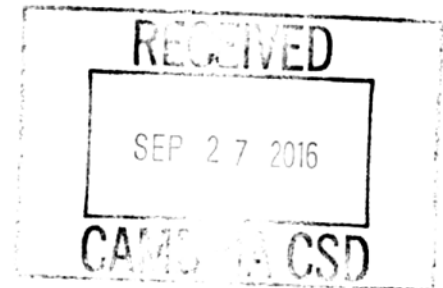
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Very truly yours,

/signature/ Neal T. Barton

Print name Neal T. Barton
9/26/2016



Received via email on 9/27/2016

Your Name

Date

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

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Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.


Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire

those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

11-1

Very truly yours,

/signature/ 

Print name

Joan + Bruce Linton

Your Name Timothy Roche

Date 9/25/2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 5255 Oakhurst Dr __ Cambria, Ca. 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

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12-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/ Timothy Roche

A handwritten signature in cursive script, appearing to read "Timothy Roche". The signature is written in black ink and is positioned to the right of the typed name below it.

Print name Timothy Roche



Mary's Jottings



Noel and Mary Schmidt

September 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are full time residents of Cambria. Our address is: 1348 Burton Dr.. I submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, We urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Noel Schmidt

Noel Schmidt

Mary Schmidt

Mary Schmidt

Charlie Casale

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 347 IVAR, Cambria, CA. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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14-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charlie Casale", written in a cursive style.

Charlie Casale

Linda Casale

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 347 IVAR, Cambria, CA
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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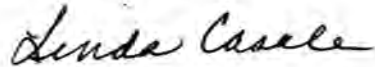
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Linda Casale

Doris Ann Densmore

Date 9/26/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 5005 Whitehall Ave. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Doris Ann Densmore".

Doris Ann Densmore

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2211 Sherwood Drive, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph Korpiel". The signature is written in a cursive style with a large, stylized initial "J".

Joseph Korpiel

Your Name

MARK & ALI KRAMER

Date

9/26/2012



Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

WE ARE

~~I am~~

full time resident of Cambria. **OUR** My address is: 4934 WINDSOR BLVD.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,  Ali C. Kramer
/signature/

Print name MARK W KRAMER ALI C. Kramer

Judy Schuster
2020 Avon Ave.
Cambria, CA 93428

September 26, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2020 Avon Ave.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Judy Schuster

Marjorie R. Sewell

Sept. 28, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 392 Leighton St. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature Marjorie R. Sewell

Marjorie R. Sewell
Print name

September 28, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are part time residents of Cambria, with a home at 2101 Sherwood Avenue. We support the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

We've owned our home since 1994, during which it seems drinking water has always been in short supply. We were, and continue to be, supportive of the CCSD decision to construct the emergency water plant.

The CCSD's pending application for a regular coastal development permit makes sense to us, as it would allow the output of this plant, now known as the SWF, to avoid existing and future water shortages.

We urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Best regards,



William & Jean Thompson



From: **Pamela Thompson** gilham@charter.net
Subject: SEIR
Date: September 25, 2016 at 8:53 AM
To: Robert C. Gresens P.E. District Engineer
Cc: Pamela Thompson gilham@charter.net, Debbie Thompson (debbie85@gmail.com), Stephanie Meyer (stephnm3@aol.com)

*Pamela C. Thompson
365 Bristol Street
Cambria, CA. 93428
September 25, 2016*

*Mr. Robert Gresens, District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428*

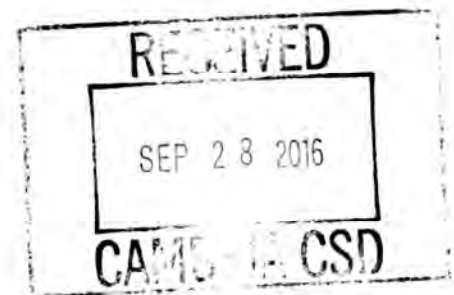
Mr. Gresens,

I am a full time resident of Cambria. The local cabal opposed the real water solution at our doorstep—a desal plant which would probably have cost no more than the maneuvers they chose to keep the area under their control.

If SEIR is now the only possible source of water, I must support it.

Pamela C. Thompson
Pamela C. Thompson

22-1



Cambria, Ca.
September 25, 2016

Mr. Robert Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, Ca 93428



Re: Subsequent Environmental Impact Report

Mr. Gresens,

My wife and I have been full time residents of Cambria since 1993. I am submitting this letter in support of the Sustainable Water Facility (SWF) and the application of the CCSD for a regular coastal development permit and support for the Subsequent Environmental Impact Report (SEIR).

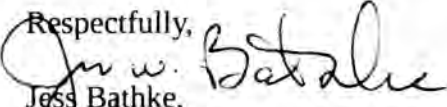
In our time in Cambria we have witnessed periods of adequate potable water supply as well as dangerously low well levels.

The SWF facility will provide assurance that we will no longer have to teeter on the edge of water unavailability. Further, issuance of a regular permit would allow for the best possible usage of a mix of groundwater supply and indirect potable use of recycled water.

These actions would also permit the CCSD to proceed with issuance of a few "intent to serve" water permits to those persons on the CCSD water wait list; many of whom have been waiting for a water connection for decades.

I believe there is no intent for anyone to permit a rapid population growth. In any event the county growth rate ordinance(s) would prevent such growth. And there is a general desire by residents to maintain the current Cambria "character"

Consequently, I urge the CCSD to adopt the SEIR and further urge SLO County to grant CCSD application for a regular coastal development permit.

Respectfully,

Jess Bathke,
399 Lampton Street,

23-1

Thomas G. Benton

Sept. 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2507 Pineridge Drive PO Box 688
I submit this letter to express my support for the Sustainable Water Facility (SWF), the **application** of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Thomas G. Benton". The signature is fluid and includes a long, sweeping underline.

Thomas G. Benton

From: Douglas S. Burhyte

September 25th, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 895 Drake Street. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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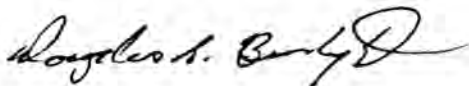
(over)

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25-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Douglas S. Burhyte

Peter & Pamela Chaldecott Sept. 26th. 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201, Cambria, CA 93428

Re: Subsequent Environmental Impact Report



Dear Mr. Gresens,

We are full time residents of Cambria. Our address is 2724 Smith Court and we submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Respectfully yours

Peter Chaldecott & Pamela R. Chaldecott dated 9-26-16

Your Name *Loris Dylt*
 Date *Sept. 25, 2016*

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 5020 Windsor Blvd

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

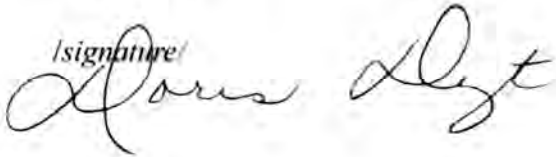
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Very truly yours,

/signature/


Print name

Doris Dyt

Terry & Jeri Farrell
3151 Wood Dr.
Cambria, CA 93428

Sept. 24, 20126

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

RECEIVED
29
CAMBRIA COMMUNITY SERVICES DISTRICT

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens.

We are full time residents of Cambria. Our address is: 3151 Wood Drive. We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

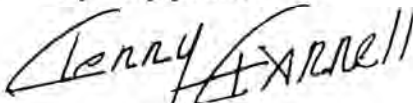
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Very truly yours,



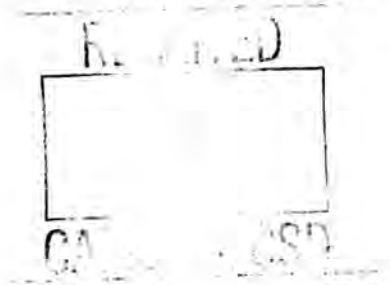
Terry Farrell



Jeri Farrell

David & Lois Feleav
September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are full time residents of Cambria. Our address is 1770 Stuart Street, Cambria, CA 93428. We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,


David Feleav



Lois Feleav

Your Name *ERIKA FREDERICKS*Date *9-26-16*

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 968 SUFFOLK ST.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Very truly yours,

/signature/



Print name

ERIKA FREDERICKS

Tom Hamlin
September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 2166 Sherwood Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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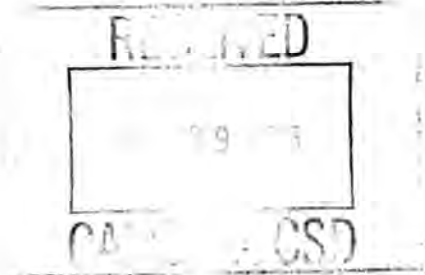
Sincerely,

A handwritten signature in black ink, appearing to read "Tom Hamlin", with a stylized flourish at the end.

Tom Hamlin

Shale Hanson
1981 Benson Avenue
Cambria, CA 93428
September 27, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1981 Benson Avenue. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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32-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Shale Hanson

John Holland

9/26/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 5780 Charing Lane, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

Sincerely,

John C. Holland

David L Lacey, MD
 Full Time Cambria Resident
 Homeowner Since September 2000

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 416 Ardath Drive, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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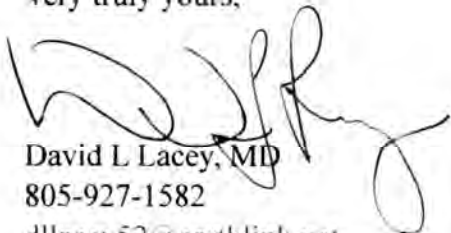
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



David L Lacey, MD
805-927-1582
dllacey52@earthlink.net
416 Ardath Drive
Cambria, CA 93428

Your Name Terry PetersonDate 9.26.16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 605 Dover Lane
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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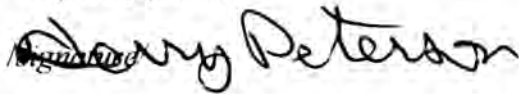
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink that reads "Terry Peterson". The signature is written in a cursive style with a large, prominent "T" and "P".

Print name

Terry Peterson

James G. Spencer
September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

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further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

To add to the "scripted" portion of this letter, I will note that my lot is 17,000 sf on Kenneth Drive with a high water position number (32). Over the 15 years since purchase, I have been waiting for the opportunity to build my home. During that period, two thirds of the Monterey Pines have died or blown down. As proof, it was surveyed in 2002 and of the original 49, fewer than 20 remain. Every year a pile of cut wood is left for neighbors to take.

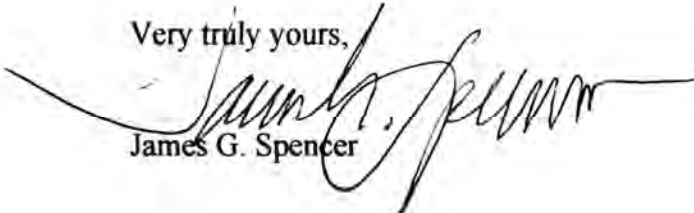
Sadly these trees, the signature feature of Cambria, are victims of lack of water, both from rainfall and irrigation. During the repeated water emergencies over the past decade, irrigation with potable water has been prohibited. Some residents have resorted to trucking in large containers of water to save their trees. Of course without a water connection, I can't irrigate at all. Though I visit at least twice a year, I'm not present to arrange for off site water sources.

Underlying the tree loss is over-drafting the water table from over-pumping for domestic uses. In turn, the pines die as the water table is lowered below their root lines.

With the new SWF source of water, residents will finally again be allowed to irrigate. This will raise the water table and ensure that more of the pines and other species will survive. That in turn will increase the health of the forest and lessen the risk of wildfire...and maybe I can realize my dream of a home there.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,


James G. Spencer

Erick Sturcke

9-26-2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 6455 Kathryn Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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37-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Erick Sturcke".

Erick Sturcke

September 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
CCSD
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My resident address is: 1715 Hudson Avenue. My mailing address is: 1241 Knollwood Drive, PMB 1715.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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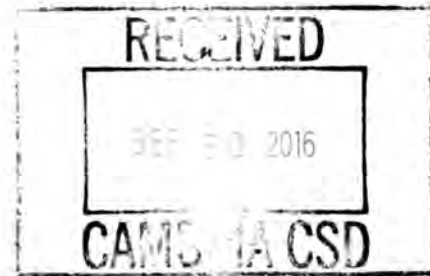
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Cordially,

A handwritten signature in black ink, appearing to read "Dixie D. Walker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dixie D. Walker



Robert C. Gresens

Cambria Community Services District

Dear Sir;

Thank you for your service and for the long road for the CCSD to get a water project on board. This has been a long and arduous task considering the constant opposition from the no growthers and environmentalists. What can I say. My wife and I bought property in Cambria in 1977. it took us 10 years to get enough money to build a small house on Avon Avenue in 1987. We knew from the start that we would never be able to retire to this wonderful place of ocean and pines and live in this basically 3 storied house with so many stairs so in 1989 we bought another small parcel so we could get on the water wait list. In 1996 knowing the lots were too small to build a single level house, we bought another lot and the lots behind us and the lots next to us and moved our water position. Yeah, big enough for a large single story home. We sold our small house on Avon in 2001 thinking we could shortly build the home of our dreams and retire to Cambria by the sea. Then the moratorium.

Long story short. My wife died July 24th, 2012. We had only been on the water wait list then for 23 years. I am now 80 years old and our dreams that we had worked so hard for are gone. I served my country in Japan and Korea (1954-1958) but no longer feel that I live in America. Is our whole country going the way of Cambria, a town subdivided in 1927 and now controlled by communists err environmentalists? A time now when some say as many as 500,000 acres in the Westlands Water District in our valley will go fallow because of a stated water shortage. I have much to say but have too much anger. May Cambria rot in hell.

Leslie k. Kleinhammer

9829 S. Thompson Avenue

Selma , California

Leslie K. Kleinhammer
September 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

39-1

Very truly yours

A handwritten signature in cursive script, reading "Leslie K. Kleinhammer", with a long horizontal flourish extending to the right.

Leslie K. Kleinhammer

September 26, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

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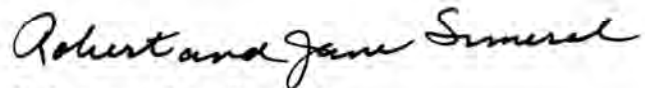
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Very truly yours,

A handwritten signature in cursive script that reads "Robert and Jane Simeral".

Robert and Jane Simeral

Received via email 10/02/2016

William Hughes

October 2, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 434 Plymouth Street, Cambria 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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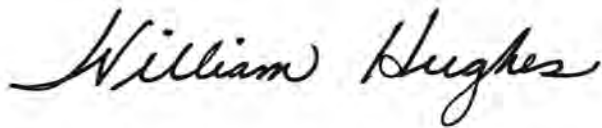
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41-1

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Very truly yours,

A handwritten signature in black ink that reads "William Hughes". The signature is written in a cursive, flowing style.

WILLIAM HUGHES

June M. Albert

Sept. 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1932 Benson Ave. . I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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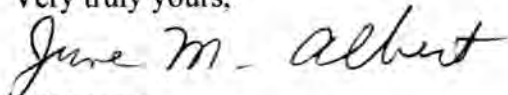
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out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

42-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "June M. Albert".

Print name

June M. Albert

Your Name

Date

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 7605 Windsor Blvd.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

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43-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

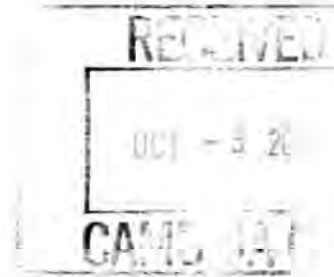
Janet Beaton
/signature/

Janet Beaton
Print name

Wes Densmore

Date 9/26/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 5005 Whitehall Ave. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink that reads "Wes Densmore". The signature is written in a cursive, flowing style.

Wes Densmore



LyVaughn Hall
Jacqueline J. Kennedy
5232 Oakhurst Drive
Cambria, CA 93428
805-927-2747
hallkennedy@charter.net

October 2, 20016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are full time residents of Cambria. Our addresses are: 5232 Oakhurst Drive (Home), 784 & 816 Main Street (Commercial Buildings). We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. We were residents here for the 1978 drought and numerous others between then and now. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable

water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Sincerely,



LyVaughn Hall



Jacqueline J. Kennedy

Carol Huckins

10/3/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 6535 Kathryn Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

46-1

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to be 'CH', with a long horizontal flourish extending to the right.

Carol Huckins

Todd Huckins

10/3/16

Received via email
10/3/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: __6535 Kathryn Drive_____. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

47-1

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47-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read 'TH', with a long horizontal flourish extending to the right.

Todd Huckins

Bruce Johnson

September 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1150 Pinewood Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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48-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bruce Johnson", with a stylized flourish at the end.

Bruce Johnson

Tony & Julie Jorge
4645 Ave.120
Corcoran, Ca 93212



Date 9/26/2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are part time residents of Cambria. Our address is: 4890 Windsor Blvd. WE submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, We urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Tony Jorge /Julie Jorge




Nicholas E. Miller

9/25/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 2251 Sherwood Drive, Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink that reads "Nicholas E. Miller". The signature is written in a cursive, flowing style.

Nicholas E. Miller

Gina V. Miller

9/25/2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 2251 Sherwood Drive, Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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51-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gina V. Miller". The signature is fluid and cursive, with a large initial "G" and "M".

Gina V. Miller

Matthew and Marcela Ortiz

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

I'm excited about the possibilities that will be available for Cambria if the Water Master Plan continues to move forward. Lot owners have been given hope that this plan will end the moratorium and allow for water meters to be released. A vocal group of citizens are adamant that they want NO new building in the town of Cambria. My life experience has taught me that compromise is necessary if we want to continue to move forward as a unified community.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Matthew Ortiz". The signature is written in a cursive style with a large, sweeping flourish at the end.

Matthew Ortiz

Richard R. Rentler
2421 Glenside Lane
Camarillo, CA 93012

September 25, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Richard R. Rentler
CCSD Water Wait List #70 (Since 1988)

John Ruml
302 North Irving Street
Arlington, Virginia 22201



September 26, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is 4754 Windsor Boulevard. I submit this letter to express my support for the Sustainable Water Facility (SWF), the CCSD's application for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

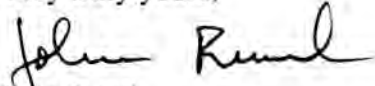
The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

It is my understanding that the SWF does *not harm* the environment; in fact, *it actually improves the environment*. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

I believe that many of the opponents are opposed not on environmental grounds but because they fear adequate water will result in substantial or rapid population growth. But for years the CCSD has taken steps to limit Cambria's maximum legal size to a small increase that can be supported by existing infrastructure. For example, the plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and county laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,


John Ruml

Brett Schroeder
1705 VINELAND
TULARE CA 93274

Date 9/26/14

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 535 WARWICK
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

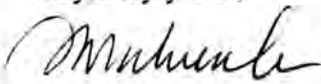
As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

55-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Print name
Brett Schroeder

NANCY SCHROEDER
1705 VINELAND
TULARE CA 93274

Date 9/26/14

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 535 WARWICK
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Print name

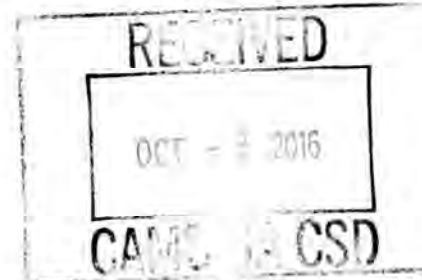
NANCY SCHROEDER

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,



I have been the owner of an undeveloped lot in Cambria since 2003. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water that would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment. In fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water and helps to prevent saltwater intrusion up gradient during dry summer months. In turn, it protects and preserves plant and animal habitats that depend on the lagoon.

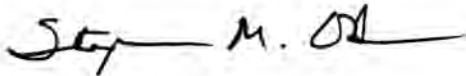
It is also very important to clarify that the SWF will not result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allows construction over

several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

57-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen M. Ode". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stephen M. Ode

1179 Lenor Way
San Jose, CA 95128

spodeode@hotmail.com

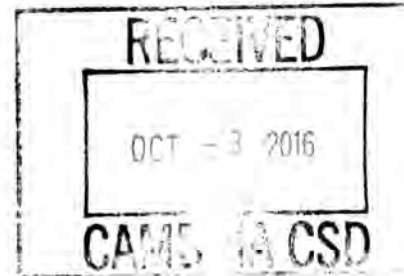
Your Name

BIRGITTA TEGELBERG

Date

09-21-16

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 598 LEIGHTON ST, CAMBRIA
 I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

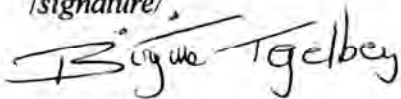
Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

58-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

A handwritten signature in black ink that reads "Birgitta Tegelberg". The signature is written in a cursive style with a large initial "B".

Print name

BIRGITTA TEGELBERG

Lance & Debbie Warner

Rossford, Ohio

September 29 2016



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

Cambria Community Services District

1316 Tamson Drive, Suite 201

Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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water which would improve the quality of life of all Cambrians *and assure economic viability* for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire

those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Yours truly

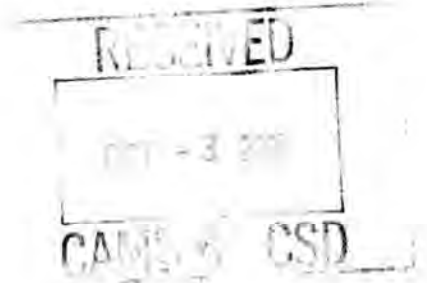
Lance Warner

Lance Warner

Dirk Winter

9/26/16

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a business in Cambria located at: 2905 Burton Dr. Cambria, CA. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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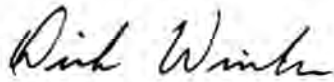
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60-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

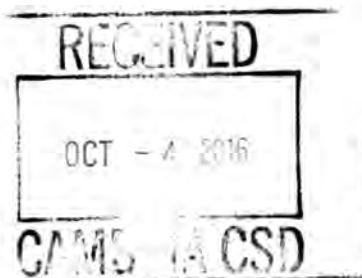
Very truly yours,



Dirk Winter

Joan and Richard Berry
October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We are full time residents of Cambria. Our address is: 1925 Berwick Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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61-1

For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

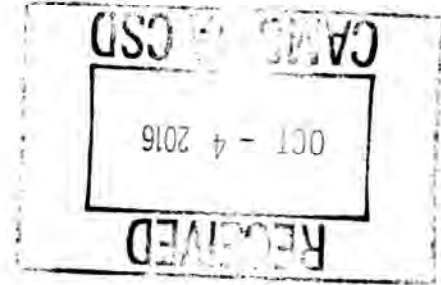
Joan H. Berry Richard Berry

Print name

Joan H. Berry
Richard Berry

Your Name David K. BoydDate 10/21/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1446 BURTON DRIVE.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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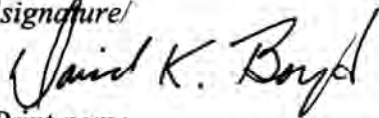
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62-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/



Print name

DAVID K. BOYD

Your Name David K. Boyd
Date 10/2/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

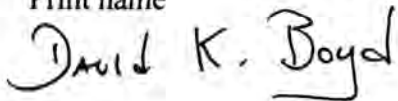
63-1

Very truly yours,

/signature/

A handwritten signature in cursive script that reads "David K. Boyd".

Print name

A printed name in a cursive font that reads "David K. Boyd".

Your Name

Janice Floyd

Date

10/2/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1440 Burton Dr.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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64-1

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Very truly yours,

/signature/ 

Print name 

Your Name

Date



2/10/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

A handwritten signature in black ink, appearing to read "J. Boyd". The signature is fluid and cursive, with a large loop at the beginning.

Print name

A handwritten name in black ink, appearing to read "J. Boyd". The handwriting is cursive and matches the signature above.

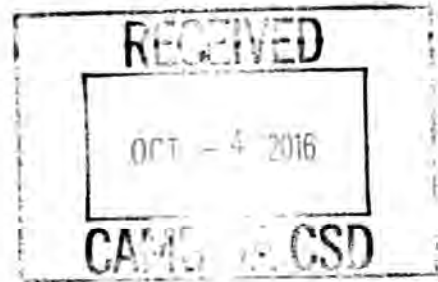
Robb & Linda Evans

5340 Windsor Blvd
Cambria, CA 93482

8000 Kroll Way #69
Bakersfield, CA 93311

September 30, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We have enjoyed our home in Cambria at 5340 Windsor Blvd since 1992. We submit this letter to express support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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Very truly yours,



Robb Evans

robb_evans@robbevans.com

RECEIVED

OCT - 4 2016

CAMBRIA CCSD

Your Name

DARIUS KAVIANI

Date

2104 Blythe Pl.
Cambria, Ca. 93428

OCT 1, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2104 Blythe Pl.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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67-1

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Very truly yours,

/signature/

Darius Kaviani

Print name DARIUS KAVIANI



Your Name

Date

Leah Kaviani
 2104 Blythe Pl.
 Cambria
 October 1, 2016
 (first)
 LK

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

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68-1

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/signature/



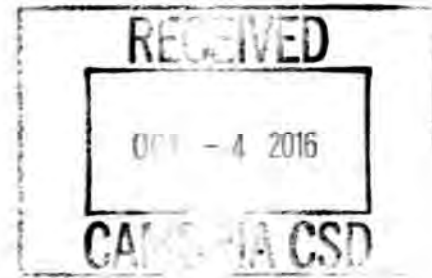
Print name

Leah Kaviani

Joseph P Zenk

Date: 9/25/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2405 Cowper St., Cambria, CA . I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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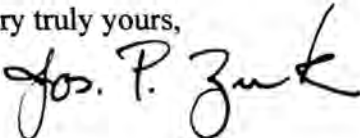
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69-1

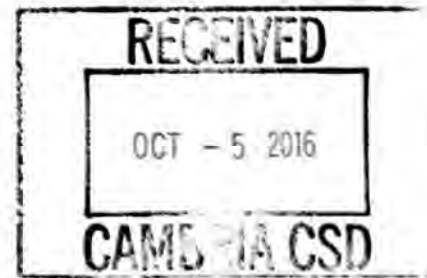
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Very truly yours,


JOSEPH P. ZENK

GREG HUNTER
October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 6393 Charing Lane. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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70-1

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Very truly yours,

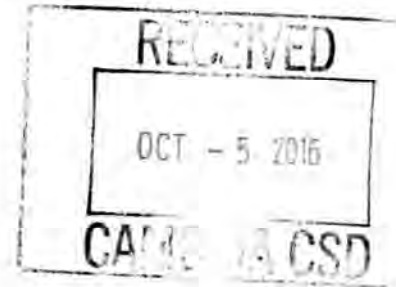
A handwritten signature in black ink that reads "Greg Hunter". The signature is written in a cursive, flowing style.

Greg Hunter

LINDA HUNTER

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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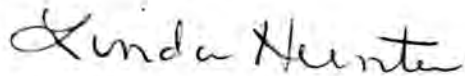
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Very truly yours,

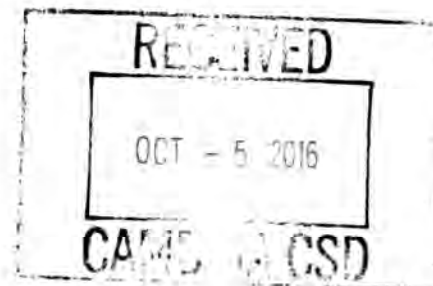
A handwritten signature in cursive script that reads "Linda Hunter".

Linda Hunter

Andy Pickar
 PO Box 1386
 Cambria, CA 93428

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 350 Ivar Street, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

72-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andy Pickar', with a long horizontal flourish extending to the right.

Andy Pickar

Walt Andrus
October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

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further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

73-1

Very truly yours,

A handwritten signature in black ink, appearing to read 'Walt Andrus', with a long, sweeping flourish extending to the right.

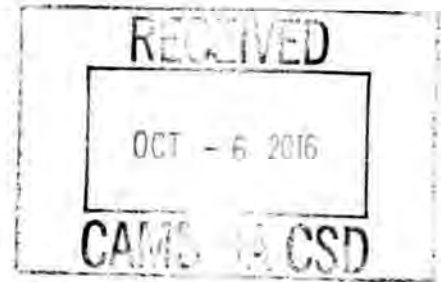
Print name

Walt Andrus

Walt Andrus

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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74-1

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Very truly yours,

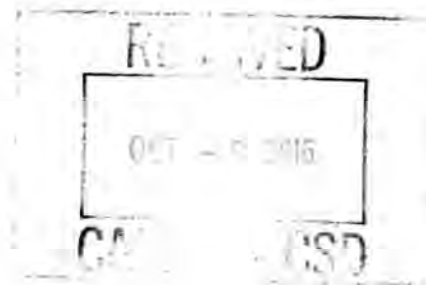
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Walt Andrus

Jerry Glenn

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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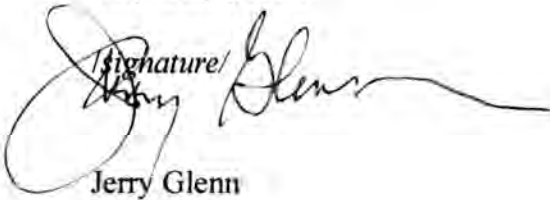
75-1

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Signature/

Jerry Glenn

Your Name MIGUEL HERNANDEZ MDDate 10-3-14

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 415 EXETER LANE.
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For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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76-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/



Print name

Miguel Hernandez MD

Hugh F. Mullin III
350 Fallbrook Street
Cambria, California 93428



October 3, 2016

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

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77-1

For the reasons stated above and in the SEiR, I urge the CCSD to adopt the SEiR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

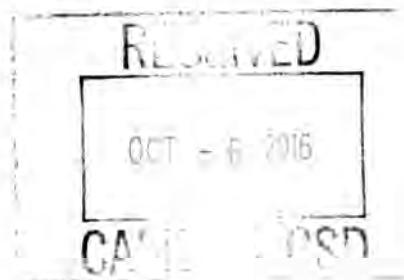
Very truly yours,

A handwritten signature in cursive script, appearing to read "H. Mullin III".

Hugh F. Mullin III

Loretta Parral
October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

78-1

Very truly yours,

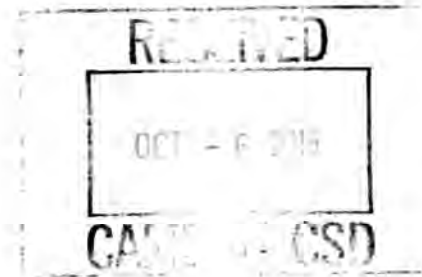
A handwritten signature in black ink, appearing to read "Loretta Parral". The signature is written in a cursive, flowing style with a large initial "L".

Loretta Parral

Loretta Parral

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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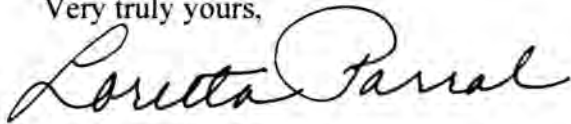
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79-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Loretta Parral". The signature is fluid and elegant, with a large initial "L" and a long, sweeping underline.

Loretta Parral

Roland FeliceYour Name

Date 10/07/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 4824 Windsor Blvd. Cambria CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Roland Felice

Roland and Susan Felice

320 Worcester Dr.
Cambria CA 93428
October 11, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Comments on Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am writing to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the Subsequent Environmental Impact Report (SEIR).

I have reviewed the SEIR and believe that the mitigation measures proposed are more than adequate to support the completion of the SWF. The facility is in an isolated area already dedicated to CCSD activities, and the impacts of continuing to use the facility appear to be minimal.

Cambria needs a reliable water supply. The continued drought has shown us that reliance on limited groundwater poses a danger to isolated communities like Cambria. Running out of water is a real possibility, as evidenced in other parts of the state, and the health, safety, and environmental impacts that would result are tremendous in comparison to the minor impacts identified in the SEIR. The long term operation of the plant also has positive impacts on the San Simeon Creek lagoon.

Many other water projects have been proposed for Cambria over the decades, and none have ever panned out. Most proposals seem to be a diversion tactic for anti-growth sentiments. I want to remind the CCSD that its obligation under state law is to provide the residents with water and other services, and that the authority to regulate growth belongs to the County, not CCSD.

I strongly urge the CCSD to approve the SEIR and also urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Yours very truly,

/s/ Robert W. Horvath
submitted by email, mahorvath@verizon.net

81-1

Your Name: Stevely Anderson

Date: October 6, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

OCT 11 2016

CA - CCSD

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2295 Benson Avenue. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

82-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

(signature)

Print name
Stevely Anderson

Bonnie C. Brockman
633 29th Street
Manhattan Beach, CA 90266

October 4, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 418 Leighton Street, Cambria CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Bonnie Brockman". The signature is written in black ink and is positioned below the typed name.

Bonnie C. Brockman

Gary S. Brockman
633 29th Street
Manhattan Beach, CA 90266

October 4, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 418 Leighton Street, Cambria CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Gary S. Brockman

October 1, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1875 Arliss Drive and I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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85-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Steven C. Castleberry". The signature is fluid and cursive, with a long horizontal flourish at the end.

Steven C Castleberry
1875 Arliss Drive
Cambria, CA 93428
805-927-5649

October 1, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1875 Arliss Drive and I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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86-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Terry L. Castleberry
1875 Arliss Drive
Cambria, CA 93428
805-927-5649

Constance M. Edwards
1957 Sherwood Dr.
Cambria, Ca 93428

October 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1957 Sherwood Dr.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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87-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Constance M. Edwards

Paul Edwards

Oct. 5, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 210 De Vault Place, Cambria, California. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

88-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink that reads "Paul L. Edwards". The signature is written in a cursive style with a large, prominent "P" and "E".

Print name

PAUL L EDWARDS



RESPONSE TO COMMENT LETTER NOS. PO 1 THROUGH PO 88

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 1 through PO 88 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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Stewart Edwards

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



October 5, 2016

Mr. Robert C Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Dr., Suite 210
Cambria, California 93428

Dear Mr. Gresens;

My wife and I have been full time residents in Cambria for about six years. We have never been exposed to government agencies as dysfunctional as CCSD and an approval process controlled by bureaucrats.

89-1

I do not understand why we cannot use water generated from the Sustainable Water Facility on a full time basis. This system was approved by CCSD for installment during a drought period, which coerced the board and the local population to approve the SWF. We are told that the SWF does not damage the environment, produces water relatively economically, and should allow Cambrians to use water without feeling guilty about flushing a toilet.

89-2

I do not understand why that Cambrians are now charged an increased water rate because of the SWF, yet the system is not used because of some bureaucratic holdup, and CCSD no longer generates enough revenue because the residents have drastically cut their consumption of water.

89-3

I am told that San Luis Obispo County has in place ordinances that control development, and they appear to use reasonable judgment when approving any project that would stress our infrastructure. The political debates about development vs. no-growth appear to influence

89-4

various government organs for a decision permitting full time use of the SWF.

89-4

Again, it is unfathomable to me that the SWF is installed and ready to generate water, that CCSD has an income shortage because of severe conservation by Cambrians, and that multiple government agencies argue among themselves about water supply to its citizens.

89-5

I do hope that these permits will be approved so that we may use tap water without guilt.

Regards:


Stewart Edwards

**RESPONSE TO COMMENT LETTER NO. PO-89**

Stewart Edwards

October 5, 2016

- PO 89-1 This comment includes statements concerning the CCSD that do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 89-2 See Response PA 7-9 concerning the E-CDP, R-CDP, and NOE. SWF operations are governed by the Emergency Coastal Development Permit (E-CDP) and the associated Conditions of Approval; see DSEIR Appendix C, E-CDP Conditions of Approval. E-CDP Condition 2 specifies the following:

This emergency permit is valid until such time that the CCSD-declared Stage 3 Water Shortage Emergency has ended, or the project has been authorized to continue to serve existing development through approval of a regular Coastal Development Permit, whichever is sooner. While processing the regular Coastal Development Permit, the emergency water facility may only be re-activated and utilized to produce water in the event of the occurrence of another Stage 3 Water Shortage Emergency and only after the CCSD has issued a formal declaration of the existence of such a Stage 3 Water Shortage Emergency. It is the intent of this condition, while processing the Regular Coastal Development Permit, to enable use of the emergency water facility to produce water for existing development in Cambria during the existence of a declared Stage 3 Water Shortage Emergency, since the community historically experiences severe periodic droughts.

Further, E-CDP Condition 6 required that the CCSD apply for a Regular Coastal Development Permit (R-CDP) to authorize the emergency work as permanent. On June 13, 2014, the CCSD submitted its application to the County for an R-CDP.

- PO 89-3 This comment pertains to increased water rates/fees and Project construction/operational costs. The DSEIR considered the Project's physical impacts to the environment in compliance with CEQA requirements. However, CEQA does not require an analysis of fiscal and economic impacts, as this topic of concern is not a significant effect on the environment (CEQA Guidelines Section 15131, *Economic and Social Effects*). As stated in CEQA Guidelines Section 15131(a), "An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than



necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.” Thus, this comment does not identify a specific concern with the adequacy of the DSEIR or raise an issue or comment specifically related to the DSEIR’s environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

PO 89-4 In compliance with CEQA Guidelines §15126(d), *Growth Inducing Impact of the Proposed Project*, the County of San Luis Obispo Growth Management Ordinance (GMO) and the Project’s potential growth-inducing impacts are discussed in detail in DSEIR Section 6.3, *Growth-Inducing Impacts*. See Responses PA 4-32 and PA 6-7 concerning the Project’s water output and potential growth-inducing impacts.

PO 89-5 See Responses PO 89-1 through PO 89-4.

Your Name

DAVE Foppiano

Date

October 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1424 BERWICK DRIVE. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/



Print name

DAVE FOPPIANO

Your Name

DAVE FAPPIANO

Date

OCT 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

Income Property

I am the owner of a business in Cambria located at: 3138 Wood Dr And 2586 Main St.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/



Print name

DAVE Foppiano

Your Name Tom GleasonDate October 4, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 479 Ardath Dr.
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For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/ Thomas E. Gleason

Print name *Thomas E. Gleason*

*P.S.
Congratulation to you and the CCSD for doing
your job and looking out for the interests
of the community. TEG*

Eric Hoffberg

October 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 315 Bristol St., Cambria, CA 93418. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

As you well know, for decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life, in some cases even risking health issues. Second, through our CCSD, we constructed an emergency water plant ("EWS") to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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93-1

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93-1

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Very truly yours,

A handwritten signature in black ink, appearing to read "Eric Hoffberg", with a long horizontal flourish extending to the right.

Eric Hoffberg

Frances Hoffberg

October 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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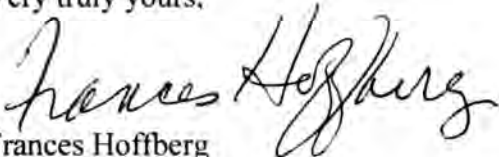
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94-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,


Frances Hoffberg

Alexsandra Lopardo

Oct. 2, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: ___375 Gaines St Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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95-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Alexandra Lopardo". The signature is written in dark ink and is positioned to the right of the typed name.

Alexsandra Lopardo



RESPONSE TO COMMENT LETTER NOS. PO 90 THROUGH PO 95

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 90 through PO 95 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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The EWS/SWF Draft Environmental Impact Report Comment, October 11, 2016

The subject Emergency Water Supply (EWS) was not operational and did not prevent the potential impact of the extreme drought Cambria sustained in 2014/15. The impact of the drought was minimized only through the incredible conservation efforts on the part of Cambria citizens.

Due to Cambria's deteriorating well levels and the negative rain projections, the CCSD short-circuited the standard project procedure to build the EWS with the SLO County issuance of the Emergency Coastal Development Permit (ECDP). The EWS project was sole-sourced to a firm with limited desalination system design and build experience. Companies such as GE Water, GeoPure Water Technologies, Rodi Systems, IDE and Poseidon Water would have brought far more desalination design and build experience to the EWS project. Such firms would have been more appropriate when the District's original intent was to obtain a temporary use, portable reverse osmosis facility that could be quickly installed to provide an immediate supplemental water supply. They could have provided essential services such as operator and service training, backup spare parts provisioning, operating problem resolution and future system enhancement development suggestions.

96-1

The revised environmental mitigation plan to eliminate use of the evaporator blowers and the brine pond as stated in the Draft EIR were suggested by public comment well before the start of EWS construction. The costs associated with these corrective actions should properly be borne by the contracted design firm and not absorbed by the CCSD.

96-2

Desalination systems such as Diablo Canyon and Morro Bay power plants, Santa Barbara Supplemental Water Supply (SWS) and most recently the Carlsbad / San Diego SWS all utilize the ocean for both their supply water source and their brine discharge. Under the revised plan, the EWS brine discharge would be transported to an offsite location. Transporting the very large volumes of discharged brine would be an extremely expensive proposition and should be critically evaluated before selecting it as the mitigation method.

96-3

The use of the EWS for its initially intended emergency use should be CCSD's prime goal of obtaining full agencies approval. Legislative effort should be expended to allow **emergency** discharge of the brine directly to the ocean in spite of being in a protected / sanctuary location. This would be the most practical method of brine disposal and typical of all the reverse-osmosis systems as previously mentioned. The Sustainable Water Facility (SWF) continuous year round operation would obviously require far more legislative support for an ocean brine discharge.

96-4

The EIR must address the potential of the EWS/SWF impact on Cambria's growth and on its existing infrastructure. Further definition is also needed on the total projected cost of the SWF redesign, the expected annual water output and the associated operation and maintenance costs.

96-5

96-6



RESPONSE TO COMMENT LETTER NO. PO-96

Allan MacKinnon

October 11, 2016

PO 96-1 This comment states the CCSD “short-circuited the standard project procedure” to build the SWF. The CCSD followed all procedures, as permitted by the established regulatory framework. As discussed on DSEIR Page 3-12, due to the ongoing drought conditions, it became necessary for the CCSD to implement expedited actions to reduce the adverse effects of water supply shortages, as well as other impacts resulting from severe drought conditions. Consequently, on January 30, 2014, the CCSD Board of Directors (Board) declared a Stage 3 Water Shortage Emergency Condition, the most severe of three levels.¹ In compliance with California Water Code (CWC) Section 350, this Stage 3 Condition was declared based on the Board’s determination that “the demands and requirements of water consumers cannot be satisfied without depleting the water supply of the CCSD to the extent that there would be insufficient water for human consumption, sanitation, and fire protection and that, based on this condition and on concerns regarding the anticipated prolonged drought conditions.”² Also, as part of its same January 30, 2014 meeting, the Board implemented a two-pronged approach to address its water shortage: 1) the Board approved an emergency brackish water supply project off of the San Simeon Creek aquifer (based on a modified/substantially simplified version of San Simeon Creek Road Brackish Water Alternative – Concept 5 (see *Water Supplies and Drought* discussion, DSEIR Page 7), which ranked highest in the CCSD’s 2013 Engineering TM); and 2) the Board approved rehabilitating and restarting older wells in the deeper section of the Santa Rosa Creek aquifer.

As stated on DSEIR Page 3-14, the CCSD Board directed its General Manager to seek an Emergency Coastal Development Permit (E-CDP) from SLO County. On April 22, 2014, the CCSD submitted an application to the County for an E-CDP, to construct and operate the Project. On May 15, 2014, the County issued an E-CDP (ZON2013-00589), authorizing construction and operation of the emergency project, subject to various conditions that addressed construction/operations and general land use entitlement matters, as well as hydrology/water quality, light/glare, noise, air quality, cultural resources, and biological resources.

As stated on DSEIR Page 3-16, the CCSD filed a Notice of Exemption for the Cambria Emergency Water Supply Project,³ noting among other factors that the

¹ Cambria Community Services CCSD, Resolution 04-2014, January 30, 2014.

² Ibid.

³ It is noted, the Cambria Emergency Water Supply Project name changed to “Sustainable Water Facility.”



Project was consistent with the Governor's January 17, 2014 State of Emergency Proclamation and his April 25, 2014 Proclamation of a Continued State of Emergency, EO Directives 12 and 19. The NOE included reference to Public Resources Code (PRC) § 21080, Subdivision (b)(4); California Code of Regulations, Title 14, § 15269, Subdivisions (b) and (c), and § 15301, which exempt from CEQA certain actions necessary to prevent or mitigate an emergency. Pursuant to the Governor's April 25, 2014 Proclamation of a Continued State of Emergency, EO Directives 12 and 19, on September 12, 2014, the State of California Office of Planning and Research (OPR) issued its concurrence that the Project was required to address the CCSD's critical drinking water shortages. The CCSD completed the Sustainable Water Facility (formerly Emergency Water Supply Project) consistent with the Governor's EOs.

On June 13, 2014, the CCSD submitted its application to the County for an R-CDP.

PO 96-2 As stated on DSEIR Page 3-16, through the environmental analysis contained in this DSEIR, and as a result of further input from regulatory agencies and the local community, various mitigation measures have been identified to avoid/reduce environmental impacts resulting from SWF operations. These mitigation measures, which generally involve evaporation pond decommissioning, RO concentrate disposal, and surface discharge, are described in detail in DSEIR Section 3.5.2, *Project Characteristics – Mitigation Measures and Project Modifications*.

This comment is concerning the costs of SWF construction. See Response PO 89-3 concerning increased water rates/fees and Project construction/operational costs.

PO 96-3 See Responses PA 4-15, PA 4-19, PA 4-33, and PA 7-10 concerning potential impacts associated with the routine transport, use, and disposal of hazardous materials for the Project and RO Concentrate Ocean Outfall Disposal Alternative. See Response PO 89-3 concerning increased water rates and construction/operational costs.

PO 96-4 See DSEIR Section 7.3, "*RO Concentrate Ocean Outfall Disposal*" Alternative, and Responses PA 4-15, PA 4-33, and PA 4-34 concerning the RO Concentrate Ocean Outfall Disposal Alternative, including the associated regulatory requirements and potential environmental impacts.

PO 96-5 The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7.

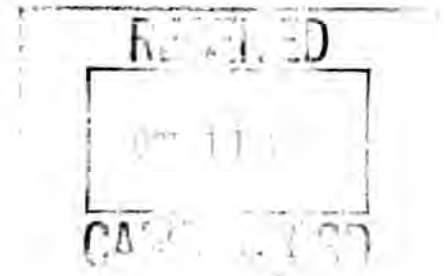


PO 96-6

See Response PO 89-3 concerning increased water rates and construction/operational costs. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7.

Your Name Marian L. MandersDate 10-2-16

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

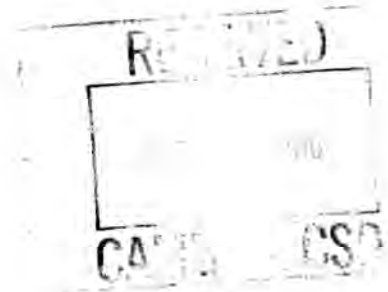
(signature) Marian L. Manders

Print name Marian L. Manders

Jon Price

October 3, 2016

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Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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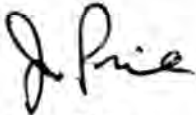
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98-1

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Very truly yours,



Jon Price

Julie Price

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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Very truly yours,

A handwritten signature in cursive script that reads "Julie Price". The signature is fluid and elegant, with a large initial "J" and a long, sweeping underline.

Julie Price

Jeanne Sherrill

October 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

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100-1

Please note that the SWF will not result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allows construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

100-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Jeanne Sherrill". The signature is written in black ink and is positioned above the printed name.

Jeanne Sherrill

Edward Siegler

October 6, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2151 Ogden Drive, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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101-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Edward Siegler

Robert F & Rita S. Simmer
October 4, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I have a home in Cambria. My address is: 295 Lampton, Cambria, Ca. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our *quality of life*. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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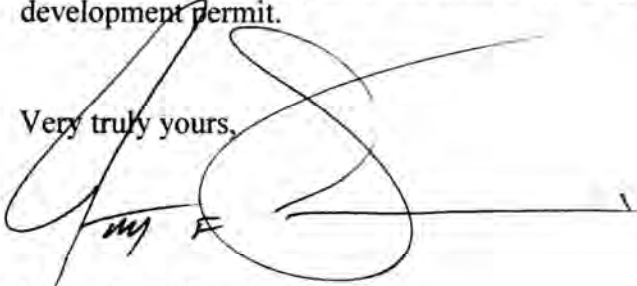
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102-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by a horizontal line extending to the right. The initials 'RF' and 'RS' are written in smaller script below the main signature.

Robert F. & Rita S. Simmer

Glen Barker

09/28/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1790 Saint Thomas Ave. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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103-1

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103-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



GLEN P. BARKER

Sharon Delp Barker

9/28/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1790 St. Thomas Ave, Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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104-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Sharon Delp Barker". The signature is written in black ink and is positioned above the printed name.

Sharon Delp Barker

Robert W Bender
10/06/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 488 Chiswick Way. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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105-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Robert W. Bender

Donald J. Burley
10-8-2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 314 Gaines St. Cambria, Ca.. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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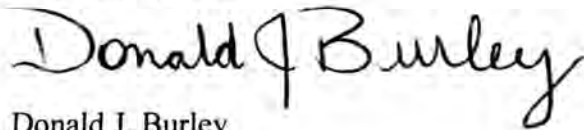
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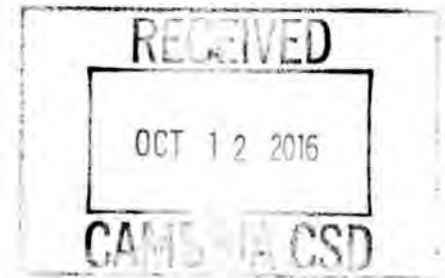
For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink that reads "Donald J. Burley". The signature is written in a cursive style with a large, prominent initial "D".

Donald J. Burley

Judith Burley
10-8-2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 314 Gaines St. Cambria, Ca.. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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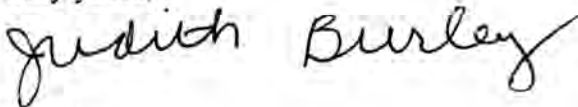
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107-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Judith Burley". The signature is written in black ink and is positioned to the right of the typed name.

Judith Burley

Carlos Cota

Date *Oct. 6, 2016*

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 1959 Tweed Ave
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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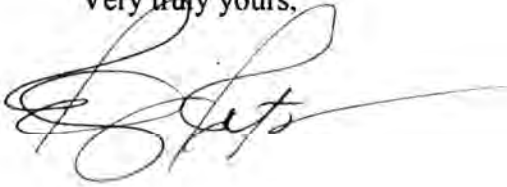
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108-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to be "L. J. [unclear]", written in a cursive style.

Greg and Holly Gordon

October 1st, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1810 Saint Thomas Avenue. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,


Greg Gordon


Holly Gordon

Date

Nicholas G. Ibarra
Oct 7, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

RECEIVED

OCT 12 2016

CAMBRIA CCSD

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

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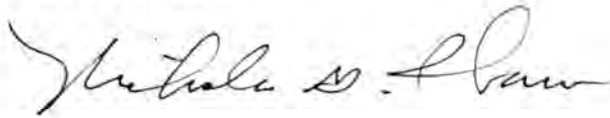
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110-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michael D. Shaw".

Robert and Debra Johnson

9/27/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 550 Plymouth St. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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111-1

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111-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Handwritten signatures of Robert and Debra Johnson. The signature for Robert is written in a cursive style and is positioned above the signature for Debra, which is also in cursive.

Robert and Debra Johnson

Eugene Lamparter

Date 10/8/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 6565 Buckley Dr. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

Our Community desperately needs a Sustainable Water Facility and I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Print name
Eugene Lamparter

112-1

Karen Lamparter

Date 10/8/2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

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113-1

Very truly yours,

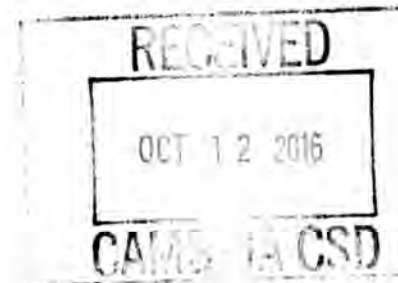
A handwritten signature in cursive script that reads "Karen Lamparter".

Print name
Karen Lamparter

Mary Maher

October 6, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria transferring to a full time resident over the next couple of months. My address is: 1835 Wales Road. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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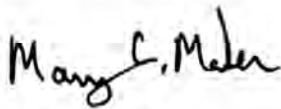
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114-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Mary C. Maher". The signature is written in black ink and is positioned above the printed name.

Mary C. Maher

Madelynn Rigopoulos

October 6, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



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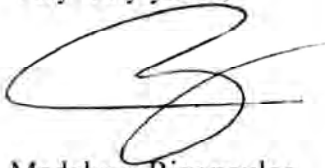
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115-1

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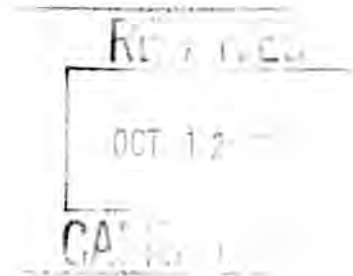
A handwritten signature in black ink, appearing to be 'Madelynn Rigopoulos', written in a cursive style.

Madelynn Rigopoulos

ELIZABETH R. ROCHEFORT

October 6, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 4630 Windsor Blvd., Cambria, California. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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116-1

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Very truly yours,

A handwritten signature in cursive script that reads "Elizabeth R. Rochefort". The signature is written in black ink and is positioned above the printed name.

Elizabeth R. Rochefort

JOHN M. ROCHEFORT

October 6, 2016

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Cambria Community Services District
1316 Tamson Drive, Suite 201
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117-1

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117-1

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Very truly yours,

A handwritten signature in black ink, appearing to read "John M. Rochefort", with a long horizontal flourish extending to the right.

John M. Rochefort



RESPONSE TO COMMENT LETTER NOS. PO 97 THROUGH PO 117

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 97 through PO 117 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

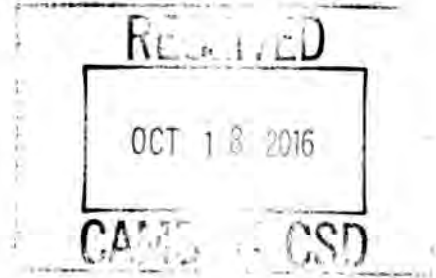


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UnClog Cambria LLC

October 13, 2016

Mr. Robert C. Gresens, P.E. District Engineer
Cambria CSD Planning Department
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Mr. Gresens:

The CCSD's Water Master Plan (WMP) and Sustainable Water Facility Project (Project) are designed to prevent thousands of landowners from developing their residentially zoned properties. The Project is limited in capacity to prevent the development of 3357 lawfully subdivided, residential parcels. While it is unclear whether the CCSD has sufficient authority to adopt and implement a scheme to limit development, there is no doubt that it lacks the authority to impair protected due process rights.

118-1

The following information and questions are submitted to illuminate some of the due process issues that should be considered before revising or certifying the SEIR.

The Draft SEIR states: "The BRP's overall goal is to retire and/or merge potential building sites in Cambria to reduce water demand. As such, BRP implementation serves as a tool to cap the maximum number of potential water service residential connections (4650, as discussed in Section 3.0 of this EIR) within the CCSD service area." See Draft SEIR page 6-7.

118-2

The Draft SEIR also states an objective of the Project is to: "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)." See Draft SEIR Executive Summary page 1-2.

Question # 1: Is it accurate to conclude that water from the Project will only be provided to existing users and those properties with CCSD wait list positions?

The Draft SEIR tiers to the CCSD's Water Master Plan. The Water Master Plan Program EIR (WMP PEIR) incorporates a Buildout Reduction Program (BRP). The BRP projects that 3379 lots will remain undeveloped. See WMP PEIR Chapter 14.03 Executive Summary of BRP pages 2-5.

118-3

Question # 2: Is it accurate to conclude that the WMP and Project prevent roughly 3379 residentially zoned parcels from obtaining water service from CCSD?

Question # 3: Because water and sewer go together in Cambria, is it accurate to conclude that the WMP and Project prevent roughly 3379 residentially zoned parcels from obtaining sewer service from CCSD?

118-4

Question # 4: Assuming the County would accept and process a variance request to allow development with trucked in water, would non-wait list holders be eligible or entitled to obtain sewer service from CCSD?

118-5

The BRP says that 879 buildable lots will be acquired at fair market price. See WMP PEIR Chapter 14.03 Executive Summary of BRP pages 2-5.

118-6

Question # 5: How do landowners find out whether their properties are targeted for acquisition?

Question # 6: Is the fair market price of a parcel based on the value of the raw land and all rights conveyed at the time of the owner's acquisition, or is determined by the price a buyer would pay knowing the right to water and sewer services from CCSD have been impaired by the WMP, Project, and District Code?

118-7

The BRP assumes 1526 lots are unbuildable; see WMP PEIR Chapter 14.03 Executive Summary of BRP pages 2-5. The Draft SEIR acknowledges that the CCSD has no land use authority because the County is the land use authority. Accordingly, it is reasonable to question how the CCSD determined 1526 lots are unbuildable.

118-8

Question # 7: Is it accurate to conclude that the CCSD has no authority to determine which lots are unbuildable?

118-9

Question # 8: Is it accurate to conclude that the County of San Luis Obispo is the proper agency to determine which lots are unbuildable?

118-10

The County's process to determine whether development can be permitted involves submitting for a coastal development permit (i.e., a land use permit) that determines the allowable use of the subject property. The County's Local Coastal Program (LCP) incorporates the North Coast Area Plan (NCAP). The NCAP includes a county wide planning area standard # 8 (CW-8): the Cambria Community Service District Review. CW-8 prevents the filing of a coastal development permit (CDP), unless a development application (for a land use or building permit) includes written verification that the CCSD will provide water and sewer services.

118-11

Question # 9: Is it accurate to conclude that a landowner cannot commence (i.e., have a land use permit taken in) the County's coastal development permitting process, unless CCSD provides written verification that it actually plans to provide water and sewer service?

Question # 10: Is there any Memorandum of Understanding between the County and CCSD or any other implementing measure that requires CCSD to provide verification whether it plans (or does not plan) to provide water and sewer service to support a development project?

Very simply, the County's permitting process is unavailable, unless CCSD provides a procedure that determines whether water and sewer service will be provided. Therefore, it is undisputable that the key that unlocks the door to filing a development permit lies with the CCSD. In other words, without a process that informs landowners whether CCSD will provide water and sewer service, the County cannot determine whether a lot is buildable or unbuildable. Hence, the due process problem is illustrated by the lack of process at CCSD.

118-12

Question # 11: What procedure or process is available that informs landowners whether the CCSD plans to provide water and/or sewer service.

118-13

The BRP includes mitigation measures designed to limit new development to only those properties with CCSD wait list positions. PSU-3 is a review of services that presumably informs a landowner whether CCSD will (or will not) provide the services required to submit a development application to the County. The PSU-3 states that it shall be completed before a development application is submitted to the County. See WMP PEIR Mitigation Measures pages 8-13 and 8-14.

118-14

Question # 12: Is the PSU-3 review limited to landowners with wait list positions, or are all landowners eligible to obtain the review?

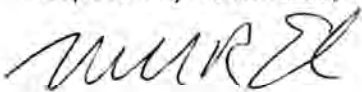
Question # 13: What are the procedures a landowner must follow to obtain the PSU-3 review?

118-15

In closing, this company is working with over 200 landowners, whose properties are targeted by the WMP and Project. These landowners have been frustrated by the unresponsive tactics employed by CCSD. For example, over the last 7 years I've personally sent over 15 certified letters to the General Manager, but have never received a reply or phone call from Tammy Ruddock or Jerry Gruber. Clearly, something is seriously amiss. Perhaps these questions will shed some light on what's in store for those left high and dry by the WMP and Project. Finally, please confirm receipt to UnClogCambria@cox.net.

118-16

Respectfully Submitted,



Michael R. Erickson
Manager and Cambria Lot Owner

**RESPONSE TO COMMENT LETTER NO. PO-118**

Michael R. Erickson, Manager and Cambria Lot Owner

UnClog Cambria LLC

October 18, 2016

PO 118-1 UnClog Cambria LLC has submitted a list of 13 items as part of the DSEIR comment process in which they state that, "The following information and questions are submitted to illuminate some of the due process issues that should be considered before revising or certifying the SEIR." Gregg Berge has submitted an eight-page document that he characterizes as "...formal questions to be addressed in writing for clarification and discussion pertaining to this project approval by the CCSD and appropriate review agencies." Mark D. Alpert of the Rudderow Law Group submitted a letter "...requesting that the SEIR address several questions/issues..." related to the fact that his clients own undeveloped, buildable lots that "...do not have a wait list position..." and concerns about their ability to obtain water and sewer service in order to develop their properties.

It is CCSD's understanding that UnClog is a Limited Liability Corporation (LLC) controlled by two individuals, Gregg Berge and Michael Erickson. They have for many years made a variety of demands on the CCSD and filed numerous lawsuits related to seeking water and sewer service from the CCSD for certain undeveloped lots. These lots are not on the CCSD's Wait Lists. Mr. Berge has also been declared by the courts to be a "vexatious litigant" and appears on the Vexatious Litigant List maintained by the Administrative Office of the Courts. Based upon an email communication from Mr. Erickson that was erroneously sent to the CCSD, the CCSD is informed that another lawsuit is going to be filed against it. The attorney now representing those interests is Mark Alpert of the Rudderow Law Group.

As noted, Mr. Berge has sued the CCSD on a number of occasions. Lawsuits have also been filed against the CCSD through surrogates who we understand are other lot owners who have "consulting agreements" with UnClog (reference Second CCSD Court of Appeals decisions in *Berge vs. Cambria Community Services CCSD* (2d Civil No. B212474), *Gilray vs. Cambria Community Services CCSD* (2d Civil No. B239158), and San Luis Obispo Superior Court ruling in *Noonan vs. Cambria Community Services CCSD*, Case No. 15CVP-0282). All of these lawsuits have been decided in favor of the CCSD. Many of the claims and demands made by UnClog, Berge and Erickson involve assertions relating to the Buildout Reduction Program (BRP). The BRP is a plan to reduce the number of buildable lots in Cambria, and is subject to the CCSD developing methods to obtain funding and other mechanisms for lot acquisition. Also, as noted, the lots represented by UnClog, Berge and Erickson are not on the CCSD's Wait Lists, and at this time water



availability for lots not on the Wait Lists has not been determined. Most of the “comments” made in the letters submitted by UnClog, Rudderow and Mr. Berge are either statements or are not comments on the DSEIR or related to environmental issues. Instead they consist of statements, conclusions, or questions that are related to their ongoing dispute with the CCSD, and their underlying theories relating to the BRP, as well as their interpretations of various provisions in the CCSD Municipal Code, provisions in the North Coast Area Plan and other documents (e.g., their references to “CW-8” and “PSU-3”).

Given the nature of the ongoing disputes, demands, and past and anticipated litigation from UnClog, Berge, Erickson, and other lot owners represented by them, the comment and response process pursuant to CEQA is not an appropriate vehicle to litigate their issues and theories.

The comment does not address the DSEIR’s adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

- PO 118-2 Water from the Project would be provided to existing CCSD water customers, regardless of whether those customers’ properties on the CCSD wait list come from the CCSD wait list at some future point in time, or whether they were existing customers as of the writing of this FSEIR. The maximum customer service would not exceed 4,650 existing and future residential units (CCSD wait list). Any future customers would be subject to CCSD connection fees in effect at the time of connection.
- PO 118-3 See Response PO 118-1.
- PO 118-4 See Response PO 118-1.
- PO 118-5 See Response PO 118-1.
- PO 118-6 See Response PO 118-1.
- PO 118-7 See Response PO 118-1.
- PO 118-8 See Response PO 118-1.
- PO 118-9 See Response PO 118-1.
- PO 118-10 See Response PO 118-1.



- PO 118-11 See Response PO 118-1.
- PO 118-12 See Response PO 118-1.
- PO 118-13 See Response PO 118-1.
- PO 118-14 See Response PO 118-1.
- PO 118-15 See Response PO 118-1.
- PO 118-16 The comment concerning responses to letters sent over the years does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

Your Name

MARYLEE BECWAR

Date

10/17/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 3220 BRADFORD CIRCLE
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

119-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/



Print name

MARY LEE BECWAR

Paul Carlson
2150 McCabe Drive
Cambria, California 93428

October 12th, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 2150 McCabe Drive, Cambria, California 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Paul Carlson, October 12th, 2016 (page 2)

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

The SWF will provide needed water to Cambria for flushing our toilets, irrigating trees and shrubs and most important, provide water for fire prevention and fighting fires.

The SWF will replenish and protect the San Simeon Lagoon during drought.

It will provide a water cushion to stop sea water intrusion into the aquifer.

It will recycle existing treated waste water and brackish water that would otherwise be wasted or go unused.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink that reads "Paul Carlson". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Paul Carlson

120-1

Gloria Coffie
8971 Tracy Avenue, Garden Grove, CA 92841

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is

121-1

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Gloria Coffie". The signature is written in black ink and is positioned below the typed name "Gloria Coffie".

Lonnie Coffie
8971 Tracy Avenue, Garden Grove, CA 92841

September 25, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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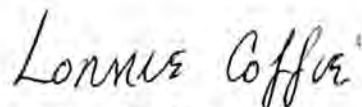
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Lonnie Coffie



RESPONSE TO COMMENT LETTER NOS. PO 119 THROUGH PO 122

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 119 through PO 122 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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From: Fermendzin <jlfermendzin@charter.net>
Sent: Friday, October 14, 2016 1:39 PM
To: Bob Gresens
Subject: Comment - Draft SEIR

Below are the first two bullet points of the Executive Summary in the draft SEIR. The second bullet point defines "existing development" to include future residential units to full build out.

- *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).*

Cambria residents need and will pay for an Emergency water supply facility. Cambria residents do not have a responsibility to pay for water supply facility to provide water for added residential or business units.

There are plenty of existing homes in Cambria for those who must live here. The plight of those who bought a lot in Cambria on which to build a house or the plight of those who bought a lot in Cambria to make a profit are not for me or other current residents to resolve. Not being able to build or sell their lot for a profit is their problem, not ours.

It is not immoral to oppose expanding the number of homes we allow in Cambria. It is immoral to change the intent for building an EMERGENCY water supply facility.

Keep the Emergency water supply facility an EMERGENCY water supply facility and not a reason to add residential units.

John Fermendzin
Cambria, CA resident

123-1

**RESPONSE TO COMMENT LETTER NO. PO-123**

John Fermendzin

October 14, 2016

PO 123-1 Comments are so noted and will be considered by the decision-makers during their deliberations on the Project. See Response PO 89-3 concerning increased water rates and construction/operational costs.

It is noted that the Cambria Emergency Water Supply Project name changed to "Sustainable Water Facility." The Project name does not affect the DSEIR's quality or content or its supporting documents. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7.



To: Cambria Community Services District (CSD)

DT: 10/13/2016

Re: Sustainable Water Facility Draft Subsequent EIR

The Surfrider Foundation is dedicated to the protection and enjoyment of the world’s oceans, waves, and beaches through a powerful activist network. We have the following comments and concerns regarding the SEIR and we support the “No project” alternative as many issues remain unaddressed by the Cambria CSD.

124-1

Our chapter does not support placing the destructive environmental impacts of desalination upon our fragile coastal environment when other options are clearly available. Also, our chapter does not support the Cambria CSD building and expanding its desalination plant without measurement and management of all other water resources available to the CSD, and further without extensive environmental review or documentation of public comment prior to construction.

124-2

Potential Damaging Ocean Outfall and Omission of Alternatives

Our San Luis Obispo chapter advocates county-wide for “No Ocean Outfall” and the CSD’s Draft Subsequent EIR strongly implies the CSD could eventually dump waste from its desalination plant in the ocean. The adverse environmental impacts from this would be dislocation of native species from the outfall area or it could pressure locales to keep ocean outfall in place. We oppose any plan to place desalination waste into the ocean when other viable options are available.

124-3

We were also surprised to see that the CSD did not consider a constructed wetland as a site for measured and managed burial of the waste from desalination. Such projects are able to attract grant funding from many sources, and the benefits of constructed wetlands extend to local habitat and ecological resources while helping to recharge the aquifer. For example, Oxnard’s Saline Treatment Wetland was successful in proving constructed wetlands can be useful in the management of RO Membrane concentrate for reclaimed water reuse. Certainly, if Cambria is to pursue measured growth, a good offset to growth is the construction of a new wetland, and this should be considered as an alternative.

124-4

Failure to Include Non-Potable Resources

Surfrider SLO has friends and members in Cambria. We share Cambria’s rich and thriving community and natural environment. Indeed, Cambria is a special place for citizens and visitors alike. Our chapter has

124-5

witnessed the Cambria CSD's response to our recent drought, and we wonder whether the CSD is using the drought and the related opportunity to build and expand its desalination plant as an excuse to shift toward unbalanced long term, urban growth.

We have seen water conservation requirements placed upon Cambria's citizens, and we have witnessed Cambria's consumptive response. One of Cambria's consumptive responses was for residents to purchase non-potable water from other sources. The CSD lists privately-held sources of deliverable, non-potable sources on their website. Yet, Cambria's availability and consumption of non-potable, imported water was not measured and documented in the Sustainable Water Facility Draft Subsequent EIR. This resulted in an unbalanced, skewed report.

As a standard, outside irrigation of residential landscapes can sometimes amount to 40 percent of residential consumption. While the CSD has moved forward with plans to build a desalination plant, the citizens added conservation measures and found other sources for water (e.g. non-potable supply from outside sources). Without measuring and projecting non-potable water resources delivered to the community, or without the CSD considering procurement of non-potable resources for delivery through the CSD, the entire supply and demand structure of Cambria's water portfolio is inadequate and misleading. We strongly encourage the Cambria CSD to measure non-potable resources already imported by the community, to estimate the potential supply that imported non-potable water could provide in the future, and to consider purchasing non-potable water from other sources compared to potential economic and environmental impacts from building and expanding the desalination plant. Likewise, the CSD could modify its Wastewater Treatment Plant to make non-potable water more available to citizens.

Surfrider Foundation San Luis Obispo supports the Cambria CSD's consideration of environmentally-responsible methods for delivering secure water supplies to its businesses and residents. However, the chapter cannot support a CSD project that clearly has not measured available resources and has not considered every alternative to reduce the waste and environmental impacts associated with desalination. Surfrider SLO supports the "No Project" alternative for Cambria CSD's Sustainable Water Facility and we ask that our concerns and comments outlined above be integrated into the economic and environmental justifications for any new project.

Thank you for your consideration.

Brad Snook

Co-Chair, Surfrider SLO

Ph# (805) 440-9489 e-mail: chair@slo.surfrider.org

124-5

124-6

**RESPONSE TO COMMENT LETTER NO. PO-124**

Brad Snook, Co-Chair
Surfrider Foundation, SLO
October 13, 2016

PO 124-1 This comment provides general introductory statements to the letter. As no significant environmental concerns are raised, no further response is required.

PO 124-2 It is noted that Surfrider SLO Chapter does not support desalination in the coastal environment, without proper management and environmental review. In compliance with CEQA requirements, the DSEIR includes an analysis of Project alternatives being considered, as well as those that were considered but rejected as infeasible; see the following DSEIR Sections:

- DSEIR Section 7.1, "No Project" Alternative;
- DSEIR Section 7.2, "SWF Without Project Modifications" Alternative;
- DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative;
and
- DSEIR Section 7.5, Alternatives Considered But Rejected.

PO 124-3 It is noted that the Surfrider SLO Chapter advocates for a county-wide "No Ocean Outfall." As discussed in DSEIR Section 3.5.2.6, Offsite RO Concentrate Disposal, with implementation of the Project Modifications, RO concentrate from the Project's RO treatment process would be stored onsite in above-ground storage tanks and then transported by truck to a disposal site, such as the Kettleman Hills Hazardous Waste Facility (Kettleman Hills). As discussed in DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative, 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. Therefore, disposal of RO concentrate in an existing ocean outfall is being considered by the CCSD, as of the writing of this response. See Response PA 4-34 and DSEIR Page 7-15 concerning use of an ocean outfall for disposal RO concentrate disposal, associated regulatory requirements, and potential environmental impacts. The potential biological impacts associated with this alternative are addressed on DSEIR Page 7-17 and the potential hydrology and water quality impacts are addressed on DSEIR Page 7-18.



PO 124-4 See Response PO 124-2 concerning the Project alternatives that were considered. Concerning the constructed wetland, the cited City of Oxnard research project for disposing of RO concentrate by means of a constructed wetlands is applauded. Due to time constraints and uncertain permitting requirements, a constructed wetland for RO concentrate disposal was not considered feasible.

PO 124-5 Comments are so noted and will be considered by the decision-makers during their deliberations on the Project. The Project's potential growth inducing impacts are addressed in DSEIR [Section 6.3, Growth Inducing Impacts](#); see also Responses PA 4-32 and PA 6-7. Cambria's water availability and demand is discussed on DSEIR Page 3-4.

The comment also requests that the CCSD consider the non-potable water resources presently being imported by the community and modifying its Wastewater Treatment Plan to make non-potable water available to the community. A rancher located to the north of Cambria (Warren) sells water from his well to private individuals wishing to haul water onto their property. The CCSD does not track water diversions from this private business venture.

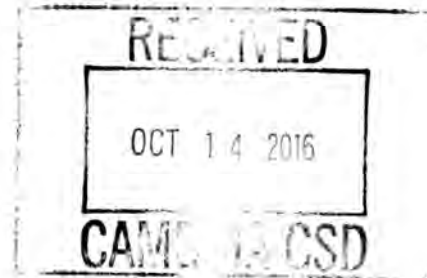
The CCSD essentially recycles all of its wastewater. Treated wastewater effluent is percolated into the San Simeon Creek groundwater basin at the CCSD's percolation ponds located on the Project site. This mounded water is part of the SWF's supply source, which meets Title 22 indirect potable reuse criteria. Percolated water that is not used by the SWF serves to form a barrier between the ocean and upgradient freshwater supply wells.

PO 124-6 See Response PO 124-2 concerning the DSEIR analysis of Project alternatives being considered, as well as those that were considered but rejected as infeasible. Cambria's water availability and demand are discussed on DSEIR Page 3-4.

**Robert Tleman
390 Pembroke Dr.
Cambria, CA 93428**

October 10, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

First things first: I whole-heartedly and fully support the CCSD's Sustainable Water Facility.

I am a full time resident of Cambria, residing at 390 Pembroke Drive on Park Hill. In sending this letter, I hereby offer my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

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further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

125-1

Very truly yours,


Robert Tieman

David Wierenga

October 5, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 293 Drake St. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

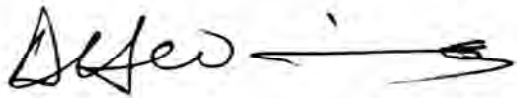
Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

126-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "David Wierenga", followed by a horizontal line with an arrowhead pointing to the right.

DAVID WIERENGA

Mary Wierenga

October 5, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 293 Drake St. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

127-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Mary K. Wierenga
Mary K. Wierenga

Gail Winett

October 11, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 2150 McCabe Drive, Cambria, California 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

128-1

by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

128-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Gail Winett". The signature is written in black ink and is positioned below the text "Very truly yours,".

Gail Winett

Your Name

Date

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 645 EVELYN CT.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

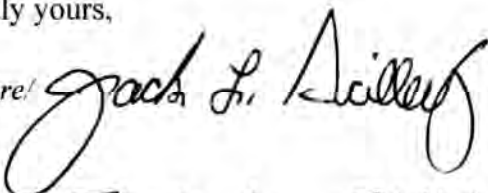
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

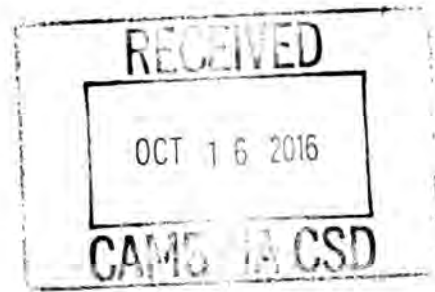
Very truly yours,

/signature/ 

Print name JACK L. SCILLEY

Your Name

Date



Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 645 EVELYN CT.
 I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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130-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

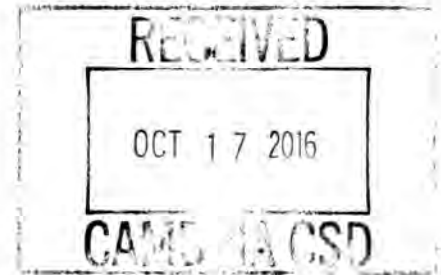


Print name

JUDITH E. SCILLEY

Paul Charles McDonnell, Jr.
395 Norfolk St.
Cambria, Ca 93428

October 7, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 395 Norfolk, Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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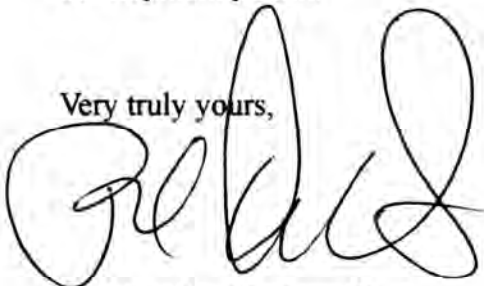
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Charles McDonnell, Jr.", written in a cursive style.

Paul Charles McDonnell, Jr.

Robin Zimpfer McDonnell
395 Norfolk St.
Cambria, Ca 93428

October 7, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 395 Norfolk, Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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132-1

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Robin McDonnell". The signature is written in black ink and is positioned below the typed name.

Robin McDonnell

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 210 Orlando Drive, Cambria Ca. Being involved in the community as a land owner since 1985 and having built our home in 1997 and becoming a full time resident in 2010 I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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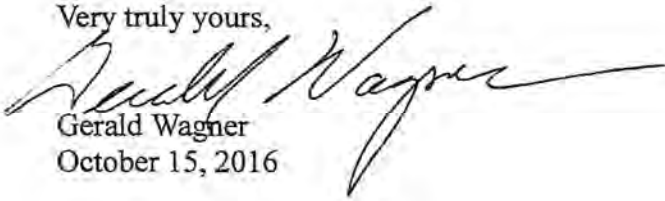
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

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Very truly yours,

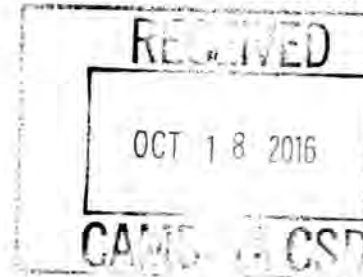
A handwritten signature in cursive script, appearing to read "Gerald Wagner", with a long horizontal flourish extending to the right.

Gerald Wagner
October 15, 2016

Varouj & Dina Moradkhanian
701 Glen Ave, Glendale CA 91206

October 13, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

We are proud owners of a double lot on Oxford street in Cambria. We think of Cambria as our second home as we've been coming there since 1996. We fell in love walking along the Moonstone beach and have planned to build our dream second home and retire one day.

We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades we've witnessed Cambria suffer from a chronic shortage of potable water. Most recently during the current multi-year extraordinary drought, the town's lack of water has passed critical conditions. The CCSD reacted well and has constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. This plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town. This is essential. As regular observers of life and economic conditions in Cambria, we cannot emphasize enough how critical it is for you to adopt the SEIR as final and urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit. Without it, Cambria's economic future will decline & we all will suffer – as Cambria is a gem and actions must be taken to secure its future.

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SWF does not harm the environment; in fact, it actually improves the environment. Simply review the Subsequent Environmental Impact Report. Furthermore, based on experience gained in using the plant during the current drought, all point to a net positive impact on environment. There are other factors as well. SWF plant is remotely located with a modest footprint; thus, it is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above, I urge once again for CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

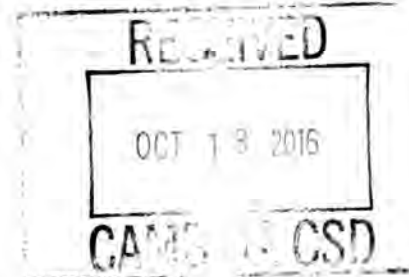
Sincerely yours,

FRANK SCOZZARI

1070 Cleveland Lane
Nipomo, CA 93444
(805) 714-8767
fgscozzari@yahoo.com

October 15, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I have been on the water wait list since 1988. I have seen several projects come and go, a lot of money and time wasted, and I am hopeful that we have finally found a solution.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Sincerely,



Frank Scozzari

October 16, 2016



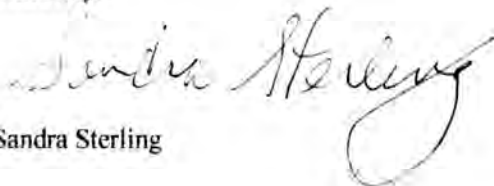
Mr. Robert Gresens, District Engineer
CCSD
1316 Tamson Dr., Ste 201
Cambria, CA 93428

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 1985 Oxford Ave. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

I have witnessed for over 50 years Cambria's suffering from a chronic shortage of potable water. During the current multi-year drought, the town's lack of water became critical. The emergency water plant is the most viable answer to our water needs. It is imperative that we obtain a regular coastal permit to avoid existing and future water shortages.

Sincerely,

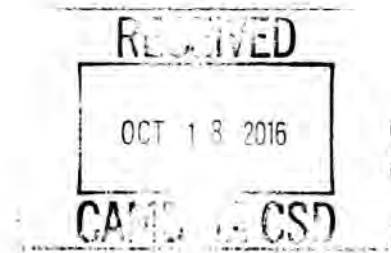

Sandra Sterling

136-1

Ed and Nancy Fuller
910 S. Lakeview Drive
Prescott, AZ 86301

September 29, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

We have been part time residents of Cambria for 22 years. Our address is: 2059 Sherwood Drive. We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

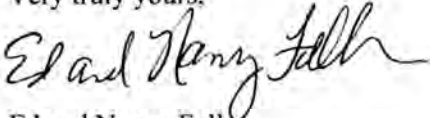
Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Furthermore we strongly encourage the community and CCSD to resist interference in this matter from Hollywood activists such as Ed Asner who admittedly had never even been to Cambria until he inserted himself into this debate. He has no property here and no business interfering in a matter he knows nothing about. He's an actor, not an expert on clean and available water needs in a community he never heard of until recently. He should not be given a voice in something that only concerns full and part time residents of Cambria.

137-1

Very truly yours,



Ed and Nancy Fuller
2059 Sherwood Drive,
Cambria, CA 93428

910 S. Lakeview Drive,
Prescott, AZ 86301
408-314-4227

Constance B E. Jordan

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2067 Sherwood Drive, Cambria I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR)

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

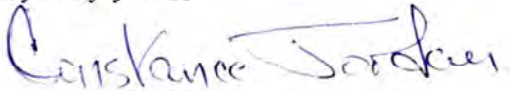
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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and

perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in blue ink that reads "Constance Jordan". The signature is written in a cursive style with a large initial 'C'.

Constance Jordan
October 17, 2016



October 14, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Deryl Robinson



RESPONSE TO COMMENT LETTER NOS. PO 125 THROUGH PO 139

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 125 through PO 139 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

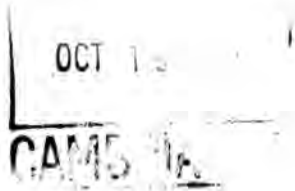


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COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428
bgresens@cambriacsd.org

October 2016



Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

140-1

This urgent request is made for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSO or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

140-2

140-3

140-4

140-5

140-6

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

140-6

Name:

Marjorie R. Sewell

Marjorie Sewell

Address: 392 Leighton St

City, State, Zip code: Cambria, CA 93428

**RESPONSE TO COMMENT LETTER NO. PO-140**

Marjorie Sewell

October 19, 2016

PO 140-1 See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. See Response PA 4-1 concerning the Project description and PA 7-9 concerning the baseline conditions and DSEIR's approach to environmental impact analysis. The already-constructed SWF was analyzed throughout the DSEIR, which was made available for public review and comment for a 45-day period that occurred between August 31, 2016 and October 6, 2016. The CCSD subsequently extended the public review period to October 26, 2016, resulting in an overall review period of 65 days. The DSEIR was made available for review and comment to the public, responsible and trustee agencies, interested groups, and organizations. The DSEIR was also made available directly to State agencies through the State Clearinghouse, Office of Planning and Research.

PO 140-2 There has been a building moratorium in Cambria, since the CCSD instated a water wait list in 1986, after a series of water shortages. The 2013/2014 water year drought prompted the CCSD's decision to provide an emergency water supply for Cambria that could be quickly implemented. As discussed on DSEIR Page 3-13, on January 30, 2014, the CCSD Board of Directors (Board) declared a Stage 3 Water Shortage Emergency Condition, the most severe of three levels.⁴ In compliance with CWC Section 350, this Stage 3 Condition was declared based on the Board's determination that "the demands and requirements of water consumers cannot be satisfied without depleting the water supply of the CCSD to the extent that there would be insufficient water for human consumption, sanitation, and fire protection and that, based on this condition and on concerns regarding the anticipated prolonged drought conditions."⁵ The Board approved implementation of a Stage 3 Water Conservation Program with enhanced water conservation measures and restrictions on the use of potable water (see also *Water Conservation*, DSEIR Page 3-10).

The water supply associated with the Project is needed to meet water demands during drought conditions and improve overall water supply reliability; see also DSEIR Section 3.3, *Project Purpose and Objectives*.

Cambria's water availability and demand is discussed on DSEIR Page 3-4.

⁴ Cambria Community Services District, Resolution 04-2014, January 30, 2014.

⁵ Ibid.



- PO 140-3 See Response PO 123-1, concerning the Project's name change.
- PO 140-4 See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE.
- PO 140-5 See Response PA 7-4 concerning the IS/MND. A Notice of Preparation Scoping Meeting was held on March 26, 2015 at the Veterans Hall in Cambria. A total of nine persons presented their oral comments at the meeting. The comment letters and oral comments received during the NOP comment period, along with a table summarizing the environmental issues raised by the comments, are included in DSEIR Appendix A.
- PO 140-5 The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, Growth Inducing Impacts; see also Responses PA 4-32 and PA 6-7.

Linda Rotolo

10/15/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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142-1

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Ms. Patricia Scarborough
1043 Le Conte Dr
Riverside, CA 92507-5934



RESPONSE TO COMMENT LETTER NOS. PO 141 THROUGH PO 142

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 141 through PO 142 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

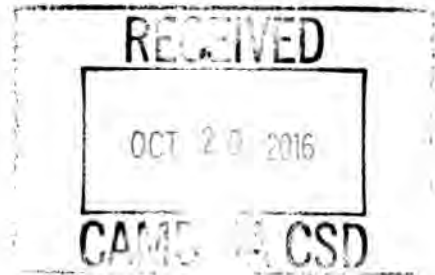


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Edward Siegler

October 18, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2151 Ogden Drive, Cambria, CA 93428. Also, I am the chairman of the Buildout Reduction Plan Citizen's Committee. I have been directed and authorized by the committee to send this letter regarding the Draft SEIR.

On page 6-4, the SEIR states, "Since adoption of the BRP and certification of the WMP PEIR, a substantial number of lots have been retired through a variety of methods." In our committee's Executive Summary dated July 26, 2016, the committee stated, "The following table represents efforts toward preserving open space throughout the community."

The committee did not state, nor did it intend to imply, that the means of retirement in the table titled, "CCSD Lot Retirement Program at a Glance," was pursuant to the BRP. While many of the property retirements were, many others have been a result of efforts not related to the BRP.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Edward Siegler".

Edward Siegler

143-1

**RESPONSE TO COMMENT LETTER NO. PO-143**

Edward Siegler

Buildout Reduction Plan Citizen's Committee

October 18, 2016

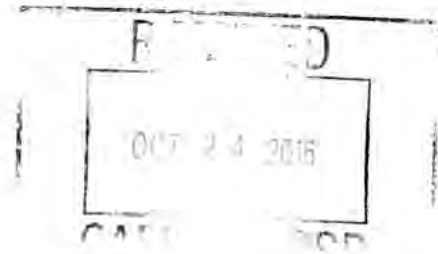
PO 143-1 To further clarify DSEIR Table 6-1, *CCSD Lot Retirement Program at Glance*, DSEIR Page 6-4 has been revised in the FSEIR, as follows:

BUILDOUT REDUCTION PROGRAM UPDATE, 2016

Since adoption of the BRP and certification of the WMP PEIR, a substantial number of lots have been retired through a variety of methods. In accordance with PEIR Mitigation Measure PHG-2 (requiring progress reporting), the CCSD has continued to track and record merger activities from 2007 and into 2016. The Voluntary Merger Program has been monitored over that time period and information is available at the CCSD office and on the CCSD website. Table 6-1, *CCSD Lot Retirement Program at a Glance*, provides an overview of lot mergers and retirements through Summer 2016. It is noted that while some property retirements were made pursuant to the BRP, many others have been a result of efforts not related to the BRP.

Verlinda Bailey
10-21-16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 354 Lancaster St., Cambria, CA. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

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out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

144-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Verlinda Bailey

Jerry Borowick

Your Name

Oct. 21, 2016

Date

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 345 Ivar St.
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145-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

A handwritten signature in black ink that reads "Jerry Borowick". The signature is written in a cursive style with a large, looping flourish at the end.

Print name

Jerry Borowick

Jacob & Susan Colarian

Date 10/17/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Jacob Colarian

Susan Colarian



October 21, 2016

Mr. Robert C. Gresens, P.E.
District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: In Support of Subsequent Environmental Impact Report - Sustainable Water Facility

Dear Mr. Gresens and all concerned,

Thank you for the opportunity to comment on the Draft Subsequent Environmental Impact Report (SCH#2014061073) for the Cambria Sustainable Water Facility Project. It is a thorough document with an exhaustive public review process aimed to protect the community and environment of Cambria. I support the findings of the SEIR and urge professional staff and policy makers to also support Cambria Community Services District's (CCSD) application for a regular coastal development permit.

I applaud the District's courage and foresight to address the sustainability of the community throughout the decades. Most recently, the construction of an emergency water plant provides maximum use of existing resources (briny water and wastewater) with minimal negative impacts - such efficiencies!

The provision of community services is at the core of the District's mission. Community is where we live. It is our history, our present livability and our future legacy. Thank you for your work in preserving our community, facilitating its healthy economy and attending to the natural environment that surrounds Cambria.

The project has been studied, analyzed and tested. Let's now see it accepted. Please adopt the SEIR as final and continue your work with San Luis Obispo County and any other regulatory agencies to achieve a regular coastal development permit. Thank you for your attention and due diligence.

Best regards,



Jimmy E. Copeland
3120 Ardath Street
Cambria, CA 93428

147-1

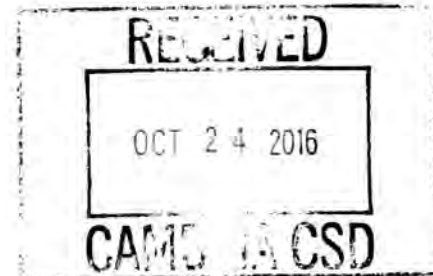
Emil James Crescenzi Jr
 3000 Galloway Ridge, Apt K209
 Pittsboro, NC 27312

October 21, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,



I am the owner of a lot in Cambria, and a recent 15-year resident of Cambria. My wife and I left Cambria in 2015 due to health reasons, to be near family in North Carolina, and to reside at a continuing care retirement facility. There will always be an emotional attachment to Cambria for both of us. We genuinely care about the future of Cambria, and the environmental integrity of San Simeon Creek. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment, in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

It is not an exaggeration to point out that in times of severe drought, operation of the SWF to maintain a healthy water level in the San Simeon Creek lagoon will make a life versus death possibility for steelhead smolt trapped in the lagoon. Immature steelhead are trapped in the lagoon in times of severe drought, particularly in the summer months. Their survival depends on having available clean, cool water. I personally took part in monitoring the water quality in the lagoon in 2014 and 2015 (before leaving Cambria), and I can assure you this lack of water is a very serious environmental issue. Low water levels are typically associated with elevated water temperature and added turbidity.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Emil James Crescenzi, Jr



RESPONSE TO COMMENT LETTER NOS. PO 144 THROUGH PO 148

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 144 through PO 148 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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Mr. Robert C. Gresens, P.E., District Engineer, CCSD, bgresens@cambriacsd.org
1316 Tamson Drive, Suite 201, Cambria, CA 93428

The original Emergency Water System (EWS) was designed and built to protect Cambria's water supply during the current and future droughts. As an emergency measure, it was not subject to normal environmental reviews. Due to its novel and complex design, it did not operate during this current drought due to problems with operation. Fortunately, it was not needed because Cambrians practiced water conservation methods to allow an adequate normal supply with prudent conservation.

149-1

Now the goal of the project has been changed to justify building some 600 new houses, in addition to providing water to existing customers during droughts. This Sustainable Water Facility (SWF) requires approval from several agencies, including an EIR. Their preliminary comments are giving a wake-up call on design flaws and negative impacts to the environment based on reports from its operation for just a short period.

The environmental issues in the agencies' comments include inadequate flows for critical habitats, deleterious effects on sea water, and damage to wildlife, some of which has already been documented during its short test periods. Coastal Commission comments note additional issues to be addressed, including water output amounts and the question of available water rights.

149-2

The draft SEIR has already admitted that brine pond and blowers could not possibly meet environmental goals. It is to be replaced by temporary storage and trucking of the toxic waste to a facility in the Central Valley. This poses quite a large carbon footprint with up to 10 large water tankers running through our environmentally sensitive area daily, to say nothing of the consequences of a toxic waste spill (like the one at CA 1 and 46 this year). While this waste is characterized as "brine", it also contains all of the chemicals removed by a reverse osmosis system, such as heavy metals and pharmaceuticals.

149-3

If approved, this project would enable the construction of over 600 new houses and commercial buildings in Cambria. While each of these projects might have a small effect on the environment, the cumulative effect will be huge, involving permanent improvements for wider streets, wastewater treatment, police and fire protection, in addition to environmental issues associated with the construction, which is projected to last for decades.

149-4

Finally, as a practical matter, the EWS has failed to supplement our water supply in the current drought, so it appears that the major goal of the SWF is to allow for new construction. The design changes already presented, as well as future modifications that will be needed to convert this project from EWS to SWF, will add huge costs to a project that is already well over its original cost estimates. Full time residents bear a major burden of the costs despite the promises of outside funding. Unless cheaper solutions can be found, Cambrians might not be able to afford the addition of hundreds of new buildings.

149-5

Sincerely,

Barbara Crowley
1801 Ogden Dr., Cambria



**RESPONSE TO COMMENT LETTER NO. PO-149**

Barbara Crowley

October 24, 2016

PO 149-1 See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. The Project is subject to review under CEQA, as discussed throughout the DSEIR and this FSEIR.

Project goals are provided in DSEIR Section 1.3, *Goals and Objectives*. The Project's goal is not to "justify building some 600 new houses," as stated in this comment. Water from the Project would be provided to both existing users and those properties on the CCSD wait list, to a maximum of 4,650 existing and future residential units (CCSD wait list). As discussed on DSEIR Page 6-7, Buildout Reduction Program (BRP) implementation serves as a tool to cap the maximum number of potential water service residential connections within the CCSD service area. The water supply associated with the Project is needed to meet water demands during drought conditions and improve overall water supply reliability. The Project implements the facility improvements identified within the Water Master Plan (WMP) and does not modify the development limitations established in the BRP. Development in Cambria is also subject to review (through SLO County's established development review process) for consistency with Title 26 (Growth Management Ordinance).

See Response PA 4-17 concerning the public agencies whose approval would be required. See Responses PA 7-4 and PO 96-2 concerning the Project modifications.

PO 149-2 Responses to Public Agency comments are provided in FSEIR Section 12.3, *Comments and Responses*. Specifically, see Responses PA 4-1 through PA 4-37 for responses to California Coastal Commission (CCC) comments. Environmental analysis related to water flows and wildlife can be found in DSEIR Section 5.3, *Biological Resources*, and DSEIR Section 5.5, *Hydrology and Water Quality*.

PO 149-3 The environmental impacts associated with the evaporation pond and mechanical spray evaporators are addressed throughout the DSEIR. See Responses PA 4-15 and PA 4-19 concerning potential Project impacts associated with the routine transport, use, and disposal of hazardous materials. See Responses PA 7-4 and PO 96-2 concerning the Project modifications. The impacts associated with offsite RO concentrate disposal are evaluated in DSEIR Sections 5.1 through 5.7, and DSEIR Section 8.0, *Effects Found Not To Be Significant*. Additionally, greenhouse gas emissions are discussed in DSEIR Section 8.4



- PO 149-4 The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7.
- PO 149-5 See Response PO 149-1 concerning Project goals and objectives. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7. See Response PO 89-3 concerning increased water rates and construction/operational costs.



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COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org

October 2016

RECEIVED

OCT 24 2016

Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and that no further applications for permitting of the project be submitted. The current, sustainable, water supply conservation effort, mandated by the declared Stage 3 Water Emergency, has proven to be a successful and reliable method to supply adequate water to Cambria residents and businesses during severe drought conditions, as recently experienced during the period 2014-2016. It is not necessary, therefore, to burden the limited resources of state and federal agencies and personnel with a lengthy, confusing, misleading and wholly unnecessary, review of a politically motivated project that is sufficiently proven as unnecessary for providing water to Cambria.

This urgent request is made for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for any emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been adequately proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings by the residents of Cambria, saved more than enough water to overcome predicted shortages, which never materialized. Moreover, during this period, no safe, potable water ever reached Cambria's water supply from the "Emergency Water Facility" that was constructed in 2014.
- Since State and Federal regulatory agencies are not mandated to support or validate the political goals of local governments, they should not be asked to assume the burden of reviewing and adjudicating this EIR. Cambria residents never voted approval for a "Sustainable Water Facility". This project was originally presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for the political goal of increasing growth by adding new water meter connections. Cambria residents did, in fact, vote almost unanimously for Conservation. Their overwhelming support for conserving water was demonstrated by achieving a California State Record amount of 43% savings between 2014 and 2016. In any case, the Emergency Water Facility was never needed, since early monitoring of the Santa Rosa and San Simeon wells in 2014 showed, that with the conservation measures in place under the declared Stage 3 Water Emergency, adequate well levels in both aquifers, were quickly realized. In fact, Cambria succeeded so well with conserving water, that the CCSD decided in May of 2014, up until July of 2014, to permit unlimited amounts of free water to be drawn by landscape contractors from the Santa Rosa wells.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Facility Project, which would have triggered appropriate agency review and public hearings. These reviews, however, are now an unnecessary burden to the resources and personnel of the concerned regulatory agencies, since the Emergency Water Facility project is not needed.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014. However, conservation does not need environmental review, or EIR, or any

150-1

regulatory compliance. It poses no threat or negative impact to the environment and it works for Cambria, since our population is stable and our groundwater reserves are at low risk for depletion, when conservation is put into place early in the dry years. The CASGEM interactive map of groundwater risks in California clearly shows the designation of the Santa Rosa and San Simeon basins to be of "Very Low Risk".

- o A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

In summary, the request for review of any this Environmental Impact Report is a substantial burdensome administrative request to the regulatory agencies involved. It is redundant and unnecessary, since there is a current, safe, proven, reliable, zero environmental impact method (conservation) in place that has provided adequate reserves of potable water for the past three years without any augmentation at all, from the Emergency Water Facility constructed under the emergency permit in 2014.

Therefore, please withdraw the draft SEIR. Cambria has enough water without this "project for growth" that will destroy our unique environment.

Melvin Dorin
Melvin Dorin
2510 Banbury Road
Cambria, CA 93428

150-1



RESPONSE TO COMMENT LETTER NO. PO-150

Melvin Dorin

October 24, 2016

150-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.

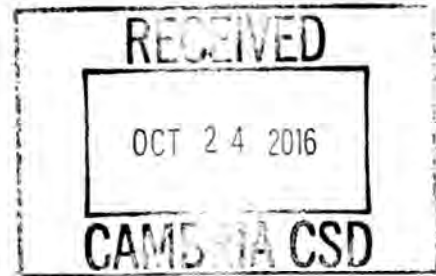


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Marion Fitzgerald

September 28, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 2601 Sherwood Dr., Cambria, CA 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

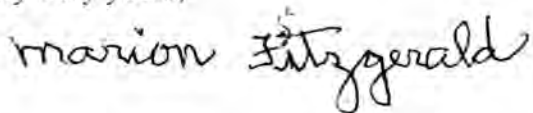
Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

151-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "marion Fitzgerald". The signature is written in black ink and is positioned below the closing "Very truly yours,".

Marion Fitzgerald

Barbara Bronson Gray, RN, MN

801 Warren Road
Cambria, CA 93428
805.927.5176
bbgray@sbcglobal.net



October 19, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Draft Subsequent Environmental Impact Report, Sustainable Water Facility

Dear Mr. Gresens:

As a full-time resident of Cambria, I am submitting this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular Coastal Development Permit (CDP) and the supporting Subsequent Environmental Impact Report (SEIR).

From my experience as a property owner and resident of Cambria for the past 11 years, I can attest to the harmful long-term impact that this community's chronic water shortage has had on the quality of life here and the local economy. As a Director of the Cambria Community Healthcare District and as a registered nurse, I also know that the tight restrictions that have been in effect for nearly three years, due to the current drought, create hazards due to inadequate sanitary practices such as hand-washing and flushing of toilets. Finally, as a member of the Cambria Fire-Safe Focus Group, an inter-agency body coordinating fire prevention efforts, I know what the water shortage has done to heighten the risk of a catastrophic fire event.

With massive tree death from the drought, this community is more vulnerable to wildfire than perhaps at any time in living memory. With the SWF permitted on an emergency basis, it has some added ability to fight fires once they start. But the limits on the operating permit mean that the SWF can only function when severe restrictions on landscape watering are in effect. This means that Cambria residents cannot adequately water their landscaping and maintain what firefighters call "defensible space" – a wide perimeter of irrigated vegetation around their homes.

Fire risk is also the greatest *environmental* hazard facing Cambria right now. Our Monterey Pine forest (one of only three native mainland stands of this species in the world) is imperiled by drought and the inability of people living in forested areas to water their property adequately. All of the minor or insignificant environmental impacts of the SWF, as described in the SEIR, carry less weight than the risk of fully permitting the SWF and then seeing the forest burn down because an adequate supply of water has not been provided.

152-1

I also support the SWF because it has direct benefits to the environment, even apart from the indirect benefit of helping prevent fires. The SWF plan, with mitigations outlined in the draft SEIR, would enhance the wildlife habitat of the San Simeon Creek Lagoon by adding fresh water to it during the dry season. It also would help protect groundwater resources by recharging the San Simeon Creek Aquifer upstream of the wastewater percolation ponds, thereby preventing intrusion of both wastewater and ocean-influenced water from downstream.

The most significant mitigation step outlined in the SEIR – conversion of the brine disposal pond to freshwater storage – may be the most important of all from an environmental and safety standpoint. Repurposing the pond will enable the CCSD to store up to 7 million gallons of fresh water (pumped during the rainy season) that can be used to fight wildfires and, with micro-filtration, can be pumped into the potable water system. Environmentally, this change in use for the pond eliminates the wildlife hazards of the current brine pond and replaces them with a safe habitat.

The regular CDP sought by the CCSD would enable it to balance its extraction of water from its two natural sources, the Santa Rosa Creek and San Simeon Creek aquifers, with a third source, the SWF's potable water produced from brackish groundwater and treated wastewater. This, too, will have an environmentally beneficial effect. The SWF water will provide a supply "cushion" that prevents over-pumping either of the aquifers, in the process guarding against groundwater depletion, habitat damage and subsidence.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final, and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Barbara Bronson Gray

Barbara Bronson Gray, RN, MN
Director, Cambria Community Healthcare District

152-1



RESPONSE TO COMMENT LETTER NOS. PO 151 THROUGH PO 152

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 151 through PO 152 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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Thomas S. Gray

801 Warren Road, Cambria, CA 93428
805-927-5176 Mobile: 805-750-1257
tsgray@sbcglobal.net



October 18, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

VIA EMAIL: bgresens@cambriacsd.org

Dear Mr. Gresens,

I am a full-time resident of Cambria, California, submitting the following comments on the Draft Supplemental Environmental Impact Report (Draft EIR) for the Sustainable Water Facility (SWF) project. I was under contract with the Cambria Community Services District (CCSD) until April 30, 2016 to provide public communications services regarding the SWF. However, I now have no connection with the CCSD, via employment, contract or any other means. I am commenting strictly as a private citizen.

153-1

First and foremost, I wish to state my unequivocal support for the SWF and for a regular Coastal Development Permit (CDP) that will allow maximum flexibility in its future use. This project is essential for Cambria's future water security. It also represents a major step forward, not just locally but for the state as a whole, in the development of water supply technology that makes maximum use of available resources with a net gain in environmental quality.

The Draft SEIR is especially notable for showing how constructively the CCSD has responded to comments on the SWF that followed the issuance of the Notice of Preparation/Project Information Packet (NOP/PIP) in March 2015. Any fair-minded reader will agree that the Draft SEIR has adequately answered all serious and scientifically informed critiques. The latter I would put into three general groups – questions about the adequacy of surface and groundwater flows, complaints about noise and aesthetic impacts, and concerns about the impact of the project on wildlife.

153-2

On water flows, for instance, Tom Luster, the chief environmental scientist for the California Coastal Commission, had questioned whether the project might substantially deplete groundwater or interfere with groundwater recharge. He also raised a concern that the planned 100-gpm flow of mitigation water to the San Simeon Creek Lagoon might

153-3

not be adequate to ensure water quality and habitat. The Draft SEIR has responded with a thorough technical study of surface and groundwater flows, more exhaustive than anything done previously for this aquifer and lagoon. The studies (in Appendix E of the Draft SEIR) show that 1) the project poses no threat to groundwater, 2) it does not have a negative impact on steelhead migration, since San Simeon Creek is normally dry for about half the year, and 3) that it actually enhances the San Simeon Creek Lagoon habitat by providing a freshwater source (the 100 gpm mitigation water) during the dry season.

153-3

Complaints about aesthetic impacts, air quality or noise all point to the current evaporation pond system as the problem. In fact, the pond and its blowers are the *only* possible source of significant impacts in these areas. All other parts of the project, such as the Advanced Water Treatment Plant, are essentially invisible and inaudible from beyond CCSD property; they also have no impact on air quality beyond temporary construction activities. The good news here is that the SEIR offers an alternative to the evaporation pond and blowers – storing reverse-osmosis concentrate in Baker tanks and trucking it offsite. In doing so, it removes the source of the complaints.

153-4

Trucking the concentrate also defuses concerns about the impact of the project on wildlife. Critics correctly cited the brine pond as the most significant wildlife hazard, for which the SEIR comes up with an elegant solution: Convert the pond to freshwater storage. Using the pond to store up to 7 million gallons (21 acre-feet) of raw water pumped from CCSD wells will not only maintain a safe habitat but will also provide water for fire suppression. With microfiltration, the water also can be piped into the CCSD's potable water supply.

153-5

Another notable fact about the brine-trucking alternative is that it follows one of Dr. Luster's recommendations almost to the letter. In his comments on the NOP/PIP, he proposed removing the evaporation basin and mechanical evaporators and suggested that "the basin could be replaced by five or six tanker trucks per day transporting the waste to a suitable offside location." This is precisely what the CCSD now expects to be doing. The SEIR gives a worst-case scenario involving more truck trips, but this is predicated on 24/7 operation of the SWF for six months. This level of operation is highly unlikely even in severe droughts such as the present one. Much more probable is the level of operation we have seen to date – 40 hours a week, for two to three months of the year. At this level, five or six daily truck trips would be sufficient to deal with the concentrate.

153-6

Dr. Luster of the Coastal Commission also said the CCSD should look into possible off-channel "storage opportunities" to put some water in reserve from "high flow periods." At the time, he and the Coastal Commission staff were probably thinking of proposals for reservoirs in side canyons off San Simeon Creek. As the SEIR points out, the CCSD looked into this alternative, and found that it would have required high dams and would have cost far more than the current project. However, the repurposed evaporation pond does provide off-channel storage, enough to fight fires and (with treatment) to maintain a safe level of potable water at peak usage times.

153-7

In short, the Draft SEIR makes a conclusive case for the SWF and leaves no room for informed criticism of the project. Political opposition may be inevitable, but I trust that state and local agencies will stick with facts and sound science when they shape the terms of the SWF's regular CDP.

153-8

Stepping back from the specifics of the SEIR, I want to point out another powerful argument for the SWF: The importance of the project to California's future. In 2009, the State Water Board mandated an increase in the use of recycled water by 200,000 acre-feet a year by 2020 and an additional 300,000 acre-feet a year by 2030. The output of Cambria's SWF plays a small role in this effort, but the project is of great significance as a model for other communities and a demonstration of what current technology can do. Any assessment of the SWF's environmental impacts should also take into account the potentially enormous benefits of water reuse on a large scale. Cambria obviously needs the SWF, and California needs it too. The County of San Luis Obispo, the Coastal Commission and other agencies with regulatory sway over this project must not lose sight of that fact.

153-9

Sincerely,

Tom Gray
Cambria, California

**RESPONSE TO COMMENT LETTER NO. PO-153**

Thomas S. Gray

October 24, 2016

- PO 153-1 This comment states general introductory statements and support for the Project. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 153-2 This comment notes how the DSEIR constructively incorporated comments received during the NOP comment period. This comment is so noted. As the comment does not address the DSEIR's adequacy or raise a significant environmental point, no further response is necessary.
- PO 153-3 See Responses to Comment Letter PA 4, which is the CCC comment letter.
- PO 153-4 This comment addresses the Project modifications, which are described in DSEIR Section 3.5.2, *Mitigation Measures and Project Modifications*, and analyzed in DSEIR Sections 5.1 through 5.7. As the comment does not address the DSEIR's adequacy or raise a significant environmental point, no further response is necessary.
- PO 153-5 See Response PO 96-2 concerning the Project modifications. See Response PA 4-654321`15 and DSEIR Section 3.5.2.6, *Offsite RO Concentrate Disposal*, concerning the routine transport of concentrate from the RO treatment process to a disposal site.
- PO 153-6 See Response PA 4-15 and DSEIR Section 3.5.2.6, *Offsite RO Concentrate Disposal*, concerning the routine transport of concentrate from the RO treatment process to a disposal site. See Response PA 4-33 concerning the routine transport of concentrate from the RO treatment process associated with the RO Concentrate Ocean Outfall Disposal Alternative.
- PO 153-7 See Response PO 153-4 concerning Project modifications. Alternatives considered but rejected (including off-stream storage opportunities) are addressed in DSEIR Section 7.5, *Alternatives Considered but Rejected*.
- PO 153-8 This commenter states the author will trust local agencies in their decision-making on the Project's CDP. This comment is so noted. As the comment does not address the DSEIR's adequacy or raise a significant environmental point, no further response is necessary.



PO 153-9

This comment states the Project's importance to California's future. This comment is so noted. As the comment does not address the DSEIR's adequacy or raise a significant environmental point, no further response is necessary.

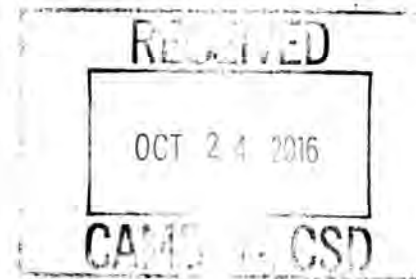


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James & Mary Jo Hollingshead

10/21/2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 1805 Norwich Ave, Cambria, CA, 93428. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

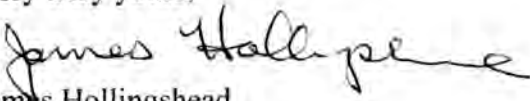
Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

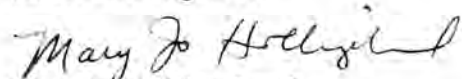
154-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



James Hollingshead

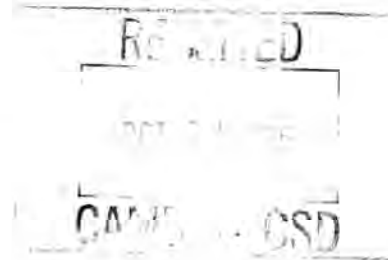


Mary Jo Hollingshead

From: Winter Johnson <calwinter@gmail.com>
Sent: Friday, October 21, 2016 9:12 PM
To: Bob Gresens; Gary Johnson
Subject: Sustainable Water in Cambria

Winter Johnson

Date 10/21/16



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2745 Evensong Way. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit. And yes, I took the form of this letter from a template, but don't assume I don't agree with the contents! I think we may even come to a long-term solution if we allow the emergency water plant to operate full time.

Very truly yours,
Winter D. Johnson

155-1



RESPONSE TO COMMENT LETTER NOS. PO 154 THROUGH PO 155

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 154 through PO 155 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

RE: DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org

October 21, 2016



Dear Mr. Gresens,

These are our concerns regarding the Draft SEIR for the Sustainable Water Facility in Cambria.

1. This facility was presented to the voters and residents of Cambria as the Emergency Water Project -- to be used for stage 3 emergencies so the village would not run out of water. It was subsequently changed to the Sustainable Water Facility, and this important change was not approved by vote by the citizens of Cambria. Instead of being used for emergencies, it will be operated -- potentially on a full time basis -- to provide water for new water meter connections and users. It should be noted that there are a number of non-single family type projects in the pipeline that only need the OK with regard to water usage to begin construction. (These are NOT those lots that are on the water wait list.)
2. This change from Emergency to Sustainable is deceitful by the CCSD, as the project to the residents, and the applications to various government agencies, was for an emergency source for the existing population. If they had *originally* proposed a facility to run 24/7, that would supply water for growing the population of Cambria, would it have been accepted by these agencies and the citizenry?
3. The CCSD called for conservation measures in 2014, and the citizenry responded by cutting back their water use from the previous year by over 40% -- nearly the highest percentage of any town in the state. As a result, the village did not "run out of water". The groundwater levels in the supply basins do not necessarily justify this water project. In the event the levels did fall below expectations, and a true emergency did occur, then the village could resort to using a temporary brackish water unit during those low periods to supplement the natural supply. It would be a true emergency, and justify the application as such. The environmental footprint would be much less than with this full time facility, operating to supply water above and beyond what is currently being consumed.
4. It is suspicious and disheartening that the CCSD has not completed the applications for the permits and the EIR in a timely manner, but yet has had the initiative to proceed full speed ahead with the construction of the facility -- seemingly with no matter what the final cost and impact on the ratepayers may be. The CCSD has not been forthcoming with answers to citizens' questions and concerns at board meetings concerning the project reviews. This is not good government, and is an injustice to those living on marginal fixed incomes.

156-1

156-2

156-3

As a retired Engineer, I am asking you reject or withdraw the Draft SEIR, and proceed with the Emergency Water Supply as it was originally applied for and listed.

156-4

Marvin and Debbie Josephson
 8262 Manifesto Circle
 Huntington Beach, CA 92646

We are 15 year homeowners on McCabe in Cambria

**RESPONSE TO COMMENT LETTER NO. PO-156**

Marvin and Debbie Josephson

October 24, 2016

- PO 156-1 See Response PO 123-1, concerning the Project's name change. The comment concerning the "non-single family type projects in the pipeline" does not address the DSEIR's adequacy or raise a significant environmental point. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*. See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts.
- PO 156-2 See Water Demand Management (DSEIR Pages 3-4 to 3-6), Water Conservation (DSEIR Page 3-10), and Response PA 4-6 concerning water demand at buildout. The water supply associated with the Project is needed to meet water demands during drought conditions and improve overall water supply reliability.
- PO 156-3 See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 156-4 Comment so noted. The decision-makers will consider these comments during their deliberations on the Project.

James C. Kelty

October 21, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is 1493 Burton Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

157-1

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

157-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "James C. Kelty". The signature is written in black ink and features a long, sweeping horizontal line extending from the end of the name.

JAMES C. KELTY



RESPONSE TO COMMENT LETTER NO. PO-157

James C. Kelty
October 24, 2016

PO 157-1 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
 bgresens@cambriacsd.org

October 21, 2016



Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

This urgent request is made for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Ted Key
 325 Dorset
 Cambria CA 93428



RESPONSE TO COMMENT LETTER NO. PO-158

Ted Key

October 24, 2016

PO 158-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.

Kingston Bay - Cambria LP

October 17, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District Planning Department
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Comments on the Draft Subsequent Environmental Impact Report (EIR) for the Cambria Sustainable Water Facility Project

Mr. Gresens:

We are in receipt of the Draft Subsequent EIR prepared for the Cambria Sustainable Water Facility Project (Project). We have reviewed the analysis and conclusions contained therein and offer the following comments and observations as it pertains to our project site located at 1981 Green Street within the unincorporated community of Cambria in San Luis Obispo County, and within the Cambria Community Service District's (District) service area.

We are largely in support of the Project, insomuch as it offers a long-term viable water solution to the District's severe drought restrictions, which has affected the ability of our site and those of other "pipeline" projects to receive necessary agency approvals that aren't overturned on appeal by the California Coastal Commission. We can appreciate that there is a long-standing difference of interpretation and opinion about what constitutes a pipeline project and about the District's ability to serve its existing users without adverse effect to the potable groundwater supply within the San Simeon Creek and Santa Rosa Creek aquifers. However, we believe the Project and Subsequent EIR clarify the baseline and future water supply demands and provide much needed information to substantiate claims of sufficient water supply being made available to all existing and anticipated users with Project approval.

The following specific items within the Subsequent EIR are offered for your consideration and response.

NOP/Information Packet Background and History

- It is stated within the NOP document that "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."

Please provide the source of this information and make it available for review.

159-1

159-2

Chapter 2 – Introduction and Purpose

- Please provide a summary discussion and quantitative analysis of the District’s existing water demands, and future proposed demands that would be accommodated by the Project. **159-3**
- Please define or explain what constitutes an “authorized” service connection. For example, Special Condition 1 of the emergency CDP states “...existing authorized water connections only (to abate the emergency), within the CCSD’s service area (i.e. not to serve new development)”... but does not offer a definition of such. **159-4**
- What is the current status of the regular CDP sought for continued operation of the Project? **159-5**

Chapter 3 – Project Description

- In Background, Section 3.2 it states that: “Cambria’s water system served 4,048 service connections in 2016.” Additionally, it states that buildout with the “wait list” projects would increase connections to 4,650 existing and future dwelling units, pursuant to the NCAP and mitigation set forth in the CCSD’s certified WMP PEIR. **159-6**

Does this include all connections, including commercial accounts? Please provide the source of this information and make it available for review.

Chapter 5.5 – Hydrology and Water Quality

- On page 37 it states: “Although the CCSD may elect to ultimately lift its current water moratorium that could conceivably lead to constructing homes off of its existing wait list, the demands from such homes would be offset by requiring stringent water conservation measures on any new construction, as well as continuing with its water conservation retrofitting and rebate incentive programs (see related discussion on future demand projections within Section 3.0, Project Description). The decision to construct homes off the CCSD wait list would also be subject to the County’s consensus via its biennial Resource Management System reporting and review process, which is associated with the County’s administration of its Growth Management Ordinance.” **159-7**

Please indicate the current status of the water conservation retrofitting and rebate incentive program, and provide additional information on the County’s GMO at its potential effect on the Project and future connections.

- On page 39 it states: “A related discussion in Section 3.0 on future projected water demands shows that in combination with continuing a water conservation program, the CCSD could stay within the amounts it has historically pumped under its SWRCB **159-8**

diversion permits. Therefore, the CCSD may consider licensing its existing SWRCB diversion permits following adoption of an updated water conservation program. A conservation program updating effort is currently in progress by the CCSD, which would be in compliance with the Urban Water Management Planning Act.”

159-8

Please provide additional information on what licensing would entail, including schedule and implementation timeframes, to better understand what the relationship and timing is to the update of the water conservation program. Generally, what is the benefit to the District and its service area?

Chapter 5.6 – Land Use and LCP Compliance

- From a California Coastal Act and County of San Luis Obispo Local Coastal Program (LCP) policy consistency analysis perspective, this assessment does not appear adequate to demonstrate compliance with applicable coastal policies, standards and implementing ordinances. Is it the intent of the District to complete a more thorough analysis as part of the concurrent CDP application? For example, the baseline assessment for purposes of policy consistency should not just defer to what’s on the ground at the time of the EIR release consistent with CEQA requirements, but should also address what was previously located onsite prior to construction and implementation of the emergency Project – i.e., was any natural habitat disturbed or removed?

159-9

Summary

Thank you for the opportunity to review and comment on the Subsequent EIR. We reiterate we are largely in support of the Project, and look forward to a more permanent resolve of the District’s long-term supply to allow for removal of the severe drought restrictions, and ultimately lifting of the moratorium. We appreciate your consideration of the above comments. We would also like to request notification of any future action on the environmental and permitting requirements for this Project to ensure we are kept apprised on its development.

159-10

Sincerely,
Kingston Bay – Cambria LP



Jeffrey H. King, General Partner

cc: Corey File, Kingston Bay – Cambria LP
Alison Evans, Dudek



RESPONSE TO COMMENT LETTER NO. PO-159

Jeffrey H. King
Kingston Bay – Cambria LP
October 24, 2016

- PO 159-1 This comment includes general introductory statements and support for the Project. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 159-2 This reference to “80 percent of the minimum rainfall” was revised in the DSEIR and the source cited; see DSEIR Page 3-7.
- PO 159-3 See Response PA 6-7 concerning the Project’s water output, and water demands and supplies.
- PO 159-4 As specified in Cambria Community Services District Code (CCSD Code) Section 4.16.120, *Enforcement*, the general manager shall be the officer primarily charged with enforcement of this chapter. All public CCSD employees who are vested with the duty or authority to issue permits or install new water meters, shall conform to the provisions of this chapter. Further, according to CCSD Code Section 5.04.520, *Application for Permit*, any person legally entitled to apply for and receive a permit shall make such application on forms provided by the district for that purpose. If the manager determines that the plans, specifications, drawings, descriptions or information furnished by the applicant are in compliance with the ordinances, rules and regulations of the district, he or she shall issue the permit applied for upon payment of the required fees as listed in this chapter. As such, it can be deduced that “authorized” permits are those issued by the manager.
- PO 159-5 See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. Since the CCSD originally submitted its application to the County for an R-CDP on June 13, 2014, the R-CDP application was updated and resubmitted to the County on February 27, 2017.
- PO 159-6 This comment is concerning inclusion of commercial accounts. The 4,048 service connections included existing residential and commercial accounts. The 4,650 existing and future dwelling units does not include commercial accounts.
- PO 159-7 This comment addresses the retrofitting and rebate incentive program. This comment does not address the DSEIR’s adequacy or raise a significant

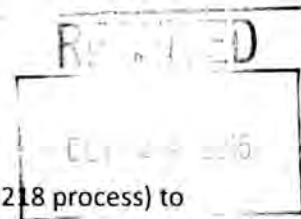


environmental point. See DSEIR Page 3-4 concerning the CCSD's water demand management, which involved improvements to the conservation program and regulations to reduce potable water use for interior and exterior use. See also Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts.

- PO 159-8 This comment addresses LCP Policy 2, Water Extractions, which is a County policy and not a proposed CCSD measures. Please see Responses PA 4-6, PA 4-7, and PA 4-8. The CCSD Board adopted an Update to its Urban Water Management Plan (UWMP) on December 15, 2016. The long-term demand water projections are summarized on the figure provided on DSEIR Page 3-5. By following the UWMP's recommended Conservation Program B, existing and future demands stay below 700 AFY. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 159-9 This comment questions the adequacy of the LCP consistency analysis (DSEIR Table 5.6-1), however, does not specify how the analysis is inadequate. The comment does provide one example stating the baseline assessment for purposes of policy consistency did not address what was previously located onsite prior to Project construction. As discussed in Response PA 7-9 and on DSEIR Page 5-1, "*Environmental Setting*", the Environmental Setting describes the physical environmental conditions in the Project's vicinity, as they existed before construction of the SWF. The Environmental Setting is the baseline condition from which potential Project impacts are analyzed.
- PO 159-10 This comment serves as the conclusion to the comment letter and expresses support for the Project. No further response is necessary.



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EIR Comments – October 18, 2016

In July of 2014, Cambria, California ratepayers agreed (thru the Proposition 218 process) to significant, multi-year water utility rate increases to build an Emergency Water Supply Project that was to be used during a "CCSD Declared" Stage 3 Emergency drought situation and was to be a backup water supply for existing residents only.

Ratepayers have been waiting more than two years for the Cambria Community Services District to complete their Coastal Development Permit (CDP) Application and submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings. Instead the District has initiated, and then abandoned, numerous environmental review processes which resulted in citizen and agency comments being submitted as required, but with no subsequent response from anyone at the CCSD or their agents. This has been the case since May of 2014.

Cambria ratepayers such as myself, oppose the "bait and switch" tactics that have been used by the 2014-2016 board of the Cambria Community Services District by renaming this Emergency Water Supply facility to a 'Sustainable Water Supply Facility' that will now serve as a driver for future growth.

The residents of Cambria have never voted for this proposed growth, nor given the CCSD any direction to undertake such a full time operational use of this water project. They have only authorized an emergency water backup system for existing residents only and only in case of legitimate emergency need. There simply is no justification for full time, non-emergency use of a water reclamation facility in Cambria to provide water for Cambria, other than for substantial growth that will damage the fragile ecosystem of this region.

Therefore, this rate payer requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible. That way government agencies and the public can review and analyze the project that has already been constructed.

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Teresa Lees

1491 Bradford Road, Cambria, CA 93428



RESPONSE TO COMMENT LETTER NO. PO-160

Teresa Lees

October 24, 2016

PO 160-1 This comment is concerning rate-payers issues beginning in 2014. See Response PO 89-3 concerning increased water rates and construction/operational costs.

Your Name MICHAEL G LYONS

Date 10/23/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2750 PATTERSON PLACE. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the

lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

Michael G. Lyons
Print name

MICHAEL G. LYONS

Michael G. Lyons
2758 Patterson Place
Cambria, CA 93428-4308

161-1

Nicholas Lyons
2387 Pineridge Drive
Cambria, CA 93428

October 23, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

Below you will find my reasons for supporting Cambria's Sustainable Water Facility.

I have deep roots here in Cambria: my father, Robert E. Lyons, was born on Lee St. (now Burton Drive) in 1918, the youngest son of William and Anna Lyons, owners of the Lyons general store which operated on Main St. for the first half of the 20th century. His oldest brother was my uncle Wilfred Lyons, a lifetime resident of Cambria. As a child in the 1950s I spent many happy hours in Cambria during our holiday visits to my grandparents' house on Bridge Street. I remember the Cambria of those days, when there were few houses in the pines and our only water-related concern was whether Santa Rosa Creek had yet broken through to the ocean, hopefully letting steelhead swim upstream to spawn.

Many years later in 1998, while living and working in the Bay Area, my wife Kathy and I were fortunate enough to build a second home on Lodge Hill on a pair of lots gifted to my father by my grandparents. Our children grew up with 'the Cambria house' as their weekend home. In 2012 we moved here full time, and our younger son graduated as salutatorian from CUHS in 2015.

I have been following the water situation here in Cambria since the 1970s. I am immensely gratified that the CCSD board had the gumption to push through a reasonable and sustainable solution to the periodic water shortages that afflict our town. The SWF may not be the absolute perfect solution, but I doubt there is a perfect solution. It may not be the cheapest solution, but I am sure there are no inexpensive solutions. The Cambria of my childhood is long gone, and we need to find 21st-century solutions for our 21st-century problems.

Kathy and I are full time residents of Cambria (address listed above). I submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

As you are no doubt aware, Cambria has suffered for decades from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation

measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

N Lyons

Nicholas Lyons

Nathan & Jana Maragoni

October 20, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Nathan Maragoni

From: Ken Martin <kmart1702@gmail.com>
Sent: Friday, October 21, 2016 6:18 PM
To: Bob Gresens
Subject: Support for Sustainable Water Facility

Kenneth L. Martin

October 21, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens.

I am a full time resident of Cambria. My address is: 1702 Melrose Avenue. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/Kenneth L. Martin/

Kenneth L. Martin

Lee Mellinger
20 October 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,



We are a part time residents of Cambria. Our address is: 2400 Marlborough Ln. We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Lee Mellinger *B. Mellinger*

Print name

Lee Mellinger Bonnie Mellinger

Beatrice C. Moore
1375 Burton Drive
Cambria, CA. 93428

October 20, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 1375 Burton Drive. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

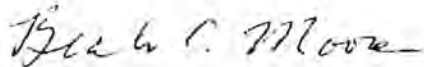
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For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Print name Beatrice C Moore

Your Name RICHARD J. MORSE
 Date 10/23/2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2750 PATTERSON PLACE. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature

Print name

Richard J. Morse
2758 Patterson Place
Cambria, CA 93428-4308

167-1

Matthew and Marcela Ortiz

October 3, 2016

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

I'm excited about the possibilities that will be available for Cambria if the Water Master Plan continues to move forward. Lot owners have been given hope that this plan will end the moratorium and allow for water meters to be released. A vocal group of citizens are adamant that they want NO new building in the town of Cambria. My life experience has taught me that compromise is necessary if we want to continue to move forward as a unified community.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Matthew Ortiz', written in a cursive style.

Matthew Ortiz

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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169-1

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Trey Pitruzzello
1043 La Conte Dr
Riverside, CA 92507-5934

Jim & Jeanette Ragan

October 21, 2016

Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Dr., #201
Cambria, CA 93428

**Re: Subsequent Environmental Impact Report**

Dear Mr. Gresens,

We have been full-time residents of Cambria since 2000. Our address is 385 Lancaster St. With this letter, we express our strong support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit, and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures that placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek, and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, we urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Jim & Jeanette Ragan

Tony Rotolo

10/15/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

171-1

Sherwin and Marilyn Rubin
4414 Greenmeadows Ave.
Torrance, CA 90505

10-19-16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

We are the owners of a lot in Cambria. We submit this letter to express our support for the Sustainable Water Facility, the application of the Cambria Community Services District for a regular coastal development permit and the supporting Subsequent Environmental Impact Report.

Cambria needs a sustainable water supply. With global warming droughts will be more likely. We support measures to add water resources for Cambria. We support the pending application for a regular coastal development permit. Cambria needs water security and efforts toward this goal would help all residents and businesses.

We urge the CCSD to adopt the Subsequent Environmental Impact Report as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Sincerely,

Sherwin and Marilyn Rubin
Lot owners since 1988

172-1



RESPONSE TO COMMENT LETTER NOS. PO 161 THROUGH PO 172

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 161 through PO 172 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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From: michael.verlangieri <michael@calpots.com>
Sent: Monday, October 17, 2016 12:57 PM
To: Bob Gresens
Subject: COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

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

October 2016

Cambria Community Services District

1316 Tamson Drive, Suite 201

Cambria, CA 93428

bgresens@cambriacsd.org



Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

This urgent request is made for the following reasons.

- o Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- o Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- o The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has

173-1

never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.

- o The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- o A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

173-1

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Name : Michael Verlangieri

Address: 1580 Preston

City, State, Zip code: Cambria ,ca 93428



RESPONSE TO COMMENT LETTER NO. PO-173

Michael Verlangieri

October 24, 2016

PO 173-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.



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Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 210 Orlando Drive, Cambria Ca. Being involved in the community as a land owner since 1985 and having built our home in 1997 and becoming a full time resident in 2010 I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

174-1

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

174-1

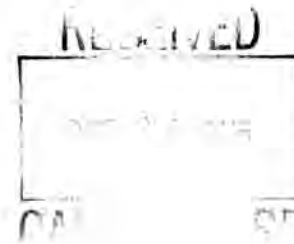
Very truly yours,

Yvonne Wagner
Yvonne Wagner
October 22, 2016

Stuart C. Warrick
6543 Buckley Drive
Cambria, CA 93428

21 October 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Bob,

I am a full time resident of Cambria. If you recall I served a year on an Ad Hoc committee formed by CCSD to examine the issues associated with an emergency interruption of our water supply and you supported our committee's work. We appreciated your efforts to supply us with information while continuing to do your other CCSD tasks.

My address is: 6543 Buckley Drive. This letter is submitted to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. We have lived here since 1992 and the issue has never been far from the forefront of our worries. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it

175-1

actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Sincerely,

Stuart (Sharkey) C. Warrick



RESPONSE TO COMMENT LETTER NOS. PO 174 THROUGH PO 175

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 174 through PO 175 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org

October 19, 2016

Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

This urgent request is made for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Claudia Harmon Worthen
 416 Dorset Street
 Cambria, CA 93428

From: Lauren Younger <zolot@charter.net>
Sent: Monday, October 17, 2016 10:37 AM
To: Bob Gresens
Subject: EIR

COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428
bgresens@cambriacsd.org



Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

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- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

177-1

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Name : Lauren Younger

Address: 2159 Wilton Drive

City, State, Zip code: Cambria, CA 93428

245 Kendall Lane
Cambria, CA 93428



October 24, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428
bgresens@cambriacsd.org

Dear Mr. Gresens,

We, the undersigned, request that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

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178-1

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

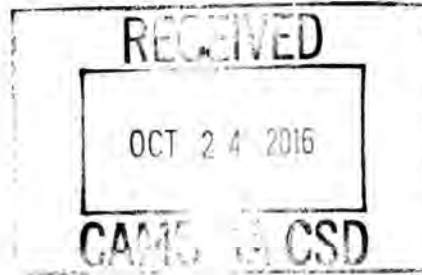
Sincerely yours,


Sherri G. Bell


John M. Bell

COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org



October 2016

Dear Mr. Gresens,

We, the undersigned, request that the-Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

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- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

179-1

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Name: *Feslie Melina Richards*

Address: *1501 San Simeon Creek Road*

city, state, zip code: *Cambria Calif 93428*



RESPONSE TO COMMENT LETTER NOS. PO 176 THROUGH PO 179

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 176 through PO 179 Comment letters PO 176 through PO 179 make up a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.



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Art Dubé

October 21, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot (position #200) in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

Patrice Fako-Kledalsch

October 15, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,



I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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Patrice Fako-Kledalsch

181-1

John Kiedaisch

RECEIVED

OCT 25 2016

October 15, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report
Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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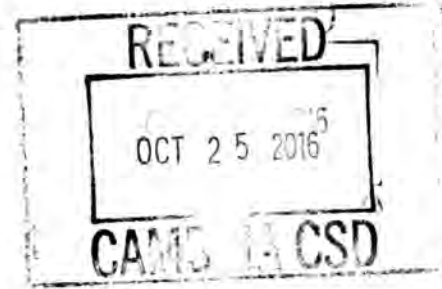
Sincerely,
John Kiedaisch

182-1

Stuart C. Warrick
6543 Buckley Drive
Cambria, CA 93428

21 October 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Bob,

I am a full time resident of Cambria. If you recall I served a year on an Ad Hoc committee formed by CCSD to examine the issues associated with an emergency interruption of our water supply and you supported our committee's work. We appreciated your efforts to supply us with information while continuing to do your other CCSD tasks.

My address is: 6543 Buckley Drive. This letter is submitted to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. We have lived here since 1992 and the issue has never been far from the forefront of our worries. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

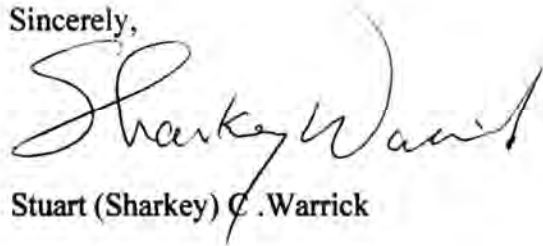
As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it

actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Sincerely,

A handwritten signature in cursive script that reads "Sharkey Warrick". The signature is written in dark ink and is positioned above the printed name.

Stuart (Sharkey) C. Warrick



RESPONSE TO COMMENT LETTER NOS. PO 180 THROUGH PO 183

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 180 through PO 183 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: jason anderson <jasondand54@hotmail.com>
Sent: Monday, October 24, 2016 2:54 PM
To: Bob Gresens



CCSD

Sent from Mail for Windows 10

Both my wife and I appose this project. From day one nothing was monitored and nothiomg but lies came from CCSD and the engineering firm which built this project. I believe it should be all dug up and inspected from start to finish. Please send us a e mail confirmation.

184-1

Jason & Lisa Anderson
Cambria CA



RESPONSE TO COMMENT LETTER NO. PO-184

Jason and Linda Anderson

October 26, 2016

PO 184-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.



Elizabeth Bettenhausen, Ph.D.
345 Plymouth Street
Cambria, CA 93428
elizabethbettenhausen@gmail.com

24 October 2016

Robert Gresens, P.E., District Engineer
Planning Department [sic]
Cambria Community Services District
1316 Tamson Dr., Suite 201
Cambria, CA 93428
e-mailed to
bgresens@cambriacsd.org

**RE: Draft SEIR for the CCSD AWTP
(SWFP)**
(SCH# 2014061073)



October rain outside, public commenting inside

Comments

Because the Draft SEIR is inseparable from the Water Master Plan Final EIR, analysis of the adequacy of that interdependence in its current version is integral to this public comment. Please note that I will refer to the Advanced Water Treatment Plant (AWTP) throughout these comments, unless context requires other attributed labels.

185-1

1. Water Demand

1.1 The analysis of population is out of date and not an objective projection of water demand.

The 2016 Draft EIR still uses 2008 Waster Master Plan (WMP) data, overestimating demand here.

1.1.1 The population of Cambria declined from the "approximately 6,300 permanent residents" stated in the WMP Program Environmental Impact Report to 6,032 (US Census 2010).

1.1.2. The 2010 CCSD Urban Water Management Plan (UWMP), adopted on Feb. 23, 2012, mentions 6,032 from the 2010 census but still uses 2000 census demographic data for analysis. In spite of the 3% population drop from 2000 to 2010, the CCSD assumes the population in 2015 will have returned to its 2000 level (2010 UWMP 2.5).

Its Table 2-2 projects the 2015 population to range from 6,294 to 6,588 depending on permitted increase in water meters. It assumes a 1% increase in water meters from 2013

185-2

to 2020 and gives a 2015 population of 6,421, all mathematically inconsistent with the 2010 census.

1.1.3 The Water Use Efficiency Plan (WUEP) adopted on Feb. 28, 2013, makes the same assumptions.

1.2 The number of residential water meters using water has declined by 229 since 2005.

1.2.1 According to the UWMP (Table 3-5) 3,741 residential accounts metered water use in 2005.

According to the UWMP (Table 3-6) 3,771 residential accounts metered water use in 2010.

The UWMP projected (Table 3-7) 4,021 residential accounts using metered water in 2015.

1.2.1.1. Note: the residential numbers for 2010 and 2015 include 246 vacation rental businesses.

1.2.2. According to the most recent CCSD Billing Summary (Aug-Sept 2016) there are 3512 residential accounts that use metered water. This is 509 fewer meters than projected and an actual decline of 229 meters actively measuring use.

1.2.2.1. Section 03 of the Program EIR of the Final Water Master Plan refers to The *Baseline Water Supply Analysis* (Kennedy/Jenks Consultants, December 8, 2000) model that determined "that the current groundwater supply was not adequate to provide a 90 or 95 percent level of reliability for water demands greater than 10 percent of the 1999 demands (4,176 residential connections)."

4,176 are **16% higher** than the present active residential connections.

1.3 The analysis of Residential Use and Commercial Use ignores the changing ratio of use.

1.3.1. The ratio of residential to commercial water use has shifted significantly.

1.3.2. The WMP does not discuss commercial water demand.

1.3.3. In the UWMP (Table 3-6) the residential meters used 75% of the total residential + commercial use in 2010—if Vacation Rentals are counted as *residential use*. Commercial use was 25% of the residential + commercial total.

1.3.4. The residential meters used 72% of the total residential + commercial use in 2010 – if Vacation Rentals are counted as *commercial use*.

Commercial use was 28% of the residential + commercial total.

1.3.5. In 2014, according to the CCSD Billing Summaries, the residential meters used 60.4% of the total water used and metered (if Vacation Rentals are counted as commercial use).

Commercial use was 36.0% of the total water used and metered. (The remaining water was "internal.")

185-2

185-3

185-4

1.3.6. This shift in the ratio of residential to commercial use has not been reflected in the Final EIR for the WMP. The only mention of commercial use appears in a Table 3-7 Potential Recycled Water Users and Demands.

185-4

1.4. The WMP requires a Build-out Reduction Plan to permit adding houses in Cambria.

“The Buildout Reduction Program (BRP) is integral to the mitigation program for the WMP” (Program Environmental Impact Report Cambria Community Services District Water Master Plan, Appendix 14.03).

185-5

A Purpose and Objective [sic] of the AWTP Project reads: “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 WMP PEIR” (Draft SEIR 3-3).

1.4.1. The Citizens Finance Steering Committee’s report, Final Draft, was presented to a CCSD town hall meeting in 2006. The total cost of the Plan was stated as \$38,827,800.

1.4.2. The CCSD Board of Directors has taken no action to approve the 2006 report.

1.4.3. Ten years later, at a Special Meeting on April 8, 2016, the CCSD Board of Directors appointed a new Buildout Reduction Plan Citizens’ Committee (BRPCC). According to the Minutes, “A discussion followed and consensus was reached regarding the scope of work for the Committee with the following suggestions:” The suggestions were not voted on individually, so their standing and BRPCC’s responsibility are ambiguous. Two of the suggestions read:

185-6

“5. Length of the Committee and number of meetings required to prepare their recommendations to the Board of Directors, possibly 60-90 days.

“6. Clear end result received from the Committee, advisory in nature. Two questions. Will the BRP meet the mitigation measures of the EIR and fulfill the needs of the CCSD? What are the funding possibilities in priority order?” (CCSD Board of Directors, Minutes, April 8, 2016, p. 2).

1.4.3.1. April 8, 2016, was 199 days ago, and no written interim report has come to the Board of Directors and the public.

1.4.3.2. No criteria have been publicly specified to answer the question, “Will the BRP meet the mitigation measures of the EIR and fulfill the needs of the CCSD?”

1.4.3.3. The reasons to support setting the water demand number of 4,650 residential connections are only in the first Buildout Reduction Report, which was not adopted.

1.4.3.4. The Executive Summary of the Water Master Plan EIR 2-5 states in a footnote, “The proposed desalination plant would be sized for 4,650 residential water connections, making this the maximum number to be permitted in Cambria: 3,786 (existing connections) + 864 (approved additional connections) = 4,650.”

185-7

The WMP Project Description states at 3-3, “Thus, the basins cannot reliably meet the increased demands of the waiting list and grandfathered connections (4,650 residential connections) without an additional water source.”

Representing the wait list as “grandfathered” is not accurate. Being placed on the wait list does not also yield an Intent to Serve standing. Further, 864 additional connections have not been and are not “approved” since 2008.

185-8

1.4.3.5. The BRP has not met the mitigation requirements of the SEIR, because the Board of Directors did not approve the final Report in 2006, and no Final Report has come to the Board or public from the BRPCC established in 2016.

185-9

1.5. Emergency Demand and Sustainable Water

1.5.1. On July 24, 2014, the CCSD Board of Directors adopted RESOLUTION 32-2014 stating, in part, “NOW, THEREFORE, BE IT RESOLVED that the CCSD Board of Directors adopts the Emergency Water Project Surcharges set forth in Exhibit A...”

1.5.2. A majority of the ratepayers did not object under Prop.218 to funding the Emergency Water Project through surcharges. That is the only vote by Cambria ratepayers (water “consumers”) on this Project.

185-10

1.5.3 The Preliminary EIR under consideration is for the Sustainable Water Facility. **The public voted to fund the Emergency Water Project, not a Sustainable Water Facility.** The CCSD Board has not taken action to change the Emergency Water Project into a Sustainable Water Facility. To date it is strictly a name change. If adoption of this EIR is interpreted as this action, a current BRP Report must be adopted first, and the public must vote on the requisite BRP funding before that adoption is possible.

1.6. Water Augmentation

1.6. The Water Master Plan’s Executive Summary ended the Projected Water Demands section with this sentence: “Based on the CCSD Board of Directors’ earlier July 24, 2003 motion, and the historical occupancy rate for Cambria averaging 1.66 persons per residence, approximately 602 AF in supplemental water will be needed for 4,650 residences assuming a 50 percent quality of life increase over existing consumption.”

1.6.1. This assumption of “a 50 percent quality of life increase over existing consumption” has been the officially changed once by the CCSD Board of Directors. This motion passed unanimously at the meeting on April 25, 2012: “set the contingency at a minimum of 220 AF above the current baseline.” I note, however, that this does not preclude a contingency of 602 AF. Indeed, no maximum is set.

185-11

1.6.2. The Project Description of the SEIR says, “The water augmentation of 250 AFY was determined to meet the minimum capacity necessary to abate the water supply shortage and provide water supply to serve buildout at 4,650 dwelling units” (SEIR 3-33).

1.6.3. The production capacity of the SWF Project is based on a buildout stipulation still without official standing.

185-12

1.7. The allegation of water supply shortage did not quite make sense.

1.7.1. At the CCSD Special Meeting on Sept. 20, 2013, the public was told that the San Simeon well field aquifer had 101 AF of water available. Monthly reports followed for aquifer water quantity. I add rain and well production data.

185-13

		<u>Rain</u>	<u>Well Production</u>
Sept. 20, 2013 Staff Report:	101 AF		19.24 AF (9/20-30)
Oct. 2013 Staff Report :	135 AF	0.18”	26.72
Nov. 2013 Staff Report:	185 AF	0.39	29.84

Dec. 2013 Staff Report 104 AF 0.25 28.61

<http://www.slocountywater.org/site/Water%20Resources/Data/Volunteer%20Precipitation%20Sites/pdf/Cambria%20CDF%20%23203.0%20Precipitation%20Data.pdf>

1.7.2. Even though 104.41 AF were pumped out of the San Simeon wells from Sept 20, 2013 to Dec. 31, 2013, and only 0.82 inches of rain fell, the water available in the aquifer had increased.

1.7.3. The Jan. 2014 Staff Report rehearses mathematical models and reaches the claim that "103 inches is needed to needed to recharge the San Simeon aquifer." I pointed out that a decimal was probably missing.

1.7.3. The production from the Santa Rosa wells increased in the three months. But that does not address the bad data for aquifer quantity in the San Simeon Creek aquifer. Does the DSEIR assume that 0.82" of rain puts 104 AF of water into the San Simeon Aquifer? If so, how does this support the claim that an AWTP is needed?

1.8 Summary

- The analysis of population is out of date and not an objective projection of water demand.
- The number of residential water meters using water has declined by 229 since 2005 and by 509 from the projected number.
- The analysis of Residential Use and Commercial Use ignores the changing ratio of use.
- The Buildout Reduction Program, integral to the mitigation program, must be adopted before the CCSD Board votes on this Subsequent EIR for the WMP.
- The only pertinent action by ratepayers was the shortfall of No votes in the Prop. 218 action to fund the Installment Sale of the Emergency Water Project.
- The production capacity of the SWF Project is based on a buildout stipulation still without official standing.
- Data on quantity of water in San Simeon Aquifer has been reported implausibly.

2. Conservation

2.1. The CCSD has been seriously weakening its conservation implementation.

"The Draft Task 4 Report assessed various long-term supply alternatives and recommended additional water conservation, recycled water, and seawater desalination" (WMP-EIR 2-1).

2.1.1 Surcharges. Although conservation is the proposed action ranking first in the Water Master Plan, **the surcharges--adopted on January 1, 2014, and the most effective way to control water use-- were dropped March 1, 2016**. According to the Table I comprised from CCSD data (see CCSD WATER PRODUCTION and BILLED USAGE: Jan. 1, 2013, to Aug. 31, 2016 on pages 8-10), the residential and commercial water use has increased steadily and significantly from that date, even through a major rate increase was adopted then too.

2.1.1.1. The Agenda for the Oct. 27, 2016, recommends adopting Resolution 41-2016 "extending the suspension of the enforcement of the surcharges/penalties related to the

185-13

185-14

185-15

CCSD's enhanced water conservation measures, restrictions on the use of potable water and maximum water use allotments through December 31, 2016."

<http://www.cambriacsd.org/Library/PDFs/BOARD%20OF%20DIRECTORS/AGENDAS/2016/2016%2010%2027%20Regular%20Meeting%20Agenda%20Packet%20Posted.pdf>

2.1.1.2. This Agenda item refers to action taken on Feb. 12, 2016 at a Special meeting of the Board:

"At a special meeting on February 12, 2016, the Board of Directors adopted rate increases for Water and Wastewater. The rates approved at that meeting assumed water consumption would be approximately 70% of the average water consumed in 2013. Those rates were also based on the assumption that surcharges/penalties would no longer be needed to encourage water conservation."

In the Agenda and Minutes of the Feb. 12, 2016, meeting, no mention is made of these assumptions.

2.1.1.3. At the Special Meeting on Nov. 12, 2015, the Board heard the rates increase presentation by the consultant, Bartle & Wells. At no point in this meeting or in the Dec. 29, 2015, special meeting was Board action taken regarding this 70% of 2013 average use.

2.1.1.4. The rate increase and the surcharges assume that the use of water in Cambria will INCREASE to yield a 30% of 2013 baseline reduction. This is not a conservation measure. Projecting the 2016 8 month average AF water use through Dec. 2016, water use will be 64.53% of water use in 2013. The assumed increase to 70% means Conserve Less!

2.1.2 In 2014 the CCSD offered non-potable (i.e., not treated aquifer) water from Santa Rosa Creek pump (SR1) to Cambrians free of direct charge. Rental and then purchase of tanks, repair of SR3 and SR3 (ca. \$500,000), and operational costs to CCSD were, of course, borne by the ratepayers. Under the guise of conservation, the use of water was made easier. The practice was ended by unanimous agreement of the board to this motion: "to have CCSD discontinue providing non-potable water from any well until the Stage 3 Emergency Drought Condition is lifted and bring back for review the impacts at the August 4 meeting."

This action was maintained at the Aug. 4, 2014, meeting, Item 3.B.

<http://www.cambriacsd.org/Library/PDFs/BOARD%20OF%20DIRECTORS/AGENDAS/2014/Special%20Meeting%20Agenda%20Packet%202014-08-04%2012-30%20final.pdf>

2.1.3. The large signs posted by the CCSD in town show a pair of hands holding a large drop of water and the words "Use Only What You Need." At the first meeting of the CCSD Board of Directors after the signs were posted, I asked about the meaning of the word "need" by pointing out synonyms:

"Demand, require, want, crave, take, must have.... What does **need** mean? How do these signs promote conservation?" No answer.

2.2. Conservation staff and reporting decline.

2.2.1. The Conservation Report was included in the General Manager's report to the Board of Directors in 2014. No such report has appeared since Feb. 2015.

2.2.2. The Conservation Report usually contained an update on the Retrofit Point Bank. The last report (Feb. 26, 2015, Board Agenda) reads, "As of 2/1/2015 the rebate point's bank total is 7989 points."

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185-16

"Rebates Total Points Bank: 7989
"Total Points Bank: 12,592."

Retrofit Upon Resale Bank: 4603

The CCSD web site gives no update on whether the Retrofit and Rebate Program has reduced water demand in Cambria.

<http://www.cambriacsd.org/Library/PDFs/BOARD%20OF%20DIRECTORS/AGENDAS/2015/Regular%20Board%20Meeting%20Agenda%20Packet%202015-02-26%2012-30%20v12.pdf>

2.2.3. The Conservation Report usually contained a report on Residential Water Surveys/Audits. Since February 1, 2015, there has been no regular reporting on this conservation action.

2.2.4. Reports on the CCSD's "water conservation demand offset program to ensure any future water connections are offset by water conservation measures" are also missing.

2.2.5. For part of 2014 the CCSD had a staff person working full time on conservation of water.

2.2.5.1. The chart of CCSD staff no longer contains a conservation specialist position. The conservation specialist left CCSD in 2015.

At meetings of the Board of Directors, I have frequently asked for a clear statement of the conservation policy and program of the CCSD, including staffing. No response has been given.

2.3. "Unaccounted for" water

2.3.1 The CCSD stated in the 2010 Urban Water Management Plan that they would like to achieve an 8% "unaccounted for" water amount in the district's water production and use.

2.3.2. At the meeting of the Board of Directors on Sept. 22, 2016, I pointed out the unaccounted for water in 2016 and distributed it in written form.

The table (pages 8-10) giving metered and produced water amounts indicates that in 2016 the produced but unaccounted for water was these percentages of production.

- o Jan-Feb 19.46%
- o Mar-Apr 14.4
- o May-June 7.85
- o Aug-Sept 12.78

2.3.2.1. The average unaccounted for water in production and use in 2016 is 13.32%. The May-June period is the only time since Jan. 2013 that the percentage has been below the 8% goal.

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185-18

CCSD WATER PRODUCTION and BILLED USAGE: Jan. 1, 2013, to Aug. 31, 2016

compiled by Elizabeth Bettenhausen

	Residential Use		Commercial Use		Vacation Rental Use		C + VR	Internal Use		Total Usage		Production	Produced but unaccounted	
	cubic feet	% of 2 month	cubic feet	% of 2 month	cubic feet	% of 2 month	% of 2 month	cubic feet	% of 2 month	cubic feet	Acre Feet	Acre Feet	AF	% of total
2013														
J-F	29,070	71.0	9,540	23.30	1,820	4.45%	27.75	513	1.25%	40,943	93.94	97.95	4.01	4.09
M-A	30,957	70.04	10,881	24.62	1,783	4.03	28.65	580	1.31	44,201	101.42	114.26	12.84	11.24
M-J	38,321	70.74	12,463	23.01	2,417	4.46	27.47	972	1.79	54,173	124.30	142.03	17.73	12.48
J-A	41,744	66.14	15,621	24.75	4,459	7.07	31.82	1,289	2.04	63,113	144.81	154.76	9.95	6.43
S-O	31,166	65.83	12,514	26.43	2,746	5.80	32.23	919	1.94	47,345	108.63	117.75	9.12	7.75
N-D	26,816	69.70	8,948	23.05	2,233	5.75	28.8	830	2.14	38,827	89.09	106.33	17.24	16.21
Total	198,074		69,967		14,858			5,103		288,602	662.19	733.08	70.89	
Avg.%		68.63		24.24		5.15	29.45		1.77					9.67
Gpcd	67.29gpcd**									98.05gpcd		108.55gpcd		
2014														
J-F	23,940	65.45	10,002	27.35	2,088	5.71	33.06	546	1.49	36,576	83.92	94.44	10.52	11.14
M-A	15,012	60.25	8,373	33.60	1,288	5.17	38.77	244	0.98	24,917	57.17	69.94	12.77	18.26
M-J	15,420	60.47	8,289	32.51	1,379	5.41	37.92	412	1.62	25,500	58.51	79.29	20.78	26.21
J-A	17,590	55.68	10,106	31.99	2,143	6.78	38.77	1,753	5.55	31,592	73.40	85.92	13.43	15.63
S-O	16,015	55.68	8,486	29.50	1,402	4.87	34.37	2,861	9.95	28,764	66.00	73.40	7.40	10.08
N-D	15,282	64.42	6,623	27.92	1,266	5.34	33.26	552	2.33	23,723	54.43	65.80	11.35	17.28
Total	103,259		51,879		9,566			6,310		171,072	392.52	466.76	76.25	
Avg.%		60.36		30.33		5.59	36.03		3.69					16.34
Gpcd	35.08gpcd									58.12gpcd		69.11gpcd		

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* Total Usage includes Commercial and Vacation Rental separately only. The merged number above is not included in the total.
 ** Gallons per capita daily for population of 6,032 in column listed. The columns list cubic or acre feet, but gpcd is gallons.

Usage numbers are from CCSD bi-monthly billing reports, obtained only through Public Records Requests until Sept. 2016, when the reports were posted on the CCSD web site.

Production numbers are from CCSD Water Production reports usually updated monthly on CCSD web site. The total here adds San Simeon and Santa Rosa, combines two months for the bimonthly format, and corrects addition mistakes in the Production Report.

CCSD WATER PRODUCTION and BILLED USAGE: Jan. 1, 2013, to Aug. 31, 2016, p. 2

compiled by Elizabeth Bettenhausen

	Residential Use		Commercial Use		Vacation Rental Use		C + VR *	Internal Use		Total Usage		Production	Produced but unaccounted	
	cubic feet	% of 2 month	cubic feet	% of 2 month	cubic feet	% of 2 month	% of 2 month	cubic feet	% of 2 month	Cubic feet	Acre Feet	Acre Feet	Acre Feet	% of total
2015														
J-F	15,205	63.44	6,913	28.84	1,233	5.14	33.98	616	2.57	23,967	54.99	66.27	11.28	17.02
M-A	17,316	59.92	8,071	27.93	1,317	4.56	32.49	2,195	7.60	28,899	66.31	76.16	9.85	12.93
M-J ^	15,831	56.63	8,327	29.79	1,376	4.92	34.71	2,419	8.65	27,953	64.17	77.82	13.65	17.54
J-Aug	18,024	53.9	9,408	28.13	1,870	5.59	33.73	4,139	12.38	33,441	76.76	89.82	13.06	14.54
S-O	18,161	55.65	8,731	2,676	1,676	5.14	31.89	4,056	12.43	32,633	74.91	84.52	9.61	11.37
N-D	16,945	62.42	7,802	28.74	1,312	4.83	33.57	1,088	4.01	27,147	62.32	72.44	10.12	13.97
Total	101,482		49,252		8,784			14,513		174,031	399.5	467.02		
Avg.%		58.31		28.30		5.05	33.35		8.33					
Gpcd	34.48gpcd									59.13		69.12		
2016														
J-F	16,228	65.00	7,110	28.48	1,262	5.05	33.53	368	1.47	24,968	57.31	71.16	13.85	19.46
M-A	17,652	63.95	8,219	29.78	1,313	4.76	34.53	419	1.52	27,603	63.36	74.02	10.66	14.40
M-J	20,409	59.95	9,385	27.57	1,706	5.01	32.58	2,543	7.47	34,043	78.15	84.80	6.65	7.84
J-Aug	21,770	58.08	10,302	27.48	2,207	5.89	33.37	3,205	8.55	37,484	86.05	98.65	12.6	12.77
S-O	Billing is not yet available for these months.													
N-D	8 month total, average, and gpcd are below.													
Total	76,059		35,016		6,488			6,535		124,098	284.9	328.63		
Avg.%		61.29		28.22		5.23	33.44		5.27					
Gpcd	38.65 gpcd									63.07 gpcd		72.76 gpcd		

185-18

* Total Usage includes Commercial and Vacation Rental separately only. The merged number is not also included in the total.

** Gallons per capita daily for population of 6,032 in column listed. The column above lists cubic or acre feet, but gpcd is gallons.

^ An Internal Use number was 93,434 units in this bi-monthly report. I requested the correct number from CCSD on July 22 and 30, 2015, but was given no answer. The Internal Use number here is the average of the other bi-monthly use in 2015, and the Total Use includes that.

1. Reducing water used

In 2013 residents of Cambria used 68.63% of the water, and in 2016 that percentage is 61.29%. In 2013 residents used an average of 67.29 gallons per person daily (gpcd). In 2014 they used an average of 35.08 gpcd, and in 2016 we are using 38.65 gpcd on average.

In 2013 commercial users of Cambria (including vacation rentals) used 29.45% of the water in Cambria. In 2014 they used 36.03% of the total water from CCSD, and in 2016 are using 33.44%.

TOTAL use adds the commercial and CCSD use to the residential use. Divided by the population (6,032) and 365 days, that came to 98.05 gpcd on average in 2013. In 2014 it dropped to an average of 58.12 gallons per person. In 2016 the average so far is 63.07 gpcd.

Looking at all the **water pumped** by CCSD from the San Simeon and Santa Rosa wells, the average daily gallons pumped per person in 2013 was 108.55. In 2014 it was 69.11 gallons per person per day, and in 2016 it is averaging 72.76 gpcd.

2. What happened to the unaccounted water?

The gap between production and use widened in 2014. In 2013 an average of 9.67% of the water drawn from the wells was not billed. In 2014 an average of 16.34% of the water drawn from the wells was not billed. This is described as unaccounted water or inefficiency of water management. While use of water has declined significantly, unaccounted water has increased. The 2010 CCSD Urban Water Management Plan projected unaccounted water as 8% of production (p. 6.4 of this link):

<http://www.cambriacsdsd.org/Library/PDFs/REPORTS/URBAN%20WATER%20MGMT%20PLAN/2012%2002%2023%20Final%20CCSD%20public%202010%20UWMP%20update.pdf>

The unaccounted water increased by 5.36 Acre Feet or 1,747,360 gallons from 2013 to 2014. In 2014 almost 25 million gallons of water (24,857,500 gallons) were unaccounted. In the past three years, the CCSD has reached 8% in only 2 months. Otherwise the range is from 10.08 % to 26.21% unaccounted-for water. This requires urgent attention.

3. At their Jan. 30, 2014, meeting the Board of Directors of CCSD declared a Stage III Water Shortage Emergency Condition and implemented a **Stage III Water Conservation Program**. The Program stipulated that surcharges/penalties would be levied as of March 1, 2014, on all water use above the allotments stipulated in their action. The surcharges are the mechanism for enforcement of the Conservation Program's rules and allotments.

The Board of Directors stopped the surcharges on March 1, 2016. On the same day higher water rates went into effect for everyone. The use of water has increased steadily since then across the board. This needs careful analysis by the CCSD.

185-19

2.3.3. I also sent to the CCSD General Manager on 27 Sept 2016 some questions regarding any testing done by the CCSD to discern water leaks from the pipe systems.

Unaccounted for water

📧 📧 📧



Elizabeth Bettenhausen <elizabethbettenhausen@gmail.com>

Sep 27

👤 Reply

In Reply To: Water Leak Audit, Mitigate (gms) from: Stephen (GMS) (GMS) - CCSD (GMS) - CCSD (GMS) - CCSD (GMS)

Jerry,

You will recall the table I developed and distributed at the meeting of the Board on Sept. 22, 2016, concerning the difference between produced water and metered water in the CCSD. I produced similar documentation in 2015 and submitted it to CCSD with questions.

How much of the 14,000,000 gallons of unaccounted for water can be verifiably attributed to leaks in the CCSD lines?

What are the methods the CCSD uses to detect water leaks?

Doing some speedy Googling regarding leak detection, I ran across today the three items below. They are not necessarily financially wise or practical for Cambria. But perhaps they are.

Audit, Intervention, Evaluation. How does CCSD now do this with the water pipes?

I look forward to your response to these questions.

1. How much of the 14,000,000 gallons of unaccounted-for water can be verifiably attributed to leaks in the CCSD lines?
2. What are the other causes of unaccounted-for water?
3. What are the methods the CCSD now uses to detect water leaks?
4. How does CCSD now audit, intervene, and evaluate the water pipes?

Thank you,

Elizabeth

Material on web sites:

1. Patching up the Pipes: How Smart Technologies Help Cities Prevent Leaks and Save Money

<http://www.waterworld.com/articles/pipelinevolume-20issue-2/article/patching-up-the-pipes-how-smart-technologies-help-cities-prevent-leaks-and-save-money.html>

2. Smart Pipe: Nanosensors for Monitoring Water Quantity and Quality in Public Water Systems

Yu-Feng Lin Illinois State Water Survey, University of Illinois at Urbana-Champaign
Chang Liu Department of Mechanical Engineering, Northwestern University
Illinois State Water Survey
Institute of Natural Resource Sustainability
University of Illinois at Urbana-Champaign
Champaign, IL

<http://www.uiuc.edu/pubdocs/2016/11.pdf>

3. Advanced Leak Detection Products for Every Pipe Material – Including PVC

Whether you are searching for an advanced IoT-enabled leak detection system or a sophisticated, yet simple-to-use correlator, Echologics' proprietary acoustic technologies put proven leak detection tools in your hands. Water experts from around the world are choosing Echologics leak detection equipment because of its ability to detect leaks accurately and efficiently on all pipe types including PVC.

Echologics has a long history of developing award-winning acoustic technologies for leak detection on buried water pipelines. Echologics worked with the National Research Council of Canada to develop a correlator that can find leaks accurately on plastic pipe materials. Since developing our first technology, our flagship product line called the LeakFunder™ correlator has been proven to work on virtually any pipe material and has won numerous head-to-head challenges vs competing products. Echologics' R&D team works closely with utility technicians and Echologics' field team to design and develop products that are easy to use. We also offer leak detection training so that a utility can quickly learn how to use the technology and be in the field searching for leaks.

Our products are compact, rugged, water-resistant and designed to reliably operate in the toughest of field conditions. Your satisfaction is very important to us. Our customer service team is always available to answer any questions about our products.



Echologics offers a full range of leak detection systems.

<http://www.echologics.com>

185-20

2.3.3.1. I have received no answer to my inquiry. I have no record of receiving one in 2015 either, when I asked about "unaccounted for" leaks. Where does this EIR engage unaccounted for water?

185-20

2.4. If 30% less water is used than the 2013 baseline, would SWF be necessary?

If water use in CCSD maintains at least a 30% reduction compared to the 2013 baseline, no analysis is provided to support the claim that the AWTP would still be required.

"However, without the SWF and its lagoon water discharge Project Design Feature, the San Simeon Creek Lagoon would be less protected during extended dry periods, than with the SWF. In this regard, the SWF would have a more beneficial impact to the San Simeon Creek lagoon wetland than the No Project Alternative. Under the No Project Alternative, the lagoon level would decline during an extended dry period by not receiving the SWF's lagoon water supply. The No Project Alternative would be environmentally superior to the SWF, since no disturbance to the site would occur, and no impacts to plants, wildlife, or sensitive habitats would occur. However, the No Project Alternative would be environmentally inferior to the SWF, since it would lose the benefit of the SWF lagoon water supply, which provides protection to the San Simeon Creek Lagoon during extended dry periods." DSEIR 7.8

185-21

In this paragraph no mention is made of conservation, reduction of water use, improved water management, new water meters, etc. Since the withdrawal from the San Simeon Creek would stay significantly below the 2013 baseline, the San Simeon Creek Lagoon would not need as much protection. In this DSEIR context the Lagoon needs protection because CCSD withdraws water from the aquifer. If this withdrawal is reduced, the need for protection is reduced.

3. Project source water and the proportionality of its components.

The Project Description describes the source water as follows.

The source water for the Project, which is pumped from existing Well 9P7, is comprised of a blend of native basin groundwater, deep aquifer brackish water, and percolated secondary effluent from the CCSD's WWTP. The brackish groundwater is comprised 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 degree to which this groundwater source is impaired depends 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 (DSEIR, 3.5.1.1.).

185-22

The Initial Study defined 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 (DSEIR SWFP 3-5), 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, 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 gpm back into the lagoon is the proposed solution. But 629 gpm of source water is being drawn out for reinserting 452 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? If so, 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? The designers do not know the proportions of elements of source water, because they don't know what will factually happen when the increased pumping happens compared to base data.

4. Connections among groundwater, surface water, and ocean.

The need for the AWTP has been and perhaps still is called an emergency by the Cambria Community Services District. Speedy design means a necessary base foundation of information is unavailable. The IS/MND stated, "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). I have seen nothing in the Draft SEIR that changes this statement.

185-22

185-23

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 began 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. What are the base data for the AWTP by which judgments of environmental impact are being reached?

For example, the distinction between Total Onsite Jurisdiction and Impacted Jurisdiction in Table 5.3-6 CDFW Jurisdictional Areas and Potential Project Impacts (and discussion of other agency jurisdiction) gives no base data and draws impermeable lines between onsite impact and wider impact.

But in the Groundwater Modeling Report, the final sentence of 2.2 *Groundwater Occurance and Flow* states: "A fresh water lagoon is present at the western extent of the valley that appears to be in hydraulic communication with groundwater, since it has water present through most years and has a water level similar to the adjacent well 8R3."

2.3 *Hydraulic Properties* follows this sentence and states:

Hydraulic characteristics of interest include the hydraulic conductivity, storage coefficient, specific yield and effective porosity. Limited characterization has been conducted in past studies, primarily quantifying hydraulic conductivity using pumping tests at seven wells located along the length of the valley. Figure 2-6 shows the location of aquifer tests and the hydraulic conductivity that was reported in the 1998 USGS report (Yates and Van Konynenburg, 1998). Responses of water levels in wells to stream stage changes were also used to estimate hydraulic properties, however, these estimates yield composite of storage coefficient and transmissivity, so it is difficult to estimate hydraulic conductivity due to the highly variable storage coefficient, which could range from the specific yield to a confined or semi-confined range. (Appendix E1 Cambria Emergency Water Supply, Project San Simeon Creek Basin, Groundwater Modeling Report, p. 2-2).

185-23

185-24

185-25

I have highlighted passages above that show that hydraulic communication and conductivity in the San Simeon valley and lagoon are not understood to a degree adequate to support the impermeable line between onsite and wider impact.

185-25

Richard Beck, Regulatory Specialist, Natural Resources/Regulatory Permitting at Michael Baker International wrote a letter to CCSD on Aug. 25, 2016 (Appendix E7 Cambria Sustainable Water Facility Project Delineation of State and Federal Jurisdictional Waters – Update). The letter concludes, Please note that based on a detailed review of the current site conditions and proposed project, our research has indicated that it will be necessary for Cambria Community Services District to obtain the following permits prior to commencement of any construction activities within the delineated jurisdictional areas: a Corps Section 404 Nationwide Permit and Regional Board Section 401 Water Quality Certification, and a CDFW Section 1602 Streambed Alteration Agreement, and a California Coastal Commission Permit.

Having read this, I submitted a Public Records Request to CCCSD on Oct. 8, 2016, for “all CCSD applications and any other correspondence” pertinent to the permits mentioned.

The CCSD responded with the letter to the right. On the same day I asked for clarification.

“Does the CCSD response to my PRR mean the applications for actions required for the Sustainable Water Facility depend on other agencies sending the application forms to the CCSD? That is, the CCSD does not request the forms, even though the district is required to submit the applications and has been made aware of the requirement?”

I have received no response. How will the public be informed that the required permits for this project have been applied for properly and in a timely fashion?



185-26

5. Microfiltration (MF)

The water that will be discharged to San Simeon Creek fresh water lagoons will have been run only through the Microfiltration Systems, not through the Reverse Osmosis and subsequent treatments (DSEIR, 3-36f). “The MF system provides pretreatment for the RO system to reduce the particulate and biological fouling of the RO membranes” (DSEIR 3-36).

Source water is “brackish groundwater is comprised 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” (DSEIR 3-28).

How was each component of the source water separately tested before any treatment to determine its biological and particulate components?

185-27

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"? the treated effluent? 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?**

In addition, the microfiltration does not remove salinity. 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?

When questions such as this are posed to the DEIR, they are often confronted with answers such as this paragraph:

The assumed source water quality and estimated treated water quality for the SWTP are summarized in Table 3-15, *SWTP Estimated Source Water and Treated Water Quality for Key Constituents*. The treated water quality is anticipated to be similar to the source water quality, except that suspended solids and turbidity would be lower in the treated water. Other water quality parameters could be higher in the treated water, due to the effects of evaporation in the potable water supply storage basin. (DSEIR 3-55)

As words and phrases that I highlighted show, the studies of the AWTP are too tentative and uncertain to support the claim that the environmental impact will be non-existent or cured with mitigations. Were the AWTP essential for the well-being of this community, then some uncertainty might be legitimate. But since the plant has been built and then redefined and now new mitigations are proposed, emergency legitimating attempts have dissolved into long-term possibilities. These assertions require sounder data, models, and assumptions about water demand. How will this be done?

6. Brine Disposition

In 2014 in my comments on the Initial Study/Mitigated Negative Declaration, I wrote,

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.

This situation has been amplified since 2014, most recently by a major agreement in August 2016 between Greenaction for Health and Environmental Justice and El Pueblo para el Aire y Agua Limpia and the California Environmental Protection Agency (CalEPA) and Department of Toxic Substances Control (DTSC) concerning Kettleman City and Title VI of the Civil Rights Act of 1964. <http://www.calepa.ca.gov/pressroom/Releases/2016/Greenaction.htm>

185-27

185-28

http://www.dtsc.ca.gov/HazardousWaste/Projects/CWMI_Kettleman.cfm

The agreement does not close Kettleman Hills Facility, owned and operated by Waste Management, Inc. through its subsidiary Chemical Waste Management, Inc. However, it does stipulate many changes in the required operation of the facility. For example, Section III.D. begins,

“Improved Air Quality Controls. DTSC, using its regulatory authorities during the consideration of the February 12, 2013, permit renewal application, and in consultation with CalEPA and the San Joaquin Valley Air Pollution Control district, will analyze measures to reduce air pollution related to KHF’s hazardous waste management activities to help improve air quality in Kettleman City. These analyses will include the consideration of:

“1. Use of emissions control devices for vehicles and equipment used on-site and in association with the hazardous waste operations at KHF. “

http://www.dtsc.ca.gov/HazardousWaste/Projects/upload/Kettleman_TitleVI_Settlement.pdf

The disposal of RO concentrate is the topic of section 3.5.2.3 and 3.5.2.6. in CCSD’s DSEIR. These paragraphs manipulate numerical analysis in confusing ways. Using seasonal rather than annual average, during the 6 months of “dry” season 9.6 daily round-trips by truck would be needed to transport the RO concentrate to Kettleman City (or elsewhere) During the 6 months of “wet” season 3.6 daily trips would be needed. That is 57,600gpd and 21,600gpd divided by 6,000 gal.

This is very different from “Average operations would likely be nine hours per day four days per week 12 months per year. Under this scenario, **four** truck trips per day would be needed to haul the RO concentrate to Kettleman Hills” (emphasis added). The annual average obscures the effect for 6 months of the year.

Disposal of the contents of the current Evaporation Pond would also entail additional such trucking of hazardous waste, 14.5 daily trips for 80 days (DSEIR 3.6.4.).

While CCSD was not involved directly, the Kettleman Title VI Agreement affects users of the Kettleman Hills Facility in many ways in addition to the example. The entire Agreement is included implicitly here for explicit response.

The Draft SEIR also does not state whether the chemical cleaning waste will be fed into the proposed mitigation, the four Baker tanks, along with the RO concentrate. On pp. 3-26 and 3-29 it goes to the evaporation pond in the existing AWTP. Where will it go in the mitigated version?

What are the criteria that would be used to decide where to dispose of the RO concentrate, the recurring chemical cleaning waste, and contents of the evaporation pond as it is repurposed, before the AWTP could go into operation?

7. Surface Water Transfer Pump Station and Treatment Plant

7.1. Four Baker tanks are proposed; together they would occupy ca. 32ft. by 46.5 ft. Then the new pump station and the new pipes would be added...and passage for the waste trucks...and....

AES-3: Within one year of completion of the SEIR process and completion of all necessary regulatory agency permits, Prior to installation, the Surface Water Treatment Plant (SWTP) shall be color treated, where reasonable, consistent with the AWTP.

185-28

185-29

185-30

185-31

I took this photo in Feb. 2015 from San Simeon State Park upper campground. What criteria will you give to the Landscape Architect for the color treatment?

Snowy Plover Camouflage Consultants can be reached at San Simeon Creek Beach.



185-32

7.2.

Looking at the numbers in the mitigation calling for the switch from evaporation pond to raw water supply storage basin, I calculate that the modification would provide 21.4AF to 66 AF of potable water every 29 days (either from rain or well fields). On p. 3-58 it says, "The treated water transfer pump station would be sized to boost the treated water's pressure into the distribution system" (my emphasis).

The raw water supply storage basin holds 21.4 AF. Since full volume would need to be pumped out "at least every 29 days" (p. 3-55), 21.4AF would be the minimum available each month. The treatment plant could treat 66AF per month, which means "at least every 29 days" is the minimum.

7.2.1. Would this increased production at least every month of the dry season decrease the amount treated by the existing AWTP during the same time?

7.2.1.1. What would be the criteria for balancing the pumping out of the storage basin and the amount drawn from 9P7?

7.2.2. When water treated in the SWTP had pressure boosted by the transfer pump station and flowed into the distribution system, is this distribution system the pipes for potable water going into town? What does "distribution system" mean?

7.2.3. How would using the Surface Water Transfer Pump Station and Treatment Plant comply with current diversion permits for San Simeon Creek?

185-33

8. AMP monitoring is crucial in the mitigations. Who will do it, staff or consultants, and how much will it cost in time and money? How will revenue to cover this be raised? Who provides oversight of the monitoring?

185-34

9. What will all the mitigations cost? How will the revenue be raised to cover the costs?

185-35

10. Has the liner of the evaporation pond been regularly studied regarding permeability to pocket gopher teeth?

I dug up this thick plastic July, because the plant supposed to have been gophers eating the roots. that pocket gophers bite with abandon and water supply storage basin percolation pond too?



pot from our garden in inside had died. It was protected from pocket Little had I understood through such plastic enthusiasm. Is the raw intended to become a

185-36

10. Finally, I note the "lost" language in these documents when referring to the water cycle.

"The Project enhances recharge to the groundwater basin, since fresh water that is currently lost to the ocean from operation of the treated waste water percolation ponds is captured, highly treated, and recharged to the groundwater basin to maintain CCSD well production and protective hydraulic gradients" (5.5-37).

"The objective of this alternative is to provide a source of recharge for beneficial use of the secondary treated waste water that would otherwise be lost to the ocean" (Appendix E, p. 115).

An editorial in the LA Times on 22 Oct 2016 pointed out the ecological insensibility of claims that water is lost in this way.

In this sixth year of drought, the agriculture industry and its supporters have pushed hard for diverting every scarce drop of water flowing down streams and rivers to orchards and field crops instead of, as they often describe it, allowing good water to be flushed downriver, through the Delta, into the San Francisco Bay and out to sea.

But like the water that sustains the Everglades, the water that is allowed to move through the Sacramento-San Joaquin River Delta and into the Pacific is not wasted. It is the lifeblood of an ecosystem whose health is essential not just to a particular run of salmon but to agriculture, to the fishing industry, to the economy and to the special qualities that make California what it is.

<http://www.latimes.com/opinion/editorials/la-ed-salmon-20161021-snap-story.html>

185-37

Water is the "lifeblood of an ecosystem." If that had been the prime criterion, this project would not have been inserted into the San Simeon Creek watershed.

I stop commenting. The absence of comment from me on any particular passage in the Draft SEIR for the CCSD AWTP (SWFP) means I ran out of time. ~ ~ ~

185-38

**RESPONSE TO COMMENT LETTER NO. PO-185**

Elizabeth Bettenhausen

October 26, 2016

PO 185-1 This comment addresses the DSEIR relationship to the WMP PEIR and provides general introductory statements, and explains acronyms used in the comment letter. The comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

PO 185-2 The comment questions the basis for the projected water demand assumed in the DSEIR. The comment also addresses the CCSD 2010 Urban Water Management Plan (2010 UWMP) and the Water Use Efficiency Plan (WUEP).

The 2010 UWMP has been superseded by the Urban Water Management Plan – Final (Maddaus Water Management, Inc., adopted by the CCSD Board on December 15, 2016) (2015 UWMP). According to 2015 UWMP Table 4-1, *Demands for Potable and Raw Water – Actual*, Cambria's total 2015 actual water demand (potable and raw) is 467 acre feet per year (AFY). Consistent with SB X7-7, each water supplier must determine and report its existing baseline water consumption and establish future water use targets in gallons per capita per day (GPCD). According to 2015 UWMP Section 5.3, *Service Area Population*, the CCSD used the ABAG 2013 population data as basis for service area population, as it represented the most current population information for the service area. According to 2015 UWMP Table 5-1, Cambria's five-year average baseline water use is 111 GPCD. The figure shown on DSEIR Page 3-5 included the results of demand forecast modeling, which had been prepared as part of the 2015 UWMP. Conservation Program B on this figure shows the projected demands recommended within the 2015 UWMP.

See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts. Therefore, the updated population figures have been presented and do not result in any change to the provision of 4,650 residential units, as referenced in Response PA 4-32.

PO 185-3 This comment is concerning residential water meters and does not address the DSEIR's adequacy or raise a significant environmental point. See Response PO 185-2 concerning Project water output and water demand.



- PO 185-4 This comment is concerning residential and commercial water use ratios and does not address the DSEIR's adequacy or raise a significant environmental point. See Response PO 185-2 concerning Project water output and water demand.
- PO 185-5 This comment includes text from the WMP Program EIR (PEIR) and DSEIR, and does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 185-6 This comment relates to the BRP 2006 Citizens Finance Steering Committee and the more recent appointment of a new BRP Citizens' Committee, its scope of work and the lack of a vote thereon. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary. See Responses PA 4-32 and PA 6-7 concerning the Project's water output and potential growth-inducing impacts.
- PO 185-7 See Responses PA 4-32 and PA 6-7 concerning the Project's water output and potential growth-inducing impacts.
- PO 185-8 The waitlist is properly referenced. There are no assumed modifications to the maximum of 4,650 existing and future residential units, with the grandfather provision.
- PO 185-9 This comment asserts that the BRP has not "met the mitigation requirements of the SEIR" since the 2006 final Report was not approved and there has not been a final report from the 2016 BRPCC. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary. See Responses PA 4-32 and PA 6-7 concerning the Project's water output and potential growth-inducing impacts.
- PO 185-10 This comment relates to the July 24, 2014 adoption of Emergency Water Project Surcharges and the Proposition 218 proceeding for the Surcharges. It further states that the EIR is for the "Sustainable Water Facility" and that the "public voted to fund the Emergency Water Project, not a Sustainable Water Facility," that the CCSD Board hasn't taken action to change it to a Sustainable Water Facility, and makes reference to the need for a new public vote on funding for the BRP. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- See Response PO 89-3 concerning increased water rates and construction/operational costs.
- See Response PO 123-1 concerning the Project's name change.



- PO 185-11 See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project’s water output and potential growth-inducing impacts. See also Response PO 185-2 concerning the basis for the projected water demand assumed in the DSEIR.
- PO 185-12 See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project’s water output and potential growth-inducing impacts. See also Response PO 185-2 concerning the basis for the projected water demand assumed in the DSEIR.
- PO 185-13 See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project’s water output and potential growth-inducing impacts. See also Response PO 185-2 concerning the basis for the projected water demand assumed in the DSEIR.
- PO 185-14 See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project’s water output and potential growth-inducing impacts. See also Response PO 185-2 concerning the basis for the projected water demand assumed in the DSEIR.
- PO 185-15 See Water Demand Management (DSEIR Pages 3-4 to 3-6), Water Conservation (DSEIR Page 3-10), and Response PA 4-6 concerning water demand at buildout. This comment alleges that removal of the surcharges on CCSD utility prices will hinder current conservation efforts. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 185-16 This comment pertains to the Conservation Report that had previously been part of the General Manager’s report, and makes references to the “Points Bank” and that the CCSD web site does not give an update on the Retrofit and Rebate Program reducing water demand. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 185-17 This comment refers to discontinuance of the Conservation Report and lack of reports on the water conservation demand offset program, and conservation program staffing. It also notes that the commentator has requested clarification at Board meetings of the CCSD’s conservation policy and staffing. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 185-18 This comment relates to the issue of “unaccounted for” water and includes two pages of data related to water production. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.



- PO 185-19 This comment relates to reductions in water used by residents and commercial users, pumped water data and raises questions about “unaccounted for” water, the “Stage III Water Shortage” declaration and surcharges, stating that the use of water has increased since the Board stopped surcharges in March, 2016, and asserting that this needs careful analysis by the CCSD. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 185-20 This comment pertains to the commentator stating that she has raised issues with the General Manager regarding water leaks, notes that she has not received a response, and asks “where does this EIR engage unaccounted for water.” This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 185-21 See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project’s water output and potential growth-inducing impacts.
- PO 185-22 See DSEIR Section 3.5.1.1, Source Water – Existing Well 9P7. The DSEIR and Title 22 Engineering Report essentially say the same thing concerning source water: (i.e., native basin groundwater is the same as fresh native basin groundwater.). While IS/MND text is not relevant in this public review period for the DSEIR, the same brackish water definition used in the IS/MND can be found on DSEIR Page 3-29.

Several terms presented by the commenter are similar in nature, and are simply different terms to describe the same type of water. For example, percolated secondary effluent and treated waste water are easily identifiable as the same thing. Similarly, “a mixture of freshwater with saltwater that has migrated inland within an underground saltwater wedge,” and “deep aquifer brackish groundwater” are easily identifiable as the same reference. Within the DSEIR, uniform and consistent phrases are used to identify Project components and other terms. Documents outside of the DSEIR may use different diction while making references, depending on the audience (such as the Title 22 Engineering Report or CCSD billing inserts).

As reported in DSEIR Section 3.5.1.1, the degree to which this groundwater source is impaired depends 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 travel time. Thus, the proportion of components in source water is variable. Because the exact proportion is not fixed at a specific percentage, it cannot be accurately reported.



To further clarify the Project's source water, DSEIR Page 3-28 is revised in the FSEIR as follows:

The source water for the Project, which is pumped from existing Well 9P7, is comprised of a blend of native basin groundwater, deep aquifer brackish groundwater, and percolated secondary effluent from the CCSD's WWTP. The deep aquifer brackish groundwater is comprised of diluted seawater (that occurs from the subterranean dispersion of salts from a deeper saltwater wedge into an overlying freshwater interface zone) and creek underflow, ~~and percolated treated wastewater effluent~~. The degree to which this groundwater source is impaired depends 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 is extracted from the San Simeon Creek Groundwater Basin, treated, and then reinjected further upstream at the existing CCSD potable well field, thus providing additional potable water supply to the Cambria community. With the system in operation, the water elevation at the potable well field is maintained higher than the secondary effluent mound, and higher than that of seawater. This serves to prevent seawater from moving inland to the potable well field.

- PO 185-23 See the following concerning groundwater modeling and potential Project impacts: DSEIR Appendix E1, Cambria Emergency Water Supply Project San Simeon Creek Basin Groundwater Modeling Report, (GMR) (CDM Smith, May 2014); DSEIR Appendix E6, Technical Memorandum – San Simeon Creek Flows, (TM) (CDM Smith, October 16, 2016); and Responses PA 4-7, PA 4-8, and PA 4-12. See Response PO 140-1 concerning the public review and comment period, which is for the Project evaluated in the DSEIR, and not the IS/MND; see also Response PA 7-4 concerning the IS/MND. In compliance with CEQA requirements, this FSEIR considers comments received on the DSEIR and not the IS/MND. Potential Project impacts to groundwater and biological resources are addressed in DSEIR Section 5.5, Hydrology and Water Quality, and in DSEIR Section 5.3, Biological Resources, respectively.
- PO 185-24 See Responses PA 4-7, PA 4-8, PA 4-12, and PO 185-23 concerning groundwater modeling and potential Project impacts. The Jurisdictional Delineation is not related to the boundary conditions in DSEIR Appendix E1, Cambria Emergency Water Supply Project San Simeon Creek Basin Groundwater Modeling Report, nor is it related to "connections" among the San Simeon Creek, San Simeon Creek Lagoon, and other hydrologic features mentioned by the commenter. The jurisdictional delineation (JD) included in DSEIR Appendix E2, Cambria Emergency Water Supply Project Delineation of State and Federal Jurisdictional Waters, identifies jurisdictional areas per public agency criteria (specifically, the U.S. Army Corps of Engineers



(ACOE), Regional Water Quality Control Board, California Department of Fish and Wildlife, and CCC). The JD was completed in accordance with each agency's criteria, and is not required to "discover the connections" but rather document jurisdictional authority.

PO 185-25 See Responses PA 4-7, PA 4-8, PA 4-12, and PO 185-23 concerning groundwater modeling and potential Project impacts.

PO 185-26 This comment includes a quote from DSEIR [Appendix E2](#), which is taken out of context concerning regulatory authority. The JD included in DSEIR [Appendix E2](#) is an update based on the Project modifications. The Project modifications have not yet been constructed. On JD Page 2, the JD Modification discussion states that the Project modification of concern is extending the filtrate pipeline to relocate the discharge further south to the San Simeon Creek bank. As such, modified impacts to U.S. ACOE, Regional Water Quality Control Board, California Department of Fish and Wildlife and CCC are evaluated in the JD.

The Project's potential impacts to riparian habitat and jurisdictional waters are discussed under DSEIR Impact 5.3-2 and Impact 5.3-3, respectively. Project modifications (filtrate pipeline extension, temporary access path, and discharge structure (ACB or other)) would impact riparian habitat/jurisdictional waters. Mitigation Measure BIO-18 requires that the surface discharge extension be designed to avoid impacts to riparian habitat to the greatest extent feasible, and that the CCSD comply with all applicable local, state, and federal regulations concerning impacts to riparian habitat and jurisdictional water, including CWA §§ 401 and 404, and/or California Fish and Wildlife Code Section 1602. Finally, Mitigation Measure BIO-19 requires that the CCSD minimize the disturbance and removal of riparian vegetation, to the extent possible. Overall, the Project modifications' direct impacts to wetlands and jurisdictional waters would be considered a significant impact unless mitigated. To minimize impacts to wetlands and jurisdictional waters, the Project modifications would be subject to compliance with Mitigation Measures BIO-4, BIO-5, BIO-6, BIO-8, BIO-18 and BIO-19.

As previously noted, coastal streams, riparian areas, and wetlands, such as are present on the Project site, are ESHA, which are protected through compliance with CZLUO §§23.07.170, 23.07.172, and 23.07.174. See DSEIR Impact 5.3-5 concerning the Project modifications' compliance with CZLUO §23.07.170 (Environmentally Sensitive Habitats), CZLUO §23.07.172 (Wetlands), and CZLUO §23.07.174 (Streams and Riparian Vegetation).



The Project modifications (filtrate pipeline extension, temporary access path, and discharge structure (ACB or other)) would require permits from the agencies listed in the DSEIR [Appendix E7](#) letter and above. It is noted, the Project modifications have not been constructed. Thus, there would be no applications or any other correspondence pertinent to the permits in the commenter's October 2016 public records request. The CCSD is aware of the regulatory requirements concerning riparian habitat impacts, and will abide by the established regulatory framework.

Public noticing and information would become available in compliance with the established regulatory framework, once the CCSD begins the permitting process with the applicable agencies.

PO 185-27 Key water quality data for Cambria WWTP effluent and brackish groundwater extracted from Well 9P7 is summarized in DSEIR [Table 3-2](#), *Source Water Quality for AWTP*. As indicated in DSEIR [Table 3-2](#), Well 9P7 water quality was generally better than the water quality assumed during design. Further, as also shown in DSEIR [Table 3-2](#), the Project proposes a 100 gpm MF filtrate product water flow to recharge San Simeon Creek Lagoon. A summary of water quality for the lagoon discharge is included in DSEIR [Table 3-4](#), which indicates the water quality identical to the source water quality for the AWTP.

The MF system removes suspended particulates and other particles by the membrane's size exclusion sieve action. RO is used to remove dissolved constituents in water, along with purification and desalination. The MF system is required for pretreatment, so that suspended particulates do not harm the RO membranes. Suspended particles in water degrade RO membrane performance.

The Project's water quality operational impacts are discussed under DSEIR Impact 5.5-2 and Response PA 3-4. Because the SWF includes activities that involve discharges to groundwater and land, a Report of Waste Discharge (ROWD) for the SWF was filed with the CCRWQCB, pursuant to CWC Section 13260. The ROWD provides the technical information in support of the WDR Permits necessary, in order to protect nearby surface, coastal, and groundwaters. The CCRWQCB issued the WDR Permits for injecting AWTP product water into the groundwater basin (at the well field and percolation ponds) and the surface discharge at the evaporation pond and the lagoon. These WDR Permits are Order No. R3-2014-0050, Order No. R3-01-100, Order No. R3-2011-0223 (NPDES No. CAG993001), and Order No. R3-2014-0047. SWF operational activities could violate water quality standards/degrade water quality. However, the SWF is subject to compliance with Order Nos. R3-2014-0050, 01-100, R3-2011-0223 (NPDES No. CAG993001), and R3-2014-0047, which continue to ensure that



potential water quality impacts remain less than significant during operation through ongoing monitoring required and enforced by the CCRWQCB. Further, SWF operations also improve groundwater quality by removing salts and further reducing nitrate concentration of its source groundwater.

- PO 185-28 See Response PO 140-1 concerning the public review and comment period, which is for the Project evaluated in the DSEIR, and not the IS/MND; see also Response PA 7-4 concerning the IS/MND. See Response PO 185-28 concerning existing and operational water quality. See Responses PA 4-15 and PA 4-35 concerning the Project's offsite RO concentrate disposal. Kettleman permitting requirements are not pertinent to the proposed Project. See DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative, and Responses PA 4-15, PA 4-33, and PA 4-34 concerning the RO Concentrate Ocean Outfall Disposal Alternative, including the associated regulatory requirements and potential environmental impacts.
- PO 185-29 See Responses PA 4-15 and PA 4-35 concerning the Project's offsite RO concentrate disposal. Kettleman permitting requirements are not pertinent to the proposed Project. See DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative, and Responses PA 4-15, PA 4-33, and PA 4-34 concerning the RO Concentrate Ocean Outfall Disposal Alternative, including the associated regulatory requirements and potential environmental impacts. As stated on DSEIR Page 3-64, for purposes of conducting a conservative analysis of the Project's potential environmental impacts associated with offsite RO concentrate disposal (i.e., mobile emissions, transportation, etc.), this DSEIR assumes the SWF would operate 24/7 for six months per year, and the RO concentrate would be hauled away to Kettleman Hills for disposal.
- PO 185-30 See Response PO 185-28 concerning the AWTP process design flows and the Project's water quality operational impacts.
- PO 185-31 The comment, which initially addresses the surface water transfer pump station, treatment plant, and above-ground storage tanks, is incomplete. The comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 185-32 The comment questions what criteria will be provided to the Landscape Architect for the SWTP color treatment required by Mitigation Measure AES-3. One of the difficulties in selecting an exterior color for the facility is that the surrounding background color, which is predominantly grassland, changes depending upon the season. The color chosen was an off-white, wheat color that blended in well with grasslands during the dry summer season. Comment so noted concerning the Snowy Plover Camouflage Consultants.



- PO 185-33 As discussed in detail in DSEIR Section 3.5.2.1, Raw Water Storage Basin (Evaporation Pond Repurposing), the proposed Project modifications include repurposing the SWF's evaporation pond to provide approximately 6.0 to 7.0 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. The source water for the raw water storage basin would be groundwater from the San Simeon or Santa Rosa aquifers, which would be seasonally filled during the wet season when there is adequate flow occurring in the local creeks. Any pumping from the aquifers for this purpose would be subject to meeting existing diversion permit requirements. As a secondary benefit, a pipeline is proposed to allow for filtration of water from Well SS-1 during times when there is surface water flow in the nearby creek. This feature provides additional CCSD operations reliability, which is currently limited to operating Wells SS-2 or SS-3 when there is flow in the creek. The evaporation pond would be repurposed/modified to serve as a raw water storage basin (i.e., prior to surface water treatment). A surface water treatment plant (SWTP) is proposed adjacent to the AWTP. The SWTP would be sized to treat the surface water from the raw water storage basin or San Simeon Well SS-1 to improve Cambria's potable water supply's overall reliability. Treated water from the raw water storage basin would augment the AWTP production, should the Santa Rosa aquifer supply become unavailable due to an unforeseen emergency (e.g., power failure, pump, or other equipment failure, low level at Santa Rosa monitoring well WBE, contamination of Santa Rosa aquifer, etc.). See Response PA 4-6 concerning SWF water diversion.
- PO 185-34 Consultants would conduct Adaptive Management Plan (AMP) monitoring; see also Responses PA 3-4 and PA 4-5 concerning the AMP. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 185-35 This comment asks about the cost of mitigation and how revenue will be raised for those costs. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 185-36 The evaporation pond includes a gopher barrier, as described on DSEIR Page 3-15. The raw water storage basin is not intended to become a percolation pond; see DSEIR Section 3.5.2.1, Raw Water Storage Basin (Evaporation Pond Repurposing), for descriptions regarding this Project component.
- PO 185-37 This comment provides a quote from an LA Times article concerning riparian ecosystem health. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.



PO 185-38

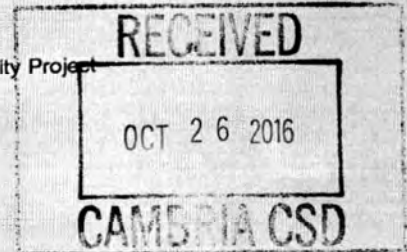
This comment serves as the conclusion to the comment letter. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.



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Mr. Bob Gresens, Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428

Draft SEIR Cambria Sustainable Water Facility Project
 Comment due date: October 26, 2016



Mr. Gresens,

I am curious to know the justification the CCSD has to use an SEIR that tiers off of an existing Master Water Plan EIR that never mentions a brackish water inland water plant; the Master Water Plan EIR, rather, discusses, an ocean intake and outlet desalination plant. Likewise, the Master Water Plan EIR does not list an inland brackish water treatment plant in the document's list of options explored.

186-1

Also, I would like an explanation as to why no NOP was issued for the current SEIR. As referenced above, this SEIR cannot utilize tier off the previous Master Water Plan EIR, and therefore cannot assume the Master Water Plan EIR Notice of Preparation is sufficient for the current SEIR.

186-2

There is a clear federal nexus in this current SEIR; therefore an Environmental Impact Statement should be completed under NEPA. The Army Corps of Engineers paid for the analysis used in exploring options in the Master Water Plan EIR and has provided staff support and funds for other aspects of the water treatment plant project.

186-3

Finally, this current SEIR, when combined with the Emergency WTP and the proposed Build-out Reduction project, constitute segmentation under CEQA. The Reduction Build-out impacts are not analyzed (amount of water needed, duration of water pumping in month per year, build-out impacts to sensitive habitats and species, build-out impacts to transportation, emergency services, or other impacts). Thus, three separate projects exist: the EWTP, the SWTP, and Build-out Reduction; these should all be considered as cumulative impacts.

186-4

Thank you for your time and consideration. I look forward to a fruitful discussion of these CEQA/NEPA issues.

Sincerely,

A handwritten signature in cursive script that reads "Donald Budetti".

Donald Budetti

1954 48th Avenue

San Francisco, CA

94116

**RESPONSE TO COMMENT LETTER NO. PO-186**

Donald Budetti

October 26, 2016

PO 186-1 See DSEIR Section 2.2, CEQA Document Tiering and Water Master Plan, and Response PA 4-32 concerning tiering. The WMP PEIR is a programmatic document, and subsequent activities in the program must be examined in the light of the PEIR. The SWF is a form of desalination, as brackish water is more saline than freshwater. As described on DSEIR Page 2-3, to avoid repetition, wasted time, and unnecessary speculation, a lead agency may “tier” EIRs for a sequence of actions so that the later EIRs incorporate and build on the information in the previous EIRs (PRC §§ 21068.5 and 21093, and CEQA Guidelines §15152).

The WMP PEIR specifically states “the level of analysis under this Program EIR focuses on the Water Master Plan’s ability to provide a reliable source of water for the community and the potential to cause growth-inducing effects” (WMP PEIR Page 3-12). The WMP does not propose a specific desalination facility, and all designs were presented as conceptual. Thus, the DSEIR properly tiers from the WMP PEIR as it proposes a site-specific Project; see PRC Section 21094(a), and CEQA Guidelines §§ 15152(b) and 15385(a).

PO 186-2 The NOP for the Project was released on March 6, 2015 for a 30-day public review period that concluded on April 6, 2015; see DSEIR Section 2.3, Notice of Preparation/Early Consultation (Scoping). See Response PO 186-1 concerning the CEQA document tiering process.

PO 186-3 There is no federal nexus for the proposed Project, and as such the Project is properly analyzed under CEQA.

PO 186-4 The commenter alleges that the DSEIR, “when combined with the Emergency WTP and Build-out Reduction project, constitute segmentation under CEQA.” In accordance CEQA Guidelines 15378(a), the Project must consist of the whole of the action. Piece-mealing phases of projects is discouraged by CEQA. Therefore, the entirety of the Project is evaluated in the DSEIR; see also Response PA 4-1.

See also DSEIR Section 4.0, Basis of Cumulative Analysis. The CCSD affirms that the DSEIR properly analyzed cumulative impacts in accordance with CEQA Guidelines §15130(b), as referenced on DSEIR Page 4-1. No further revisions are necessary.

From: Rita Burton <gn4abtn@gmail.com>
Sent: Monday, October 24, 2016 12:29 PM
To: Bob Gresens
Subject: Emergency Water Supply Project



October 24, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria 93428

Dear Sir,

I respectfully request that the Draft Environmental Impact Report for the Sustainable Water Facility be withdrawn and a completed Application for the Environmental Water Supply Project be submitted to ensure that all parties interested in this important issue are fully informed as to its consequences.

Please confirm your receipt of this email.

Sincerely,

Rita A. Burton
1840 Dreydon Avenue
Cambria, CA 93428

187-1



RESPONSE TO COMMENT LETTER NO. PO-187

Rita Barton

October 26, 2016

PO 187-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.

COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428
bgresens@cambriacsd.org

24th October 2016



Dear Mr. Gresens,

We, the undersigned, request that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

We make this urgent request for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

188-1

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Name : Anthony Church and Penny Church

Address: 2998 Ernest Place, Cambria, CA 93428

Please acknowledge receipt by return e-mail to: agcfam@aol.com



RESPONSE TO COMMENT LETTER NO. PO-188

Anthony and Penny

October 26, 2016

PO 188-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.

Emil James Crescenzi Jr.
3000 Galloway Ridge, Apt. K209
Pittsboro, NC 27312

October 21, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria, and a recent 15-year resident of Cambria. My wife and I left Cambria in 2015 due to health reasons, to be near family in North Carolina, and to reside at a continuing care retirement facility. There will always be an emotional attachment to Cambria for both of us. We genuinely care about the future of Cambria, and the environmental integrity of San Simeon Creek. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment, in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

It is not an exaggeration to point out that in times of severe drought, operation of the SWF to maintain a healthy water level in the San Simeon Creek lagoon will make a life versus death possibility for steelhead smolt trapped in the lagoon. Immature steelhead are trapped in the lagoon in times of severe drought, particularly in the summer months. Their survival depends on having available clean, cool water. I personally took part in monitoring the water quality in the lagoon in 2014 and 2015 (before leaving Cambria), and I can assure you this lack of water is a very serious environmental issue. Low water levels are typically associated with elevated water temperature and added turbidity.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Emil James Crescenzi, Jr.



RESPONSE TO COMMENT LETTER NO. PO-189

Emil James Crescenzi, Jr.

October 26, 2016

PO 189-1 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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From: Frank DePasquale <tantobuono@aol.com>
Sent: Monday, October 24, 2016 2:07 PM
To: Bob Gresens
Subject: Draft SEIR



Dear Mr. Gresens,
We would like the CCSD to withdraw the Draft SEIR and complete the application for EWS project.
Thank You,
Frank & Diann DePasquale
2018 Benson Ave.
Cambria, 93428

190-1



RESPONSE TO COMMENT LETTER NO. PO-190

Frank DePasquale

October 24, 2016

PO 190-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.



MEMO October 24, 2016

To: Robert Gresens, CCSD Engineer; Jerry Gruber, CCSD General Manager; Gail Robinette, President, CCSD Board of Directors; Members, CCSD Board of Directors

From: Greenspace – The Cambria Land Trust

RE: Comments on the CCSD's Draft SEIR for EWS/SWF Project

The SEIR released by the Cambria Community Services District is challenging on many levels. Over 2,000 pages in length, it appears to be designed to deter ordinary citizens from comprehending both the scope of the project and the proposed terms of environmental mitigation.

191-1

The Executive Summary and sections of Chapter 3, for example, include confusing descriptions of the project's several environmentally impactful parts, combining elements of construction already completed and proposed changes to the system. As one instance, there is a lengthy description of the evaporative blowers, even though we now know that they did not work as described and the new plan is to dismantle and remove them.

191-2

Titling the document "Subsequent Environmental Impact Report" implies that there was a prior EIR, which, for the specific brackish water desalination plant, there was not. Hence, the EIR to which this one is subsequent is that written for the 2008 CCSD Water Master Plan.

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However, that plan is now outdated as: 1) it relied on data then nearly 10 years old; 2) it called for Cambrians to use 50% more water than they were using in 2008; 3) it did not include new state requirements for reduction of GHG and increase of renewable energy sources; 4) it did not result in serious Instream flow studies of San Simeon or Santa Rosa Creeks; and 5) subsequent attempts to install desalination water systems at both San Simeon and Santa Rosa Creeks were denied by the California Coastal Commission and State Parks. Moreover, the 2008 WMP was overridden by the subsequent 2014-2015 construction of the then-named Emergency Water Supply Project.

191-4

The SEIR refers to this project from its inception as the "Sustainable Water Facility" (see p. III-9). Such a long-term public works project would never have received exemption from CEQA under the Governor's drought emergency declaration, as this project, in fact, did.

191-5

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At the time that Prop. 84 funds were sought for its construction, it was advertised to the public and presented to state and county agencies as a temporary facility to be used in case of drought emergencies only, with an evaporation pond solution to the RO plant's waste outfall. The \$4 million Prop. 84 IRWM grant received for the project could now be called into question, as the project clearly was never intended only for emergency use.

191-5

That facility has now, without any public approval or external agency review, been restyled as the "Sustainable Water Facility." In part, this is because the San Simeon Creek wells actually never fell below historic averages, thus obviating the need for an "emergency" system. In part, it appears from recent CCSD actions, that the renaming is to justify expanding water service (in violation of the Stage Three Water Emergency still in place in Cambria) to positions on the water meter wait list that date to the beginning of the residential development moratorium in 2001.

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From the discussion of mitigation measures in the draft SEIR Executive Summary, it appears that the SWF project is now to be reconfigured to: 1) release surface water into the San Simeon Creek Lagoon; 2) decommission and dismantle the evaporation pond blowers; 3) temporarily truck wastewater to Kettleman City for disposal and eventually construct an ocean outfall; and 4) refigure the evaporation pond as a potable water holding tank for use by Cal Fire and others in fighting fires.

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But does this environmental impact report refer to the EWS construction or the SWF reconstruction and additions, or some hybrid of the two?

The timeframe of the project (or projects) mitigations for which the SEIR has been written is both confusing and suspect. While the mitigation steps appear to refer to future construction, they actually include issues of the EWS/SWF construction already completed. For the now-operational RO plant, pumping system and evaporation pond/blower system, we have no way of knowing whether or not the "proposed" mitigations ever took place. This effectively means that, under this SEIR, there will be no mitigation for the actual construction of the RO plant or the evaporation pond which is now to be "repurposed."

191-8

Is there documentation that demonstrates that the "proposed" mitigations listed in the draft SEIR ever took place during the actual system construction? Was the Adaptive Management Plan for wildlife, and especially for endangered species, implemented? In February of 2015, US Fish and Wildlife project Field Supervisor Stephen Henry informed CCSD lead engineer Robert Gresens that the USFW had never received the AMP for review prior to its publication, as required. At that point, the EWS construction phase was nearly complete.

191-9

Perhaps the mitigations set forth in the SEIR are only intended to apply to the upcoming dismantling of the blowers, creek/lagoon recharge and repurposing of the evaporation pond. However, the plant has been operational for over a year—is there no requirement for mitigation for the lack of environmental protection and monitoring during that period?

From State Parks biologists' monitoring and citizen reports, we know that the initial construction and subsequent operation of the EWS had significant impacts on habitat

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along both San Simeon and Van Gordon Creeks. Once the RO facility and the evaporation pond and blowers were completed, the system had numerous documented harmful effects.

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There was extensive view, nighttime light and noise pollution, along with health impacts to neighboring livestock. Other documented impacts included discharge of contents of the brine pond into Van Gordon Creek, overspray of the brine pond contents onto State Parks and adjacent farm lands and crops, creek spills of chlorine from the RO plant and nitrates from the wastewater field, the death of migratory seabirds, and overgrowth of algae that may have included potentially toxic species in the evaporation pond, San Simeon Creek and its lagoon. The creek did not receive adequate surface water recharge from the system in 2015-16 to offset dewatering of the lower reach and the lagoon.

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Based on public reports and documentation, Greenspace – The Cambria Land Trust maintains that significant environmental impacts already have occurred with construction and operation of the EWF. These never have been properly mitigated, resulting in the death of wildlife, significant disruption of endangered and threatened species' habitat, dewatering of the San Simeon Creek lagoon area and overgrowth of algae. The SEIR's claim that "less than significant" impacts (some "with mitigation") occurred or will occur related to construction and operation of the EWS/SWF is not true (pp. I-4 – I-16), based on documented effects to date. We have no reason to believe that the proposed SWF modification project (or projects) will have "less than significant" impacts to ecosystem habitats.

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The CCSD has not produced public data that would support their claims of mitigation and monitoring in the construction and initial operative stages of the EWS. However, since these steps are stated in the SEIR as if they are yet to happen, rather than as actions taken during the actual initial construction phase of the EWS/SWF project, we find them irrelevant to the actual environmental mitigation needs of the project as a whole.

191-13

Further, the so-called Sustainable Water Facility is at this point a fictional entity. The Emergency Water Facility was approved by ratepayers in 2014. There has never been a ratepayer vote per Proposition 218 on the change of the EWS to a permanent, long term public works facility that would support growth. And a permanent facility is what the CCSD, in this SEIR clearly intends to be the actual purpose of the RO plant and groundwater recharge system (p. I-2).

191-14

The effectiveness and impacts of the project as it actually was designed—an "Emergency Water Supply project for existing customers only"—needs to be analyzed before CCSD, the public and regulatory agencies can make informed decisions on how best to move forward to expand its use or not. We have no clear answers for these questions to date:

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- What is the actual cost to operate the system as a drought emergency water supply? (The system has never provided significant water to the community.)
- How often and for how many months would it be needed to augment the groundwater basin supply?

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- How much brine waste would the RO plant produce if it were to run 24/7 for six months, as the draft SEIR proposes? **191-18**
- What would be the impacts to San Simeon Creek and the lagoon during such an operation? **191-19**
- Would the proposed mitigation surface water be sufficient to protect habitat in the lagoon? **191-20**

As the report acknowledges, the brine pond evaporative system is an abject (and very expensive) failure, which could have been avoided had a proper engineering assessment and environmental impact report been prepared prior to its construction. Repurposing the brine pond as a holding pond for fire-fighting may be a viable reuse suggestion (and is certainly more attractive from a public relations standpoint). However, this redesign must be analyzed by experts familiar with such use. It could still be a danger to native wildlife if over-chlorinated and a breeding site for cyanobacteria if not properly maintained. **191-21**

At this point, given the paucity of data and lack of mitigation effort to date, we simply cannot know what the environmental implications are for the next phases of this facility based on this SEIR as written. What we now do know is that the intent of the CCSD was never to build a temporary emergency facility—the 2008 Water Master Plan, the Army Corps of Engineers study, the design plan and the physical construction of the project all make that clear, just as the brine pond was never intended to be the long-term solution to the waste issue. **191-22**

This classic “bait and switch” maneuver, in the guise of rectifying problems with the evaporation pond (at considerable additional expense to ratepayers), now will include yet another switch—repurposing the evaporation pond and trucking wastewater to Kettleman City, which the SEIR already finds financially and environmentally undesirable. The final switch, which we maintain has been a goal all along, will be to dump wastewater in the nearshore marine environment via an ocean outfall pipeline. The SEIR designates this project alteration as the most environmentally sound alternative to the “No Project Alternative.” **191-23**

Briefly, Greenspace also would like to address the issue of long-term environmental impacts and the SEIR’s response in Chapter 6, “Other CEQA Considerations.” The Build-Out Reduction Plan (BRP) is intended by the CCSD to address the issue of population growth induced by a more abundant water supply in Cambria.

The document notes that multiple properties have been retired by Greenspace and other land trusts and conservancies in the years leading up to the implementation of the EWS/SWF. We would like to make it clear that Greenspace’s retirement of lots is for the purpose of preservation and conservation. It has nothing to do with supporting or helping to implement the BRP. The Greenspace Board of Directors voted in 2008 not to participate in the BRP because alternatives to seawater desalination were not being seriously considered in the Water Master Plan development process, due to a baseless determination that ratepayers would use 50% more water in coming years than they used at the time. It was also clear that BRP implementation could violate landowners’ rights, **191-24**

and place us in the questionable position of receiving then selling 'unallocated water meters' ahead of wait list participants.

191-24

The financial practicality of the BRP is even more questionable today than a decade ago. It remains unfunded, but is estimated to cost \$38 million. Local residents, having seen two major increases in their water and wastewater bills to help pay for cost overruns on the EWS/SWF are unlikely to support additional special fees or taxation to retire lots.

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Transfer of development credits and lot mergers actually can serve to increase rather than diminish environmental impacts, as they encourage the building of larger homes and expansion of existing structures in forested areas. Finally, the sudden revival of the BRP, after a decade of inaction, in the face of the impending SLO County permit requirement for the SWF points to a lack of genuine commitment to the entire buildout reduction process on the part of the CCSD.

191-26

To conclude, Greenspace maintains that the draft SEIR's Summary of Project Alternatives (Section 1.5, pp.I-17ff and Chapter 7, pp.VII-1ff) is inadequate. It points toward a focus on the ocean as dumping ground for chemically treated and highly saline wastewater. And, if seawater intrusion is the outcome of the brackish water reclamation, which is likely, then the ocean also becomes the alternative for sourcing water to meet the area's growing demand.

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The "No Project Alternative" (and again, it's not clear what project is referred to) is no longer viable because of the four-plus millions of dollars in cost overruns incurred due to poor design and no-bid contracting by CCSD and now imposed on ratepayers. Therefore, Greenspace proposes the following mitigations, which would actually address the damage done to date and the potential damage to be incurred by project modifications and a nearshore ocean outfall in the future:

191-28

1. A Watershed Management Plan for all of San Simeon and Van Gordon Creeks, to ensure that scientifically evaluated ecological management is being practiced up and down the watershed and potential steelhead habitat is restored, to be funded in part by CCSD and developed by independent scientific organizations;

191-29

2. A permanent flow and water quality monitoring project developed by an independent scientific and engineering group and funded by the CCSD, County of San Luis Obispo and the State of California that would monitor creek and lagoon habitat impacts below the CCSD San Simeon Creek well fields, on lower Van Gordon Creek and below the RO plant;

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3. Research and development of a brine treatment system using wetlands to clean wastewater from the RO plant, which will obviate the need for hauling wastewater or a hazardous ocean outfall system.

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4. In addition, we would propose consideration of retiring one or more of the CCSD potable water wells on Santa Rosa Creek to support the recovery of the SRC groundwater basin, creek flow and water quality as viable alternative habitat for steelhead, tidewater

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goby, red-legged frogs and Western pond turtle populations that have been impacted by the EWS/SWF.

191-32

In sum, we hope to see a vigorous public and agency challenge to the findings of this draft SEIR, as it is designed to obscure rather than reveal whether or not steps actually have been taken to ensure that San Simeon and Van Gordon Creeks and San Simeon Lagoon are protected. It also does little to allay community and agency concerns that ecosystem integrity will not be maintained through careful planning, execution and outcome monitoring of future modifications. The SEIR as written paves the way for ocean outfall of wastewater from the brackish water desalination system and does not provide a meaningful set of mitigation measures for either short- or long-term environmental protection.

191-33

Sincerely,



Constance Higdon Gannon, Executive Director

Cc: Rita Garcia, Michael Baker, RBF Consulting
Bruce Gibson, Supervisor District 2, County of San Luis Obispo
Arlin Singewald, Planner, County of San Luis Obispo
San Luis Obispo County Air Quality Control Board
Central Coast Regional Water Quality Board
California State Water Resources Control Board
California Coastal Commission
California Department of Fish and Wildlife
California State Parks
Monterey Bay Marine Sanctuary
United States Fish and Wildlife Service, Ventura Office
United States Army Corps of Engineers
United States National Marine Fisheries Service
United States National Oceanic and Atmospheric Administration

**RESPONSE TO COMMENT LETTER NO. PO-191**

Constance Higdon Gannon, Ph.D.

Greenspace: The Cambria Land Trust

October 26, 2016

- PO 191-1 This comment opines on the DSEIR, but does not identify a specific concern or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 191-2 DSEIR Section 3.0, Project Description, is intended to provide descriptions of all Project elements and does not discuss environmental impacts. In accordance CEQA Guidelines 15378(a), the Project must consist of the whole of the action. Piece-mealing phases of projects is discouraged by CEQA. Therefore, the entirety of the Project is presented in the DSEIR; see also Response PA 4-1. The Project Description includes a thorough description of the Sustainable Water Facility (currently as operating), and Project Modifications. As stated on DSEIR Page 3-26, for the purposes of this Project description and the analysis in this SEIR, the “Sustainable Water Facility” involves the built and operational Project components, whereas the “Mitigation Measures and Project Modifications” involve proposed Project components, including those required for compliance with various SWF mitigation measures. The evaporators are already constructed and operational, and thus they are described in DSEIR Section 3.5.1.3, Evaporation Pond. Changes to the evaporation pond are discussed in DSEIR Section 3.5.2.1, Raw Water Storage Basin (Evaporation Pond Repurposing). Additionally, DSEIR Section 1.0, Executive Summary, is intended to function as a summary of the DSEIR and should not be relied upon exclusively for the purposes of understanding the Project or the environmental impact analysis.
- PO 191-3 See DSEIR Section 2.2, CEQA Document Tiering and Water Master Plan. The DSEIR is appropriately named “Subsequent,” as it tiers from the WMP PEIR. Where appropriate and as permitted by CEQA, the DSEIR tiers from the WMP PEIR. As discussed under Response PO 186-1, under CEQA Guidelines §15152, tiering is appropriate when the sequence of analysis follows from an EIR prepared for a general plan, policy, or program to an EIR of a lesser scope, or to a site-specific EIR. Under CEQA, the WMP PEIR is considered a first tier document and this DSEIR for the proposed Project is considered a second tier document. Pursuant to CEQA Guidelines §15152(d)(1) and (2), the standard review for an SEIR is defined as follows:



(d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.

Since the CCSD's certification of the WMP PEIR in 2008, new information has become known and changes in environmental setting potentially affecting the severity of environmental impacts have occurred, as discussed throughout the DSEIR.

- PO 191-4 See Responses PO 186-1 and PO 191-3 concerning tiering. Also see Response PA 7-9 concerning the NOP and existing baseline conditions/environmental setting.
- PO 191-5 This comment makes reference to the Proposition 84 funding for a "temporary facility" for drought emergencies, and asserts it was "never intended only for emergency use." See Response PO 89-3 concerning increased water rates and construction/operational costs. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 191-6 This comment asserts that renaming the SWP was based upon well levels not falling to a level justifying an emergency, and to justify expanding water service to positions on the water meter wait list. See Response PO 123-1, concerning the Project's name change. See also Responses PA 4-32 and PA 6-7 concerning the Project's water output, and Response PO 140-2 concerning Cambria's building moratorium.
- PO 191-7 This comment incorrectly summarizes the DSEIR Executive Summary. The Project does not propose to "temporarily truck wastewater to Kettleman City for disposal and eventually construct an ocean outfall." See Response PA 4-15 concerning offsite RO concentrate disposal. See Response PA 4-1 concerning the Project description and Response PA 7-9 concerning the baseline conditions and approach to environmental impact analysis included in the DSEIR. The Project does not propose an ocean outfall to dispose of RO concentrate, however, does



analyze this as a Project Alternative. See DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative, and Responses PA 4-15, PA 4-33, and PA 4-34 concerning the RO Concentrate Ocean Outfall Disposal Alternative. Additionally, it is noted that the evaporation pond would be decommissioned and repurposed as a raw water storage basin. The raw water storage basin would be seasonally filled during the wet season when there is adequate flow occurring in local creeks. The raw water stored in the basin could be used for fire-fighting helicopters during a wildland fire (also for supply).

- PO 191-8 The commenter implies that DSEIR mitigation measures are only intended for Project modification construction and operation. However, the E-CDP required that various mitigation measures be required as Project conditions of approval; see DSEIR Appendix C. As discussed on DSEIR Page 3-15, to ensure compliance with all E-CDP conditions, the CCSD prepared the Emergency Coastal Development Permit Mitigation Monitoring and Reporting Program (E-CDP MMRP), which involved monitoring and reporting during the Project's construction phase. The E-CDP and CDP MMRP are available for review on the CCSD's website (www.cambriacsd.org/cm/Home.html) and at the CCSD offices located at 1316 Tamson Drive, Suite 201, Cambria, California 93428. Moreover, a MMRP that incorporates all Project mitigation measures is included in FSEIR Section 11.0, Mitigation Monitoring and Reporting Program. The Project MMRP will be adopted in concert with DSEIR certification to provide a clear framework on how the Project's mitigation measures will be implemented, who specifically will be the responsible party to ensure mitigation is implemented, and the specific location and timing of each mitigation measure. CCSD thus affirms that the Project's mitigation measures, including BIO-7 (AMP), are fully enforceable and consistent with CEQA Guidelines §15126.4(a)(2).
- PO 191-9 See Response PO 191-8 concerning the DSEIR Mitigation Measures.
- PO 191-10 The commenter makes a reference to "State Parks biologists' monitoring and citizen reports," which apparently identify significant habitat impacts on San Simeon and Van Gordon Creeks. However, the commenter does not provide documentation for the alleged impacts. These comments do not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 191-11 The commenter does not provide evidence of the alleged impacts. These comments do not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.



- PO 191-12 The commenter claims that the Project has already resulted in significant environmental impacts. See Response PA 4-1 concerning the Project description and PA 7-9 concerning the baseline conditions and approach to DSEIR's environmental impact analysis. The short-term construction-related and long-term operational impacts of the already-constructed SWF was analyzed throughout the DSEIR. As discussed throughout DSEIR Section 5.0, *Environmental Analysis*, the Project would not result in any significant and unavoidable impacts to the environment. CCSD maintains its conclusion that Project implementation would result in less than significant impacts following compliance with DSEIR Mitigation Measures and the established regulatory framework and Project permitting process. See also Responses PO 191-10 and PO 191-11 concerning implementation of mitigation measures.
- PO 191-13 See Responses PO 191-8 through PO 191-12 concerning Project Mitigation Measures. See Response PA 4-1 concerning the Project description and PA 7-9 concerning the baseline conditions and DSEIR's approach to environmental impact analysis.
- PO 191-14 See Response PO 123-1, concerning the Project's name change. See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts.
- PO 191-15 See Response PA 4-1 concerning the Project description and Response PA 7-9 concerning the baseline conditions and DSEIR's approach to environmental impact analysis. See Response PO 123-1 concerning the Project's name change. The SWF environmental impacts are analyzed in DSEIR Sections 5.1 through 5.7. Thus, CCSD affirms that the DSEIR's environmental analysis provides adequate information necessary for making an environmentally informed decision concerning whether or not to proceed with the proposed Project.
- PO 191-16 This comment asks about the cost to operate the system as an emergency water supply. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 191-17 See the following concerning groundwater modeling and potential Project impacts: DSEIR Appendix E1, *Cambria Emergency Water Supply Project San Simeon Creek Basin Groundwater Modeling Report*, (GMR) (CDM Smith, May 2014); DSEIR Appendix E6, *Technical Memorandum – San Simeon Creek Flows*, (TM) (CDM Smith, October 16, 2016); and Responses PA 4-7, PA 4-8, and PA 4-12.
- PO 191-18 As discussed under DSEIR Section 3.5.2.3, *Modified SWF Operations*, it is anticipated that the SWF would run for 24 hours per day seven days per week



(24/7), during the driest time of the year (approximately six months). When the Project operates 24/7 during the driest time of year, the estimated RO concentrate volume would be approximately 57,600 gpd. However, it is unlikely that the Project would require 24/7 operation for extended periods throughout the year. Average operation would likely be 9 hours per day four days per week 12 weeks per year. Under this scenario, the estimated RO concentrate volume would be approximately 21,600 gpd. The DSEIR's analysis of environmental impacts conservatively assumes the SWF would operate 24/7.

- PO 191-19 Impacts to San Simeon Creek and San Simeon Creek Lagoon are analyzed in DSEIR Section 5.3, *Biological Resources*. It is noted, Project operations do not involve the disposal/blending of RO concentrate in San Simeon Creek or San Simeon Creek Lagoon. See DSEIR Section 3.5.2.6, *Offsite RO Concentrate Disposal*, which describes the proposed transport and disposal of RO concentrate at the Kettleman Hills Hazardous Waste Facility. See also Responses PA 4-15 and PO 124-3.
- PO 191-20 As concluded in DSEIR Section 5.3, the 100 gpm MF filtrate product water and specified mitigation measures would be adequate to ensure Project operations result in less than significant impacts to the San Simeon Creek Lagoon. See also Responses PA 3-4, PA 4-7, PA 4-8, PA 4-12, and PA 4-18 concerning the 100 gpm MF filtrate product water flow to San Simeon Creek Lagoon and the Project's AMP.
- PO 191-21 The commenter argues that the evaporation pond system is "an abject (and very expensive) failure" and suggests the CCSD repurpose the evaporation pond as a holding pond for fire-fighting. See Response PO 185-33 concerning repurposing the evaporation pond and fire-fighting. Thus, the evaporation pond would no longer be used to store RO concentrate and the repurposed pond (i.e., the raw water storage basin) would be filled with raw potable water. See also DSEIR Page 5.3-86 and Responses PA 7-3 and PO 194-7.
- PO 191-22 See Response PA 4-1 concerning the Project description and PA 7-9 concerning the baseline conditions and DSEIR's approach to environmental impact analysis. The already-constructed SWF was analyzed throughout the DSEIR. Thus, CCSD affirms that the DSEIR provides sufficient information to evaluate the Project's potential environmental effects and specify mitigation measures, and for the CCSD to make an environmentally informed decision on the Project.
- PO 191-23 See Response PO 123-1 concerning the Project's name change. See Response PA 4-15 and DSEIR Section 3.5.2.6, *Offsite RO Concentrate Disposal*, concerning the routine transport of concentrate from the RO treatment process to a disposal site.



The commenter incorrectly concludes that Project implementation would result in the disposal of “wastewater in the nearshore marine environment via an ocean outfall pipeline.” See Responses PA 7-2, PO 191-12, and PO 191-21 concerning analysis of the Project’s impacts. See also Response PO 191-7.

- PO 191-24 See Response PO 143-1 concerning clarification of lot retirement.
- PO 191-25 See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 191-26 The transfer of development credits does not result in the assumption of greater environmental effects. Site specific considerations of building footprint and future construction are subject to review by SLO County. The Buildout Reduction Committee has been established to review and refresh the structure and implementation of buildout reduction. Although dormant for a period of time, buildout reduction has continued, as lots have continued to be retired over the years.
- PO 191-27 It is assumed this comment is referring to the RO Concentrate Ocean Outfall Disposal Alternative. See DSEIR Section 7.3, “RO Concentrate Ocean Outfall Disposal” Alternative, and Responses PA 4-15, PA 4-33, and PA 4-34 concerning the RO Concentrate Ocean Outfall Disposal Alternative.
- PO 191-28 CEQA Guidelines §15126.6 requires that an environmental document evaluate a “No Project” alternative, identify alternatives that were initially considered, but then eliminated from detailed evaluation, and identify the “environmentally superior alternative.” The DSEIR describes and evaluates a “No Project” Alternative to provide the decision-makers and the public with an assessment of what could reasonably be expected to occur if the proposed Project were not approved and implemented.
- PO 191-29 The commenter suggests preparation of a Watershed Management Plan for all of San Simeon and Van Gordon Creeks. This comment is duly noted. CCSD will consider this information during Project deliberations. The comments do not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 191-30 The commenter suggests CCSD fund a permanent flow and water quality monitoring project. This comment is duly noted. CCSD will consider this information during Project deliberations. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.



- PO 191-31 The commenter suggests CCSD research and develop a brine treatment system using wetlands to clean wastewater from the RO plant. This comment is duly noted. CCSD will consider this information during Project deliberations. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 191-32 The commenter requests CCSD consider retiring one or more of their potable water wells on Santa Rosa Creek. This comment is duly noted. CCSD will consider this information during Project deliberations. These comments do not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 191-33 This comment provides a conclusion to the letter and asserts that based on the preceding comments, the DSEIR fails to comply with CEQA, and suggests that the DSEIR "paves the way for ocean outfall of wastewater from the brackish water desalination system." These comments are so noted. These comments do not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.



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October 25, 2016

From: Jim and Giff Kassebaum

To:

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

My wife and I have owned our lot in Cambria since the 1990s. As you might imagine, the dreams she and I shared 20 years ago of building our retirement home on the wonderful central coast in the town of Cambria have been seriously challenged; but even now, nine years after our retirement, we refuse to let those dreams be crushed. The balance of this letter will undoubtedly read with a familiar ring, for it was drafted by the board representing those of us who earnestly seek to fulfill our hopes of becoming members of the Cambria community.

Mr. Gresens, we submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry

summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the existing and future single family units already approved by the North Coast Area Plan and Cambria's certified Water Master Plan, and the construction will be spread over several years.

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

s/Jim and Giff Kassebaum

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RESPONSE TO COMMENT LETTER NO. PO-192

Jim and Giff Kassebaum

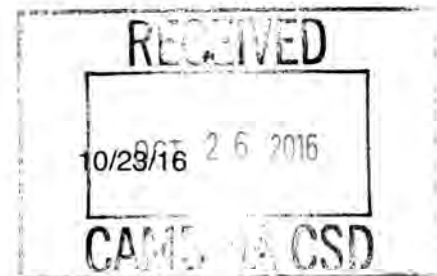
October 26, 2016

PO 192-1 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District Planning Department
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org



Re: Draft SEIR

Dear Mr. Gresens,

Commenting on this project is something many of us have done many times over the years. The Water Master Plan has spawned its first project and continues to shield it from many assessed impacts on the environment. First the WMP noted that it was simply a 'program' not a project, and was therefore immune to project specific critiques. Now a project comes along, already built and asks for comments on anticipated impacts to the community and the environment. However, many issues now appear off the table, having been determined in the WMP to have little impact. Project induced growth, an obvious consideration, was 'mitigated' in the WMP by a Buildout Reduction Program. When the issue is raised again for this SEIR, it has already been addressed, by the prior accepted and certified mitigation in the WMP.

193-1

The focus of these comments is on the 100 GPM "mitigation water" concept: how this was developed and what benefit, if any, it provides. In particular I am looking at the draft memorandum of 10/16/15 entitled Appendix E6 Technical Memorandum – San Simeon Creek Flows. Guiding my inquiry is a set of questions about how this amount of water was chosen and what information indicates it would benefit wildlife in the lagoon at San Simeon Creek. The persistent population of south central California coastal steelhead is an iconic and protected species of concern, their continued survival a test of environmental stewardship

193-2

Some rather weak attempts are made in the SEIR to re-classify San Simeon Creek to a non-perennial creek, a non-Core 1 habitat (South Central California Coastal Steelhead Recovery Plan- 2013 designation) and a general depiction of a seasonal creek that frequently goes dry in the summer. This is of course partially true about this creek and most creeks in SLO county. This does not mean it is less suitable to maintaining a population of steelhead trout. Portions of San Simeon Creek have water in them year round and have existed for generations dating back to several Native American encampments along the creek.

So what is a Core 1 habitat? The SCCCS Recovery Plan prepared by NMFS in 2013 describes it as: The Core 1 populations are populations identified as the highest priority for recovery based on a variety of factors, including:

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- the intrinsic potential of the population in an unimpaired condition;
- the role of the population in meeting the spatial and/or redundancy viability criteria;
- the current condition of the populations;
- the severity of the threats facing the populations;
- the potential ecological or genetic diversity the watershed and population could provide to the species; and,
- the capacity of the watershed and population to respond to the critical recovery actions needed to abate those threats.

At no point is the notion of a 'perennial creek' mentioned, nor a minimum amount of water.

This list categorizes some of our local creeks.

San Carpoforo Creek Core 1	Core 3	San Simeon Creek Core 1
Big Creek Core 3	Salmon Creek Core 3	Santa Rosa Creek Core 1
Limekiln Creek Core 3	Arroyo de la Cruz Core 2	Villa Creek Core 3
Prewitt Creek Core 3	Little Pico Creek Core 2	Cayucos Creek Core 3
Willow Creek	Pico Creek Core 2	

Of interest here is that the Core 1 designation only applies to three local waterways, San Simeon, Santa Rosa and San Carpoforo Creeks. What is critical in these environments, and for this species, is not that water continually run throughout the creek, but that some areas of the creek have water year round. Estuaries can be a vital habitat for young steelhead, without water, they are not.

CDM Smith in the Technical Memorandum argues that "San Simeon Creek should not be designated as steelhead critical habitat, due to predominately dry conditions during the critical summer season" (Pg. 4) This critique is directed towards Stillwater Sciences and their San Luis Obispo County Regional Instream Flow Assessment and does not address the Core 1 criteria outlined by NMFS. But all arguments over how much water is needed to maintain steelhead in the creek are obviated by the visual presence of mature fish in the creek. Likewise, a bone dry creek renders such considerations moot. Mature steelhead are often observed adjacent to the campground at San Simeon Creek.

The Technical Memorandum cites a rather unique approach to figuring out the amount of water needed in the lagoon to maintain life there. A one week monitoring of lagoon levels was conducted, "during a period when a brief runoff event resulted in a rise in water levels in the lagoon of about 0.83 feet ". Further observations gave rise to the following calculations: "Water levels in the lagoon dropped subsequent to this event, allowing an estimate of the seepage rate. The loss rate, lagoon area and the change in head were used to estimate the permeability of the lagoon bed for use in modeling analyses. During the monitoring period, the water level in the lagoon declined by 7.3 inches, indicating a loss rate of 77 gpm." The lagoon area assumption is not provided and is critical to understanding the loss rate calculation. The operating assumption appears to be: replace the water in the lagoon at a rate equal to or greater than the loss rate and the lagoon will be maintained. Obviously the size of the lagoon will effect the amount of water lost. The modeling for the ill-fated "evaporation pond" also showed that environmental conditions (was it sunny and bright or cool and foggy?) effect transpiration rates which compound seepage rates.

The final result, that the lagoon is losing 77 GPM is important to what eventually informs the "mitigation water" calculations. While permeability rates are discussed and thought to decrease in fine sediment lagoon basins, the actual conditions in the lagoon are unknown. A "runoff

193-3

193-4

193-5

193-6

event" (which is assumed to mean rain) can scour out the lagoon area, transporting fine and lighter sediments, while leaving coarser and more permeable deposits. While the report notes that a beach berm was present, one can safely assume that the runoff was contained within the lagoon. While this study was done in April, a month typically having 1.9 inches of rain (Weather DB for San Simeon 2014) it is possible that large mats of algae were either in the lagoon or upstream from it. We have learned from years of using "percolation ponds" nearby that permeability can be variable and adversely effected by the presence of algal filaments.

193-6

It is important to note that the lagoon of San Simeon Creek to the west of Highway 1 is an open expanse of flood plain with no trees and no cover. A good spot for Stickleback but an unlikely spot for steelhead. To the east of the Highway there are deep sections of channel that have held steelhead often through the summer months. As we know that freshwater in the lagoon sits atop fresh or brackish groundwater which that far west, sits atop a wedge of saltwater. It makes one wonder if the "loss rate" would be effected by the relative depth of each layer. This information is not present in the paper.

193-7

What seems to be the burr under Tech Memo's saddle is a recommendation in the aforementioned Stillwater Sciences report that steelhead need a minimum of .5 CFS to survive. This works out to 224.4 GPM. The Tech Memo states "the .5 CFS environmental water demand recommended in the 2014 Stillwater Sciences report is not justified". Recall however, that it is not justified in light of one calculation based on one week and one flow event. While no steelhead were seen during this event, no where is the 77 GPM figure tied to their survival. The memo goes on to state "detailed analysis of required supplemental water to support the lagoon concluded that 100 gpm will improve protection of this area when the project is in operation, compared to a no project scenario." This does not mean more than "something is better than nothing" and does not address the needs of steelhead in the creek. Their habitat is more nuanced and particular than simply the lagoon proper. Cooler, deeper pools, some with bedrock present seem to be perennial homes for these fish.

193-8

It seems to me that an experiment when the lagoon is dry would be more relevant. Let's see what 100 GPM (or 77GPM for that matter) does when dumped on dry sand? I bet it won't be there long enough for a mosquito to live let alone a steelhead. What supports the lagoon is the level of groundwater beneath it. What effects the level of the groundwater is rainfall and extraction. What the SEIR posits is pumping groundwater not far from the lagoon at a rate of over 450 GPM and returning water to the lagoon at 50-100 GPM, as needed. The problem with Stillwater Sciences 250 GPM rate is that you end up using half your machines output just to recharge the lagoon. Add to that the fact that nearly half of the final "product water" will never reach the well fields it is intended to replenish and all production efficiencies are gone.

193-9

If this is a water bank, deposits and withdrawals are out of synch. As the area around well 9P7 is pumped a cone of depression is created. As water is pumped from the Waste Water Treatment Plant, to immediately adjacent settling areas, a water mound is formed. At the Injection well, a water mound is formed; at the well field a cone of depression. Half the water from the injection well flows away from the well field. This is man made hydrology at work. If these assumptions are correct then the 450 GPM water project, losing 225 GPM downgrade and up to 100 GPM to the lagoon, leaving 125 GPM of product water. Of course some percent is lost to the R/O process leaving a little over 100 GPM for Cambria. That is some very expensive water.

193-10

Cambria struggles with a way to dispose of its waste water from the process of treating its non potable water. The idea of dumping municipal wastes into a world class marine environment should be unacceptable to any responsible citizen. If waste water is trucked away it will not pollute our beautiful nearshore waters. While this alternative may not have the smallest carbon footprint, the context makes this a ridiculously small difference. The thousand plus megawatt hours of electrical power consumed in running the R/O process dwarfs the contribution of the tank trucks.

193-11

Some assertions in the SEIR are positively countermanded by recent events. For example, in Section 5.5, Pg. 29, the statement that "currently ...the project site is protected from flooding" is out of step with the flooding that occurred in 2016. The entire well field was under water, from what was described as a floating debris dam. While damage was minimal, it is ludicrous to deny what so many residents witnessed first hand.

193-12

Finally, it is good to have a back up water supply that makes use of some of the waste water our community generates. However, this project mainly uses groundwater with a very small component of waste water. As such, like the well field above it, it further strains the resources of the creek and all that depend upon it. In exceptionally dry conditions, the waste water percentage may climb relative to groundwater. The irony is that what really turns 9P7 into non-drinking water quality will be the wastes we deposit nearby. It would be more efficient to simply treat the effluent from the waste water treatment plant, either there or at San Simeon Creek, and feed the resulting stream to the R/O plant. The technology is identical; why dump the polluted water on the ground, let it percolate and then pump it back out and treat it? The biggest reason, is that the project currently is mainly just pumping groundwater from beneath the creek.

193-13



Jim Webb
1186 Hartford St.
Cambria, CA
93428

**RESPONSE TO COMMENT LETTER NO. PO-193**

Jim Webb

October 26, 2016

- PO 193-1 This comment provides general introductory comments, as well as comments on the WMP PIER. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*. See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts.
- PO 193-2 See Responses PA 4-12 and PA 4-18 concerning groundwater modeling, the 100 gpm MF filtrate water flow to San Simeon Creek Lagoon, and the Project's AMP.
- PO 193-3 See Responses PA 4-12 and PA 4-22 concerning San Simeon Creek's classification as a non-perennial creek and non-Core 1 habitat.
- PO 193-4 See Response PA 4-23 concerning steelhead Critical Habitat and Core 1 criteria.
- PO 193-5 The commenter requests an explanation of the assumptions used in DSEIR Appendix E6, *Technical Memorandum – San Simeon Creek Flows*, to calculate lagoon area in order to better understand the report's loss rate calculation. The lagoon area used in calculations was approximately 4.0 acres (i.e., 3.915 acres). DSEIR Exhibit 3-5, *SWF Project Facilities*, illustrates the lagoon.
- PO 193-6 The commenter notes that the lagoon's sediment composition would affect its permeability rates, which were used to inform the DSEIR's MF filtrate product water calculations. The commenter also notes that permeability is variable and claims that modeling could have been compromised due to the presence of large mats of algae in the lagoon or upstream from it. San Simeon Creek Lagoon sediment composition. The study was based on natural conditions occurring within the lagoon, including the presence of deposits along the lagoon invert. The comment mentions the CCSD's nearby effluent percolation ponds. Such a comparison would be slanted towards higher rates of percolation due to the wastewater effluent ponds being designed to encourage percolation while also being periodically dried, disked, and mowed to similarly encourage more rapid percolations rates.
- PO 193-7 The commenter notes that DSEIR Appendix E6 does not explain that "freshwater in the lagoon sits atop fresh or brackish groundwater to which that far west, sits atop a wedge of saltwater," and infers that the relative depth of each layer would affect the Lagoon's loss rate. As discussed in Response PA 3-4, the DSEIR



proposes Mitigation Measure BIO-7 (Adaptive Management Plan), which requires that the CCSD implement an AMP entailing long-term monitoring. The AMP requires monitoring of groundwater levels, surface water levels/flows, in-stream and riparian habitat, among others. See also Responses PA 3-4 and PA 4-12 concerning the 100 gpm MF filtrate water flow and Mitigation Measure BIO-7.

- PO 193-8 See Responses PA 3-4 and PA 4-12 concerning the 100 gpm MF filtrate water flows and Mitigation Measure BIO-7 (Adaptive Management Plan).
- PO 193-9 The commenter claims that “an experiment when the lagoon is dry would be more relevant.” However, such an experiment would likely bias the lagoon water flow rate higher. Further, based on the GMR’s and TM’s findings, the 100 gpm MF filtrate water flow to San Simeon Creek Lagoon would maintain water levels in the lagoon. See Responses PO 196-6, PA 3-4, and PA 4-12 concerning the 100 gpm MF filtrate water flow and Mitigation Measure BIO-7 (AMP).
- PO 193-10 See Responses PO 196-6, PA 3-4, PA 4-12, and PA 7-6.
- PO 193-11 The commenter incorrectly infers that the Project would involve “dumping municipal waste into a world class marine environment.” Offsite disposal of RO concentrate is addressed in DSEIR Section 3.5.2.6, Offsite RO Concentrate Disposal. See also Responses PA 4-15 and PA 4-35 concerning the Project’s offsite RO concentrate disposal. See DSEIR Section 7.3, “RO Concentrate Ocean Outfall Disposal” Alternative, and Responses PA 4-15, PA 4-33, and PA 4-34 concerning the RO Concentrate Ocean Outfall Disposal Alternative.
- PO 193-12 The quote from the commenter was taken out of context. DSEIR Page 5.5-29 states that “Currently, all stormwater is directed away from the treatment facility. Stormwater that comes into contact with the treatment process is collected and treated. As stated on DSEIR Page 5.5-42, “the Project site is protected from flooding or washout from a 100-year flood event” and “These facilities, as well as the SWF, were specifically designed to be protected from flooding or washout from a 100-year event.” Additionally, the DSEIR does not claim that the Project is protected from all floods, but is protected from flooding or washout from the 100-year (or 1 percent) flood event. See Response PA 4-30 concerning the 500-year flood event.
- PO 193-13 See Responses PA 3-4, PA 4-12, and PA 4-18 concerning the 100 gpm MF filtrate water flow to San Simeon Creek Lagoon and the Project’s AMP.

From: Mary Webb <webb.mary599@gmail.com>
Sent: Tuesday, October 25, 2016 2:10 PM
To: Bob Gresens
Subject: SCH 2014061073 DSEIR comments



Hi Bob, please respond so that I know you received as I'm traveling.
Thank you.

October 2016

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

Cambria Community Services District

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bgresens@cambriacsd.org

RE: SCH 2014061073 SUBSEQUENT TO CAMBRIA WATER MASTER PLAN PROGRAM
EIR (SCH No. 2004071009, Certified August 21, 2008) *

Under the cover of an emergency water shortage declared by Governor Jerry Brown in January 2014 and knowing, from 20 years of trying, that a seawater desalination facility was going to be extremely difficult to permit, CSD Directors sought to obtain a fast-tracked SLO County emergency permit to construct a water reclamation facility without compliance with the proper environment safeguards, such as CEQA and an EIR and circumvented the most critical agencies that regulate the environment, including CA and US Fish and Wildlife and the CA Coastal Commission. The "emergency" project which has morphed into a "sustainable water supply for growth" should have been made to comply with CEQA prior to construction, as agencies and residents warned back in 2014. Cambria never ran out of water, due to typical, seasonable rainfall and heroic conservation measures shouldered by residents.

194-1

The Cambria Community Services District (CCSD) has initiated, then abandoned numerous environmental processes on an "Emergency Water Supply Project" which was expected to deliver water during the 2014 dry season, be used only during a Stage 3 water shortage emergency condition, and to provide water for existing Cambria residents only.

Buried within those aborted 2014-2015 environmental review processes are pages of critical agency and citizen comments that have never been answered on the 'emergency water supply'

194-2

project which was a project that did not assume growth and was supposed to provide near-immediate relief during the water shortage condition in the summer of 2014. Since that time, no new water has been delivered to existing Cambria ratepayers. None of the original “emergency” project goals have been met. However, those 2014-2015 agency comments should be brought forward into this process so that they can be fully addressed.

194-2

One of the conditions of the Emergency permit was that CCSD apply for a regular coastal development permit (CDP) for the emergency project. A regular coastal development permit application has never been deemed completed for processing, therefore over 900 days has passed on a permit that should have expired within 30 days of issuance.

194-3

CDM Smith’s custom designed project, which the CCSD proudly calls ‘operational’, has failed to provide potable drinking water to ratepayers. It has been unable to pass a 60 day tracer test which is being repeated today at ratepayer expense rather than being charged against CDM Smith for their hydrogeological modeling mistakes. It will not provide the water needed to serve existing residents and the environment as promised because the injection/extraction/mitigation numbers do not add up to an overall benefit for people or wildlife.

194-4

What is certain is that the project itself has caused damages to the environment. Over 13 notices of violation were issued by the Regional Quality Control Board in February of 2015. Changes in creek mitigation flow and project design resulted in a chlorine spill into Van Gordon Creek/San Simeon Creek which is rated as a CORE 1 Steelhead habitat recovery site. Unpermitted discharges from the waste pond were poured into Van Gordon Creek. These events were reported by concerned citizens, diligent State Parks employees and others rather than CSD or CDM Smith operators. Neighbors photographed chlorine delivery trucks, while making chlorine deliveries in the dark of night, stuck and tilting in the flooded and muddy debris field in January of 2016. Attempts were made to discredit citizens for reporting that hazardous and flammable materials and chemicals were stored on site with no warning labels, with no water tank for fire fighting, and without proper containment in 2014. Expenses for these items showed up ‘after the fact’ in 2015. Chemical warning labels were only recently installed on the San Simeon well houses this year following the January flood event. Those labels would not exist today if not for citizen oversight.

194-5

The brine waste pit itself required an unexpected added expense of closure and corrective action bonds premiums of \$70,000 annually. Operators were warned against discharging brine waste by hosing it into nearby Van Gordon Creek, which was photographed by a bystander. Changes requiring the installation of mechanical blowers to evaporate waste from the undersized brine waste pit caused noise levels so high on San Simeon Creek Road that CA State Parks, campers, and local ranchers complained. An adjacent ranch owner described it as “the sound of a multi engine turbo prop at the end of the runway revving for take off”. Within days of the start up of the mechanical blowers, a horse on San Simeon Creek Road was startled, bolted and injured itself resulting in it having to be euthanized.

194-6

Attempts by CDM Smith and the CSD to prevent migratory birds from landing in the waste pit failed. Dead and dying migratory birds were dragged out of the brine waste ponds and intakes after wildlife agencies were notified by residents. Deer fencing, gopher barriers, and red legged frog fences were constructed and expensed at the last minute as CA Fish and Wildlife was alerted to the projects hasty construction without CEQA oversight. Those measures also failed as CSD recently reported deer inside the enclosures and a gopher gassing program was instituted. The fact this entire area is documented as Western Pond Turtle habitat has, most likely, not entered into the minds of those gassing the gophers.

194-7

Public health and safety concerns, expressed by a neighboring rancher, have never been fully analyzed “Of greater concern to me is wind drift carrying the mist created by the blowers. We grow vegetable crops for human consumption bordering, and immediately east of CCSD property. Our nearest crop land is less than a mile from the blowers. It is currently planted to sugar snaps. With the blowers pointed in our direction, and the prevailing wind blowing from west to east up the valley, I feel that it is inevitable that brine pond residue will begin to appear on our field crops.” Of greater concern to me, was allowing this chemical brine waste to drift for months onto the workers, the neighbors and unsuspecting campers in flimsy tents vacationing with their kids.

194-8

All warnings by agencies and citizens were ignored and the District plowed forward. The District now admits the failed evaporation waste pond and mechanical evaporators will have to be removed, but ratepayers will shoulder this expense instead of CDM Smith being charged for this costly failure in design.

194-9

Project cost overruns and design changes continue to rise and total more than \$4 million. Total cost of operation per year remains unknown. Cost per acre foot has not been revealed. Key level employees and operators have left the district with the resulting costs of retraining and replacement with high level operators and temporary contractors.

194-10

In March of 2016, the Cambria CSD admitted it rushed to build a long term public works project to open the 16 year building moratorium in Cambria, rather than a project that should have provided immediate relief for existing customers. The District changed the name and purpose of the “Emergency Water Supply” project to a “Sustainable Water Supply” project. Since that time the District has retroactively inserted the new name, “Sustainable Water Supply”, a project for growth, in place of the original name “Emergency Water Supply” by rewriting documents. The district is obviously now back to its seawater desalination design by claiming an ocean outfall is the “environmentally superior alternative” to the failed brine waste pit. Ocean Intakes will most likely show up in the next CSD water project document.

194-11

The fact this project received a Prop. 84 IRWM grant in excess of \$4 million for an emergency project should cause the granting agencies to call that grant into question. This cynical ‘bait and switch’ maneuver should not be allowed. A Notice of Preparation has never been issued for a “Sustainable Water Supply” project that will cause significant environmental harms and growth without ratepayer notice or approval; with no analysis of alternatives.

194-12

*In August of 2016, Cambria ratepayers received notice to comment on various unauthorized water supply project scenarios contained in a “Draft EIR SUBSEQUENT TO CAMBRIA WATER MASTER PLAN PROGRAM EIR” which ‘tiers off the 2008 Water Master Plan.” This highly controversial 2008 Water plan called for 602 Acre Feet of water ‘in the dry season’ which eliminated virtually all alternatives to supply water to the 6000 person town of Cambria other than a Seawater Desalination Project requiring ocean intakes and outfalls into the highly protected Monterey Bay National Marine Sanctuary and the Cambria State Marine Park which is also a Marine Protected Area. Cambria ratepayers never voted to approve Seawater Desalination, and the local outrage to the 2008 Water Master Plan resulted in hundreds of pages of agency comments with concerns, and citizen comments opposing it. Subsequent Seawater Desalination project proposals were denied by the CA Coastal Commission on both San Simeon and Santa Rosa Creeks over the past 16 years. Seawater Desalination should always be the last resort, and it is not necessary even at full build out.

194-13

An independent and peer reviewed cost benefit and environmental analysis of small water projects and policies that provide 250 Acre Feet in the Dry season, rather than 602 Acre Feet in the dry season, as proposed in the 2008 Water Master Plan, should be mandated prior to deciding on a water project for growth in Cambria.

194-14

Alternatives

A serious analysis of affordable alternatives that do not produce brine waste, do not increase GHG emissions, and that respects environmental laws must be considered. WE should install off stream storage; tank farms or bladder farms; accept rancher offers to provide water during shortages; incentivize low water crop in ag areas; place limits on commercial water use including policies that prohibit beer brewing or other intensive water uses; encourage event and tourism management and mitigation; replace lawns with low water landscapes; fund strict enforcement of CSD and County ordinances, penalties and surcharges on water overuse; limit guest house construction, vacation and air BnB rentals; promote Stormwater retention and wetland restoration projects; and conservation. (Not in priority order)

194-15

It is only with serious and imaginative consideration of multiple small water projects in concert with continued conservation measures and businesses working with environmental groups that Cambria will ever solve this problem. Let's get started.

194-16

Mary Webb

1186 Hartford

Cambria CA 93428

Sent from my iPad

**RESPONSE TO COMMENT LETTER NO. PO-194**

Mary Webb

October 26, 2016

- PO 194-1 See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. See Response PA 4-1 concerning the Project description and PA 7-9 concerning the baseline conditions and DSEIR's approach to environmental impact analysis. The already-constructed SWF was analyzed throughout the DSEIR. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7.
- PO 194-2 See Response PO 140-1 concerning the public review and comment period, which is for the Project evaluated in the DSEIR, and not the IS/MND; see also Response PA 7-4 concerning the IS/MND. In compliance with CEQA requirements, this FSEIR considers comments received on the DSEIR and not the IS/MND.
- PO 194-3 This comment makes reference to the requirement that the CCSD apply for a regular Coastal Development Permit, that the application has not been deemed complete and the time that has passed. See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE.
- PO 194-4 See Responses PA 4-10 and PA 4-26 concerning the tracer test. See Response PO 89-3 concerning increased water rates and construction/operational costs. See Responses PA 4-32 and PA 6-7 concerning the Project's water output and potential growth-inducing impacts.
- PO 194-5 This comment makes reference to notices of violation from the RWQCB, citizen reports of the violations, and related matters. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 194-6 See Response PO 89-3 concerning increased water rates and construction/operational costs. It is noted, Project operations do not involve the disposal/blending of RO concentrate in San Simeon Creek or San Simeon Creek Lagoon. See DSEIR Section 3.5.2.6, *Offsite RO Concentrate Disposal*, which describes the proposed transport and disposal of RO concentrate at the Kettleman Hills Hazardous Waste Facility. See also Responses PA 4-15 and PO 124-3.
- PO 194-7 See Response PA 7-12 concerning potential impacts to avian species, including migratory birds. See Response PO 89-3 concerning increased water rates and



construction/operational costs. Concerning failure of deer exclusionary fencing and gophers. See Response PA 7-3 concerning potential impacts to western pond turtle (and other listed species).

- PO 194-8 See DSEIR Page 3-45 concerning RO concentrate drift, evaporator noise, and adjustments to evaporator operations. As shown in [Table 5.7-12](#), the CZLUO's acceptable daytime exterior noise standard of 50 dBA is exceeded at noise measurement locations 1, 2, and 5 (52.2, 51.1, and 53.1 dBA L_{eq} , respectively) with all five spray evaporators running simultaneously. In addition, nighttime noise levels exceeded the CZLUO's acceptable nighttime exterior noise standard of 45 dBA at noise measurement locations 1 and 5 (50.6 and 50.3 dBA L_{eq} , respectively) with all five spray evaporators running simultaneously resulting in a potentially significant impact. Mitigation Measure AES-2 requires removal of evaporators. Therefore, with mitigation, the potential for RO concentrate drift and spray evaporator noise would not occur and no impact would occur in this regard.
- PO 194-9 This comment asserts that "warnings by agencies and citizens" have been ignored, notes that the evaporation pond and evaporators have to be removed, and makes reference to the expenses being incurred. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- The SWF has operated intermittently, since January 2015. Through the environmental analysis contained in this DSEIR, and as a result of further input from regulatory agencies and the local community, various operational mitigation measures (Mitigation Measures AES-2 and BIO-3) were identified to avoid/reduce environmental impacts resulting from SWF operations; see DSEIR [Section 3.5.2, *Project Characteristics – Mitigation Measures and Project Modifications*](#). Compliance with these operational mitigation measures would necessitate modifications to the SWF, including evaporation pond decommissioning, mechanical spray evaporator removal, and surface discharge to San Simeon Creek extension.
- PO 194-10 See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 194-11 This comment primarily focuses on the change of the name from EWS to SWF. It makes reference to the CCSD asserted seeking to "open the 16 year building moratorium", and is going back to a "seawater desalination design", speculating that "Ocean intakes will most likely show up next..." See Responses PA 4-32 and PA 6-7 concerning the Project's water output and potential growth-inducing impacts. See Response PO 123-1, concerning the Project's name change. Concerning the commenter's claim that the CCSD is "back to its seawater



desalination design by claiming an ocean outfall is the ‘environmentally superior alternative.’” See Responses PA 4-33, PA 4-34, and PA 5-3.

PO 194-12 A NOP for the CCSD’s Emergency Water Supply Project was released in March 6, 2015 for a 30-day public review period that concluded on April 6, 2015; see DSEIR Section 2.3, Notice of Preparation/Early Consultation (Scoping). The NOP was filed with the Office of Planning and Research, posted on the CCSD website, and sent to responsible and trustee agencies and all interested parties requesting notice.

See DSEIR Section 2.2, CEQA Document Tiering and Water Master Plan, and Responses PA 4-32 and PO 186-1 concerning tiering. The WMP PEIR, off of which the DSEIR was tiered, included a comprehensive assessment of long-term water supply alternatives. The DSEIR includes an alternatives analysis at DSEIR Section 7.0. The Emergency Water Supply Project was provided with an emergency exemption from CEQA by Governor Brown in 2014 as a result of the extreme drought conditions threatening the community’s water supply. The emergency water supply project was constructed under an E-CDP issued by SLO County. The DSEIR uses the term sustainable water facility to better describe the expanded use of the existing facility, with proposed Project environmental enhancement modifications, for which the subject R-CDP is being sought. Also see Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. The Project’s potential growth inducing impacts are addressed in DSEIR Section 6.3, Growth Inducing Impacts; see also Responses PA 4-32 and PA 6-7.

The DSEIR includes an alternatives analysis; see DSEIR Section 7.0.

PO 194-13 This comment is asterisked, and appears to relate to the caption of the comment letter/email. It states that the August 2016 notice to comment was on “various unauthorized water supply project scenarios” in the DSEIR, that the 2008 Water Master Plan was “highly controversial,” and that desalination project proposals on the San Simeon and Santa Rosa Creeks have been denied by the CCC “over the last 16 years.” This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.

See DSEIR Section 3.0, Project Description, for a description regarding each Project component. An ocean intake or outfall is not proposed as part of the Project. The Alternative of using an ocean outfall for RO concentrate disposal was analyzed as a Project Alternative (see DSEIR Section 7.0), but was rejected.

PO 194-14 This comment suggests that an “independent and peer reviewed cost benefit and environmental analysis” of projects that provide 250 acre feet of water, before



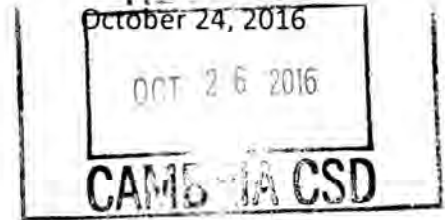
“deciding on a water project for growth”, should be mandated. The DSEIR includes an alternatives analysis; see DSEIR Section 7.0. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.

PO 194-15 In compliance with CEQA requirements, the DSEIR includes an alternatives analysis; see DSEIR Section 7.0. This comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary.

PO 194-16 See Response PO 194-15.

COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428
bgresens@cambriacsd.org



Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

195-1

This urgent request is made for the following reason.

On October 22, 2014 I was doing my own research on evaporation systems after I attended the North Coast Advisory Council Land Use Committee's CCSD site visit to the future home of the emergency water project with Bob Gresens. Being a California girl, I was curious about these "snow blowers" proposed by CDM Smith to aerate the toxic brackish water from the proposed desal plant. I happened upon a conversation with Nic Horgan, the SMI Evaporation Systems sales representative and the man who sold our CSD the five blowers and weather system. If you look at their website, nowhere in their vast amount of project photographs do they show evaporators in environmentally sensitive habitat (ESHA). Nor do they show evaporation systems adjacent to two creeks with endangered species and a state park. When I asked about this, Nic told me it was not the proper method of installation. SMI suggested some type of three-sided enclosure to help deflect the spray. When I asked why they sold the evaporators to our water district, Nic stated, "My boss told me to make the sale". He tried to allay my fears regarding our sensitive habitat and human well being by explaining their weather system that would be calibrated to turn off when the wind shifts toward the state park. These safeguards, I was told, will reduce the toxic drift but not eliminate the problem.

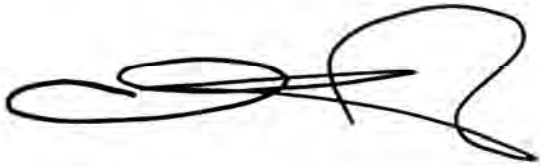
195-2

Almost all evaporator systems are installed in the middle of very large ponds/lakes in vast open space. This allows the spray and drift to remain in the pond/lake. The Cambria evaporation is unique. When I asked Bob Gresens, at the 2014 site visit why the CSD didn't just install a larger reservoir or more ponds, he told the committee it would be too expensive. If an EIR would have been conducted *before* the blowers were purchased, the resulting Life Cycle Assessment (LCA) would have proved the preferred economical solution. The CSD's own EIR determined that the evaporators must be removed along with the enclosures and their five dedicated weather machines. How much this will cost our community is yet to be determined. I asked Amanda Rice what the CSD is considering and she told the attendees at a public forum meeting

195-3

on September 29th that she had not read the draft EIR and the CSD has not discussed the financial solution to this very expensive mistake.

Thank you,

A handwritten signature in black ink, appearing to read 'Claudia Harmon Worthen', with a stylized, looping flourish at the end.

Claudia Harmon Worthen
LEED AP ID+C, CAPS, CID #6727
Member of the NCAC Land Use Committee
30 year Cambria resident
416 Dorset Street
Cambria, CA 93428
805. 927.1934

**RESPONSE TO COMMENT LETTER NO. PO-195**

Claudia Harmon Worthen

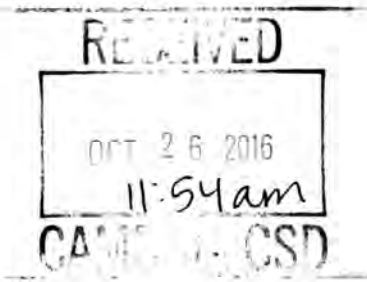
October 26, 2016

- PO 195-1 The commenter requests that the DSEIR be withdrawn and that CCSD instead file a completed Application for the EWSP, as soon as possible so that affected agencies can review and analyze the existing Water Supply Project. See DSEIR Section 3.2.1, *Project History*, for a detailed explanation on the Project's history. See also Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. See Response PA 4-1 concerning the Project description and PA 7-9 concerning the baseline conditions and DSEIR's approach to environmental impact analysis. As explained on DSEIR Page 3-16, the CCSD filed a NOE for the Cambria Emergency Water Supply Project on September 9, 2014. The NOE included reference to Public Resources Code, § 21080, Subdivision (b)(4); California Code of Regulations, Title 14, § 15269, Subdivisions (b) and (c), and § 15301, which exempt from CEQA certain actions necessary to prevent or mitigate an emergency. Due to the drought emergency in Cambria, the State of California Office of Planning and Research issued its concurrence that the Project could move forward, and the SWF was completed consistent with the Governor's Executive Orders. Thus, the CEQA requirements have been fulfilled for the Cambria Emergency Water Supply Project, and there is no need to withdraw this current DSEIR.
- PO 195-2 DSEIR Mitigation Measure AES-2 requires removal of the mechanical spray evaporators and their enclosures. Refer also to Response PA 7-9 concerning the NOP and existing baseline conditions/environmental setting.
- PO 195-3 The commenter indicates concern regarding the costs of implementing DSEIR Mitigation Measure AES-2, which requires removal of the mechanical spray evaporators and related infrastructure. See Response PO 89-3 concerning increased water rates and construction/operational costs.



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**Brownstein Hyatt
Farber Schreck**



October 26, 2016

Jena R. Shoaf
Associate
805.882.1427 tel
805.965.4333 fax
jshoaf@bhfs.com

VIA FEDERAL EXPRESS AND ELECTRONIC MAIL (BGRESENS@CAMBRIACSD.ORG)

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District Planning Department
1316 Tamson Street, Suite 201
Cambria, CA 93428

RE: Comments on Draft Environmental Impact Report for the Cambria Sustainable Water Facility Project

Dear Mr. Gresens:

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 from his property.

This letter responds to the Draft Environmental Impact Report ("DEIR") for the Cambria Sustainable Water Facility Project ("Project"). State law requires the Cambria Community Services District ("CCSD") to consider all information submitted by any person during the Environmental Impact Report ("EIR") process, including comments on the DEIR. (Pub. Res. Code § 21082.1; 14 Cal. Code Regs. § 15084(c).)

We have reviewed the DEIR and believe that there are deficiencies in the CCSD's analysis of significant environmental impacts and mitigation measures. In order to be sufficient, the Final Environmental Impact Report ("FEIR") must identify and describe the project's significant environmental effects, including direct, indirect, and long-term effects. (Pub. Res. Code § 21100(b)(1); 14 Cal. Code Regs § 15126.2(a).) Further, the FEIR's findings regarding significant impacts must be supported by substantial evidence (Pub. Res. Code § 21080; 14 Cal. Code Regs. § 15091(b).) We request that the FEIR address the comments and incorporate the recommended analysis and mitigation measures provided in this letter.

Hydrology and Water Quality

The Notice of Preparation ("NOP") prepared for this Project recognized that the Project may significantly impact the area's hydrology and water quality by substantially depleting 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." Although the DEIR states that the Project would increase pumping from the CCSD's Well 9P7—and acknowledges that there are multiple private wells located nearby—it fails to analyze, or even address, the effect of the Project on these users' groundwater supply. The DEIR's conclusions regarding the impacts of increased pumping, therefore, are not supported by substantial evidence.

As recognized by the CCSD, Warren has a right to receive water from Well 9P2, located in close proximity to Well 9P7, pursuant to a settlement agreement signed with the CCSD on November 6, 2006 ("2006

196-1

196-2

196-3

1020 State Street
Santa Barbara, CA 93101-2711
main 805.963.7000

Settlement Agreement"). The 2006 Settlement Agreement also ensures that the water pumped from Well 9P2 meet certain water quality standards. Aggressive pumping of the Well 9P7, as contemplated by the Project, may materially interfere with Warren's permitted right to capture and divert water pursuant to both his State Water Resources Control Board permit and the 2006 Settlement Agreement. Although the CCSD notified Warren that they would be conducting a draw down test to determine whether the CCSD's pumping would have any impact on Warren's Well 9P2, Warren was never advised of the results and the results are not set forth in the DEIR. Because these results have not been made public, it is also unclear how they may affect the DEIR's impacts analysis and cumulative impacts analysis on hydrology and water quality. We therefore strongly advise the CCSD to conduct and publish the results of a draw down test and comprehensively analyze and mitigate this issue in the FEIR in order to avoid legal challenges to both the adequacy of the CEQA document and our client's legitimate common law, statutory and contractual water rights.

196-3

Aesthetics

We disagree with the DEIR's finding that the Project will have a less than significant impact on (1) the area's scenic vistas, and (2) creation of a new source of glare. Prior to construction of the 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. (See DEIR, p. 5.1-1.) Construction of the 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 request that the FEIR analyze the Project's impacts to local residents on the surrounding viewshed and scenic vistas.

196-4

The Project will also impact views in the area by creating a significant amount of new glare. The DEIR describes glare as "the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials." (DEIR, p. 5.1-8.) As can be seen in the photos included in DEIR Exhibit 5.1-1, the Project reservoir is lined with a reflective black material that reflects sunlight and creates glare. This glare impacts both recreational users and local residences who invested in the area for its scenic and natural views.

196-5

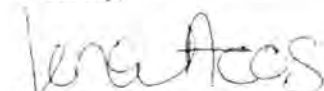
By failing to recognize the glare being created by the Project, the DEIR also fails to propose any mitigation measures. Our client, as well as other local landowners and residents, have recommended cost-effective landscaping—such as screening the facilities with Leyland Cypress trees or similar vegetation—in order to mitigate this significant impact. We request that this impact to our client—as well as potential mitigation measures such as additional landscaping—be fully analyzed in the FEIR.

196-6

Thank you for considering the above comments for inclusion in the FEIR. Additionally, please add us to the distribution list for the FEIR and all notices associated with the Project.

196-7

Sincerely,



Jena S. Acos

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**RESPONSE TO COMMENT LETTER NO. PO-196**

Jena S. Acos
Brownstein Hyatt Farber Schreck
October 26, 2016

- PO 196-1 This comment serves as the introduction to the comment letter, providing basic information about the commenter and the proposed Project. Responses to specific comments are provided below. No further response is warranted.
- PO 196-2 The commentator notes that the Project's NOP identified hydrology and water quality in the summary of probable environmental effects. Environmental analysis related to hydrology and water quality can be found in DSEIR [Section 5.3, *Biological Resources*](#), and DSEIR [Section 5.5, *Hydrology and Water Quality*](#). The commentator then quotes a portion of Initial Study Section IX.b, and indicates they believe the issue was not adequately studied. Environmental analysis regarding Project impacts on groundwater levels and existing nearby wells can be found at DSEIR Page 5.5-2. Also see Response PA 4-6.
- PO 196-3 See Response PO 196-2. The commentator states that the Project contemplates aggressive pumping of Well 9P7. Well 9P7 will only be pumped when the Project is operating. On average, Project operations will be limited to 9 hours per day, 4 days per week, and 12 weeks per year. The CCSD stands by the commitments set forth in the 2006 the Settlement Agreement and will continue to provide riparian water to the Warren property.
- PO 196-4 The commenter disagrees with the DSEIR's conclusion that Project implementation would result in less than significant impacts on scenic vistas and would not result in significant light and glare impacts, claiming that construction has "significantly changed the quality of the surrounding area and has created an industrial eyesore." The DSEIR proposes several mitigation measures intended to reduce the Project's impacts to the area's scenic vistas; see DSEIR [Impact 5.1-3, *Scenic Vistas/Corridors*](#). DSEIR Mitigation Measure AES-2 requires evaporation pond decommissioning and evaporator/enclosure removal. DSEIR Mitigation Measure AES-3 requires that the AWTP be color-treated such that it blends in with the surrounding landscape. DSEIR Mitigation Measure AES-4 requires that all areas where native vegetation was removed and where water facilities were not located, be re-vegetated with indigenous plants. With implementation of DSEIR Mitigation Measures AES-2 through AES-4, as well as compliance with relevant LCP Policies and CZLUO, CCSD affirms that the proposed Project modifications would not have a substantial adverse effect on this scenic vista and a less than significant impact would occur in this regard.



- PO 196-5 See DSEIR Impact 5.1-5, *Light and Glare*. DSEIR Mitigation Measure AES-2 requires the removal of the evaporators and enclosures, thus any potential daytime glare associated with this feature would be avoided. The glare associated with the proposed raw water storage basin would be similar to surrounding agricultural uses in the area, which also use ponds and daytime irrigation. As the visual character would be similar to other uses in the area, CCSD affirms that impacts would be less than significant.
- PO 196-6 The commenter incorrectly claims that the DSEIR fails to propose any mitigation measures to reduce the Project's impacts related to light and glare. With implementation of Mitigation Measures AES-2 through AES-4, as well as compliance with CZLUO §§ 23.04.190 (Fencing and Screening) and 23.04.320 (Outdoor Lights), CCSD affirms that the proposed Project modifications would not have a substantial adverse light and glare affect and a less than significant impact would occur in this regard.
- PO 196-7 This comment serves as the conclusion to the comment letter. No further response is necessary.

RUDDEROW

L A W G R O U P

October 25, 2016

Sent via email to: bgresens@cambriacsd.org & first class mail

Mr. Robert C. Gresens, P.E. District Engineer
Cambria Community Services District Planning Department
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Dear Mr. Gresens:

I represent Joyce G. Alexander, Mike and Karen Windeler, and Jeffrey and Eddna Schneider, who own an undeveloped, but buildable lot in the County. They do not have a wait list position and are concerned about the impact of the Cambria Community Services District ("District") Water Master Plan (WMP) and Sustainable Water Facility Project (Project) on their and similarly situated property owners seeking the right to obtain water and/or sewer service in order to develop their property. We are requesting that the SEIR address several questions/issues related to that concern. In addition, we join in the questions raised by other property owners, including Michael R. Erickson.

197-1

District code Section 8.04.070 prevents CCSD from taking in or accepting applications to join the waiting lists for water and sewer service. District Code Section 8.04.050 prevents non-wait list holders from obtaining water and sewer services, including active connections.

Question 1 - Does District Code Section 8.04.050 provide the authority to refuse to provide application forms for water and sewer service to non-wait list holders?

197-2

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LAW GROUP

District Code Section 4.04.020 reads, in relevant, part: "Any person desiring water service from the district shall make application to the district on a water service application form provided by the district." As it relates to sewer service, District Code Section 5.04.520 reads, in relevant part: "Any person legally entitled to apply for and receive a permit shall make such application on forms provided by the district for that purpose."

197-2

Question 2 - Pursuant to District Code Section 4.04.020, are non-wait list holders eligible to obtain an application for water service?

- a. If they are eligible to obtain an application for water service, what do they need to do to obtain a water service application from the CCSD?

197-3

Question 3 – Pursuant to District Code Section 5.04.520, are non-wait list holders eligible to apply for and receive a sewer connection permit?

- a. If they are eligible or entitled to apply for and receive a sewer connection permit, what do they need to do to obtain a sewer service application form the CCSD?

197-4

One of my clients (Mrs. Joyce Alexander) recently requested water and sewer applications for a new construction project from the District Manager. By way of reply, CCSD Counsel stated: "the application forms you are requesting are currently unavailable." (See attachments 1 & 2)

Question 4 – Does the CCSD have application forms for water and sewer service for new construction projects?

- a. If it does, why were the requested applications not provided?
- b. If it does not, why are applications not available for services CCSD was created to provide?

197-5

Question 5 – Is it accurate to conclude that District Counsel's reply means non-wait list holders are not eligible to obtain water and sewer service applications?

197-6

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Question 6 – Is there any significant environmental impact that was linked to the decision to limit the project in a way that will preclude providing water and sewer service to my client and similarly situated property owners?

197-7

Question 7 – What are the environmental impacts of potentially leaving thousands of privately owned lots permanently undevelopable and what plan is in place to mitigate such impacts. In particular, such property owners are unlikely to maintain or improve such properties in a manner that will protect against physical harms such as the trash being left on the properties, including trash that may have toxic or environmentally harmful substances, flooding, run-off of water to neighboring properties and into the water system, the overgrowth of weeds and related fire risks, and all other harm that can arise from coastal properties, which predictably will not be maintained.

197-8

We look forward to the District addressing these issues.

Sincerely,



Mark D. Alpert, Esq.

MDA/lr
Enclosures

Cc: Joyce Alexander
Mike and Karen Windeler
Jeffrey and Eddna Schneider

18500 Von Karman Avenue • Suite 300
Irvine, California 92612

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LAW GROUP

October 26, 2016



Sent via email to: bgresens@cambridiasd.org & first class mail

Mr. Robert C. Gresens, P.E. District Engineer
Cambria Community Services District Planning Department
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Dear Mr. Gresens:

Following up on my letter of yesterday, which I have attached. I am writing to clarify that we also represent Bruce and Terri DePaola and may well represent additional property owners in the near future.

Thank you for the consideration of our comments/questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark D. Alpert".

Mark D. Alpert, Esq.

MDA/lr
Enclosures

Cc: Bruce and Terri DePaola

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Irvine, California 92612

(949) 271-3225 • www.rudderowlaw.com

197-9

**RESPONSE TO COMMENT LETTER NO. PO-197**

Mark D. Alpert
Rudderow Law Group
October 26, 2016

- PO 197-1 This comment provides general introductory and background information. Responses to specific comments are provided below; no further response is necessary.
- PO 197-2 See Response PO 118-1.
- PO 197-3 See Response PO 197-2. The comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 197-4 See Response PO 197-2. The comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 197-5 See Response PO 197-2. The comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 197-6 See Response PO 197-2. The comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 197-7 The commenter requests clarification as to whether the DSEIR identifies a significant environmental impact, which would preclude providing water and sewer service to property-owners with the CCSD service area. The Project involves construction of water facilities to address an existing water supply shortage, while improving reliability of the existing water supply for the CCSD. As described in DSEIR Section 8.13, *Utilities and Service Systems*, the DSEIR would not result in significant impacts concerning water and sewer services.
- PO 197-8 The commenter requests CCSD identify and mitigate the environmental impacts that would occur as a result of "leaving thousands of privately owned lots permanently undevelopable." Of particular concern to the commenter is the Project's potential to result in increased littering, flooding, and site runoff. The Project involves design and construction of water facilities, and thus does not involve the introduction of a new land use or induce substantial population growth (i.e., as a result of new housing or employment-generating uses) in the area; see DSEIR Section 6.3, *Growth-Inducing Impacts*, and DSEIR Section 8.0, *Effects Found Not To Be Significant*. The proposed use would not generate solid



waste above existing conditions; thus, Project implementation would not involve environmental impacts as a result of increased littering.

See Responses PA 4-29 and PA 4-30 concerning the Project's potential impacts related to flooding and site runoff.

Your Name Neal T. BartonDate 10/22/2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a full time resident of Cambria. My address is: 2190 Benson Ave.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

out allow construction over several years of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

198-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/



Print name

Neal T. Barton



RESPONSE TO COMMENT LETTER NO. PO-198

Neal Barton

October 26, 2016

PO 198-1 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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October 20, 2016

Mr. Robert C. Gresens
P.E. District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Sent Via Email to: gresens@cambriacsd.org

Airlin Singewald
Senior Planner
County of San Luis Obispo
Department of Planning and Building
Room 300
San Luis Obispo, CA 93408

Sent Via Email to: asingewald@co.slo.ca.us

Subject: Comments on Review and Request for Formal Written Responses to Questions in Reference to CCSD Draft SEIR for the proposed Sustainable Water Facility Project (SCH# 2014061073)

Dear Mr. Gresens and Mr. Singewald:

Pursuant to the current review period of the Subsequent Environmental Impact Report (Draft SEIR)(SCH# 2014061073 for the Cambria Sustainable Water Facility Project ("Project"), please let this letter serve as our formal questions to be addressed in writing for clarification and discussion pertaining to this project approval by the CCSD and appropriate review agencies.

I want to thank Mr. Singewald of the County of San Luis Obispo Department of Planning and Building (the "County") who is liaison working together with the Cambria Community Services District (the "CCSD") for taking the time to answer many of my questions in preparing this letter of request.

Mr. Singewald did verify that that the County would not answer any question unless the County was the lead agency for the proposed project. He also verified that the project would also have to obtain a Coastal Development Permit from the County that if approved would be subject to appeal to the California Coastal Commission.

It is important to note that the project (Sustainable Water Facility or "SWF") tiers from the Cambria Water Master Plan PEIR pursuant to PRC 15152, and as in sequence the analysis of the proposed project follows from a general plan, policy, or program an part of an EIR of lesser scope or site specific. Under CEQA, the WMP PEIR is considered the first tier document and the SEIR for the proposed project ("SWF") is considered the second tier document. Pursuant to the established CEQA Guidelines, section 15152(d)(1) and (2) govern the standard of review for this SEIR.

Under the principles related to tiering, if the first tier document found significant impacts, then

199-1

the second tier EIR must require implementation of the first tier mitigation measures unless the analysis explains that the mitigation measures are not applicable or that other mitigation measures can replace the previous measures and similarly reduce the impacts to level of significance. The current SEIR incorporates the WMP PEIR as part of these environmental documents under review by the CCSD acting in the capacity as the lead agency for the SEIR.

-2-

It is important to note that the CCSD was also the lead agency under the WMP PEIR when it certified the document in 2008, and that it concedes that new information has become known and changes in the environmental setting potentially affecting the severity of the environmental impacts have occurred. The SEIR has been prepared in the context of the physical conditions that were present at the time the NOP was issued, prior to the construction and operation under emergency permit and as subsequent to the WMP PEIR.

The project's emergency exemption did not allow for an EIR at the time the County approved the emergency permit, and concurrently with the NOP, the CCSD did issue a project information packet and an environmental checklist that identified potentially significant impacts associated with this project in addition to those issues the CCSD identified as "no impact" or effects not to be found to be significant.

These impacts and effects can be found on Page 2-6 of this SEIR.

As part of this SEIR, the CCSD in footnote #1 found on Page 2-6 acknowledges that the analysis of the project's growth inducing impacts pursuant to PRC 15126(d), (as both a renewable water source and a new water project); must analyze and discuss the ways the proposed project could foster economic or population growth and/or impact the construction of additional housing, either directly or indirectly, in the surrounding environment. This would also include the cumulative effects and impacts that the proposed project could have on subsequent projects on a "case by case" basis of analysis within the CCSD boundary.

The WMP PEIR also requires that the CCSD do analysis of any proposed residential single family or multi-family dwellings within its jurisdictional boundary on a "case by case" site specific analysis against the regulatory provisions of the water master plan and its related environmental documents that is the first tier document as related to this SEIR.

The 2008 CCSD Water Master Plan Program EIR (WMP PEIR) included a comprehensive discussion and presentation of regulatory provisions that adopted as part of the master plan environmental documents. The WMP PEIR introduced and adopted the Buildout Reduction Program (the "BRP") as a key implementation tool to respond to the growth inducing related issues and concerns for the unincorporated community of Cambria.

As part of the Population, Housing, and Growth section of the WMP PEIR, the CCSD provided a detailed assessment of the regulatory conditions set forth under local, regional, and state agencies and consistently references programming that responds to the buildout of Cambria. As part of the WMP PEIR, section 5.13 provides the nexus of the regulatory setting to an analysis of impacts related to the potential for growth inducing impacts and presented a framework for the BRP under Mitigation Measures PHG-1 and PHG-2.

Mitigation Measures PHG-1 and PHG-2 of the Mitigation, Monitoring, and Reporting Program (the "MMRP") as adopted as part of the WMP PEIR and submitted and on file with the County, requires that the CCSD "shall" adopt the Buildout Reduction Program that is consistent with the Buildout Reduction Program Report Town Hall Meeting Final Draft (May 16, 2006) (Appendix 14.3) (PHG-1) and "shall" prepare an annual progress report and provide status information on the Buildout Reduction Program (PHG-2).

-3-

My questions center around the implementation and effects of the BRP and to the enforcement of the adopted mitigation measure as applied to both the WMP-PEIR and the current SEIR for the SWP. Here are my questions to be provided a written response under the SEIR proceedings pursuant to CEQA:

SECTION 1

- 1) • The BRP states that approximately 3357 lots within the CCSD jurisdictional boundaries are to remain undeveloped as part of the Buildout Reduction Program. Has the CCSD mapped the specific properties to remain vacant? **199-1**
- 2) • Is the CCSD currently the service function provider for water to those 3357 lots within the Urban Service Line of the district? Is the answer is yes, will the CCSD continue to provide water service function to those specific 3357 lots within the Urban Service Line (the "USL")? **199-2**
- 3) • Is the CCSD currently the service function provider for sewer to those 3357 lots within the Urban Service Line? If the answer is yes, will the CCSD continue to provide sewer service function to those specific 3357 lots? **199-3**
- 4) • If the answer to questions 2 and 3 above is no, who is the service provider for water and sewer service functions for those specific 3357 lots to remain vacant and/or undeveloped within the CCSD service boundary? **199-4**
- 5) • Has the "BRP" been adopted and implemented under the WMP PEIR (2008), specifically under mitigation measures PHG 1 and PHG-2? If the answer to this question is yes, what was the date that the BRP was implemented? **199-5**
- 6) • Is the BRP in full force and effect under both the WMP PEIR and/or the CCSD Urban Water Master Plan? **199-6**
- 7) • If the answer to #6 is yes, is the SEIR for the current project subject to the terms and conditions of the adopted WMP PEIR, and specifically subject to the terms and conditions of the adopted mitigation measure that is the BRP? **199-7**
- 8) • Does the BRP eliminate water and sewer service functions from being provided by the CCSD to those specific 3357 lots that are to remain vacant or undeveloped based upon the constraints of the adopted mitigation measures PHG 1 and PHG-2? **199-8**
- 9) • Since California law requires that any property fronting sewer (when there is no known constraint on sewer capacity) "shall" or "must" connect to sewer and if required by state law, will the CCSD allow a connection to sewer if water is not provided by the district? **199-9**
- 10) • Have any of the 3357 specific lots to remain vacant under the BRP been specially **199-10**
- 11) • **199-11**

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| <p>assessed for the construction and upgrading of public water or sewer facilities and equipment? If the answer to this question is yes, are any of the 3357 specific lots have a "right" or "entitlement" to an immediate connection to the Heath Lane Wastewater Treatment Plant?</p> | 199-11 |
| <p>11) • Were any of the 3357 specific lots to remain vacant part of the proceedings for fees or assessments for the repayment of the Davis Grunsky Loan funded by the CCSD?</p> | 199-12 |
| <p>12) • Does the CCSD as lead agency under both the WMP PEIR and the SEIR for the SWF required to amend Coastal Development Permit #428-10 for the new public water project, and specifically the 5250 dwelling unit cap as conditioned under the 1981 CDP and impacted by the BRP? We have verified that the terms and conditions of CDP 428-10 are still in force and effect.</p> | 199-13 |
| <p>13) • Is the 4650 dwelling unit cap in place, and if so, has the California Coastal Commission approved the BRP to lower the water and sewer connections to 4650 under the terms and conditions of CDP 428-10 (specifically related to the confirmed service area established by CDP #428-10 pursuant to PRC 30412)?</p> | 199-14 |

-4-

<p>The following questions relate to the effects of the adopted mitigation measure (the "BRP") as related to the provisions of the Cortese Knox Hertzberg Local Government Reorganization Act of 2000 that the CCSD is subject to under California state law (Government Code 56000 et seq)</p>	199-15
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SECTION II

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|---|---------------|
| <p>1) • Prior to or after the adoption and WMP PEIR and as part of this SEIR, has or did the CCSD seek approval from the Local Agency Formation Commission ("LAFCO") in the implementation of the "BRP" through formal application or by resolution of application or petition initiating a "change of organization" as required by the LAFCO Commission or executive officer under Government Code section(s) 56013, 56017.1 or 56017.2?</p> | 199-16 |
| <p>2) • Does the CCSD have a "duty" as a special district as defined under Government Code section 56013, to file for by resolution, application, or petition to seek formal approval of a "change in organization" (Gov. Code section 56021(m)) from LAFCO for any exercise of new or different functions or classes of services, or divestiture of the power to provide particular functions or classes of services, within all or part of the jurisdictional boundaries of the special district as provided in Article 1.5 (commencing with Section 56824.10) of Chapter 5 of this division?</p> | 199-17 |
| <p>3) • When the CCSD determines through factual findings that it will not provide service functions for water or sewer to 3357 properties within its established jurisdictional boundary (and specifically within its USL) as mitigation for growth inducing impacts of its proposed WMP PEIR and subsequent SEIR, does the CCSD have a duty to seek approval of the BRP of the WMP through LAFCO (especially when there are specially benefitted improvement districts involved that are fully vested) under established joint power authorities (JPA)?</p> | 199-18 |
| <p>4) • Have the 3357 lots impacted by the BRP that must remain vacant and undeveloped been "detached" from the CCSD organizational boundary pursuant to Government Code section 56021(f) or has the CCSD created non-service islands within the district? Those lots not to be served for water or sewer by the district (AKA non-waitlist holders)</p> | 199-19 |

- within the district boundary).
- 5) • For purposes of this question(s), non-service islands is defined pursuant to California Attorney General Opinion No. 10-902 as an "island" is an area of unincorporated territory that is (1) completely surrounded to a large degree, or in the main-either by the city to which annexation is proposed or by the city and a county boundary or the Pacific Ocean or (2) completely surrounded by the city to which annexation is proposed and adjacent cities. The AG opinion goes on to expand the definition of an island as "something resembling an island by its isolated, surrounded, or sequestered position". The 3357 lots meet this definition because they are within the USL with water and sewer fronting, but will not be served by the CCSD pursuant to the constraints of the BRP. LAFCO is authorized by law and through the legislative intent of the CKH Act to "review and approve or disapprove with or without amendment, wholly, partially, or conditionally, proposals for changes of organizations or reorganization, consistent with its written policies, procedures, and guidelines. Detachment of an unincorporated territory from a district in a new or different functions within all or part of the jurisdictional boundaries of a special district is a "change in organization". Has the CCSD created 3357 non-service islands not to be provided water or sewer service functions within its jurisdictional boundaries? Yes or no.
 - 6) • Is the 3357 lots to be left vacant an "affected territory" pursuant to Government Code section 56015, and if so, has the CCSD made such a factual finding under the WMP PEIR or SEIR?
 - 7) • Has the CCSD made a formal "detachment" of the 3357 lots within the district USL which as defined under Government Code section 56033 is the exclusion, deletion, or removal from a city

199-19

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or district of any portion of the territory of the city or district as defined under a change of organization under the Cortese Knox Hertzberg Act?

- 8) • Has the CCSD completed a formal "divestiture of power" in the termination of the power and authority to provide particular service functions or classes of services within all or part of the jurisdictional boundaries of a the special district in the adoption and enforcement of the BRP as part of the WMP PEIR and subsequent SEIR? (Government Code section 56037.2)
- 9) • Is the CCSD required to provide either water and/or sewer service functions pursuant to Assessment District (Improvement District) proceedings under existing Joint Powers Agency and Joint Powers Authority of the Cambria County Water District and County of San Luis Obispo under the terms and conditions of the Reorganization Plan of Cambria 1976 by LAFCO and affirmed by both the County of San Luis Obispo Board of Supervisors, and the voters of Cambria? (Government Code section 56047.7)
- 10) • Has the CCSD complied with the provisions of Government Code sections 56824.12 and 56824.14 when it made a factual finding to not provide water or sewer service functions or other classes of service (existing customers and CCSD waitlist holders versus non-waitlist holders) to over 3357 lot owners with the adoption of the WMP PEIR, the BRP as mitigation, and the current SEIR?
For purposes of this question, the term "service" is defined under Government Code

199-23

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199-25

section 56074 as a power currently in force and effect by the CCSD and not a latent power.

199-25

SECTION III

For purposes of this section the questions put forth relate to the enforcement by the CCSD (acting in its capacity as lead agency under both the WMP PEIR and the subsequent SEIR) of the mitigation measure commonly referred to as the Buildout Reduction Program or the "BRP".

199-26

- 1) • How is the "BRP" mitigation measure enforced by the CCSD through regulations, permit conditions, and other measures against those properties on the existing CCSD waitlists for water and sewer? **199-27**
- 2) • How is the "BRP" mitigation measure enforced by the CCSD through regulations, permit conditions, and other measures against those 3357 lots that are to remain vacant under the BRP and are the same properties not on the CCSD waitlists? **199-28**
- 3) • If the CCSD is not the service provider for sewer for the 3357 lots referenced in the BRP, who is the service provider? If the CCSD is the service provider will they confirm in writing that they are the service provider for sewer? **199-29**
- 4) • If the CCSD is not the service provider for water for the 3357 lots referenced in the BRP, who is the service provider? If the CCSD is the service provider will they confirm in writing that they are the service provider for water? **199-30**
- 5) • What are the application procedures and policies at the CCSD to enforce the BRP against the 3357 lots to remain vacant? **199-31**
- 6) • Does the CCSD have an application process to enforce the BRP against any of the 3357 properties on a "case by case basis as referenced in the WMP PEIR? If the answer is yes, please provide the application, application requirements and exhibits needed to be submitted to the CCSD pursuant to Government Code section 65940 to determine if the specific proposed project is subject to the constraints of the BRP mitigation measure. **199-32**

-6-

- 7) • What is the application and review process at the CCSD that complies with the CW-8 Planning Area Standard of the North Coast Area Plan? **199-33**
- 8) • What exhibit does the CCSD issue in compliance with CW-8 Planning Area Standard that meets the County requirements for written verification of water and sewer service functions from the district? **199-34**
- 9) • Under the legislative intent of the BRP as passed by the CCSD Board of Directors as part of the WMP PEIR and for the proposed water project as part of the SEIR, will the CCSD provide sewer and water services to the 3357 vacant lots referenced in the BRP? **199-35**
- 10) • If any proposed residential single family residence not to be provided water service by the CCSD (as part of a case by case specific review as referenced in the WMP PEIR) will the CCSD provide sewer service if water is not sourced from district facilities or both the San Simeon and Santa Rosa Creeks? If not, under what statutory authorities is the CCSD denying right to sewer when it is fronting and **199-36**

- abutting pursuant to the California Uniform Plumbing Code?
- (1) • I own APN Nos. 023-383-041, 024-262-036, and 024-182-043 within the USL of the CCSD and both sewer and water are fronting my properties. I do not have a CCSD waitlist position. Are my properties not to be served for water and sewer by the district as part of the 3357 lots to remain vacant? This question goes to if the CCSD has formally mapped the properties not to be served by the district acting in the capacity as the approved service provider and not the land use authority for the area? Yes or NO?

199-36

199-37

End of Questions

Note:

For the administrative record of these proceedings and any subsequent coastal development permit actions and proceedings, Mr. Airlin Singewald confirmed that the County of San Luis Obispo requires any proposed project for a land use permit must provide written verification of sewer and water from the CCSD in order for an CDP application to the County to be accepted and deemed complete by the County Department of Planning and Building under Government Code section(s) 65940 and 65943. He also stated that the written verification from the CCSD is needed in order for the County's own established approval body to comply with the Coastal Plan and Policies (Public Works Policy No. 1) in a factual finding required under the North Coast Area Plan (LCP) for any land use permit.

By design, the regulatory scheme in place by the County and the CCSD is to prohibit and preclude any non-wait list holder (properties not on CCSD waitlist) from obtaining a final administrative decision that is subject to appeal to the Board of Supervisors of the County of San Luis Obispo. Also by design is the fact that only approved coastal development permits (Minor Use Permits as a land use permit) is appealable to the California Coastal Commission. This governmental scheme was created by the SLO Planning Director in 1989 and now is the model statewide that is being used to deny due process and equal protection and to control growth and was the foundation of the Growth Management Ordinance adopted in 1989 by the County of San Luis Obispo. The GMO is fully referenced throughout both the WMP PEIR and the current SEIR.

199-38

-7-

It is also the current model being used to limit development rights under the proposed Los Osos Community Plan environmental documents currently under review and subject to approval and certification by the California Coastal Commission.

He also confirmed that there is no provision within the County Code (CZLUO) that enforces the CCSD to comply with the North Coast Area Planning Area Standards which is not consistent with the adopted CCSD Mitigation Monitoring and Reporting Program (MMRP)

199-39

requiring the CCSD to complete the Cambria Community Services District Review (CW-8 or its equivalent).

199-39

Simply put, this is all been designed behind closed doors a very long time ago and if it working, don't fix it is the mantra. The problem is that the current force field at the state court level is running out of excuses to not let an application be acted upon in violation of state law.

The current status of applications for any proposed project at the CCSD for review on a case by case basis as referenced in the WMP PEIR as well as the SEIR for any non-waitlist property (AKA the 3357 lots to be left vacant and undeveloped) is that there is.....wait for it.....wait for it.....

"There is no current application for review on a case by case basis for any non-waitlist property" and as such violates the mitigation measure (the "BRP") under CEQA because there is no permit application, permit conditions, or other measures to enforce the adopted mitigation measure.

199-40

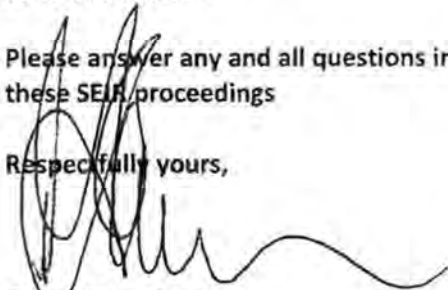
This was confirmed by CCSD District Counsel.

You have got to be kidding!!!!

The 3357 of us property owners are not that stupid and we are due an answer that is honest and not with parsed legal language. The community of Cambria at least owes us that. Time will only tell as to who is right in this issue. The SEIR and approval of the SWF we feel will get us to this answer.

Please answer any and all questions in writing as part of the administrative record of the these SEIR proceedings

Respectfully yours,



Gregg Allen Berge
40735 Pocona Place
Murrieta, CA 92562
Owner of Record of APN Nos. 023-383-041, 024-262-036, and 024-182-043.



RESPONSE TO COMMENT LETTER NO. PO-199

Gregg Allen Berge

October 26, 2016

- PO 199-1 This comment provides general introductory information, as well as a Project summary from the commenter. The comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 199-2 This comment is BRP-specific. The comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.
- See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts.
- PO 199-3 See Response PO 199-2.
- PO 199-4 See Response PO 199-2.
- PO 199-5 See Response PO 199-2.
- PO 199-6 Concerning BRP adoption. See Responses PA 4-32, PA 6-7, and PO 89-4 concerning the Project's water output and potential growth-inducing impacts.
- PO 199-7 See Response PO 199-2.
- PO 199-8 See Response PO 199-2.
- PO 199-9 See Response PO 199-2.
- PO 199-10 See Responses PO 118-1 and PO 199-2.
- PO 199-11 See Response PO 199-2.
- PO 199-12 See Response PO 199-2.
- PO 199-13 See Responses PO 118-1 and PO 199-2.
- PO 199-14 See Responses PO 118-1 and PO 199-2.



- PO 199-15 This is an introductory statement concerning the following comments. No further response is necessary.
- PO 199-16 See Responses PO 118-1 and PO 199-2.
- PO 199-17 See Responses PO 118-1 and PO 199-2.
- PO 199-18 See Responses PO 118-1 and PO 199-2.
- PO 199-19 See Responses PO 118-1 and PO 199-2.
- PO 199-20 See Responses PO 118-1 and PO 199-2.
- PO 199-21 See Responses PO 118-1 and PO 199-2.
- PO 199-22 See Responses PO 118-1 and PO 199-2.
- PO 199-23 See Responses PO 118-1 and PO 199-2.
- PO 199-24 See Responses PO 118-1 and PO 199-2.
- PO 199-25 See Responses PO 118-1 and PO 199-2.
- PO 199-26 This is an introductory statement concerning the following comments. No further response is necessary.
- PO 199-27 See Responses PO 118-1, PO 191-8, and PO 199-10.
- PO 199-28 See Responses PO 118-1, PO 191-8, and PO 199-10.
- PO 199-29 See Responses PO 118-1 and PO 199-10.
- PO 199-30 See Responses PO 118-1 and PO 199-10.
- PO 199-31 See Responses PO 118-1 and PO 199-10.
- PO 199-32 See Responses PO 118-1 and PO 199-10.
- PO 199-33 See Responses PO 118-1 and PO 199-10.
- PO 199-34 See Responses PO 118-1 and PO 199-10.
- PO 199-35 See Responses PO 118-1 and PO 199-10.



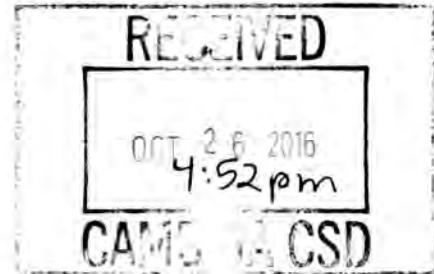
- PO 199-36 See Responses PO 118-1 and PO 199-10.
- PO 199-37 See Response PO 199-10.
- PO 199-38 See Response PO 199-10.
- PO 199-39 See Response PO 199-10.
- PO 199-40 See Responses PO 118-1 and PO 199-10.



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Tina S. Dickason
574 Leighton St.
Cambria, CA 93428

October 26, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Dr., Suite 201
Cambria, CA 93428

e-mailed to: bgresens@cambriacsd.org

RE: Cambria Community Services District (CCSD) Draft SEIR SWF

Dear Mr. Gresens,

Please find my comments related to the Draft SEIR as follows:

In a year of extreme drought, 2013, the CCSD Board of Directors, chose as two of their goals to: 1) Lift the moratorium set in place in 2001, (which legally had to remain until a new source of water had been acquired by the District). 2) To issue as many as 20, intent to serve letters. In March, 2013, the Board took action to "lift the moratorium," and August 22, 2013, the board took action to issue up to as many as 20, intent to serve letters at the following month's board meeting.

200-1

Approximately 2 weeks after the Aug. 22 meeting, Cambrians were informed of a water shortage crisis: We learned that we would be 19 acre feet short of water for the month of October, 2013. No Emergency Water Shortage Conditions had been declared until Jan. 30, 2014, (two weeks after the Governor's Executive Order on Jan. 17, 2014), when the general manager declared a Stage III Water Shortage Condition for Cambria. How could the general manager, engineer and Water Dept. not be aware of a pending crisis, as the board was moving towards growth?

200-2

Cambrians have been misled with a project that was agreed to through a Proposition 218 rate increase. That project, known as the **Emergency Water Supply (EWS)** was identified as a water supply to be used in drought conditions for current residents. (My CCSD bi-monthly bill refers to EWS charges). However, in reading from this section, the second bullet point refers to providing "a reliable water supply, which would serve no more than 4,650 existing and future residential units, at full build out, pursuant to the North Coast Area Plan (NCAP) and mitigation set forth in the CCSD's certified Water Master Plan Environmental Impact Report (WMP PEIR)." Clearly, the newly-named Sustainable Water Facility (SWF), is intended for growth.

200-3

Cambrians had no say in the change of the intent of the project from a EWS to a Sustainable Water Facility (SWF) for growth. The existing EWS project has already cost millions more than originally estimated. How much more will it cost as a differently named project, with a different intent?

200-4

The application to the DWR for Proposition 84 funding, was for a EWS project, not a SWF; were they also misled? (None of the \$4.16 million dollars the CCSD received from the grant was used to pay down the loan for the EWS as we had been informed it would). In a press release from the CCSD, December 2015, it was made clear the project had a new name: The Sustainable Water Facility (SWF), and that it would not only be for drought conditions, but also for growth. Cambrians have since learned that the CCSD intends to issue approximately 40, intent to serve letters per year over the course of the next twenty years or so.

200-5

1-3 "Meeting all regulatory agency permitted conditions, including those of SLO County and the State Water Board." The project has been, and is, fraught with problems, most of which were identified in the comments from regulatory agencies and the public in the July 22, 2014 IS/MND. The District chose not to respond to the comments, but soon learned, as the project was being built and tested, that issues raised in the IS/MND comments, came to pass. A major public works project should never be a rush to judgment, especially when it involves a community's drinking water, but rather, it should be mandatory that it go through the necessary processes and requirements for a project of this magnitude. An after-the-fact, Draft SEIR for a different project, is to me, unacceptable!

200-6

A Draft EIR and CEQA analysis were not presented **before** work on the project began, inviting potential problems to arise and issues to be mitigated, along with mounting project costs. The project manager for the contractor, CDM-Smith, made it clear in a workshop-presentation to the community, that the project would be a "challenge." It has indeed been a challenge, and will continue to be. The project, in my opinion, is an absolute disaster; fostered by a no-bid contract, no EIR, and SLO County Planning Department's willingness to issue an emergency CDP for a major public works project to be built within a six-month period. This was definitely a project that put the "cart before the horse;" all leading to multiple environmental and costly consequences.

200-7

1-3 "Repurposing the SWF evaporation pond to address potential environmental impacts" is yet a clear example of the poor design and planning of this project. CCSD was forewarned of the potential impacts of the evaporation pond, to no avail.

200-8

1-3 "Minimizing economic hardship and losses to local residences and businesses, including tourism." Tourism has increased and flourished during the past four years of drought. No events in Cambria were cancelled due to lack of water. Despite the fear-mongering that sand would come out of our taps, Cambrians have heroically conserved over 40% of their water usage. We have not at any time during these years of drought, run out of water.

200-9

1-4 Environmental Issues/Mitigation Summary 1-5

Impact 5.1-1 Excavation of the evaporation pond has already caused disruption to wild life habitat and humans alike. Pollution, both in the form of noise and dust was generated from the excavation of the evaporation pond area and the facility site. For a number of months, a steady flow of semi- trucks were seen entering and leaving San Simeon Creek Rd., off Hwy. 1. Five snow blowers, incorporated after the fact, to hasten evaporation at the pond site, created harmful and disturbing noise issues. I would also venture to say that the snow blowers might have impacted the health and welfare of birds flying into the pond. I would maintain that further disruption caused by Mitigation Measures in the Draft SEIR to renurpose the evaporation pond, will have similar impacts.

200-10

The evaporation pond is directly adjacent to a State Park campground. Despite various precautionary measures taken to keep out gophers, frogs, deer and birds, they have proven to be unsuccessful. Wires crossing the pond with mylar strips attached, in an attempt in preventing birds from entering the pond, ended up in the loss of bird life from the very wires that were attempting to keep birds out of the pond. Many varieties of birds have been seen and photographed in the pond. Deer have also been photographed inside the pond area (See Exhibit 1: photos of deer and birds in evap. pond). Gophers and ground squirrels have been creating tunnels, as evidenced by piles of earth on the periphery of the berm area. (See Exhibit 2, letter of Notice of Violation from RWQCB, 10-25-16).

200-11

How does the CCSD intend to maintain the integrity of the pond, and use it as a potential reservoir, when animals' natural habits are creating degradation to the surround of the pond? Does the CCSD intend to use pesticides to address this issue, and if so specifically what type(s) of pesticide would be used?

200-12

The evaporation pond is without a doubt, an attractive nuisance. For residents, hikers, bikers, birdwatchers, as well as the numerous campers who stay at the State Park campground, (the most easterly portion of which overlooks the evaporation pond) presents an ugly eyesore in an otherwise beautiful and serene, habitat area. This is a place where people come from all over the world to witness and enjoy the scenic beauty this area has to offer, with its incredible vistas, walking trails and natural habitat. Because of its close proximity to the State Park campground, and the beauty of the area in general, I would still consider the pond an attractive nuisance, despite the proposed change from an evaporation pond holding brine waste, to a holding pond for raw potable water.

200-13

EVAPORATION POND/BRINE WASTE DISPOSAL

Another environmental issue relates to the trucking of brine waste to a facility that is licensed to haul it to their facility. Kettleman City is cited in the Draft SEIR, as a possible disposal site. This would require a 170-mile round trip for up to as many as 8 trucks per day. Is the brine waste material considered hazardous or non-hazardous? The danger of spillage is a major concern when hauling material of this nature. (Last year, a truck, hauling sludge from Cambria's Waste Water Treatment Plant, tipped over at the intersection of Highways 1 and 46, spilling the contents into the road and easement area). Again, how can CCSD protect the integrity of the project area, and beyond, when so many issues are at stake as they relate to protection of the environment?

200-14

The other issue related to brine disposal, is that of cost—something not mentioned in the Draft SEIR but of enormous consequence financially to the District. (Please see Exhibit 3: Brine Waste Hauling Costs)

200-15

3-53 SOURCE WATER

The Draft SEIR states the following: "The potable water supply storage basin's water quality would generally be similar to the Well SS-1 and Well SS-2 water quality. However, because the potable water supply basin is uncovered, water quality could potentially degrade due to various sources of contamination, including bird and animal waste, algal growth, insects and fish and airborne deposition. Because open storage would diminish water quality, a containerized filtration unit is proposed to ensure

200-16

water quality criteria are met.” Adding a Filtration Unit and a Surface Water Transfer Pump Station to clean up potential contamination, presents even more examples of a very poorly designed project, with additional costs involved in attempting to try and make something work; we’ve been down that road before! If the project itself cannot supply the water needed, I can’t understand why the repurposed reservoir would have to serve as an additional source of potable drinking water. For firefighting purposes, I can see the logic—but for drinking water as an additional supply, raises questions!

200-16

1-9 BIO-7 Biological Resources

Why was an Adaptive Management Plan not included as part of the Draft SEIR? The AMP should have been addressed in this document, not as an after-the-fact, post construction plan when (or if), the SWF is operating.

200-17

Reading through the numerous biological impacts to the project site, which in ESHA, deems it not suitable for the proposed measures as described in the Draft SEIR; it never was, and I believe it never will be.

200-18

BIO-6 Best Management Practices (BMP’s) From numerous violations cited during the construction, testing, and even currently, I do not believe BMP’s have been carefully adhered to. I cite one such example, a gross violation that occurred when the lagoon mitigation pipe was diverted from San Simeon Creek to Van Gordon Creek, and a large volume of chlorine was disposed into that creek. (*See Exhibit 4, RWQCB Notice of Violation*) BMP’s were not adhered to then, and how can we be assured they will be with further disruption to a critically sensitive habitat area?

200-19

1-19 Environmentally Superior Alternative—Warren Reservoir/Off-stream Storage

Even though the CCSD has not looked at the alternative I draw to attention below, I believe it provides a significant water supply alternative, and offer the following for consideration:

Shortly after the water shortage crisis was announced to Cambrians in early September, 2013, I became interested in searching for a water solution that would be: 1) Environmentally feasible, and 2) Affordable to Cambrians, (aided by the possibility of obtaining financial assistance through State Funding means, available for reservoirs). In Nov., 2013, I contacted Mr. Clyde Warren, a rancher on San Simeon Creek Rd., who I heard had land, some of which might serve as a possible resource for an off-stream storage solution. I contacted Mr. Warren, and he invited me to take a site visit on his property. Of notable interest during that visit was a dry-wall canyon on his property, located directly across San Simeon Creek Rd. from the CCSD’s well field. The dry-wall canyon is not a blue line stream, and from an initial viewing, it looked as if there might be some real potential at this particular location, especially as it related to ESHA and the ideal location.

200-20

I contacted the San Luis Obispo Planning Dept. to find out if such a project would be within the County’s LCP; the planner I spoke to, confirmed it was. The planner also said that if CCSD would act on such a project, it could be completed within in a two-year period. He also stated this would be a good project for Cambria, as it would provide much-needed storage. I contacted California Coastal Commission (CCC) staff to find out what their thinking might be of such a project. I was told that if the project did not have significant ESHA issues, it could be a project worth pursuing for Cambria.

Mr. Warren had been following up on our discussions by having some preliminary studies performed: a capacity study, and some evaluation on seepage and evaporation by Gus Yates. (See Exhibit 5, *Capacity, Evaporation and Seepage studies for Warren reservoir*). Mr. Warren also sent Jerry Gruber, the general manager of the CCSD, information related to the possibility of an off-stream storage project on land he was willing to sell to the District.

Jan. 20, 2014, I held a workshop for interested Cambrians to attend and learn about the possibility of the Warren off-stream storage as a water supply alternative solution for Cambria. A panel, including Mr. Warren, the engineer, who had done the capacity studies, and a hydrogeologist, were invited to answer questions the public might have. The workshop was very well attended and included three directors of the CCSD (all directors had been invited, as had the general mgr. and engineer). Approximately 95% of the attendees at the meeting, indicated their support for such a project. This water supply alternative was never given consideration by the CCSD. In the Army Corps of Engineers (ACE) project alternatives, off-stream storage was mentioned, but not at the Warren site. Instead, they included 3 reservoir sites north east of the property, with an astounding cost of close to \$70 million. No studies were performed on these sites, one of which is a blue line stream, and none of the properties were for sale.

Ten days after the workshop, the CCSD held a board meeting, Jan. 30, 2014, announcing plans to resolve the water crisis. Their decision led to the choice of a brackish-water desalination plant, built two years ago and named the Emergency Water Supply (EWS). I remain convinced that the Superior Alternative to the EWS/SWF, would be the Warren reservoir/off-stream storage solution, which in the capacity studies revealed storage capacity of between 600-700 acre feet. Evaporation and seepage studies, evaluated by Gus Yates, looked very promising. (See documentation).

The Warren reservoir water supply alternative would have been environmentally superior to the EWS or SWF, as it would not have the environmental issues associated with the present facility. It would not have required the energy resources and costs associated with the project that has been built; it would not have required the expensive chemicals for the current EWS facility; it would not have required the evaporation pond; it would not have required additional staffing to engage in maintenance issues and numerous monitoring reports to various agencies; it would have supplied Cambria with plenty of water and allowed for winter pumping for storage; it is in an ideal location, directly across from the District's well field. The land is for sale, and the property is not a blue line stream. In my opinion, this solution would have been far preferable than the choice made by the CCSD for Cambria's water supply needs.

RESERVOIR FUNDING

Funding for reservoirs is available through a \$2.7 billion dollar California Proposition 1 Water Storage Investment Program (see link below). I received a response to a letter I wrote to Senator Dianne Feinstein, related to Federal funding for reservoirs. In her response she cited (S.2533) as a possible federal source for reservoir funding. Since these monies are available, I would ask CCSD if they have ever considered applying for any of these funding mechanisms?

Prop 1 Water Storage Investment Program

200-20

200-21

https://cwc.ca.gov/Pages/Implementation_Process.aspx
<https://cwc.ca.gov/Pages/ConceptPapers.aspx>

USBR WaterSMART (Sustain and Manage America's Resources for Tomorrow)
<http://www.usbr.gov/watersmart/index.html>

200-21

5.5 FLOODING (CZLUO Section 23.07.174)

LCP 20— Coastal Streams and Riparian Vegetation

This section states: "Coastal streams and adjacent riparian areas are environmentally sensitive habitats. The provisions of this section are intended to preserve and protect the natural hydrological system and ecological functions of coastal streams."

On January 19, 2016, the San Simeon well field was under several feet of water, resulting from the impact of a significant storm. The recently-installed injection (part of the EWS project) well, couldn't be seen; it was submerged in several feet of water! San Simeon Creek overflowed to the point of covering the entire San Simeon well field. (See Exhibit 6, *Photos of flooding, as documented in photos I took Jan. 19, 2016*). The San Simeon wells, the main source of Cambria's water supply, were shut down due to possible contamination issues resulting from the high water levels.

The PVC pipe, leading from the injection well to the plant, was literally floating, as it had not been secured. This shows another area of poor engineering design, bearing unanticipated consequences. Because of the area's sensitive habitat, home to endangered and threatened species, the enormous amounts of debris that accumulated during the storm, had to be removed very carefully. A biologist was hired to oversee the removal of the debris so that protection of the animal species was afforded as much integrity as possible in sparing them.

200-22

How is it possible to continue this kind of operation in an area prone to flooding, as witnessed Jan. 19, 2016, (and in previous years of flooding) without creating harmful and potentially dangerous situations from occurring? How can this area be preserved and protected, assuring the natural hydrological system and ecological functions of coastal streams? Mitigation measures can only go so far when dealing with Mother Nature. Who are we to come along and think we know better? Clearly, from all that has occurred, we don't!

5.5.2 FLOOD PLAIN MAPPING

In addition to what I have stated above, I also refer to the sentence under the above heading: "According to Federal Management Agency (FEMA) portions of the Project site are located within a 100-year floodplain; refer to the *National Flood Insurance Program* Section below." Again, I reiterate my comments related to poor choice of location, planning and design.

3. 3. 7 WATER SUPPLIES AND DROUGHT—Water Rights

According to information I received from the SWRCB, the maximum pumping allowable from the San Simeon groundwater basin is 798 acre-feet per year, 370 AF of which is the maximum pumping allowable during the dry season, May 1-Oct. 31. In the Santa Rosa groundwater basin, the maximum

200-23

pumping allowable, according to the SWRCB is 217.9 AF per year, of which 155.34 AF is the maximum pumping currently allowable during the dry season.

*Please see below the information provided to me from Mitch Moody at the SWRCB re: the District's current water diversion permits. These numbers do not match up with those on page 3: 3-7 of the Draft SEIR, which claim that: "The current SWRCB water rights diversion permits (20387 and 17827) allowed CCSD to pump from both the San Simeon and Santa Rosa groundwater basins a maximum of 1,118 acre-feet (AF) of water during the wet season, and 630 AF of water during the dry season." Those numbers represent a total of 1,748 AF, compared to the SWRCB's current total number of 1,015.9 AF. CCSD is using the original diversion permit numbers, which is not an accurate representation.

200-23

The District, in October of 2014, applied to the SWRCB for time extensions, as their water rights diversion permits for both Santa Rosa and Simeon aquifers had expired. I would ask how the District arrived at the original diversion permit numbers in this Draft SEIR, knowing that both permits had expired? CCSD lobbyist, Dean Florez, in his report to the Board, August 25, 2016, had the following comments to make, which I have copied and pasted from the Staff Agenda packet.

4 STATE WATER RESOURCES CONTROL BOARD-DIVISION OF WATER RIGHTS

"Continued discussion in Sacramento along with GM Jerry Gruber with Mitchell Moody of the State Division of Water Rights at the State Water Resources Control Board. On discussion of the licensing of the CCSD Diversion Permits for the San Simeon and Santa Rosa Aquifers. Working through the District's decision move forward with Licensing of our permits as opposed to asking for an extension of time. Securing necessary paperwork, justification and letters so that CCSD can start the process." (sic)

200-24

By moving forward with the licensing of the permits, the District will be limited to the diversion limits as explained by Mitch Moody in his reports below. The original diversion permit for San Simeon was 1,230 AF, and for Santa Rosa, 518 AF!

*From: **Moody, Mitchell@Waterboards** <Mitchell.Moody@waterboards.ca.gov>

Date: Mon, Nov 17, 2014 at 2:51 PM

Subject: RE: water rights

To: "tenacioustina2000@gmail.com" <tenacioustina2000@gmail.com>

Cc: "McCarthy, Matthew@Waterboards" <Matthew.McCarthy@waterboards.ca.gov>

Tina,

200-25

Both permits are past their completion of use dates and the District has filed petitions to extend the time to complete beneficial use under these permits. Until or unless these extensions are granted the District is authorized to divert only up the maximum use achieved during the time periods designated for completion of beneficial use under each permit. Permit 20387 for A028158 was issued on 11/7/1989 and had a completion of use date of 12/31/10. The maximum use during this period according to our records is 217.9 af. Permit 17287 for A025002 was issued on 5/9/1978 and the completion of beneficial use date expired on 12/31/05. Our records show that the maximum use

achieved during this period was 798 af. Until the District obtains approval from the Division of Water Rights for an extension of time to complete beneficial use under each of its permits, the District's diversions are limited to a maximum of 798 af from San Simeon Creek, and 217.9 from Santa Rosa Creek.

Mitchell Moody, P.E.
Water Resource Control Engineer
Coastal Lahontan Unit
Division of Water Rights
State Water Resources Control Board
1000 I St., 14th. Floor, P.O. Box 2000
Sacramento, CA 95814

200-25

RE: FW: water rights, Oct 14

Mitchell@Waterboards <Mitchell.Moody@waterboards.ca.gov>

Tina,

The Santa Rosa Creek permit, A028158, places a cap of 260 af on diversion during the period of May 1 to October 31. The completion of use date for that permit ended on December 31, 2010. So CCSD's dry season diversion amount would be limited to the historical maximum amount diverted during the dry season prior to the expiration of the completion of use date. CCSD reports dry season usage on the link below from 2004- 2009, its confusing because these years are truncated and hard to read. When they say on the table "per permit" they are only restating the limits of diversion under each permit, for 28158, it being 260 af. 2008 was their year of maximum use, with annual use of 217 af. For the dry season during 2008, it was also their year of maximum dry season use, which, as the table below shows, is 155.34 af at Santa RosaCreek. So again, the annual diversion limit based on maximum use under the permit for the year 2008 was 217 af (the amount they perfected). This compares to an annual use limit under the permit of 518 af, so they under-utilized their annual diversion right amount for this permit. As for their dry season right, they were authorized up to 260 af under the permit 20387 for Santa Rosa Creek, but were

only able to perfect 155.34 by permit expiration in 2010. So this would probably be the amount awarded for license purposes as a maximum amount for dry season use.

Mitchell Moody, P.E.
Water Resource Control Engineer
Coastal Lahontan Unit
Division of Water Rights
State Water Resources Control Board

200-25

CONCLUDING SUMMARY

Time does not allow me to address any other items contained in the Draft SEIR, but suffice it to say, I am not impressed with the manipulation of Cambrians believing they are paying for one project, the EWS, and its original intent to serve current resident in times of drought, only to be informed that the project has been addressed with a different name in this Draft SEIR, the SWF, for purposes of growth. Through serious and genuine conservation efforts that Cambrians have made, and will need to continue to make to some degree, as will the rest of California, I am far from convinced that the route the CCSD took in its rush to judgment to solve Cambria's "water crisis," is ultimately in the best interests for the Cambria community, the surrounding habitat and the wildlife, who also make this beautiful place their home.

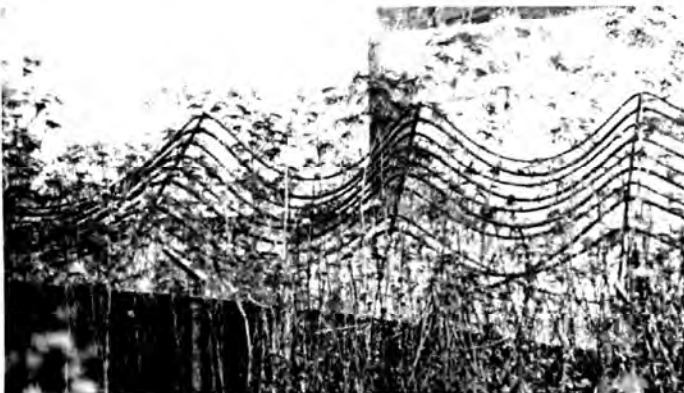
200-26

Submitted by Tina Dickason, October 26, 2016

**EXHIBIT 1:
PHOTOGRAPHS OF DEER AND BIRDS IN EVAPORATION POND**



Figure 1 Sent from Jon Rokke RWQCB on Aug. 2, 2016



**EXHIBIT 2: NOTICE OF VIOLATION, CALIFORNIA WATEBOARD
10/24/2016**



Central Coast Regional Water Quality Control Board

October 24, 2016

Jerry Gruber, General Manager Cambria
Community Services District P.O. Box 65
Cambria, CA 93428
jgruber@cambriacsd.org

VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7015 3430 0000 5440 7328

Dear Mr. Gruber:

**NOTICE OF-VIOLATION: FAILURE TO SUBMIT A COMPLETE REPORT REQUIRED UNDER WATER CODE
SECTION 13267: CAMBRIA COMMUNITY SERVICES DISTRICT**

Central Coast Regional Water Quality Control Board (Water Board) staff received the Cambria Community Services District (Cambria CSD) September 30, 2016, submittal in response to our August 9, 2016, California Water Code section 13267 Request for Information (13267 Request for Information) regarding wildlife issues associated with the Cambria CSD's class II surface impoundment (surface impoundment). The August 9, 2016, 13267 Request for Information requires a plan to exclude deer or any wildlife from accessing the surface impoundment liner and requires a burrowing animal management plan. The Cambria CSD failed to submit a report with all of the information required by the 13267 Request for Information (see attached).

The Cambria CSD's September 30, 2016, submittal includes plans to hire a pest control contractor to eradicate burrowing animals, but fails to include a burrowing animal management plan as required in the 13267 Request for Information. The Cambria CSD must develop and implement a burrowing animal management plan that includes corrective actions to remediate existing damage to the surface impoundment berms, and a training component to ensure Cambria CSD staff identify and correct burrowing animal activity. The Cambria CSD's submittal did not address corrective actions or future efforts to identify and correct burrowing animal issues. It is important that the Cambria CSD not only eliminate existing burrowing animals from the surface impoundment berms, but also repair damage to the berms to prevent potential slope failure or liner damage.

In addition, the Cambria CSD intends to install a new fence along Van Gordon Creek to keep deer from accessing the surface impoundment liner. The Cambria CSD's submittal states that trees have grown through the old fencing thereby limiting its effectiveness, but the submittal does not indicate if the entire fence perimeter was inspected or whether the height of the fence in relation to surrounding areas was evaluated. The Cambria CSD must verify that the entire fence line was evaluated and must document that the effective fence height (the height of the fence in relation to surrounding areas) is sufficient to prevent wildlife access. The California Department of Fish and Wildlife recommends a minimum eight-foot-tall fence to deer proof an area (<https://www.wildlife.ca.gov/Keep-Me-Wild/Deer>).

The Cambria CSD must comply with all applicable state and federal wildlife requirements while operating and maintaining the surface impoundment. The selection and implementation of the required corrective action measures must consider the potential presence of protected species. Consequently,

Mr. Jerry Gruber

- 2 -

October 24, 2016

the Cambria CSD must coordinate with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service on the selection and implementation of appropriate methods to eliminate burrowing animals to ensure that any protected or endangered species, such as the California red-legged frog, are properly protected.

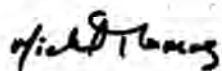
Failure to comply with the request for the technical information as outlined in our August 9, 2016, 13267 Request for Information subjects the Cambria CSD to monetary penalties pursuant to California Water Code Section 13268. This Notice of Violation is to inform you of your violation of the request for technical information pursuant to Water Code Section 13267, and of the associated liabilities that accrue for each day of violation from the compliance due date identified above.

You are required to immediately provide the requested technical report as specified in the August 9, 2016, 13267 Request for Information. Pursuant to California Water Code Section 13268, your violation of Water Code Section 13267 subjects you to administrative civil liabilities up to \$1,000 for each day for which the violation occurs with respect to the above noted compliance date (i.e., \$1,000 for each day the requested technical report is late or incomplete). As of October 24, 2016, and based on the provisions of California Water Code Section 13268, the maximum liability that the Water Board may impose upon the Cambria CSD is up to \$24,000 for the late technical report.

The Cambria CSD invested significant resources in constructing and maintaining the surface impoundment and should make every effort to protect the integrity of the surface impoundment berms and liner system. Proper operation and maintenance activities should be in place to identify and correct issues with burrowing animals and to prevent deer or other wildlife from accessing the surface impoundment. Please review the attached August 9, 2016 letter thoroughly and submit a technical report with all requested information to the Water Board Executive Officer for review and approval as soon as possible.

If you have any questions or comments regarding this letter, please contact **Ryan Lodge at (805) 549-3506** or Matthew Keeling at (805) 549-3685.

Sincerely,



Michael Thomas
Assistant Executive Officer

Digitally signed by Michael Thomas
Date: 2016.10.24 16:01:56 -07'00'

Attachment: Water Code Section 13267 Request for Information, August 9, 2016

cc: Bob Gresens, bgresens@cambriacsd.org
Todd Tognazzini, todd.tognazzini@wildlife.ca.gov
Melissa Boggs, Melissa.boggs@wildlife.ca.gov
Lena Chang, lena_chang@fws.gov
Doug Barker, Doug.Barker@parks.ca.gov
Matthew Keeling, Matt.Keeling@waterboards.ca.gov
Todd Stanley, Todd.Stanley@waterboards.ca.gov
Ryan Lodge, ryan.lodge@waterboards.ca.gov



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Coast Regional Water Quality Control Board

August 9, 2016

Jerry Gruber, General Manager Cambria
Community Services District
jgruber@cambriacsd.org

Dear Mr. Gruber:

WATER CODE SECTION 13267 REQUEST FOR INFORMATION: CAMBRIA COMMUNITY SERVICES DISTRICT

Central Coast Regional Water Quality Control Board (Water Board) staff conducted a site inspection at the Cambria Community Services District (Cambria CSD) class II surface impoundment (surface impoundment) on August 4, 2016. The Cambria CSD surface impoundment is regulated through Waste Discharge Requirements Order No. R3-2014-0047. The Site inspection was conducted to follow-up on a citizen's report indicating deer were grazing next to the surface impoundment within the fenced impoundment area. During the inspection Cambria CSD staff acknowledged observing deer within the fenced area in the past. The fence appeared intact around the surface impoundment and Cambria CSD staff indicated gates are closed and locked when staff are not onsite. It appears that the deer may be jumping over the fence to gain access to vegetation surrounding the surface impoundment. Deer entering the surface impoundment area could damage the surface impoundment liner with their hooves. Wildlife, such as deer, should be excluded from the surface impoundment area to prevent liner damage, and to protect them from the wastes stored in the impoundment.

The Cambria CSD must determine the effectiveness of the surface impoundment exclusion fencing to prevent wildlife access to the surface impoundment. Cambria CSD staff must evaluate the fence height and integrity; verify the fence completely surrounds the impoundment and has no gaps, especially along Van Gordon Creek where it is difficult to visually verify the fence is intact due to extensive vegetation. The Cambria CSD should also verify that hills or sloped areas located near the fence do not render it's effective height low enough to allow deer to jump over the fence,.

During the August 4, 2016 inspection, Water Boards staff noted burrowing animal activity within the gopher fenced area surrounding the surface impoundment. Numerous mounds and holes were documented on the surface impoundment berm. Burrowing animals could damage the surface impoundment liner from below grade and could undermine the integrity of the surface impoundment berm. The Cambria CSD installed a gopher fence intended to keep burrowing animals away from the surface impoundment liner and berm. It is not clear whether the burrowing animals were not properly eradicated from the surface impoundment area prior to the gopher fence installation and are now populating the area inside the fence or whether the burrowing animals entered below the gopher fence. The Cambria CSD needs to develop and

implement a burrowing animal management plan to eliminate the burrowing animal population within the gopher fence area.

The Cambria CSD is required maintain the liner system as designed and approved by Water Board Executive Officer. Excluding wildlife that could potentially damage the liner system is a required part of operation and maintenance activities for the Class II Surface Impoundment. Monitoring and Reporting Program section D.1.iv requires the Cambria CSD inspect and perform routine maintenance. There was no indication that the animal burrows were noted during daily site inspections or are part of a scheduled maintenance program. Cambria CSD staff must inspect the liner system including the surface impoundment berms for integrity and document any issues and resolution of those issues.

Water Board staff understand that the Cambria CSD is exploring options to haul brine offsite for disposal rather than maintain the surface impoundment. Water Board staff encourage the Cambria CSD to find alternative brine disposal options. However, the Cambria CSD is still required to comply with the WDR Order No. R3-2014-0047 until an alternative disposal option is in place and the WDRs are rescinded.

The Cambria CSD must submit a technical report by **September 30, 2016**, that includes, at a minimum, the following information:

1. A plan to exclude deer or any wildlife that could damage the liner from accessing the surface impoundment liner system. The Cambria CSD must evaluate the current exclusion fencing and determine how to improve the system to effectively keep deer or other wildlife from accessing the surface impoundment area.
2. A burrowing animal management plan. The plan should outline measures to control and eliminate burrowing animals from within the gopher perimeter fencing. The Cambria CSD must propose corrective actions to remediate damage to the surface impoundment berms to maintain surface impoundment integrity. The plan should include ongoing training requirements for Cambria CSD staff to ensure that any evidence of burrowing animal activity is immediately documented and corrective actions are implemented to remedy identified issues.

The technical report shall be submitted to the Water Board Executive Officer for review and approval prior to plan implementation. The Water Board needs the required information to evaluate and ensure compliance with Waste Discharge Requirements. The Cambria CSD is required to submit this information because on August 4, 2016, Water Board staff inspected the Cambria CSD Class II Surface Impoundment and found maintenance issues associated with protecting the liner system from potential wildlife damage. Water Board staff discussed the evidence supporting this requirement with Cambria CSD staff on August 4, 2016. More detailed information is available in the Water Board's public file on this matter.

The Water Board's requirement that the Cambria CSD submit a technical report is made pursuant to Section 13267 of the California Water Code. Pursuant to section 13268 of the California Water Code, a violation of a California Water Code section 13267 requirement may subject the Cambria CSD to civil liability of up to \$1,000 per day for each day in which the violation occurs. If the Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$5,000 per day for each violation (California Water Code section 13268(b)(2)). Days of violation and the associated potential civil liability

continue to accrue for each day of non-compliance. The Water Board reserves its right to take any enforcement action authorized by law.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00p.m. on the next business day. Copies of the law and regulations applicable to filing petitions will be provided on request, or may be found on the internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality/

If you have any questions or comments regarding this letter, please contact **Ryan Lodge at (805) 549-3506** or Matthew Keeling at (805) 549-3685.

Sincerely,

Matthew T. Keeling

for John M. Robertson
Executive Officer

cc: Bob Gresens,
bgresens@cambriacsd.org
Todd Tognazzini,
todd.tognazzini@wildlife.ca.gov Melissa
Boggs, Melissa.boggs@wildlife.ca.gov
Matthew Keeling,
Matt.Keeling@waterboards.ca.gov Ryan
Lodge, ryan.lodge@waterboards.ca.gov

Digitally signed by Matthew T. Keeling
Date: 2016.08.09 15:19:20 -07'00'

**EXHIBIT 3:
BRINE HAULING COSTS**

From: Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>
Date: Fri, Oct 14, 2016 at 12:55 PM
Subject: Cambria CSD Brine Hauling Cost
To: "Tina Dickason (tenacioustina2000@gmail.com)" <tenacioustina2000@gmail.com>

Tina,

You had asked about the cost associated with hauling brine to Kettleman Hills for disposal yesterday on the phone and I couldn't recall the numbers we had received from the District. I have attached the costs the District provided to haul the waste in the event that a leak developed in the liner system and they had to remove the brine in order to repair the liner. The Water Board required the analysis and financial assurance in case the liner leaked and the impoundment was full. Hopefully this helps answer your question regarding brine hauling costs. This information is also available on our Geotracker website for the Cambria project. This page is located in the Report of Waste Discharge Appendices 2A – 3A and is Attachment 3. Let me know if you have any questions.

Ryan Lodge, PE
Water Resource Control Engineer
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Phone: (805) 549-3506
Fax: (805) 543-0397

Attachment A

Calculations: Estimated Costs to Pump and Haul Brine Waste From the Evaporation Pond

Assumptions:

- 1) At the time of pumping, the evaporation pond will be at max capacity (6.96 million gallons, i.e., maximum capacity plus 1,000 year storm)
- 2) All Class II designated liquid waste will be pumped out by a Vacuum Tanker Truck (4,800 gallons/truck) and hauled to Kettleman Hills Landfill
- 3) The cost to dispose Class II designated liquid waste at Kettleman Hills Landfill is approximately \$0.20/gallon
- 4) Each truck can make two trips between Cambria and Kettleman Hills Landfill per day
- 5) The cost per trip (Cambria to Kettleman Hills and back) will cost \$575/truck load
- 6) At the end of the project, each truck used will require washout, costing \$450/truck

Volume to be pumped	6,960,000	gallons
Tanker Truck Volume	4,800	gallons/truck
Haul Cost per Load	\$ 575	per truck load
Cost of Disposal	\$ 0.20	per gallon
Washout Cost	\$ 450	per truck used

---Max Brine Level (6.2 Million Gallons plus 1,000 year storm)

Number of Truck Loads Needed = 1,450 truck loads

Cost of Hauling Liquid Waste = \$ 833,750

Cost to Dispose of Liquid Waste at Landfill = \$ 1,392,000

Number of Truck Days = 725 Truck-days needed

Number of Days to Remove Brine = 50 working days --- Estimated time to remove the liquid brine from the pond

Number of Trucks Needed = 15 trucks needed to haul waste in allotted time

Cost for Washout of each Truck = \$ 6,750

Summary

Cost of Hauling Liquid Waste = \$ 833,750

Cost of Disposal at Landfill = \$ 1,392,000

Cost of Truck washout = \$ 6,750

Sub Total = \$ 2,232,500

20% Contingency = \$ 446,500

**EXHIBIT 4:
NOTICE VIOLATION FEBRUARY 2015**



Central Coast Regional Water Quality Control Board

February 27, 2015

Jerry Gruber, General Manager
Cambria Community Services District
jgruber@cambriacsd.org

VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7008 1140 0003 4708 8902

Bob Gresens, District Engineer
Cambria Community Services District
bgresens@cambriacsd.org

Dear Mr. Gruber and Mr. Gresens:

NOTICE OF VIOLATION AND WATER CODE SECTION 13267 REQUEST FOR INFORMATION: CAMBRIA COMMUNITY SERVICES DISTRICT

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.

Following a complaint received from the public on the afternoon of February 9, 2015, Water Board staff observed a discharge of water originating from the Cambria Emergency Water Supply project into Van Gordon Creek. The pipe discharging water to Van Gordon Creek had been moved from its original permitted location to the west, where it had been connected to a diffuser intended to facilitate overland flow into the San Simeon Creek. Van Gordon Creek was dry upstream of the observed discharge point, and we estimated that a flow of approximately 100 gallons per minute (gpm) was discharging into the dry creek bed. A sample of the discharge into Van Gordon Creek contained 0.61 mg/L residual chlorine (sampled collected by Water Board staff and analyzed at ELAP certified laboratory Moore Twining Associates, Inc.). Also, we observed extensive erosion in the location of the Van Gordon discharge as a result of the discharge.

On February 20, 2015, Water Board staff conducted a site inspection at the CCSD Class II surface impoundment. Water Board staff observed brine drift from the blower system operation extending outside of the surface impoundment lined area.

While on the site, Water Board staff asked to review the daily log book of surface impoundment available freeboard. The log book contained information from February 10th up to the February 20th inspection, but no information from plant start-up on January 20th to February 9th.

Dr. David Paulsen, Water Board Chair | Kathleen A. Harbo, Executive Director

895 Aero Vista Place, Suite 101, San Luis Obispo, CA 93401 | www.waterboards.ca.gov/centralcoast



Also on February 20, 2015, Water Board staff asked the site operator if the leachate collection and recovery system (LCRS) and the vadose zone monitoring system (VZMS) had been inspected for the presence of liquid. The onsite operator did not know if the LCRS or VZMS had been inspected for the presence of liquid. On February 26, 2015, CCSD contract staff verified that the LCRS and VZMS had not been inspected prior to February 10th. WDR Order No. R3-2014-0047 requires weekly LCRS and VZMS inspections when brine is present in the surface impoundment.

Specific violations relative to each Order are described below.

WDR Order No. R3-2014-0050

Section VI of WDR Order No. R3-2014-0050, entitled STATE WATER RESOURCES CONTROL BOARD DIVISION OF DRINKING WATER (DDW) REQUIREMENTS, states in part:

“The CCSD must operate the treatment facility in compliance with an OMMP approved by the DDW and the Water Board.”

The OMMP approved by both DDW and the Water Board states in relevant parts:

Section 5.1 “A new conveyance pipeline will be routed southwest to a surface discharge structure at San Simeon Creek.”

Section 18.3.5 “Significant changes in the approved OMMP must be approved by the DDW and the RWQCB prior to instituting changes. The CCSD is responsible for ensuring that the OMMP is, at all times, representative of the current operations, maintenance, and monitoring of the Cambria AWTP.”

Because the location of the discharge was moved without the express approval or knowledge of DDW and the RWQCB, this constitutes a violation of WDR Order No. R3-2014-0050 Section VI.

NPDES Order No. R3-2011-0223

On December 8, 2014, the Water Board sent the CCSD a Notice of Applicability for the CCSD's enrollment in the NPDES Order No. R3-2011-0223 for the discharge of membrane filtration (MF) product water to San Simeon Creek. A monitoring and reporting program (MRP) specific to the CCSD's project, as described in the application package (Notice of Intent), was transmitted with the Notice of Applicability.

The CCSD's Notice of Intent described discharging up to 100 gpm to San Simeon Creek to maintain fresh water conditions in San Simeon Creek Lagoon. The Notice of Intent (Section 2.1 Technical Memorandum dated November 25, 2014) also specifically states, “[t]here will not be chemicals added into the MF feed water nor in the MF filtrate stream that will be discharged in the San Simeon Creek. Sodium hypochlorite and aqueous ammonia will be added only in the MF filtrate stream that will be further treated through RO to protect the RO membranes from bio-fouling.” During a site inspection on February 24, 2015, CCSD staff and representatives told Water Board staff that reverse osmosis treated water had been discharged to the creek. No waste stream, other than the MF product water, is permitted to be discharged to the creek. Furthermore, the CCSD cannot use reverse osmosis treated water in an attempt to dilute

concentrations to meet effluent or receiving water limitations under NPDES Order No. R3-2011-0223. These diluted waste streams are specifically prohibited from enrollment in the Order.

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

1. NPDES Order Section B.1 Discharge Prohibitions: "The discharge of any waste at a location or in a manner different from that described in the approved NOI or regulated by this General Permit is prohibited."
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."
3. NPDES Order Section C.1 Effluent Limitations: "Effluent shall not have detectable chlorine residual greater than or equal to 0.02 milligrams per liter (mg/L)."
4. MRP Section D.1 Start-up Phase Monitoring and Reporting: "Notification: The Discharger shall notify Executive Officer in writing of the start-up date 7 to 14 days prior to start up beginning."
5. MRP Section D.2 Start-up Phase Monitoring and Reporting: "Monitoring: During the initial effluent discharge, sampling of the effluent must occur on the first day... Prior to receipt of the results of the initial samples, all effluent shall be discharged into a holding tank (that is contained, not discharged to the receiving water) until the results of the analyses show the discharge to be within the effluent limits established in this Order and/or in the authorization letter."
6. MRP Section E.3 Discharge Monitoring: "The Discharger will perform monitoring within the first 24 hours of the wastewater discharge system startup and thereafter as directed by the following table." (Table 1, MRP)
7. MRP Section G.1 Reporting: "A report on the start-up phase shall be submitted to the Central Coast Water Board no more than 15 days after the end of the start-up phase."
8. MRP Section G.6 Reporting: "If the Discharger introduces chemical additives in a manner that will change effluent characteristics originally not reported in the NOI then the Discharger shall submit to the Central Coast Water Board a report describing the need, method of chemical application and disposal. The Discharger shall submit a Chemical Additives Report at least 30 days before the use of any chemicals in the operation and maintenance of the wastewater discharge system."

WDR Order No. R3-2014-0047

The CCSD violated the following sections of WDR Order No. R3-20145-0047:

1. WDR Discharge Prohibition B.1: "Discharge of waste to areas outside the approved and permitted Class II surface impoundment as illustrated in Figure 3 is prohibited, unless approved by the Executive Officer. This includes drift from mechanical blowers designed to increase surface impoundment evaporation efficiency. No material from the surface impoundment shall be allowed to drift, drain, or otherwise discharge to any area other than within the surface impoundment."

2. MRP Section D.1.ii: "Daily – Measure and record freeboard, as measured from the top of the lowest part of the berm to the brine surface. Observations and measurements must be recorded in a permanent log book kept onsite."
3. MRP Section D.2.i: "Weekly - Inspect all systems for the presence of liquid and collection system integrity, record volume of leachate collected (gallons)."

Technical Report Requirements

Water Board staff has received differing reports regarding the length of time the discharge to Van Gordon Creek occurred. In order to assess the potential impacts to Van Gordon Creek, Water Board staff needs to know the date, duration, volume, and quality of any and all of the discharges that have occurred. Therefore pursuant to Section 13267 of the California Water Code, you are required to provide a technical report to the Water Board by March 27, 2015, addressing the following:

1. Document the dates, durations and volumes of all discharges to Van Gordon Creek or any other surface water body, and provide all monitoring data for all pollutants collected during those discharges, from all sources of water (MF filtered water and RO product water) that were discharged to Van Gordon Creek or any other surface water body. The documentation is to include copies of the actual data logged by the facility's SCADA and other automated monitoring systems. Such data shall include pump run times and flow rates for the full 24 hour periods of the days when the subject discharges occurred. All data are to be clearly labeled so as to easily allow the reader to understand where and when each data point was collected.
2. Provide information detailing how and when you intend to resolve the issue of the San Simeon Creek water supply augmentation potentially interfering with monitoring well 16D1. Please note that you will need DDW and Regional Board approval before deviating from the discharge methodology described in the OMMP and NPDES Permit NOI.
3. Provide information regarding measures the CCSD will take to prevent brine drift outside of the surface impoundment liner system and how the CCSD is verifying brine drift is not occurring. The blowers were in operation since January 20th; provide data, observances, or other measures utilized by CCSD to verify whether brine drift was occurring prior to the February 20th site inspection and how or if those measures were adjusted to ensure brine drift is no longer occurring. Provide specific examples of the measures previously employed by the CCSD to determine brine drift and measures currently employed to verify brine drift is not occurring.

Pursuant to section 13268 of the California Water Code, a violation of a California Water Code section 13267 requirement may subject you to civil liability of up to \$1,000 per day for each day in which the violation occurs. If the Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$5,000 per day for each violation (California Water Code section 13268(b)(2)). Days of violation and the associated potential civil liability continue to accrue for each day of non-compliance. The Water Board reserves its right to take any enforcement action authorized by law.

We realize and appreciate that the CCSD has been working diligently to design, build, and test this new system in an emergency situation, and that you are dealing with multiple challenges simultaneously. Some of the enforcement actions we take are mandatory per the California Water Code, while others are more discretionary. Our discretionary enforcement actions beyond this Notice of Violation will be determined based on your responses to this Notice of Violation and your future compliance with Orders regulating this facility.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions will be provided on request, or may be found on the internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality/

If you have any questions regarding this Notice of Violation, please contact Thea Tryon at 542-4776 or by email at thea.tryon@waterboards.ca.gov.

Sincerely,

Michael Thomas
Assistant Executive Officer

cc: Jeff Densmore, DDW
Jeff.Densmore@waterboards.ca.gov

Todd Stanley, Water Board
Todd.stanley@waterboards.ca.gov

Chris Park, CDM Smith
parkce@cdmsmith.com

Todd Tognazzini, CA DFW
Todd.Tognazzini@wildlife.ca.gov

Melissa Boggs, CA DFW
Melissa.Boggs@wildlife.ca.gov

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ECM: CW-809684

EXHIBIT 5: DATA AND DOCUMENTATION ON RESERVOIR

EXHIBIT 5:
WATER SUPPLY ALTERNATIVE: WARREN RESERVOIR DATA

From: **Clyde Warren** <ctwarren@hotmail.com>
Date: Mon, Jan 13, 2014 at 10:59 AM
Subject: Reservoir
To: "gyates@toddengineers.com" <gyates@toddengineers.com>
Cc: Tina Dickason <tenacioustina2000@gmail.com>, Clyde Warren <ctwarren@hotmail.com>

Hi Gus,

We may be calling on you so I wanted to give you a heads up on the reservoir site. Here some photos to refresh your memory. The designs are two for elevations. 610 acre feet at 240' high and 704 acre feet at 255' high.
Clyde

----- Forwarded message -----

From: Clyde Warren <ctwarren@hotmail.com>
Date: Thu, Jan 9, 2014 at 1:38 PM
Subject: Fw: Pond on Warren property
To: Tina Dickason <tenacioustina2000@gmail.com>

Hi Tina, I sent this to Jerry and a copy of the photos I sent to Bill and you.
Clyde

Sent from Windows Mail

From: Clyde Warren
Sent: Thursday, January 9, 2014 1:36 PM
To: Jerry Gruber
Cc: Clyde Warren

Hi Jerry,

I showed the CCSD this site over ten years ago. I never did hear what the capacity is for it. So I hired AT Geo to find out. It will hold 610 acre feet of water. You have existing wells and permit to fill it. It does not involve a blue line stream and it is the drainage above your well field. I'll send you photos next. I will be presenting this to the Cambria For Change meeting on the 20th.

I would like to meet with you first at your convenience before this meeting.

Clyde
927-3588

From: Bill@VolbrechtSurveys.com
To: ctwarren@hotmail.com
CC: bill@atgeosys.com; Alan@atgeosys.com
Subject: Pond on Warren property
Date: Tue, 3 Dec 2013 20:23:25 +0000

Clyde,
Alan noted the title block was not printed. Here are copies with the title block printed.

Here is an update of Exhibit 2 and Exhibit 2G. This update shows the existing contours from the quad sheet. The explanation of Exhibit 2 and 2G has been updated to show the proposed volumes with the higher dam height.

Exhibit 1 : With the water surface at an elevation of 240 feet, this is about 200 feet above the yard.
The Pond volume is 610 af and the disturbed area is 30 acres and moves 851,000± cy.
Exhibit 1G: is the same basin with a google photo as a background.

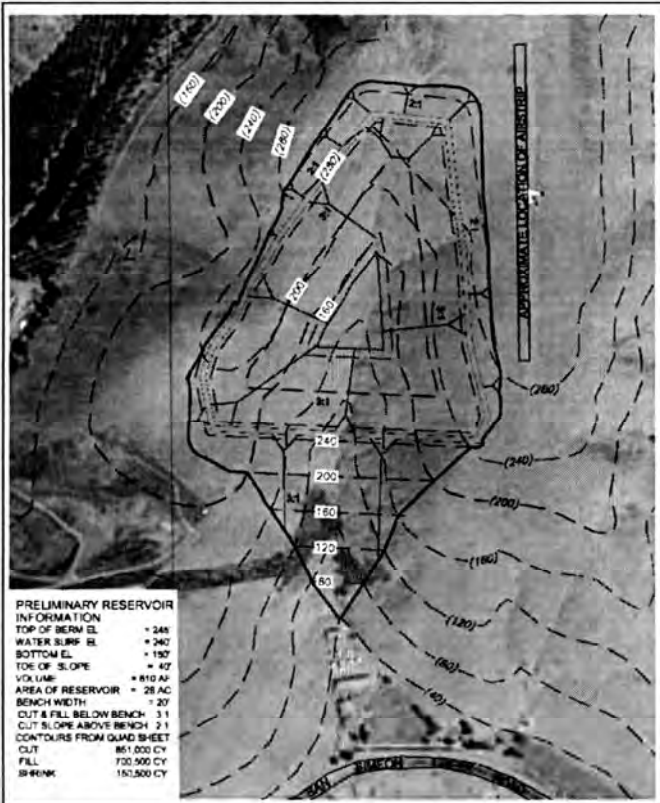
Exhibit 2 : With the water surface at an elevation of 255 feet, this is about 215 feet above the yard.
The Pond volume is 704 af and the disturbed area is 30.3 acres and moves 964,000± cy.
Exhibit 2G: is the same basin with a google photo as a background.

The existing ground is from quad sheet topography with 40 foot contour intervals.
The water surface could be raised more, and retain a greater volume but the fill required and the cut to generate that fill would also increase.

If you have any questions please contact me.

Thank You

Bill Rebik,
PE, PLS, QSP/QSD
Sr. Engineer
AT GeoSystems, Inc.
dba Volbrecht Surveys
3590 Sacramento St., Ste 110
San Luis Obispo, CA 93401
Off 805.781.9296
Fax 805.781.8050
<http://www.atgeosys.com>

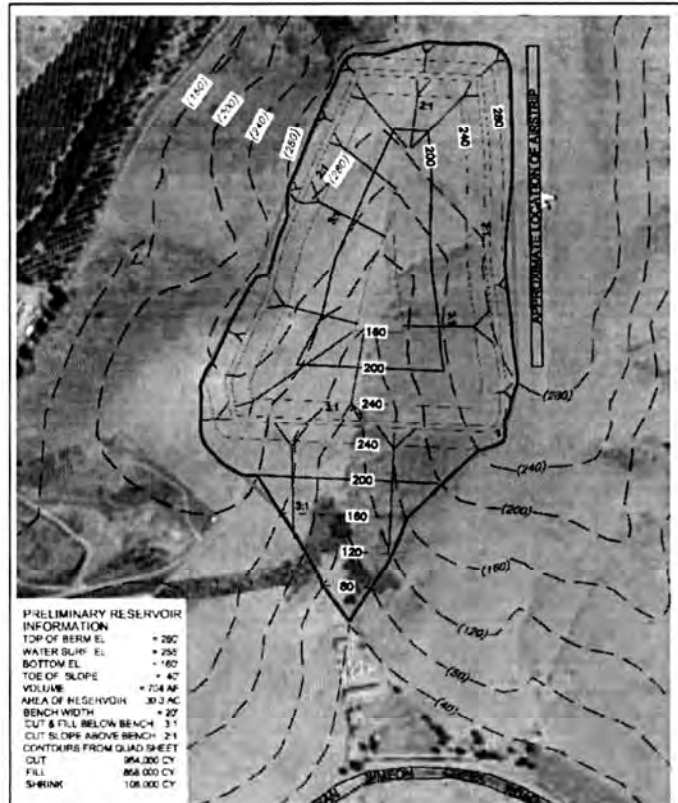


PRELIMINARY RESERVOIR INFORMATION
 TOP OF BERM EL. + 248
 WATER SURF EL. + 240
 BOTTOM EL. + 190
 TOE OF SLOPE + 40
 VOLUME + 810 AC
 AREA OF RESERVOIR + 28 AC
 BENCH WIDTH + 20
 CUT & FILL BELOW BENCH - 3.1
 CUT & FILL ABOVE BENCH 2.1
 CONTOURS FROM QUAD SHEET
 CUT 851,000 CY
 FILL 730,900 CY
 SHRINK 160,100 CY

EXHIBIT 1G
 PRELIMINARY RESERVOIR
 APN-013-062-003
 SAN LUIS OBISPO COUNTY
 PREPARED FOR CLYDE WARREN
 NOV. 2013

AT GeoSystems
 Civil Engineers Land Surveyors
 3350 Sacramento Dr. Suite 110 San Luis Obispo, CA 93401 (805)781-9294 atgeosys.com

SCALE: 1"=300'

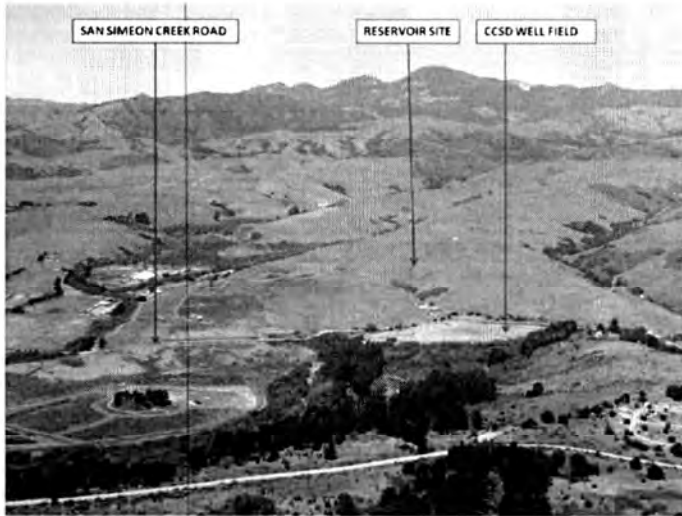
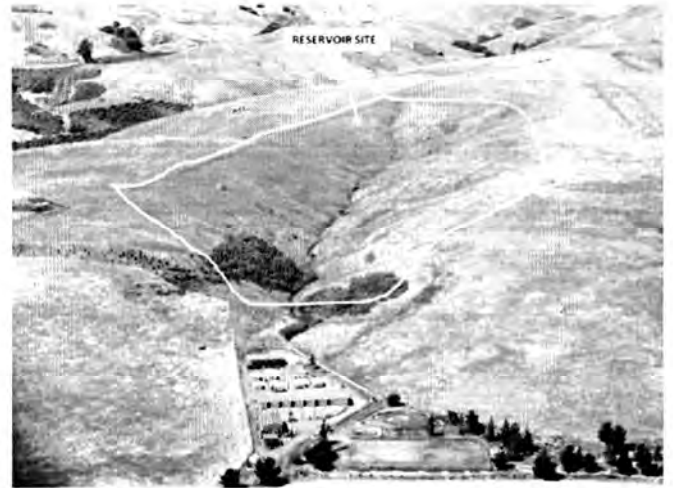
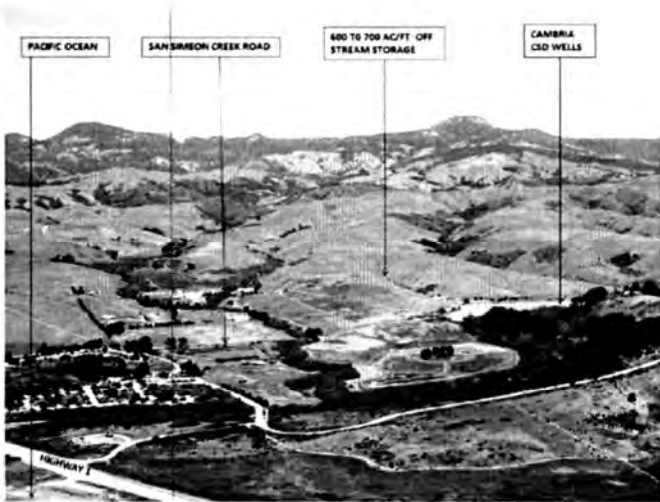


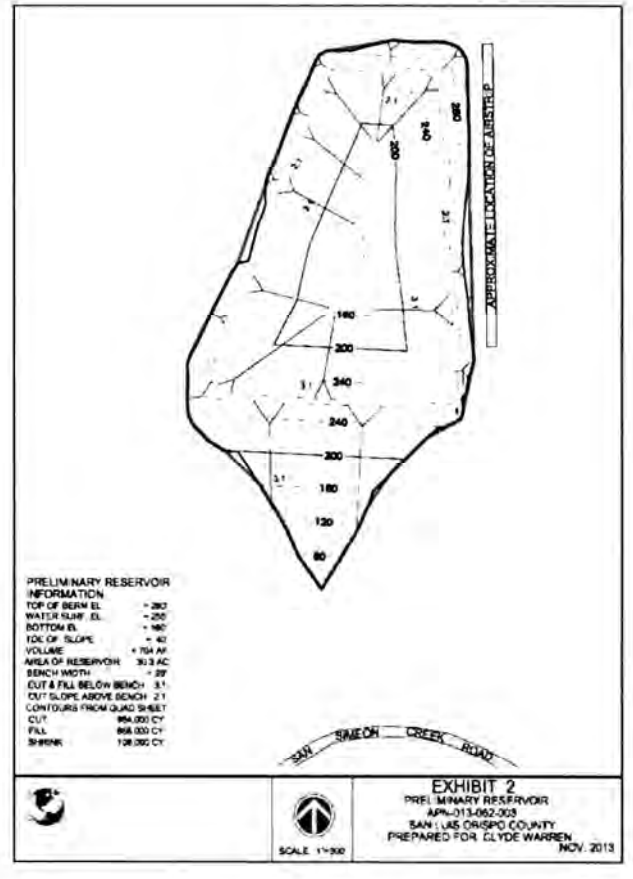
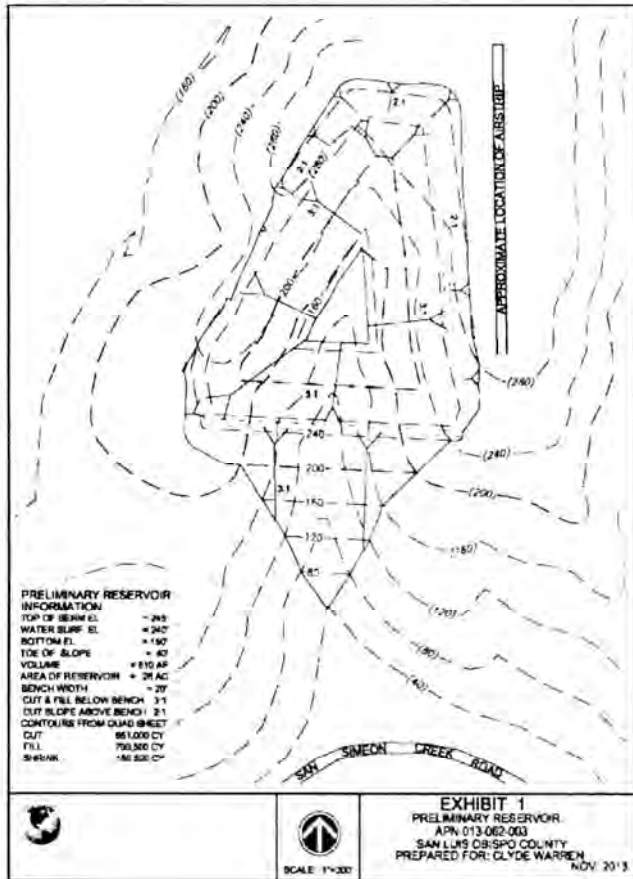
PRELIMINARY RESERVOIR INFORMATION
 TOP OF BERM EL. + 250
 WATER SURF EL. + 250
 BOTTOM EL. + 150
 TOE OF SLOPE + 40
 VOLUME + 754 AC
 AREA OF RESERVOIR 30.2 AC
 BENCH WIDTH + 20
 CUT & FILL BELOW BENCH - 3.1
 CUT & FILL ABOVE BENCH 2.1
 CONTOURS FROM QUAD SHEET
 CUT 964,300 CY
 FILL 868,000 CY
 SHRINK 108,000 CY

EXHIBIT 2G
 PRELIMINARY RESERVOIR
 APN-013-062-003
 SAN LUIS OBISPO COUNTY
 PREPARED FOR CLYDE WARREN
 NOV. 2013

AT GeoSystems
 Civil Engineers Land Surveyors
 3350 Sacramento Dr. Suite 110 San Luis Obispo, CA 93401 (805)781-9294 atgeosys.com

SCALE: 1"=300'





GUS YATES CAPACITY STUDY OF RESERVOIR:

----- Forwarded message -----

From: **Clyde Warren** <cjwarren@hotmail.com>

Date: Wed, Jan 22, 2014 at 9:18 AM

Subject: Fw: Reservoir losses and operation

To: Tina Dickason <tenacioustina2000@gmail.com>, Jerry Gruber <jgruber@cambrnacsdsd.org>, Bob Gresens <bgresens@cambrnacsdsd.org>

Cc: Bruce Gibson <bbgibson@co.slo.ca.us>, Rick Hawley <rick@greenspacecambrna.org>, Russell M McGlothlin <RMcGlothlin@bhfs.com>

Hi everyone, Here is Gus Yates information on the reservoir.

Clyde

Sent from Windows Mail

From: Gus Yates

Sent: Tuesday, January 21, 2014 4:58 PM

To: Clyde Warren

Hi Clyde,

I have finally had a chance to look over the schematics and photographs of the proposed reservoir site in the gully adjacent to CCSD's San Simeon well field. It appears that there are two capacities under consideration. The smaller one has a maximum capacity of 610 AF, a maximum surface area of 28 acres and a 90-foot water-level range. The larger one has 704 AF of storage, 30 acres of surface area and a 105-foot water-level range. Here is a bit of information as well as questions/issues that would need to be addressed to further develop the concept of an off-stream storage reservoir at that location:

- Net evaporative losses are the difference between annual evaporation and annual rainfall, multiplied by the surface area. Annual rainfall is about 20 in/yr (Piedras Blancas gauge) and annual evaporation is about 33 in/yr (assumed equal to reference ET in CIMIS zone 1). Multiplying the difference ($13 \text{ in}/(12 \text{ in/ft}) = 1.1 \text{ ft}$) by 30 acres equals 33 AFY of net loss, or about 5% of reservoir capacity per year.
- Seepage loss is much more difficult to predict because it would occur as flow through fractures in the underlying Franciscan mélangé bedrock. The occurrence of fractures can be highly variable, which means you would either want to do localized testing or plan to roller-compact clay over the bottom of the reservoir before filling it. If the areally-averaged seepage rate were 0.01 ft/d, it would take 25 years for it to drain the reservoir. If it were 0.1 ft/d (which seems high for an average), it would take only 2.5 years.
- Seepage out the bottom of the reservoir would just return to the basin deposits at the well field anyway, so the water would not be lost to CCSD. But the purpose of the reservoir is to store water for periods when the alluvial supply runs out, so you certainly don't want the water to seep out too quickly.
- I can't emphasize enough the importance of extremely dry years in determining the reliable yield of the alluvial groundwater supply and hence the circumstances under which the reservoir supply would be valuable. Groundwater yield can run out under two circumstances: 1) an exceptionally long dry season, or 2) a winter with too little stream flow to refill the aquifer (which has a probability of about 0.04, or 1 year out of 25 on average). This is frequent enough to justify a supplemental supply for those dry years. The probability of two

winters in a row with incomplete recharge is on the order of 1 year in more than 400 years, which is probably too rare an event to be worth planning for. So the water stored in the reservoir needs to remain available for up to 2 years between refill events to be truly valuable in terms of providing a reliable supplemental supply to CCSD. The attached figure illustrates the importance of infrequent but extremely dry years. It shows annual discharge in San Simeon Creek at the Palmer Flats gauge for 1971-1992. In 1976 and 1977 total discharge was less than current annual CCSD water use and in 1990 it was about equal to that use.

- The good news is that the annual net evaporation and seepage rates both appear to be relatively small percentages of total reservoir capacity, so that a substantial percentage of the stored water would still be in the reservoir after 2 years.
- The reservoir could be filled using CCSD's existing municipal wells (with a booster pump?), but how would the reservoir water be returned? Reservoir water is surface water, and to avoid the need for constructing a surface-water treatment plant, the water would have to be percolated into the aquifer sufficiently far upstream that it would meet subsurface residence-time criteria required by the California Department of Public Health. I investigated that question at one point in the early 1990s when there was a proposal to percolate recycled wastewater.
- You would need to do a reservoir operations and stream flow time series analysis to confirm yield and investigate steelhead migration impacts. It might be necessary to install an additional well to allow more rapid filling of the reservoir during periods of high stream flow. Fish passage impacts typically occur as periods of a few days to a week when natural stream flow recedes past the minimum flow required for adult or smolt passage over the critical riffle in the lower basin area. Stream flow depletion (from additional pumping at the well field) does not impact migration opportunity when flows are higher or lower than the critical passage flow by an amount equal to the additional pumping rate).

At first glance, I see no fatal flaws in this idea.

Gus

Gus Yates, PG, CHg

Senior Hydrologist

TODD GROUNDWATER

2490 Mariner Square Loop, Suite 215

Alameda, CA 94501

gyates@toddgroundwater.com

[510.747.6920 x108](tel:510.747.6920)

www.toddgroundwater.com

EXHIBIT 6: PHOTOGRAPHS OF FLOODING AT CCSD WELL FIELD

EXHIBIT 6:
IMAGES OF FLOODING AT BOTH CCSD WELL FIELD AND STATE PARKS PROPERTY January 19, 2016:



Figure 2: Flooded San Simeon Creek





**RESPONSE TO COMMENT LETTER NO. PO-200**

Tina S. Dickason

October 26, 2016

- PO 200-1 This comment makes statements regarding the commenter's belief that in 2013 the CCSD Board had the goal of lifting the moratorium and issuing intent to serve letters. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 200-2 This comment discusses the "water shortage" in 2013, the timing of the Stage 3 Water Shortage Condition, and questions how CCSD staff could "not be aware of a pending crisis, as the board was moving towards growth?" This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 200-3 This comment makes reference to the Proposition 218 proceeding, that the EWS was to be used in drought conditions, and that the Sustainable Water Facility "...is intended for growth." The Project's potential growth inducing impacts are addressed in DSEIR [Section 6.3, *Growth Inducing Impacts*](#); see also Responses PA 4-32 and PA 6-7. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 200-4 This comment makes reference to the cost of the EWP, questioning how much more "a differently named project, with a different intent" will cost. See Response PO 89-3 concerning increased water rates and construction/operational costs. See Response PO 123-1 concerning the Project's name change.
- PO 200-5 This comment makes reference to the Proposition 84 grant, the renaming of the project, and the issuance of future intent to serve letters. This comment does not address the DSEIR's adequacy or raise a significant environmental point. See Response PO 123-1 concerning the Project's name change. This comment does not address the DSEIR's adequacy or raise a significant environmental point.
- PO 200-6 This comment refers to comments from "regulatory agencies" on the IS/MND and questions doing an "after-the-fact, DSEIR for a different project." See Response PO 140-1 concerning the public review and comment period, which is for the Project evaluated in the DSEIR, and not the IS/MND; see also Response PA 7-4 concerning the IS/MND.



- PO 200-7 See DSEIR [Section 3.2.1, Project History](#). An EIR was not circulated prior to SWF construction, due to the emergency nature of the Project; see Response PO 195-1. The CCSD received an Emergency CDP issued by SLO County, and submitted a NOE to the Office of Planning and Research (OPR). The OPR issued a concurrence on the NOE, and thus the SWF CEQA requirements were fulfilled. See also Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE.
- PO 200-8 See Responses PA 7-4 and PO 96-2 concerning the Project modifications. See Response PO 89-3, concerning increased water rates and construction/operational costs.
- PO 200-9 This comment references tourism, citizen's conservation efforts and not running out of water. See Response PA 6-7 concerning the Project's water output, and water demands and supplies. Tourism is not an environmental issue of concern, per CEQA guidelines. These comment do not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 200-10 The commenter claims that the Project modifications concerning evaporation pond repurposing would result in negative environmental impacts concerning noise, air quality, and biological resources. In actuality, Mitigation Measure AES-2 concerning evaporation pond and evaporator decommissioning, and the surface discharge extension, are required to avoid adverse environmental impacts concerning aesthetics, biological resources, and noise, and reduce environmental impacts concerning hydrology. As explained on DSEIR Page 5.7-17, given the sporadic nature of noise levels generated during construction of Project modifications and following compliance with CZLUO Sections 23.06.042 through 23.06.050, construction-related noise impacts from the proposed Project modifications would be less than significant. Concerning the Project's potential construction-related air quality impacts, the DSEIR incorporates the analysis construction air emissions based on CalEEMod calculations, as recommended by the San Luis Obispo Air Pollution Control District (SLOAPCD). As presented in DSEIR [Table 5.2-4](#), the Project's potential fugitive dust emissions do not exceed SLOAPCD thresholds during construction and are less than significant. The SWF Project is subject to compliance with all mitigation measures, including those in place to reduce evaporation pond-related potential impacts to avian species, as detailed in the DSEIR. See also Response PA 7-12 concerning avian species.
- PO 200-11 The commenter expresses concern regarding the evaporation pond's potential to impact wildlife. DSEIR [Section 5.3, Biological Resources](#), evaluates the Project's potential impacts to biological resources, including impacts to wildlife resources and their habitats resulting from the evaporation pond. A Hazing Study (Report



of Dr. Winston Vickers Regarding Restriction of Wildlife Access to Evaporation Pond, December 16, 2015) was conducted to determine the best approach to haze/deter wildlife from the evaporation pond to avoid/lessen impacts to wildlife; see DSEIR Appendix E5. Mitigation Measure AES-2 requires removal of the mechanical spray evaporators and their enclosures. Thus, the evaporation pond would no longer be used to store RO concentrate and the repurposed pond (i.e., the raw water storage basin) would be filled with raw water, avoiding impacts associated with the evaporation pond. See DSEIR Page 5.3-86 and Responses PA 7-3 and PO 194-7.

- PO 200-12 See DSEIR Mitigation Measures BIO-1 to BIO-19, for all proposed mitigation to maintain the integrity of the raw water storage basin and the surrounding natural habitats on the Project site.
- PO 200-13 This comment asserts that the evaporation pond is an “attractive nuisance.” It is noted that the DSEIR incorporates several Project Modifications intended to improve the visual character of the existing evaporation pond; see Response PO 196-4.
- PO 200-14 See Responses PA 4-15 and PA 4-19 concerning the Project’s proposed hauling of RO concentrate to Kettleman Hills.
- PO 200-15 This comment pertains to the cost of brine disposal. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 200-16 See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 200-17 The comment states that the AMP should have been developed prior to DSEIR distribution. See Responses PA 3-4 and PA 4-5 concerning the AMP and update. The CCSD is committed to a robust AMP process that includes monitoring and performance criteria designed to carefully monitor changes and respond to them in real time; refer also to Mitigation Measure BIO-7. Pursuant to Mitigation Measure BIO-7, the CCSD is required to implement the AMP at commencement of SWF operations. The adaptive management process is a recognized method for “learning by doing” using best available data when there is such uncertainty in the response of an ecosystem to a proposed action. Thus, CCSD is not required to circulate its AMP a part of the CEQA process for the Project, and incorporation of the AMP as part of the DSEIR is not necessary.
- PO 200-18 See DSEIR Impact 5.3-5 for a discussion of the Project’s compliance with CZLUO Section 23.07.170.e.2 (Development in ESHA to Avoid a Taking).



- PO 200-19 The mitigation measures identified in the DSEIR, including Mitigation Measure BIO-6, would be implemented using the Project's MMRP; see Response PO 191-8. The CCSD thus affirms that the Project's mitigation measures, including BIO-6, are fully enforceable and consistent with CEQA Guidelines Section 15126.4(a)(2).
- PO 200-20 The CCSD has spent decades studying various long-term water supply alternatives; see DSEIR [Section 3.2.2, *Project History*](#). Refer also to [Section 7.5, *Alternatives Considered but Rejected*](#). The San Simeon Off-Stream Storage Alternative facilities was considered as a Project alternative, but ultimately rejected. This Alternative is complex, and would have required permitting a tall dam within the Coastal Zone. Permitting would be required from the State Water Resources Control Board, Division of Safety of Dams, Regional Water Quality Control Board, California Department of Public Health, U.S. Fish and Wildlife, California Department of Fish and Game, California Coastal Commission, and other County building permits. It is noted that the permitting process with the Division of Safety of Dams is particularly complex and lengthy. There is also unreliability associated with this Alternative, as there may not be enough precipitation to fill the dam if it was constructed.
- The commenter makes several claims concerning an off-site stream storage facility being the environmentally superior Project alternative. However, it is noted that an Off-Site Stream Storage facility would not eliminate the need for chemicals to be present on-site for water purification or eliminate the need for CCSD maintenance. There is no basis for the commenter's claims that the Warren reservoir site is "ideally located." This Alternative would not reliably supply Cambria with water, as the commenter claims, because water could only be diverted during wet winter years. During drought years, such as 2014 to 2015, limited water would be available to store in a reservoir. As such, this Alternative is not environmentally superior to the Project.
- PO 200-21 This comment relates to funding sources for reservoirs. See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 200-22 The Project was designed to be protected from flooding and washout up to the 100-year (1%) flood. Building in the 100-year flood zone is not illegal, and the Project complied with the necessary regulations. See Responses PA 4-29 and PA 4-30 concerning the Project's potential impacts related to flooding and site runoff.
- PO 200-23 See Responses PA 4-6 and PA 7-5 concerning water rights.



- PO 200-24 The commenter requests clarification as to how CCSD determined the maximum pumping rights for the San Simeon and Santa Rosa groundwater basins, and suggests the DSEIR information conflicts with pumping rights identified in the SWRCB water right diversion permits. See Responses PA 4-6 and PA 7-5 concerning water rights.
- PO 200-25 See Responses PA 4-6 and PA 7-5 concerning water rights.
- PO 200-26 This comment serves as the conclusion to the comment letter. Response to specific comments are provided above. No further response is needed.

To: Mr. Bob Gresens, Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

RECEIVED
Oct 26 2016

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12:02 pm

CAMBRIA COMMUNITY SERVICES DISTRICT

Mr. Gresens,

Please consider and respond to the following comments regarding the current Draft SEIR Cambria Sustainable Water Facility Project (State Clearinghouse number: SCH 2014061073).

-The net amount of water to be extracted is unclear and the impact of extraction on surrounding wetlands, lagoon, creek, and habitats is not adequately analyzed.

201-1

-The overall water project appears manipulative of the CEQA process and appears dishonest, transforming from a PEIR, to an emergency CDP, to an uncertified DEIR, and now an SEIR. Project proponents should complete the EWTP EIR rather than attempt to piggyback a permanent-use facility on top of an "emergency" project.

201-2

-The Master Water Plan EIR reads as follows: "*A future project specific EIR/EIS would need to further determine the potential impacts to sensitive species after more details become known regarding the desalination facility* (p. 5.6-28)." Despite this quote, an EIS has not been prepared, and thus, impacts from the project have not been adequately analyzed.

201-3

-The growth-inducing impacts of the Build-out Reduction and SWTP projects are not sufficiently analyzed. Cambria is anticipated to see an increase in 800 residential water connections, growing from 3,850 to 4,650 residences.

201-4

-The discussion of EIR sufficiency on page 2-8 on EIR sufficiency does not lead to the logical conclusion that EIR sufficiency can be applied to the current SEIR.

201-5

-The SEIR incorporates by reference documents that are uncertified (p. 2-12), including abandoned EIR's reports, and internal CCSD plans.

201-6

-The CCSD anticipates continuous "*likely need for continues use of the SWF for the next 20 years* (p. 3-14)." Yet, on several other occasions the document leans on 'emergency water extraction during Stage 3 periods'. Which comments should reviewers take as accurate, continued use or only emergency use?

201-7

-The SEIR quantifies that "*up to 100 gpm*" (p. 3-34) would be discharged into San Simeon Creek, yet there is no way to calculate total volume (i.e. is this 24 hours a day every day, is 100 gpm actually anticipated.) Therefore impacts to lagoon and its species cannot be determined and are not adequately addressed.

201-8

-The SEIR and the Master Water Plan PEIR fail to adequately conduct an analysis of the impact of groundwater extraction on various wetlands (impact 5.3-2), including on-site wetlands, adjacent riparian wetlands, adjacent salt marsh, other wetlands, and the creeks and lagoon.

201-9

-The SEIR and Master Water Plan PEIR fails to sufficiently conduct an analysis of the impact of groundwater extraction on wetlands (impact 5.3-3), including 404 wetlands, on-site wetlands, adjacent

201-10

riparian wetlands, adjacent salt, other wetlands, and the creeks and lagoon itself.

201-10

-Cumulative impacts must consider cumulative development related to a project (impact 5.3.6). In this case, there are three related elements, the EWTP, the SWTP, and the addition of 800 new residences in Cambria. Given the number of listed and sensitive species and the lack of analysis of the cumulative impacts, one cannot assume impacts are less than significant.

201-11

-An inadequate analysis is provided to determine impacts of water extraction on the adjacent Monterey pine forest (8.1 Agricultural and forest resources). Impacts cannot be analyzed since the amount of water to be removed, and the duration of extraction, are unclear.

201-12

-The SEIR states that there is no impact to any conservation plans (8.2 Biological Resources). However, in the South-Central California Steelhead Recovery Plan (Page 18), groundwater extraction is specifically pointed out as being a very high threat to steelhead.

201-13

On a related note, the SEIR regularly references an Adaptive Management Plan to deal with any impacts to sensitive species or habitats, yet there are no specifics offered in this plan. Therefore, no analysis of the suitability of the AMP can be made without more detail or endorsement by one of the wildlife agencies.

201-14

Sincerely,

K. M. Duffy

**K. M. Duffy
2016 Fairchild
Los Osos, CA, 93402**

**RESPONSE TO COMMENT LETTER NO. PO-201**

KM Duffy

October 26, 2016

- PO 201-1 See Response PA 6-7 concerning the Project's water output, and water demands and supplies. See DSEIR Section 5.3, *Biological Resources*, for a discussion concerning the Project's potential impacts to habitat occurring on and surrounding the Project site.
- PO 201-2 This comment questions the CEQA process being used. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 201-3 The preparation of an EIS would be necessary if there was a federal nexus concerning the Project. The Water Master Plan EIR is a programmatic document, written before any specific design for a desalination facility was created. At the time, specific Project details were not known and as such the Water Master Plan EIR refers to both an EIR/EIS. The DSEIR has been prepared to satisfy the principal CEQA Guidelines Sections 15120 through 15132 (Contents of Environmental Impact Reports) and 15162 (Subsequent EIRs and Negative Declarations); see DSEIR Page 2-1. No further response is necessary.
- PO 201-4 The commenter claims that the DSEIR does not sufficiently analyze the growth-inducing impacts associated with the BRP and SWTP projects. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7.
- PO 201-5 The commenter is referring to DSEIR Page 2-8, which summarizes CEQA Guidelines Section 15151 and its explanation of the adequacy of an EIR. This information from CEQA Guidelines is presented for informational purposes, to assist the reader in understanding the certification process for a Final EIR. The commenter does not state a basis for the claim that the DSEIR would not be sufficient under CEQA Guidelines Section 15151. No further response is necessary in this regard.
- PO 201-6 The commenter does not specifically state which documents incorporated by reference are "abandoned EIR reports, and internal CCSD plans." All documents listed under Section 2.7, *Incorporation by Reference*, are appropriate and accurate



resources for the DSEIR to rely on in accordance with CEQA Guidelines Section 15150 requirements.

- PO 201-7 The quote the commenter refers to on DSEIR Page 3-14, is part of a discussion concerning State of California anticipating continued water shortages and drought conditions over the course of the next 20 years. This section is part of a larger discussion concerning Project background and history; see DSEIR [Section 3.2](#). As such, the Project History discussion includes presenting the E-CDP application and authorization in 2014. The document does not inappropriately “lean on emergency water extraction during Stage 3 periods,” as the commenter implies. DSEIR [Section 3.2](#) presents the Project history in its entirety, and DSEIR [Section 3.3](#) describes the Project objectives. See also Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE.
- PO 201-8 The commenter questions how often the Project would discharge 100 gpm of MF filtrate water flow into San Simeon Creek Lagoon. See Responses PA 3-4 through PA 3-6, and PA 4-12 concerning the 100 gpm MF filtrate water flow to the Lagoon.
- PO 201-9 The commenter claims the DSEIR and Master Water Plan PEIR fail to analyze groundwater extraction impacts to wetlands. Potential Project impacts concerning wetland and riparian features are discussed under DSEIR Impact 5.3-2, *Riparian Habitat or Other Sensitive Natural Community*, and Impact 5.3-3, *Wetlands and Jurisdictional Waters*. Refer also to Response PA 4-24, PA 4-25, PA 4-26, and PA 4-27.
- PO 201-10 See Response PO 201-9 concerning potential Project impacts to wetlands.
- PO 201-11 See DSEIR [Table 4-1, Cumulative Projects List](#), and [Exhibit 4-1, Cumulative Projects](#). The DSEIR properly analyzed cumulative impacts in accordance with CEQA Guidelines Section 15130(b), as referenced on DSEIR Page 4-1.
- PO 201-12 See [Section 8.1, Agricultural and Forest Resources](#). The Project site does not contain forest land, and the site has been in public utility use since 1979. Additionally, Well 9P7 Discharge pipeline is already existing underneath the on-site Monterey pines. The Monterey pines on the Project site are considered isolated stands, not actual “forest community.” As groundwater pumping and other water utility uses have occurred on the Project site for a number of years, and no additional improvements would occur near the Monterey pine stand, no impacts would occur.



- PO 201-13 Impacts to steelhead are discussed under Impact 5.3-1, *Special-Status Plant and Wildlife Species*. Concerning the Project's potential to impact an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other related conservation plan, the South-Central California Steelhead Recovery Plan is not a relevant conservation plan applicable under this threshold; see Response PA 4-18. Thus, CCSD affirms that the Project site is located outside of the jurisdiction of any applicable conservation plans.
- PO 201-14 The AMP is described on DSEIR Page 5.3-60; see also Mitigation Measure BIO-7 and Responses PA 3-4, PA 4-5, and PO 200-17 concerning the AMP.



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COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org



Dear Mr. Gresens,

This public comment requests that the Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

This urgent request is made for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Robert Fountain
 324 Fallbrook St
 Cambria CA 93428



RESPONSE TO COMMENT LETTER NO. PO-202

Robert Fountain

October 26, 2016

PO 202-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.



COMMENTS ON THE
"SUSTAINABLE WATER FACILITY DRAFT SUBSEQUENT EIR"

Submitted by LandWatch San Luis Obispo County

Prepared by Cynthia Hawley, Attorney

October 26, 2016

404pm

What follows are LandWatch's comments on the "Sustainable Water Facility Draft Subsequent EIR".

The Emergency Water Supply project and the Sustainable Water Facility are two separate projects under CEQA that are improperly conflated within the Sustainable Water Facility Subsequent EIR (SEIR).

The Emergency Water Supply project and the Sustainable Water Facility are separate projects under CEQA that are improperly conflated in the SEIR and improperly referred to and discussed in the SEIR as the same project.

203-1

Pursuant to §21065 a "project" requiring environmental review is "an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment..." A "project" is not necessarily a structure. These two projects are profoundly different activities for using the same infrastructure for different purposes with radically different environmental effects.

The record is clear and the District testified to the Court in *LandWatch v. the Cambria Community Services District, et al.* that the brackish water/wastewater effluent desalination infrastructure was built as the Emergency Water Supply project (EWS) under an emergency permit. The purpose of the activity permitted within the EWS is strictly limited to production of up to 250 acre-feet of water to serve existing water connections only, to abate emergency, "i.e. not to serve new development." See EIR Appendix C "Emergency Coastal Development Conditions of Approval" condition 1. Condition 2 makes it very clear that any regular coastal development issued for the EWS is also limited to servicing existing development.

203-2

The Sustainable Water Facility (SWF), on the other hand, would use the same infrastructure as modified for the purposes of year around production of water for use by new development for full build-out of Cambria. This activity is explicitly prohibited by the EWS emergency permit and regular coastal development permit (if the District should obtain one). This project has far reaching potential impacts related to, among other things, groundwater management, growth inducement, air quality including increases in greenhouse gas emissions, water quality, and impacts on biological, archaeological, agricultural, and scenic coastal resources.

These two projects are obviously mutually exclusive. The infrastructure cannot function to desalinate brackish water during droughts for existing water customers only and for year around desalination of brackish water to produce water for new development at the

same time.

203-2

In addition, the District has not taken public action to change the project to year around production of water for new development – a significant policy decision that must be made in public. The only CEQA project with any semblance of approval that exists at the site is the Emergency Water Supply project for production of water during drought conditions to existing customers. As discussed below, tiering from the Water Master Plan EIR does not provide this approval since the desalination of brackish water and recycling of wastewater effluent pumped from a well for potable use is not included in the Water Master Plan EIR.

203-3

The EIR does not provide an accurate, stable and finite project description in violation of CEQA.

In direct violation of CEQA’s requirement for “An accurate, stable and finite project description” which is “the Sine qua non of an informative and legally sufficient EIR” (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193) the EIR fluctuates between project descriptions so it is not possible to tell whether the CEQA “Project” being evaluated in the EIR is the Emergency Water Supply project for which the District promised to provide an EIR, the broader Sustainable Water Facility, or the Sustainable Water Facility with modifications.

203-4

In the Notice of Availability of the Draft Subsequent EIR with the “Project Title” of The Cambria Sustainable Water Facility Project, the project description lists the structural elements of the Emergency Water Supply project:

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

203-5

In contradiction, the EIR states that the Emergency Water Supply project is the “Project” analyzed by the EIR (see page 3-25 “Project Description”) but describes the Sustainable Water Facility which includes:

- Expansion of water production to provide water for buildout of the CCSD wait list.
- Expansion of the purpose of the project to process treated sewage effluent for potable reuse (p. 7-2)
- Increased use of electric power (= climate change impact)
- Offsite disposal of toxic reverse osmosis waste by ocean outfall and by trucking the waste for landfilling.
- Decommissioning of the evaporation pond. (Rinsing the existing plastic liners)
- Removal of mechanical spray evaporators.

- Modification of the evaporation pond into a basin for storage of raw potable water supply prior to surface water treatment.
- Construction of a new project component that includes the storage pond, a surface water transfer tank and transfer pump station, and a Surface Water Treatment Plant.
- Additional piping systems.
- Changing the discharge location of filtered water into San Simeon Creek lagoon.
- Ancillary facilities. (I haven't found out what these are yet or if they refer to the above)

203-5

The Project Description at page 3-13 of the EIR describes the Emergency Water Supply project and then conflates it with the Sustainable Water Facility by saying that “The Project involves construction and operation of a sustainable water facility at the CCSD’s existing San Simeon well field and treated wastewater effluent land disposal system property.”

Page 1-18 of the Executive Summary states that the environmental baseline for the “SWF without Project Modifications Alternative” is the Project site as it exists as the writing of the EIR which would mean the infrastructure for the Emergency Water Supply project. Section 15125 of the CEQA Guidelines clarifies that the “environmental setting will normally constitute the **baseline** physical conditions by which a lead agency determines whether an impact is significant.”

At page 3-35 the EIR states that “for purposes of this Project description and the analysis contained in this SEIR, the “Sustainable Water Facility” involves the built and operational Project components, whereas the “Mitigation Measures (Project modifications)” involve proposed Project components, including modifications to Project components required for compliance with evaporation pond and lagoon surface discharge operations-related mitigation measures.

203-6

This Draft EIR is not legally sufficient because it lacks an accurate, stable and finite project description.

The SEIR falsely claims that the use of the desalination infrastructure for year around production of water for new development was found to be exempt from CEQA and was issued an emergency coastal development permit by the County.

In spite of the reality that they are mutually exclusive, the EIR improperly and wrongly conflates these two vastly different CEQA projects with vastly different environmental effects as if they were one and the same project. The infrastructure may be the same but the projects are not.

203-7

The SEIR uses these project titles interchangeably which is, at the very least, a serious flaw in the EIR in terms of an inadequate project description and of the failure to provide information on which the public and decision makers may make informed decisions about a specific project and the impacts that project may have on the environment.

203-8

However, the SEIR takes it a step further and makes the false claim that the Sustainable Water Facility was also exempted from CEQA and allowed to be constructed under the County's emergency coastal development permit along with the Emergency Water Supply project by way of this fictional post-construction merge of the two projects – which, of course, is nowhere to be found in the record.

203-9

An analysis of the language in the Notice of Availability project description discloses that the District conflates the Sustainable Water Facility with the Emergency Water Supply as the Project and then explicitly claims that the Sustainable Water Facility – the project that includes year around production of water for new development - is the "Project" that was completed in November 2014, the "Project" that the Board of Directors approved and determined was statutorily exempt from CEQA on January 30, 2014, the "Project" for which the County issued the emergency coastal development permit and granted an extension for submission of a complete application for a regular coastal development permit, and by implication, the project for which the rate payers agreed to a rate increase. Needless to say this is not true and provides for more confusion as to what the Project is.

203-10

The ratepayers and the people of the state of California have been denied protection of public resources and the opportunity to participate an informed public decision making process because the District did not provide the EIR for the stand alone EWS

Because there is no EIR for the Emergency Water Supply Project, the community and people interested in protecting environmental resources have been denied the information, analyses, and opportunity to determine what impacts the construction and operation of the EWS has had and is having on San Simeon Creek, its riparian area and flood plane, on plant and animal habitats, on surrounding agricultural land and the adjacent State Park, and on the people who live in and visit the area and how, if possible, to mitigate those impacts. The District has effectively evaded that process by first claiming that the "emergency" required immediate action with no time for environmental review, and now by simply reneging on its guarantee to public agencies, the community, and the Court that a post-construction EIR for the EWS was forthcoming.

203-11

And while a post-construction environmental review perverts the purpose of CEQA to identify and mitigate possible impacts before project approval, post-construction analyses and determination of existing and potential impacts following the CEQA rules would serve the practical purpose of identifying and mitigating harms to the extent possible.

The EIR fails to provide information and analyses of the impacts of the Emergency Water Supply Project and precludes it as a choice.

The District guaranteed the community, other agencies, and the Court that an EIR for the Emergency Water Supply Project would be provided – that information and analyses of the impacts of the project that serves existing customers with water during droughts was forthcoming. As stated above, the Emergency Water Supply Project is a specific activity that caused changes and is causing environmental changes to the San Simeon Creek and

203-12

surrounding areas. It is a “project” under CEQA for which an EIR is required. It is a project that the community was led to believe was a choice for long term water to meet the community’s needs. This Subsequent EIR does not analyze the impacts of the Emergency Water Supply project – not even as a project alternative – and the District has entirely evaded environmental review of the existing infrastructure and its intended use as a source of water for existing customers during drought conditions. This, and the fact that the District failed to provide an EIR for the stand alone Emergency Water Supply project, have effectively eliminated the EWS as a choice.

203-12

The District’s actions indicate that there was never a stand alone Emergency Water Supply Project.

The District misrepresented to the rate payers that it was building an emergency project that was necessary to prevent immanent disaster and necessary for ongoing protection of the public health, safety and welfare when it was not – it said it was providing one thing and provided another. Behind closed doors the District converted the Emergency Water Supply project to year around production of water for new development, “rebranded” the EWS as the Sustainable Water Facility, and tiered the SWF EIR from the Water Master Plan EIR for seawater desalination. Now, it has not provide the Emergency Water Supply EIR and not included it as an option in the SEIR which has effectively taken production of water for existing customers during drought out of the running as a long term project.

203-13

And, as evidenced by this EIR with its additional infrastructure and transport of desalination waste for ocean disposal, paying for the first phase of the District’s long term water project for new development as described below is just the beginning.

203-14

The District improperly piecemeals environmental review of the Cambria Community Services District’s long term water project.

Either the existing infrastructure and its intended use as a dry season emergency supply of water for existing customers is a stand alone separate project for which an EIR is required under CEQA or it is a phased segment of a larger project. It’s got to be one or the other and, as discussed above, the District has not provided any environmental review of the stand alone Emergency Water Supply project.

203-15

Under CEQA a “Project means the whole of an action” that has a potential for causing a direct or indirect change in the physical environment. CEQA forbids piecemealing environmental review of a project. It prohibits segmentation of the environmental review of a project for the purpose of evading environmental considerations of the project as a whole. In the case of *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, the California Supreme Court set aside an EIR for failing to analyze the impacts of the reasonably foreseeable second phase of a multi-phased project.

It is no secret that the infrastructure constructed for the Emergency Water Supply project and the modifications of it that make up the Sustainable Water Facility are steps in the District’s long planned seawater desalination project. The phase of adding seawater

203-16

intake infrastructure and the processing of seawater is reasonably foreseeable. The District's web site states that the "CCSD's long-term water supply planning calls for seawater desalination as a long-term means to provide drought protection while augmenting the area's local groundwater supply." Seawater desalination is the selected project in the District's Water Master Plan EIR.

The issue related to CEQA compliance is not that the District chose to construct its seawater desalination project in phases. And while it has not made a secret of the fact that the current infrastructure is part of that long term water project, the District failed provide CEQA review of the "whole of the action" that has a potential for causing changes in the environment in violation of CEQA. The District's "overview" of its long term water supply

(<http://www.cambriacsd.org/cm/projects/Long%20Term%20Water%20Supply/Home.html>) identifies "key" environmental concerns of its planned seawater desalination project including growth inducement, "impacts to marine life at the intake due to impingement and entrainment, returning seawater at salinity concentrations greater than naturally occurring background levels, [and] greenhouse gas emissions from the power used to operate the facility."

The District has already segmented the project into the Emergency Water Supply project and the Sustainable Water Facility for production of water for new development. Getting rid of the evaporation pond and blowers as useless to dispose of the volume of waste that will result from increasing the volume of water produced, and developing the infrastructure and processes for ocean disposal of the additional volume of desalination waste seems to be the subject of this EIR. According to the Water Master Plan EIR, which is thoroughly discussed in this SEIR and from which the District claims this SEIR tiers, ocean intake would be the next step.

CEQA forbids piecemealing and the District must step back and provide the community with an EIR that addresses the whole of the proposed and intended long term project or adopt new goals to not pursue desalination for new development and provide an EIR for the Emergency Water Supply project as promised.

The scope and content of the EIR is inadequate because no NOP was distributed for the EIR entitled Cambria Sustainable Water Facility Subsequent EIR.

CEQA Guideline §15082 requires that immediately after deciding that an environmental impact report is required for a project the agency must send the Notice of Preparation "...to the Office of Planning and Research and each responsible and trustee agency..." and subsection (b) requires responsible and trustee agencies to provide the lead agency with details about the scope of the EIR and the content that must be included in the EIR.

This process is required under CEQA and is the mechanism by which the District and the public is informed of the specific scope and content of the environmental information related to a responsible or trustee agency's area of statutory responsibility that must be included in the draft EIR.

203-16

203-17

203-18

In violation of CEQA the District did not send out a Notice of Preparation to responsible and trustee agencies when it decided to prepare an EIR subsequent to the Water Master Plan EIR for the Cambria Sustainable Water Facility and its modifications. As a result, the scope of the Subsequent EIR and its content do not reflect input and information from responsible and trustee agencies and the public has been denied the right to participate in an informed decision making process. This is a very serious failure to include whole categories of information from responsible and trustee agencies and is a prejudicial abuse of the District's discretion.

The District attempts to cover for its failure to circulate an NOP for this Sustainable Water Facility Subsequent EIR by wrongfully passing off the March 4, 2015 NOP it circulated for the Cambria Emergency Water Supply Project EIR. The District refers in this SEIR to these previous agency responses as if they applied to the SEIR when they do not. And to add to the misrepresentation and confusion, the District somehow convinced the Governor's Office of Planning and Research to change the title of the March 4, 2015 NOP from an EIR for the "Cambria Emergency Water Supply Project" to an EIR for the "Cambria Sustainable Water Facility Project" on the OPR website. The underlying document remains the same. (SCH# 2014061073 at <http://www.ceqanet.ca.gov>)

The District must retract the existing SEIR as fundamentally defective and distribute an NOP for the Cambria Sustainable Water Facility project SEIR to responsible and trustee agencies and the public in order to provide proper scoping and content for an adequate draft SEIR.

The EIR violates the fundamental purpose of CEQA to provide an EIR before approval of the project.

The District makes a mockery of CEQA by completing construction of the Emergency Water Supply project before providing an EIR as if that is normal procedure. The California Code of Regulations (CEQA Guidelines) at § 15004 states that "Before granting any approval of a project subject to CEQA, every lead agency or responsible agency shall consider a final EIR or negative declaration..." The first step is certification of the EIR with mitigation measures that must then be included in the project approval as conditions of approval. According to the California Supreme Court, no agency has the discretion to make a commitment to a project before preparation of an EIR and to do so is an evasion of CEQA's central command that an EIR must be completed prior to approval of a project. *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 131-132.

Now the District has evaded even the post-construction EIR and a development permit for the Emergency Water Supply project as discussed above.

The analysis of the "no project" alternative should be stuck as contrary to the Guidelines, an evasion of essential analysis, a failure to provide required information, and an utter charade.

Topping the absurdity of a post-construction EIR is the utter charade of establishing the "no project" alternative as the undisturbed site as if the existing infrastructure had never

203-18

203-19

203-20

been constructed and going through the motions of a fictional analysis of the impacts of not disturbing the site. The District justifies this nonsense based on a misrepresentation of CEQA Guidelines §15126.6 which it wrongly quotes as requiring the “no project” alternative “...to discuss the existing conditions (at the time the Notice of Preparation [NOP] is published)” while leaving out the option of “or if no notice of preparation is published, at the time environmental analysis is commenced.” As discussed above, the District did not publish or distribute a notice of preparation for the Sustainable Water Facility SEIR. The only notice of preparation it published was for the vastly different Emergency Water Supply project.

203-20

The effect of this charade is to frustrate and evade the very purpose of evaluating the “no project” alternative which is to “allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” (§15126.6)

In this case the analysis would be a comparison between the environmental impacts of the Emergency Water Supply project producing water for existing customers during drought conditions and the impacts of the Sustainable Water Facility as it is described including production of water for new development, the ocean disposal of desalination waste, and the additional infrastructure described within the project modification. This is the meaningful and required analysis that must take place in evaluation of a realistic “no project” alternative which the EIR has entirely evaded. The effect of not evaluating the existing infrastructure and the EWS as the “no project” alternative is another way of eliminating it as a choice for ongoing drought protection for existing customers.

203-21

Again, the failure to provide information required by CEQA is prejudicial abuse of the District’s discretion.

This EIR may not tier from the Water Master Plan EIR because the Project analyzed in this EIR does not exist in the Water Master Plan.

On page 2-5 the EIR states that “Accordingly, this SEIR will address current site-specific conditions and focus its analysis on changes to the Project or the surrounding circumstances that may have occurred, since the certification of the WMP PEIR. Under Pub. Res. Code 21068.5 tiering “means the coverage of general matters and environmental effects in an environmental impact report prepared for a policy, plan, program or ordinance followed by narrower or site-specific environmental impact reports which incorporate by reference the discussion in any prior environmental impact report...”

203-22

The “Project” in this Draft EIR – which seems to be the Sustainable Water Facility including recycling wastewater effluent for potable uses and as modified by the open disposal of desalination waste and additional infrastructure and systems – does not exist in the Water Master Plan EIR. The Water Master Plan EIR calls for the use of recycled water but not for production of potable recycled water.

The Water Master Plan EIR includes seawater desalination as the selected project. There

is no coverage of general matters and environmental effects related to the Sustainable Water Facility or the Emergency Water Supply project in the Water Master Plan EIR from which either of these project may tier. The effects of pumping brackish water and wastewater effluent from the underground aquifer on groundwater management cannot be tiered from the Water Master Plan EIR and neither can the myriad effects of treating wastewater into potable water, injecting it into the groundwater, and disposing of the treatment waste. Even the impacts resulting from development of the Project site for the Sustainable Water Facility cannot be assumed have the same effects on the environment as development of the site for desalination of seawater. The EIR must be amended to exclude any purported tiering from the Water Master Plan EIR.

203-22

The EIR is inadequate because it fails to address the reasonably foreseeable growth inducing effects of regional distribution of the water for development of the North Coast Planning Area.

According to the North Coast Area Plan, desalination is considered to be the source of water for development of the North Coast Planning Area. The EIR claims repeatedly that the project is consistent with the North Coast Area Plan. At page 3-1 the North Coast Area Plan (NCAP) states that:

...this Plan is based upon the assumption that water supply for the entire north coast, including Cambria and Sam Simeon Acres, is limited to that which can be obtained locally from groundwater extraction, desalination, reclamation, and conservation.

203-23

At page 3-7 the NCAP states that:

Possible future water sources for population centers of the North Coast Planning Area are the Nacimiento project, surface storage developed on, or near, one of the coastal creeks, and desalination. In the near term, the most feasible approaches appear to be conservation, retrofit programs, reclamation of waste water for irrigation, and desalination.

In other words, according to the NCAP, the most feasible source of new water for development of the North Coast is desalination. Measure P-06 does not prohibit delivery of water produced in Cambria's desalination plant outside the District boundary. It merely imposes conditions on it.

The August 2015 San Luis Obispo County Desalination Opportunities Summary Report confirms the plan to provide desalinated water for new development in the North Coast Planning Area. This report identifies expansion of the Cambria Emergency Water Supply project as a potential source of regional water.

203-24

Therefore, it is reasonably foreseeable that the geographic scope of environmental and growth inducing impacts related to the conversion of the existing infrastructure from dry season use for existing customers only to year around production of water for new development encompasses the North Coast Planning Area. The EIR does not consider this reasonably foreseeable scope of potential impacts and fails to provide information

necessary for informed public decision making as required by CEQA. The EIR should provide information and analyses related to the reasonably foreseeable impacts the source of water may have on the North Coast Planning Area in terms of inducing growth and direct impacts on resources including but not limited to agricultural, archaeological, biological, and scenic resources, and air quality and traffic.

203-24

The EIR is inadequate because it fails to address the cumulative effects of build out of Cambria with development planned for the North Coast Planning Area.

Under Cal.Code of Regulations (CEQA Guidelines) §15130, the District must discuss the cumulative impacts of full build out of Cambria with planned development in the North Coast Planning Area that will cause related impacts on traffic, air quality including greenhouse gas emissions, water quality, and agricultural, archaeological, biological, and scenic resources.

The North Coast Area Plan includes, among other things, major development at San Simeon Cove and Point on Hearst Corporation property. The North Coast Area Plan calls for development at San Simeon Point including “a resort lodge of approximately 250 rooms, restaurant, cocktail lounge, convention/meeting facilities, tourist cottages, golf course, swimming pool, and tennis courts.” On approximately three acres of adjacent land where Sebastian’s store and restaurant is today, the Area Plan calls for development of “...restaurants, specialty retail shops, museums, art galleries, and marine and boating goods.”

203-25

Regardless of the source of water for areas outside of Cambria, the EIR must consider the cumulative effects of build out of Cambria and planned development in the North Coast Planning Area including the development planned for San Simeon Point and Cove.

The EIR is inadequate because it fails to provide a meaningful discussion of the growth inducing impacts of the new source of water.

The EIR also fails to meaningfully analyze the growth inducing impacts that development of this water source will have on the North Coast including development at San Simeon Cove and Point and other development planned on Hearst Corporation property.

203-26

The EIR is inadequate because it fails to address the reasonably foreseeable effects of potential multinational corporate ownership of the desalination plant on coastal resources.

The 2004 paper “International Trade and Investment Rules and State Regulation of Desalination Facilities” prepared for the Coastal Commission by the Georgetown University Law Center discusses the “...concerns about potential conflicts between trade rules and state regulatory authority, particularly with regard to desalination (or “desal”) facilities in the coastal zone.” The paper notes that “desal facilities are part of a water service industry that is dominated by multinational corporations” and that “the two types of rules that present the greatest potential for conflict with regulation of desalination facilities are rules governing trade in services, such as those contained in the World Trade

203-27

Organization (WTO)'s General Agreement on Trade in Services (GATS), and investment rules, such as those contained in Chapter 11 of the North American Free Trade Agreement (NAFTA)."

Another Seawater Desalination Report written for the Coastal Commission in 2003 states that "Multinational corporations have been able to invoke bilateral trade agreements that allow them to evade regulatory controls and sue nation-states for lost or unmade profits." According to the report, "Coastal Act policies relating to concentration of development, siting, habitat protection, agricultural preservation, or mitigation requirements for impacts.... are likely sufficient to provoke a trade challenge" What makes this project particularly susceptible to the possibility of multinational corporate ownership is that the infrastructure for the Emergency Water Supply project is owned by the Torrey Pines Bank Investments, Inc. Western Alliance Bank of Arizona under an Installment Sale Agreement that allows the bank to sell its interests in the project upon notice to the District.

Where, as in this case, a private corporation with the right to sell its interest already owns the desalination infrastructure, it is reasonably foreseeable that local and state regulations relating to concentration of development, siting, habitat protection, and agricultural preservation could be challenged and the environmental impact of the loss of those controls must be analyzed. Public review, decision making and mitigation is especially critical when the District is expanding the scope of the impacts of the Bank owned infrastructure from those related to production of water for existing CCSD customers during drought to year around production of water for new development.

203-27

**RESPONSE TO COMMENT LETTER NO. PO-203**

Cynthia Hawley
Landwatch San Luis Obispo County
October 26, 2016

- PO 203-1 The commentator states that the EWSP and SWF Project are separate projects under CEQA that are improperly conflated in the DSEIR. The EWSP was approved on January 30, 2014 to address an extreme emergency drought condition and the approval included an emergency exemption from the CEQA process. The Office of Planning and Research concurred that the project was exempt from CEQA under the Governor's Executive Orders. The project was allowed to be constructed and operated under an E-CDP issued by SLO County on May 15, 2014; see Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. While the project was constructed to address an emergency, the CCSD also hoped and intended to operate the facility on a long-term basis as needed to address future water shortages, to more efficiently manage water in non-emergency conditions, and to help prevent future emergencies from developing. In fact, the County's D-CDP contained a specific condition requiring that the CCSD apply for an R-CDP within 30 days of issuance of the E-CDP. Thus, while the Project was being constructed under the E-CDP, the CCSD began the process of seeking an R-CDP that would authorize the continued operation of the Project after the Stage 3 emergency was over. The Sustainable Water Facility is the name chosen for the Project for which the R-CDP is being sought and that is proposed to continue to operate on a long-term basis under both emergency and non-emergency conditions, and is based on the Cambria Water Supply Project Description Revised Final; see DSEIR Section 3.5.1, Sustainable Water Facility. The SWF Project modifications that are intended to further mitigate environmental impacts associated with the constructed facility are at the heart of the environmental analysis in DSEIR Section 5.0, Environmental Analysis.
- PO 203-2 The comment is duly noted. No response is required under CEQA as the comment does not raise an environmental issue.
- PO 203-3 The comment is duly noted. No response is required under CEQA as the comment does not raise an environmental issue.
- PO 203-4 See Response PO 203-1.
- PO 203-5 See Response PO 203-1. The commentator states that there is a contradiction in the Project Description between the Project title in the Notice of Availability (to wit: "The Cambria Sustainable Water Facility Project") and the Project described



on DSEIR Page 3-25. DSEIR Page 3-25 (DSEIR [Section 3.5.1](#), *Sustainable Water Facility*) states that: “The SWF is based upon the Cambria Emergency Water Supply Project Description Revised Final” and describes the proposed Project modifications. There is no apparent contradiction.

- PO 203-6 The commentator contrasts and challenges the Project Description contained in DSEIR [Section 1.0](#), *Executive Summary*, (Page 1–18) and the “project description” set forth on DSEIR Page 3–35. The two descriptions set forth in the comment, the project site as it exists as of the DSEIR writing, and the built and operational project components are the same.
- PO 203-7 See Response PO 203-1.
- PO 203-8 The commentator states that the DSEIR uses the terms “sustainable water facility” and “emergency water supply project” interchangeably. The terms are not used interchangeably as explained in detail on DSEIR Pages 3–16, 3–25, and 3–51.
- PO 203-9 See Responses PO 203-1, PO 203-2, and PO 203-3.
- PO 203-10 See Responses PO 203-1 and PO 203-5
- PO 203-11 The comment is duly noted. No response is required under CEQA as the comment does not raise an environmental issue.
- PO 203-12 See Responses PO 203-1 and PO 203-5.
- PO 203-13 The comment is duly noted. The comment does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary. It is noted that how the SWF will be used is a policy decision that has not been made at this time, and that the policy decision is subject to the constraints imposed through the permitting process.
- PO 203-14 See Response PA 4-15 and DSEIR [Section 3.5.2.6](#), *Offsite RO Concentrate Disposal*, concerning the routine transport of concentrate from the RO treatment process to a disposal site. See Response PA 4-33 concerning the routine transport of concentrate from the RO treatment process associated with the RO Concentrate Ocean Outfall Disposal Alternative.
- PO 203-15 See Response PO 203-1.
- PO 203-16 The commentator indicates that the CCSD improperly piecemealed environmental review of the CCSD’s long term water supply project, a seawater



desalination project, and that the Sustainable Water Facility is the first phase of that project. There is no evidence to support the proposition that the SWF is the first phase of a seawater desalination project. The California Supreme Court has observed, “[W]here future development is unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences.” *Lake County Energy Council vs. County of Lake* ([1st Dist.] 1977) 70 Cal. App. 3d 851, 854-855.

- PO 203-17 See Responses PO 203-1 and PO 203-16.
- PO 203-18 The March 4, 2015 Notice of Preparation (NOP) complies in all material respects with CEQA Guidelines §15082 in providing sufficient information describing the Project to responsible and trustee agencies and OPR to enable a meaningful response. The Project name does not affect the quality of the information that was included in the NOP.
- PO 203-19 See DSEIR Page 3-14. See Responses PA 7-9, PO 89-2, and PO 96-1 concerning the E-CDP, R-CDP, and NOE. See also Response PO 203-1.
- PO 203-20 As noted in DSEIR Section 7.1, “No Project” Alternative, the no project analysis is required to discuss the existing conditions (at the time the Notice of Preparation [NOP] is published), as well as what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. The Project’s NOP was published March 4, 2015. However, given the SWF (formerly Emergency Water Supply Project) was constructed in response to the CCSD Board of Directors’ January 30, 2014 declared Stage 3 Water Shortage Emergency Condition, and since the SWF was required to be constructed within 180 days from issuance of the Emergency Coastal Development Permit (E-CDP) (E-CDP Condition 5), this DSEIR is unique involving environmental analysis after SWF completion. DSEIR Section 7.1 specifically states that this DSEIR is unique because it involves environmental analysis after the SWF completion (as the SWF was required to be constructed within 180 days from issuance of E-CDP). Therefore, the No Project Alternative analysis considers environmental conditions prior to construction of the SWF Project, in accordance with CEQA Guidelines §15126.6(e); see also DSEIR Section 7.2, “SWF Without Project Modifications” Alternative. This section assumes a current environmental baseline with the Project as it exists as of the writing of the DSEIR (i.e., with the SWF constructed and operational). Both Alternatives are presented with clear view regarding the unique situation of analyzing environmental impacts after a portion of the Project is constructed, and was not written to go “through the



motions of a fictional analysis of the impacts of not disturbing the site.” DSEIR Section 7.0, *Alternatives*, was written in accordance with CEQA Guidelines.

The No Project Alternative analysis also considers the circumstance under which the SWF would not have proceeded. The analysis compares the environmental effects of the property remaining in its existing state (i.e., before SWF construction) against the environmental effects that occurred due to SWF construction. DSEIR Section 7.2, *“SWF Without Project Modifications” Alternative*, considers the SWF without Project Modifications Alternative, which assumes a current environmental baseline with the Project site, as it exists as of the writing of this DSEIR (i.e., with the SWF constructed and operational).

- PO 203-21 The Project does not proposed the ocean outfall disposal of RO concentrate; see Response PO 203-14. Additionally, DSEIR Section 7.2, *“SWF Without Project Modifications” Alternative*, assumes the current environmental baseline, i.e., the SWF constructed and operational without any of the Project modifications. The Alternatives section does evaluate existing infrastructure. See also Responses PO 203-1 and PO 203-20.
- PO 203-22 Brackish water is defined as water that has more salinity than fresh water, but is less saline than seawater. Thus, brackish water requires a desalination process (although not as intensive as seawater desalination as the salt concentration is lower in brackish water). The WMP PEIR included seawater desalination, among other system improvements. Brackish desalination and seawater desalination are similar processes, and as the WMP PEIR analyzed seawater desalination in a programmatic manner, the DSEIR is properly tiered. See DSEIR Section 2.2, *CEQA Document Tiering and Water Master Plan*. See also Response PO 203-3.
- PO 203-23 The commenter claims that the DSEIR is inadequate as it fails to address the growth-related impacts of distributing water to the North Coast Planning Area. The Project does not propose to be the source of water for development in the North Coast Planning Area. Additionally, the Project does not propose delivery of water produced at the SWF outside of the CCSD Boundary, as the commenter implies. The CCSD can only provide potable water service within its 2006 boundaries per Measure P-06 passed by voters in 2006. The Project’s potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7. CEQA Guidelines specifically indicate that it must not be assumed that growth in any area is necessary beneficial, detrimental, or of little significance to the environment; see CEQA Guidelines Section 15126.2(d), *Growth Inducing Impact of the Proposed Project*. As concluded in Section 6.3, Project implementation would only foster population and housing growth associated with the CCSD’s existing wait list. Project



implementation would not result in an unregulated amount of growth, due to BRP restrictions.

PO 203-24 The CCSD can only provide potable water service within its 2006 boundaries per Measure P-06 passed by voters in 2006. See also Response 203-23.

PO 203-25 See Response PO 203-24.

PO 203-26 See Response PO 203-24.

PO 203-27 The Sustainable Water Facility is not a desalination plant; see Response PO 203-22.

25 October 2016

Mr. Robert C. Gresens, P.E.
District Engineer
Cambria Community Services District
Planning Department
1316 Tamson Drive, Suite 201
Cambria, CA 93428



bgresens@cambriacsd.org

Mr. Gresens:

Thank you for this opportunity to comment on the Draft Subsequent Environmental Impact Report. The report is long overdue. Environmental Impact Reports are, by definition, written records submitted to the deciding authorities to identify the likely environmental effects of the continuing operation of an existing facility or of a proposed project and ways to avoid or mitigate them. The project for which this EIR is written was constructed two years ago, before the community had the opportunity to consider its impacts.

204-1

Rushing the project to construction was made possible under an Emergency Permit from the county. The declared Stage 3 Water Emergency was effectively managed by Cambria residents conserving water. Problem solved. The plant never produced any water for the community.

204-2

The Emergency Water Plant is now being called the Sustainable Water Facility and being politically recommended to justify issuing building permits to new residential and commercial construction in Cambria. Cambrians have not had the opportunity to discuss this change in direction from an emergency water production facility to a permanent one.

204-3

Adding new homes and businesses to Cambria is an issue that the community as a whole should discuss and decide. More infrastructure will be needed. Water is not the sole determiner of whether Cambria can grow. Fire protection, roads, schools, wastewater treatment and other support is needed. Local officials have championed this project as a way to encourage growth in Cambria.

204-4

Submitting this after-the-fact EIR to state and federal agencies continues a subterfuge of growth policies without an open discussion. It involves agencies in decisions that should be made locally. The fact that the issue of growth is contentious and strongly felt only makes it more important to resolve it with local people.

204-5

Cambria solved its water use problem with low-cost conservation. Conservation in California is the path to the future. California, a historically dry state, has been in a drought for several years. Climate change suggests this is the New Normal.

204-6

While agency personnel are not the appropriate people to resolve local issues, their expertise on technical and policy is important to advise the community on what the pitfalls of this project are.

204-7

I am grateful to all the agencies that have submitted comments over the years. I include them later in these comments.

204-7

The size of the report is daunting. At 2,000 pages, Cambria residents are overwhelmed. The CSD held one meeting to hear comments, but held no workshop meetings to help residents understand what the report contains. The community deserves better information on which to make decisions.

204-8

I applaud the agencies for their perseverance. The Cambria CSD has circled this subject for years, requiring repeated attention to various plans, reports, workshops, and other public meetings. The issues don't change, but they are determined to get the answer they want: full desalination with ocean outfall. The US Fish & Wildlife Service helpfully chronicles its history on this project of comment without response from the CSD, see below.

204-9

State Parks makes clear that the Draft SEIR is inadequate because the project is subject to federal rules, due to its previous federal funding. Not also the department's concern over the loss of its campground, valued at \$35 million.

204-10

The Coastal Commission's comments are most detailed, coming from its position as protector of the coastline. The commission raises questions of streamflow that will cascade through the legally protected wildlife in the area. While the fact that the project was constructed without prior consideration of wildlife, it remains the CSD's responsibility to make provisions for it.

"Accordingly, 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 to implement a short-term and immediate solution rather than construct long-term major infrastructure that raises significant LCP and Coastal Act policy concerns. Additional data, evaluation, and discussion among all the resource agencies with authority over the project is required before a long-term project is designed, constructed, and operated," the commission wrote in its letter of July 22, 2014.

204-11

The National Marine Fisheries Service directs attention to the baseline data needed to determine what effect changes in streamflow will have on steelhead. The project is designed to remove water from some sources and return it in other places. Steelhead are important both locally and nationally. The public deserves attention to protecting this iconic wildlife.

204-12

I ask the District to defer consideration of this EIR until the significant questions raised by these agencies are answered. Until that time, the Emergency Water Project's name should not be changed, the original purpose for which the only permit thus far issued be observed ("to serve existing water connections only (to abate the emergency), within the CCSD's service area, (i.e. not to serve new development)."

204-13

Excerpts from agency comments follow:

California Coastal Commission in its comments submitted April 8, 2015, included the following points. Many had been previously raised in 2014. The plant was built without regard to the Coastal Commission's concerns.

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.

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. 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, 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. 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.

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 considers more suitable and exposed locations for the weather monitors to provide more accurate data regarding those conditions.

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 off channel 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 1 00-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.

The National Marine Fisheries Service of the National Oceanic and Atmospheric Administration comments on April 6, 2015:

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.

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

204-14

204-15

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 100gpm (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") of S-CCC steelhead.

I 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).

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.

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.

California Department of Parks and Recreation submitted its comments on April 6, 2015, noting that “The Draft Environmental Impact Report is insufficient due to the project’s federal nexus and a Draft Environmental Impact Statement will also need to be prepared under the National Environmental Protection Act, as required by federal law.” The agency’s comments include the Army Corps of Engineers’ financial summary for the desalination project, dated September 24, 2013 and received by the Community Services District October 10, 2013. This letter documents the Army’s \$3.9 million federal funds. Contractor 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.”

Other comments cover cultural resources: archaeological surveys conducted for an Initial Study Environmental Assessment “does not meet the requirements of Section 106 of the National Historic Preservation Act 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.”

The agency’s comments raise questions about specific aspects of its construction. The brine pond evaporation issues, which the district has now abandoned, were raised. “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 and has been considered as an alternative. The DEIR/DEIS should fully disclose this alternative method of brine discharge and fully evaluate it.” Instead, the SDEIR proposes trucking the brine discharge to a disposal location, leaving the ocean outfall still unexamined.

Comments also extend to:

Aesthetics, due to the location of the campground directly above the facilities and percolation pond. “Lights at night would disturb the tranquil country feel associated with camping.”

Air Quality: “Park users and workers, which represent a substantial number of people, will likely be exposed to odors from pond and drift mist.”

Biological Resources: “There will likely be direct and indirect take of listed species...There may be impacts to the lagoon mouth and beach...There will likely be serious

204-15

204-16

impacts to riparian habitats...Draw down, intrusion, and chemical discharge events can be expected to substantially adversely effecting San Simeon Creek, lagoon and salt marsh... 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.).... This violates many laws, policies, guidelines, management and recovery plans.... This will likely violate the Local Coastal Plan, California Fish and Wildlife and US Fish and Wildlife habitat and recovery plans."

Geology and Soils: "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 o liquefaction."

Hazards and Hazardous Materials: In addition to the heavy metal content in the brine pond sludge. "The project is located on a site which should be on the list of hazardous materials sites pursuant to Gov. Code 65962.5 because of documented high nitrate concentration due to an old unlined percolation pond used by CCSD... 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... Mitigation should include vegetation abatement, emergency firefighting equipment and proper signage."

Hydrology and Water Quality: "The project has a potentially significant impact because the project has already caused erosion as documented in the RWQCB notice of violation report... The project has a potentially significant impact because wter for the lagoon recharge which is release into the diffusion pit has substantially increased the rate and amount of surface run-off both onsite and offsite."

Population and Housing: "The project has a potentially significant impact on growth... 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."

Transportation: "The project will have a potentially significant impact because the project has discussed alternatives for removing the brine water, including transportation of bine discharge., Eight 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."

Utilities and Service Systems: "The project has already violated allowable chlorine levels in water discharged to San Simeon Creek... Until the project addresses the potential for new

development in Cambria, the impact on wastewater treatment cannot be assumed to be less than significant.”

The statement goes on to recommend that the Project Conditions include the cost of relocating the San Simeon campground, estimated at \$35 million.

204-16

The **US Fish and Wildlife Service, April 6, 2015**, recounts its history of comments on the plant, which have gone without response:

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 IO(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.

204-17

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.

204-17

To my knowledge, the District has not responded in writing to any of the above agency comments. If such responses exist, please share them with me and the community.

204-18

The Emergency nature of this project has been made meaningless by events. The justification that it is needed for growth has not been resolved within the community. Other more thoughtful projects, such as off-stream storage and working with local ranchers, can be part of the answer without jeopardizing Cambria's protected habitat. Tiered water rate structure and disincentives for excessive water use, combined with Cambrians' demonstrated ability to conserve, are long-term solutions to Cambria's water future.

204-19

Sincerely yours,

Gordon and Christine Heinrichs
1800 Downing Ave.
Cambria, CA 93428

**RESPONSE TO COMMENT LETTER NO. PO-204**

Gordon and Christine Heinrichs

October 26, 2016

- PO 204-1 This comment serves as the introduction to the commenter's statements below. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 204-2 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-3 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-4 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-5 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-6 Cambria's water conservation efforts are described on DSEIR Page 3-10 and 3-11. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-7 [This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-8 In accordance with CEQA Guidelines Section 15082(a), on March 6, 2015, CCSD issued a Notice of Preparation (NOP) (DSEIR Appendix A) to inform agencies and the general public that an EIR was being prepared and invited comments on the scope and content of the document and participation at a public scoping meeting held March 26, 2015. The NOP was distributed to Federal agencies, responsible and trustee agencies, interested parties and organizations. The NOP was circulated through April 6, 2015, in compliance with the CEQA-required 30-day circulation period.
- PO 204-9 The CCSD is required by law to consult and coordinate with appropriate state and local agencies as necessary during the CEQA process, and during other regulatory permitting processes. This comment does not address the DSEIR's



adequacy or raise a significant environmental point. As such, no further response is necessary.

- PO 204-10 The California State Parks did not submit a comment letter during the DSEIR public review period. Additionally, State Parks did not submit a letter during the NOP comment period; see DSEIR Appendix A. The Project does not propose any components within the State Parks property, nor would there be any loss of campground.
- PO 204-11 It is assumed the California Coastal Commission comment referenced here pertains to the CCC comment letter on the Project's NOP; see DSEIR Appendix A. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-12 The CCSD recognizes the importance of sustaining steelhead. The DSEIR incorporates several mitigation measures intended to avoid the take of this species and ensure Project implementation results in less than significant impacts to steelhead and their habitat. See also Responses PA 4-17, PA 4-18, PA 4-22, and PA 4-23.
- PO 204-13 The commenter requests the CCSD postpone DSEIR certification until the "significant questions posed by these agencies are answered." This comment is duly noted. This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.
- PO 204-14 This comment reiterates CCC's comment letter on the NOP (dated April 6, 2015); see DSEIR Appendix A. All comment letters (including the CCC letter) and oral comments received during the NOP comment period were used to further determine the scope of the environmental issues to be addressed in the DSEIR. The DSEIR's scope considered all of the relevant comments received in response to the NOP.
- PO 204-15 This comment reiterates the National Oceanic and Atmospheric Administration comment letter on the NOP (dated April 6, 2015); see DSEIR Appendix A and Response PO 204-14.
- PO 204-16 This comment reiterates the California Department of Parks and Recreation comment letter on the NOP (dated April 6, 2015); see DSEIR Appendix A and Response PO 204-14.
- PO 204-17 This comment reiterates the U.S. Fish and Wildlife Service comment letter on the NOP (dated April 6, 2015); see DSEIR Appendix A and Response 204-14.



- PO 204-18 In its role as Lead Agency, the CCSD is not required under CEQA to provide written responses to comments received on the Project NOP; see Response PO 204-14. It is noted that CEQA Guidelines Section 15088, *Evaluation of and Response to Comments*, requires that a Lead Agency evaluate and respond to comments on environmental issues received from persons who reviewed a Draft EIR (emphasis added).
- PO 204-19 This comment is noted. This comment serves as the conclusion to the comment letter and suggests alternatives to the proposed Project. Responses to specific comments are provided above; no further response is necessary.

Carol & Duane Kannberg
598 Cambridge St.
Cambria, CA 93428

Mr. Robert C. Gresens, P>E> District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201



Re: Subsequent Environment Impact Report

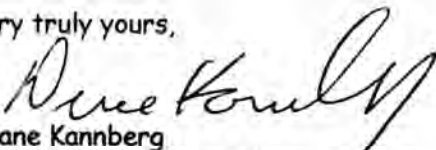
Dear Mr. Gresens,

We are full time residents of Cambria. Our address is 598 Cambridge St. We submit this letter to express our support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

The SWF has taken on a political aspect in Cambria. Individuals who oppose this facility have an agenda other than that which provides for water for the future of Cambria. For these individuals their agenda supercedes the need for water in our community. Their viewpoint endangers the safety and well being and future of Cambria. We urge the CCSD not to be distracted by these individuals

We urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular costal development permit.

Very truly yours,


Duane Kannberg


Carol Kannberg

205-1

**RESPONSE TO COMMENT LETTER NO. PO-205**

Carol and Duane Kannberg

October 26, 2016

PO 205-1 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

Mr Robert C Gresens, P.E. District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



October 26, 2016

Dear Mr Gresens,

We have reviewed the Draft SEIR for the Cambria Sustainable Water Facility Project and we have the following comments for your consideration.

1. SECTION 6.3 GROWTH-INDUCING IMPACTS - BUILDOUT REDUCTION PROGRAM UPDATE, 2016

The first paragraph of this section and Table 6-1 should be revised to show the progress made toward implementing the 2006 Buildout Reduction Program.

206-1

The 2006 Buildout Reduction Program specifies the purchase and retirement of residential parcels using funds collected from mitigation fees on new development, rate increases and the sale of unallocated water meters. To date, no parcels have been purchased and retired using BRP funds.

206-2

The Voluntary Merger Program has reduced the number of parcels eligible for water connections by approximately 325 APN parcels. The number 788 of APN's "merged away" in Table 6-1 is incorrect.

206-3

The Land Conservancy of SLO Transfer Development Credits Program has retired 140 parcels in Special Project Areas 1 and 2, areas not included in the 2006 Buildout Reduction Program.

206-4

The Greenspace land purchases and the Fiscalini Ranch Preserve purchase are significant land conservation accomplishments which are independent of the 2006 Buildout Reduction Program.

206-5

2. SECTION 7.0 ALTERNATIVES TO THE PROPOSED PROJECT

There is not enough information in this section to justify repurposing of the evaporation pond and construction of a surface water treatment facility. Specifically, no cost information for the proposed modifications is provided and no estimate of rate increases that will be necessary. The CEQA process requires that the public is provided with all information necessary to evaluate the impacts of the project.

206-6

A more cost-effective approach to dispose of the RO waste water is to retain the evaporation pond and to add a suitable floating cover designed to accelerate evaporation and prevent wildlife from contacting the water. To accelerate evaporation, the cover material must be a dark color to transfer heat from sunlight into the water. An engineering analysis is needed to select the most effective cover design. Reducing the volume of RO waste water that must be trucked away reduces fuel use, emissions and noise from the trucking operations. In some years, no trucking will be needed.

206-7

3. SECTION 8.1.d EFFECTS FOUND NOT TO BE SIGNIFICANT
AGRICULTURAL AND FOREST RESOURCES

The SWF Project will have an adverse impact on forest and native vegetation areas outside of the project site. By providing potable water needed to develop residential parcels on the water wait list, the project will cause clearing of trees and native vegetation on these sites. Of the 666 parcels on the wait list, at least 465 parcels are located in forested areas of Special Project Areas 1 and 2, Lodge Hill, North Lodge Hill and Cambria Pines Estates. Mitigation measures are needed to offset the loss of trees and native vegetation in these environmentally sensitive areas.

206-8

Please contact us by email or phone if you have any questions about our comments.

Regards,



Crosby and Laura Swartz
swartcr@earthlink.net
805 203-5134

**RESPONSE TO COMMENT LETTER NO. PO-206**

Crosby and Laura Swartz

October 26, 2016

- PO 206-1 DSEIR Section 6.3 (beginning Page 6-4) provides the BRP update.
- PO 206-2 Comment is noted. The purchase and retirement of lots utilizing mitigation fees and other related sources is a component of the BRP. In March 2016, the CCSD Board appointed a Buildout Reduction Citizens Committee to review and provide recommendations, in order to update the BRP. The Committee is also tasked with reviewing the financial program.
- PO 206-3 The reference to records provided by SLO County Department of Planning and Building is accurate.
- PO 206-4 Comment is noted.
- PO 206-5 The reference to parcels retired by the Conservancy is correct and referenced by the Buildout Reduction Citizens Committee.
- PO 206-6 See Response PO 89-3 concerning increased water rates and construction/operational costs.
- PO 206-7 The commenter suggests CCSD implement a “more cost-effective approach” of preserving the evaporation pond and adding a “suitable floating cover designed to accelerate evaporation and prevent wildlife from contacting the water.” See Response PO 89-3 concerning increased water rates and construction/operational costs. The commenter claims that their suggested design would lessen the Project’s operational impacts to noise and GHG emissions. As concluded in DSEIR Impact 5.7-3 and Impact 5.7-4, the Project’s operational noise impacts from stationary and mobile sources would be less than significant; see also Response PO 194-8. With mitigation, Project impacts to biological resources would be reduced to less than significant; see DSEIR Section 5.3, Biological Resources. Additionally, as concluded in Section 8.4, Greenhouse Gas Emissions and Climate Change, Project operations would involve less than significant impacts on greenhouse gas emissions. CEQA Guidelines Section 15126.6 requires an EIR to identify a range of reasonable alternatives to a project capable of attaining most of the objectives of a project while avoiding or substantially lessening any significant impacts of the project. Thus, the suggested alternative would not represent an environmentally superior alternative to the proposed Project.



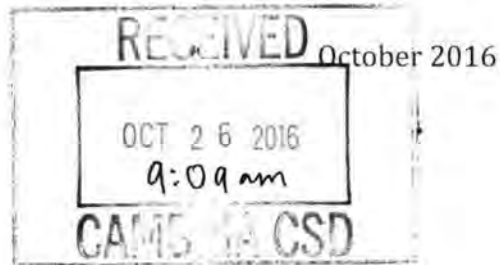
PO 206-8

While the commenter accurately states that the Project would be able to supply water to the CCSD's wait list, Project implementation would not result in unregulated growth. The Project's potential growth inducing impacts are addressed in DSEIR Section 6.3, *Growth Inducing Impacts*; see also Responses PA 4-32 and PA 6-7. Project implementation would be subject to compliance with existing BRP restrictions, SLO C County and CCSD adopted growth management policies, and established SLO County provisions. For these reasons, Project implementation would not result in significant growth-inducing impacts.

The commenter's statement regarding the tree removal on wait-list properties is speculative, and does not require additional mitigation to offset any environmental impacts; see CEQA Guidelines Section 15145. Future development projects would require site-specific environmental review, and, if subject to CEQA, these projects would identify any necessary mitigation measures that are associated with Project-specific impacts. The timing and verification mechanisms of the mitigation measures would also be identified in a project-specific MMRP. Therefore, it cannot be reasonably assumed that future development would have specific biological impacts (such as removal of trees), and the DSEIR does not require additional mitigation measures to address these speculations.

COMMENTS TO DRAFT SUBSEQUENT ENVIRONMENTAL IMPACT REPORT

Mr. Robert C. Gresens, P.E., District Engineer
 Cambria Community Services District
 1316 Tamson Drive, Suite 201
 Cambria, CA 93428
bgresens@cambriacsd.org



Dear Mr. Gresens,

We, the undersigned, request that the-Draft Subsequent Environmental Impact Report (Draft SEIR) (SCH# 2014061073) for the Cambria "Sustainable Water Facility" be withdrawn and a completed Application for the Emergency Water Supply Project be submitted as soon as possible, so that government agencies and the public can review and analyze the project that has already been constructed.

We make this urgent request for the following reasons.

- Historic groundwater levels in the Santa Rosa and San Simeon basins do not reflect a need for emergency supplemental water projects for Cambria's stable population of 6,000 residents and businesses. This has been proven during the worst drought in California's history, 2014-2016. Conservation measures, resulting in 43% water savings, provided more than enough water to overcome predicted shortages, which never materialized.
- Cambria residents never voted approval for a "Sustainable Water Facility". This project was presented to voters as an "Emergency Water Project" to be used only in case of a declared Stage 3 Water Emergency and only to provide enough water for the existing residents of Cambria, not for increasing growth by adding new water meter connections.
- The operational impacts and financial expense of running the Emergency Water Supply Project for any length of time could not have been quantified or analyzed by regulatory agencies, because the plant has never run for 90 consecutive days during a Stage 3 Emergency. Ratepayers have been waiting more than two years for the Cambria Community Services District to complete the application for the Emergency Water Supply Project, their Coastal Development Permit (CDP) Application, and then submit the Environmental Impact Report to the County of San Luis Obispo for the Emergency Water Project, which would have triggered appropriate agency review and public hearings.
- The District has initiated, and then abandoned, numerous environmental review processes, which resulted in citizen and agency comments being submitted as required, but with no subsequent response from the CCSD or their agents. No public hearings with ability to appeal have been held since May of 2014.
- A full time, non-emergency water reclamation facility in Cambria would enable substantial growth that will damage the fragile ecosystem and economy of this region.

Please withdraw the draft SEIR and complete the application for the Emergency Water Supply project.

Name : Hetty Pearson

Address: 1511 Berwick Drive

city, state, zip code: Cambria, CA 93428



RESPONSE TO COMMENT LETTER NO. PO-207

Hetty Pearson

October 26, 2016

PO 207-1 This comment letter is a form letter that is consistent with Comment Letter PO-140. See Responses PO 140-1 and PO 140-2.

Tina S. Dickason
574 Leighton St.
Cambria, CA 93428

October 26, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Dr., Suite 201
Cambria, CA 93428

208-1

e-mailed to: bgresens@cambriacsd.org

RE: Cambria Community Services District (CCSD) Draft SEIR SWF

Dear Mr. Gresens,

Please find my comments related to the Draft SEIR as follows:

In a year of extreme drought, 2013, the CCSD Board of Directors, chose as two of their goals to: 1) Lift the moratorium set in place in 2001, (which legally had to remain until a new source of water had been acquired by the District). 2) To issue as many as 20, intent to serve letters. In March, 2013, the Board took action to "lift the moratorium," and August 22, 2013, the board took action to issue up to as many as 20, intent to serve letters at the following month's board meeting.

Approximately 2 weeks after the Aug. 22 meeting, Cambrians were informed of a water shortage crisis: We learned that we would be 19 acre feet short of water for the month of October, 2013. No Emergency Water Shortage Conditions had been declared until Jan. 30, 2014, (two weeks after the Governor's Executive Order on Jan. 17, 2014), when the general manager declared a Stage III Water Shortage Condition for Cambria. How could the general manager, engineer and Water Dept. not be aware of a pending crisis, as the board was moving towards growth?

1.3 Cambrians have been misled with a project that was agreed to through a Proposition 218 rate increase. That project, known as the **Emergency Water Supply (EWS)** was identified as a water supply to be used in drought conditions for current residents. (My CCSD bi-monthly bill refers to EWS charges). However, in reading from this section, the second bullet point refers to providing "a reliable water supply, which would serve no more than 4,650 existing and future residential units, at full build out, pursuant to the North Coast Area Plan (NCAP) and mitigation set forth in the CCSD's certified Water Master Plan Environmental Impact Report (WMP PEIR)." Clearly, the newly-named Sustainable Water Facility (SWF), is intended for growth.

Cambrians had no say in the change of the intent of the project from a EWS to a Sustainable Water Facility (SWF) for growth. The existing EWS project has already cost millions more than originally estimated. How much more will it cost as a differently named project, with a different intent?

The application to the DWR for Proposition 84 funding, was for a EWS project, not a SWF; were they also misled? (None of the \$4.16 million dollars the CCSD received from the grant was used to pay down the loan for the EWS as we had been informed it would). In a press release from the CCSD, December 2015, it was made clear the project had a new name: The Sustainable Water Facility (SWF), and that it would not only be for drought conditions, but also for growth. Cambrians have since learned that the CCSD intends to issue approximately 40, intent to serve letters per year over the course of the next twenty years or so.

1-3 "Meeting all regulatory agency permitted conditions, including those of SLO County and the State Water Board." The project has been, and is, fraught with problems, most of which were identified in the comments from regulatory agencies and the public in the July 22, 2014 IS/MND. The District chose not to respond to the comments, but soon learned, as the project was being built and tested, that issues raised in the IS/MND comments, came to pass. A major public works project should never be a rush to judgment, especially when it involves a community's drinking water, but rather, it should be mandatory that it go through the necessary processes and requirements for a project of this magnitude. An after-the-fact, Draft SEIR for a different project, is to me, unacceptable!

A Draft EIR and CEQA analysis were not presented **before** work on the project began, inviting potential problems to arise and issues to be mitigated, along with mounting project costs. The project manager for the contractor, CDM-Smith, made it clear in a workshop-presentation to the community, that the project would be a "challenge." It has indeed been a challenge, and will continue to be. The project, in my opinion, is an absolute disaster; fostered by a no-bid contract, no EIR, and SLO County Planning Department's willingness to issue an emergency CDP for a major public works project to be built within a six-month period. This was definitely a project that put the "cart before the horse;" all leading to multiple environmental and costly consequences.

1-3 "Repurposing the SWF evaporation pond to address potential environmental impacts" is yet a clear example of the poor design and planning of this project. CCSD was forewarned of the potential impacts of the evaporation pond, to no avail.

1-3 "Minimizing economic hardship and losses to local residences and businesses, including tourism." Tourism has increased and flourished during the past four years of drought. No events in Cambria were cancelled due to lack of water. Despite the fear-mongering that sand would come out of our taps, Cambrians have heroically conserved over 40% of their water usage. We have not at any time during these years of drought, run out of water.

1-4 Environmental Issues/Mitigation Summary 1-5

Impact 5.1-1 Excavation of the evaporation pond has already caused disruption to wild life habitat and humans alike. Pollution, both in the form of noise and dust was generated from the excavation of the evaporation pond area and the facility site. For a number of months, a steady flow of semi- trucks were seen entering and leaving San Simeon Creek Rd., off Hwy. 1. Five snow blowers, incorporated after the fact, to hasten evaporation at the pond site, created harmful and disturbing noise issues. I would also venture to say that the snow blowers might have impacted the health and welfare of birds flying into the pond. I would maintain that further disruption caused by Mitigation Measures in the Draft SEIR to renurpose the evaporation pond, will have similar impacts.

The evaporation pond is directly adjacent to a State Park campground. Despite various precautionary measures taken to keep out gophers, frogs, deer and birds, they have proven to be unsuccessful. Wires crossing the pond with mylar strips attached, in an attempt in preventing birds from entering the pond, ended up in the loss of bird life from the very wires that were attempting to keep birds out of the pond. Many varieties of birds have been seen and photographed in the pond. Deer have also been photographed inside the pond area (*See Exhibit 1: photos of deer and birds in evap. pond*). Gophers and ground squirrels have been creating tunnels, as evidenced by piles of earth on the periphery of the berm area. (*See Exhibit 2, letter of Notice of Violation from RWQCB, 10-25-16*).

How does the CCSD intend to maintain the integrity of the pond, and use it as a potential reservoir, when animals' natural habits are creating degradation to the surround of the pond? Does the CCSD intend to use pesticides to address this issue, and if so specifically what type(s) of pesticide would be used?

The evaporation pond is without a doubt, an attractive nuisance. For residents, hikers, bikers, birdwatchers, as well as the numerous campers who stay at the State Park campground, (the most easterly portion of which overlooks the evaporation pond) presents an ugly eyesore in an otherwise beautiful and serene, habitat area. This is a place where people come from all over the world to witness and enjoy the scenic beauty this area has to offer, with its incredible vistas, walking trails and natural habitat. Because of its close proximity to the State Park campground, and the beauty of the area in general, I would still consider the pond an attractive nuisance, despite the proposed change from an evaporation pond holding brine waste, to a holding pond for raw potable water.

EVAPORATION POND/BRINE WASTE DISPOSAL

Another environmental issue relates to the trucking of brine waste to a facility that is licensed to haul it to their facility. Kettleman City is cited in the Draft SEIR, as a possible disposal site. This would require a 170-mile round trip for up to as many as 8 trucks per day. Is the brine waste material considered hazardous or non-hazardous? The danger of spillage is a major concern when hauling material of this nature. (Last year, a truck, hauling sludge from Cambria's Waste Water Treatment Plant, tipped over at the intersection of Highways 1 and 46, spilling the contents into the road and easement area). Again, how can CCSD protect the integrity of the project area, and beyond, when so many issues are at stake as they relate to protection of the environment?

The other issue related to brine disposal, is that of cost—something not mentioned in the Draft SEIR but of enormous consequence financially to the District. (*Please see Exhibit 3: Brine Waste Hauling Costs*)

3-53 SOURCE WATER

The Draft SEIR states the following: "The potable water supply storage basin's water quality would generally be similar to the Well SS-1 and Well SS-2 water quality. However, because the potable water supply basin is uncovered, water quality could potentially degrade due to various sources of contamination, including bird and animal waste, algal growth, insects and fish and airborne deposition. Because open storage would diminish water quality, a containerized filtration unit is proposed to ensure

water quality criteria are met.” Adding a Filtration Unit and a Surface Water Transfer Pump Station to clean up potential contamination, presents even more examples of a very poorly designed project, with additional costs involved in attempting to try and make something work; we’ve been down that road before! If the project itself cannot supply the water needed, I can’t understand why the repurposed reservoir would have to serve as an additional source of potable drinking water. For firefighting purposes, I can see the logic—but for drinking water as an additional supply, raises questions!

1-9 BIO-7 Biological Resources

Why was an Adaptive Management Plan not included as part of the Draft SEIR? The AMP should have been addressed in this document, not as an after-the-fact, post construction plan when (or if), the SWF is operating.

Reading through the numerous biological impacts to the project site, which in ESHA, deems it not suitable for the proposed measures as described in the Draft SEIR; it never was, and I believe it never will be.

BIO-6 Best Management Practices (BMP’s) From numerous violations cited during the construction, testing, and even currently, I do not believe BMP’s have been carefully adhered to. I cite one such example, a gross violation that occurred when the lagoon mitigation pipe was diverted from San Simeon Creek to Van Gordon Creek, and a large volume of chlorine was disposed into that creek. (*See Exhibit 4, RWQCB Notice of Violation*) BMP’s were not adhered to then, and how can we be assured they will be with further disruption to a critically sensitive habitat area?

1-19 Environmentally Superior Alternative—Warren Reservoir/Off-stream Storage

Even though the CCSD has not looked at the alternative I draw to attention below, I believe it provides a significant water supply alternative, and offer the following for consideration:

Shortly after the water shortage crisis was announced to Cambrians in early September, 2013, I became interested in searching for a water solution that would be: 1) Environmentally feasible, and 2) Affordable to Cambrians, (aided by the possibility of obtaining financial assistance through State Funding means, available for reservoirs). In Nov., 2013, I contacted Mr. Clyde Warren, a rancher on San Simeon Creek Rd., who I heard had land, some of which might serve as a possible resource for an off-stream storage solution. I contacted Mr. Warren, and he invited me to take a site visit on his property. Of notable interest during that visit was a dry-wall canyon on his property, located directly across San Simeon Creek Rd. from the CCSD’s well field. The dry-wall canyon is not a blue line stream, and from an initial viewing, it looked as if there might be some real potential at this particular location, especially as it related to ESHA and the ideal location.

I contacted the San Luis Obispo Planning Dept. to find out if such a project would be within the County’s LCP; the planner I spoke to, confirmed it was. The planner also said that if CCSD would act on such a project, it could be completed within in a two-year period. He also stated this would be a good project for Cambria, as it would provide much-needed storage. I contacted California Coastal Commission (CCC) staff to find out what their thinking might be of such a project. I was told that if the project did not have significant ESHA issues, it could be a project worth pursuing for Cambria.

Mr. Warren had been following up on our discussions by having some preliminary studies performed: a capacity study, and some evaluation on seepage and evaporation by Gus Yates. (*See Exhibit 5, Capacity, Evaporation and Seepage studies for Warren reservoir*). Mr. Warren also sent Jerry Gruber, the general manager of the CCSD, information related to the possibility of an off-stream storage project on land he was willing to sell to the District.

Jan. 20, 2014, I held a workshop for interested Cambrians to attend and learn about the possibility of the Warren off-stream storage as a water supply alternative solution for Cambria. A panel, including Mr. Warren, the engineer, who had done the capacity studies, and a hydrogeologist, were invited to answer questions the public might have. The workshop was very well attended and included three directors of the CCSD (all directors had been invited, as had the general mgr. and engineer). Approximately 95% of the attendees at the meeting, indicated their support for such a project. This water supply alternative was never given consideration by the CCSD. In the Army Corps of Engineers (ACE) project alternatives, off-stream storage was mentioned, but not at the Warren site. Instead, they included 3 reservoir sites north east of the property, with an astounding cost of close to \$70 million. No studies were performed on these sites, one of which is a blue line stream, and none of the properties were for sale.

Ten days after the workshop, the CCSD held a board meeting, Jan. 30, 2014, announcing plans to resolve the water crisis. Their decision led to the choice of a brackish-water desalination plant, built two years ago and named the Emergency Water Supply (EWS). I remain convinced that the Superior Alternative to the EWS/SWF, would be the Warren reservoir/off-stream storage solution, which in the capacity studies revealed storage capacity of between 600-700 acre feet. Evaporation and seepage studies, evaluated by Gus Yates, looked very promising. (See documentation).

The Warren reservoir water supply alternative would have been environmentally superior to the EWS or SWF, as it would not have the environmental issues associated with the present facility. It would not have required the energy resources and costs associated with the project that has been built; it would not have required the expensive chemicals for the current EWS facility; it would not have required the evaporation pond; it would not have required additional staffing to engage in maintenance issues and numerous monitoring reports to various agencies; it would have supplied Cambria with plenty of water and allowed for winter pumping for storage; it is in an ideal location, directly across from the District's well field. The land is for sale, and the property is not a blue line stream. In my opinion, this solution would have been far preferable than the choice made by the CCSD for Cambria's water supply needs.

RESERVOIR FUNDING

Funding for reservoirs is available through a \$2.7 billion dollar California Proposition 1 Water Storage Investment Program (see link below). I received a response to a letter I wrote to Senator Dianne Feinstein, related to Federal funding for reservoirs. In her response she cited (S.2533) as a possible federal source for reservoir funding. Since these monies are available, I would ask CCSD if they have ever considered applying for any of these funding mechanisms?

[Prop 1 Water Storage Investment Program](#)

https://cwc.ca.gov/Pages/Implementation_Process.aspx
<https://cwc.ca.gov/Pages/ConceptPapers.aspx>

USBR WaterSMART (Sustain and Manage America's Resources for Tomorrow)
<http://www.usbr.gov/watersmart/index.html>

5.5 FLOODING (CZLUO Section 23.07.174)

LCP 20— Coastal Streams and Riparian Vegetation

This section states: “Coastal streams and adjacent riparian areas are environmentally sensitive habitats. The provisions of this section are intended to preserve and protect the natural hydrological system and ecological functions of coastal streams.”

On January 19, 2016, the San Simeon well field was under several feet of water, resulting from the impact of a significant storm. The recently-installed injection (part of the EWS project) well, couldn't be seen; it was submerged in several feet of water! San Simeon Creek overflowed to the point of covering the entire San Simeon well field. (*See Exhibit 6, Photos of flooding, as documented in photos I took Jan. 19, 2016*). The San Simeon wells, the main source of Cambria's water supply, were shut down due to possible contamination issues resulting from the high water levels.

The PVC pipe, leading from the injection well to the plant, was literally floating, as it had not been secured. This shows another area of poor engineering design, bearing unanticipated consequences. Because of the area's sensitive habitat, home to endangered and threatened species, the enormous amounts of debris that accumulated during the storm, had to be removed very carefully. A biologist was hired to oversee the removal of the debris so that protection of the animal species was afforded as much integrity as possible in sparing them.

How is it possible to continue this kind of operation in an area prone to flooding, as witnessed Jan. 19, 2016, (and in previous years of flooding) without creating harmful and potentially dangerous situations from occurring? How can this area be preserved and protected, assuring the natural hydrological system and ecological functions of coastal streams? Mitigation measures can only go so far when dealing with Mother Nature. Who are we to come along and think we know better? Clearly, from all that has occurred, we don't!

5.5.2 FLOOD PLAIN MAPPING

In addition to what I have stated above, I also refer to the sentence under the above heading: “According to Federal Management Agency (FEMA) portions of the Project site are located within a 100-year floodplain; refer to the *National Flood Insurance Program* Section below.” Again, I reiterate my comments related to poor choice of location, planning and design.

3. 3. 7 WATER SUPPLIES AND DROUGHT—Water Rights

According to information I received from the SWRCB, the maximum pumping allowable from the San Simeon groundwater basin is 798 acre-feet per year, 370 AF of which is the maximum pumping allowable during the dry season, May 1-Oct. 31. In the Santa Rosa groundwater basin, the maximum

pumping allowable, according to the SWRCB is 217.9 AF per year, of which 155.34 AF is the maximum pumping currently allowable during the dry season.

*Please see below the information provided to me from Mitch Moody at the SWRCB re: the District's current water diversion permits. These numbers do not match up with those on page 3: 3-7 of the Draft SEIR, which claim that: "The current SWRCB water rights diversion permits (20387 and 17827) allowed CCSD to pump from both the San Simeon and Santa Rosa groundwater basins a maximum of 1,118 acre-feet (AF) of water during the wet season, and 630 AF of water during the dry season." Those numbers represent a total of 1,748 AF, compared to the SWRCB's current total number of 1,015.9 AF. CCSD is using the original diversion permit numbers, which is not an accurate representation.

The District, in October of 2014, applied to the SWRCB for time extensions, as their water rights diversion permits for both Santa Rosa and Simeon aquifers had expired. I would ask how the District arrived at the original diversion permit numbers in this Draft SEIR, knowing that both permits had expired? CCSD lobbyist, Dean Florez, in his report to the Board, August 25, 2016, had the following comments to make, which I have copied and pasted from the Staff Agenda packet.

4 STATE WATER RESOURCES CONTROL BOARD-DIVISION OF WATER RIGHTS

"Continued discussion in Sacramento along with GM Jerry Gruber with Mitchell Moody of the State Division of Water Rights at the State Water Resources Control Board. On discussion of the licensing of the CCSD Diversion Permits for the San Simeon and Santa Rosa Aquifers. Working through the District's decision move forward with Licensing of our permits as opposed to asking for an extension of time. Securing necessary paperwork, justification and letters so that CCSD can start the process." (sic)

By moving forward with the licensing of the permits, the District will be limited to the diversion limits as explained by Mitch Moody in his reports below. The original diversion permit for San Simeon was 1,230 AF, and for Santa Rosa, 518 AF!

*From: **Moody, Mitchell@Waterboards** <Mitchell.Moody@waterboards.ca.gov>

Date: Mon, Nov 17, 2014 at 2:51 PM

Subject: RE: water rights

To: "tenacioustina2000@gmail.com" <tenacioustina2000@gmail.com>

Cc: "McCarthy, Matthew@Waterboards" <Matthew.McCarthy@waterboards.ca.gov>

Tina,

Both permits are past their completion of use dates and the District has filed petitions to extend the time to complete beneficial use under these permits. Until or unless these extensions are granted the District is authorized to divert only up the maximum use achieved during the time periods designated for completion of beneficial use under each permit. Permit 20387 for A028158 was issued on 11/7/1989 and had a completion of use date of 12/31/10. The maximum use during this period according to our records is 217.9 af. Permit 17287 for A025002 was issued on 5/9/1978 and the completion of beneficial use date expired on 12/31/05. Our records show that the maximum use

achieved during this period was 798 af. Until the District obtains approval from the Division of Water Rights for an extension of time to complete beneficial use under each of its permits, the District's diversions are limited to a maximum of 798 af from San Simeon Creek, and 217.9 from Santa Rosa Creek.

Mitchell Moody, P.E.
Water Resource Control Engineer
Coastal Lahontan Unit
Division of Water Rights
State Water Resources Control Board
1000 I St., 14th. Floor, P.O. Box 2000
Sacramento, CA 95814

RE: FW: water rights, Oct 14

Mitchell@Waterboards <Mitchell.Moody@waterboards.ca.gov>

Tina,

The Santa Rosa Creek permit, A028158, places a cap of 260 af on diversion during the period of May 1 to October 31. The completion of use date for that permit ended on December 31, 2010. So CCSD's dry season diversion amount would be limited to the historical maximum amount diverted during the dry season prior to the expiration of the completion of use date. CCSD reports dry season usage on the link below from 2004- 2009, its confusing because these years are truncated and hard to read. When they say on the table "per permit" they are only restating the limits of diversion under each permit, for 28158, it being 260 af. 2008 was their year of maximum use, with annual use of 217 af. For the dry season during 2008, it was also their year of maximum dry season use, which, as the table below shows, is 155.34 af at Santa RosaCreek. So again, the annual diversion limit based on maximum use under the permit for the year 2008 was 217 af (the amount they perfected). This compares to an annual use limit under the permit of 518 af, so they under-utilized their annual diversion right amount for this permit. As for their dry season right, they were authorized up to 260 af under the permit 20387 for Santa Rosa Creek, but were

only able to perfect 155.34 by permit expiration in 2010. So this would probably be the amount awarded for license purposes as a maximum amount for dry season use.

Mitchell Moody, P.E.
Water Resource Control Engineer
Coastal Lahontan Unit
Division of Water Rights
State Water Resources Control Board

CONCLUDING SUMMARY

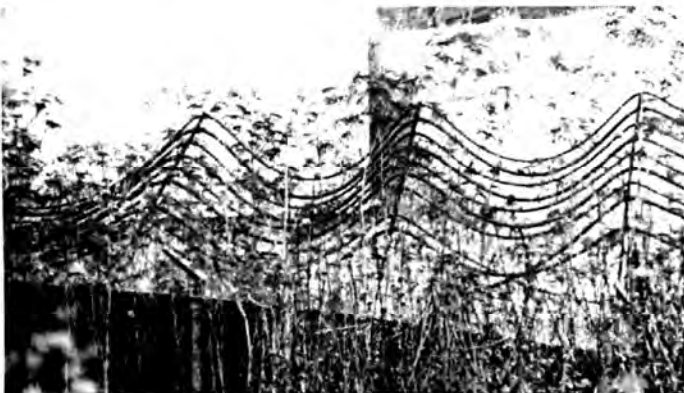
Time does not allow me to address any other items contained in the Draft SEIR, but suffice it to say, I am not impressed with the manipulation of Cambrians believing they are paying for one project, the EWS, and its original intent to serve current resident in times of drought, only to be informed that the project has been addressed with a different name in this Draft SEIR, the SWF, for purposes of growth. Through serious and genuine conservation efforts that Cambrians have made, and will need to continue to make to some degree, as will the rest of California, I am far from convinced that the route the CCSD took in its rush to judgment to solve Cambria's "water crisis," is ultimately in the best interests for the Cambria community, the surrounding habitat and the wildlife, who also make this beautiful place their home.

Submitted by Tina Dickason, October 26, 2016

**EXHIBIT 1:
PHOTOGRAPHS OF DEER AND BIRDS IN EVAPORATION POND**



Figure 1 Sent from Jon Rokke RWQCB on Aug. 2, 2016



**EXHIBIT 2: NOTICE OF VIOLATION, CALIFORNIA WATEBOARD
10/24/2016**



Central Coast Regional Water Quality Control Board

October 24, 2016

Jerry Gruber, General Manager Cambria
Community Services District P.O. Box 65
Cambria, CA 93428
jgruber@cambriacsd.org

VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7015 3430 0000 5440 7328

Dear Mr. Gruber:

**NOTICE OF-VIOLATION: FAILURE TO SUBMIT A COMPLETE REPORT REQUIRED UNDER WATER CODE
SECTION 13267: CAMBRIA COMMUNITY SERVICES DISTRICT**

Central Coast Regional Water Quality Control Board (Water Board) staff received the Cambria Community Services District (Cambria CSD) September 30, 2016, submittal in response to our August 9, 2016, California Water Code section 13267 Request for Information (13267 Request for Information) regarding wildlife issues associated with the Cambria CSD's class II surface impoundment (surface impoundment). The August 9, 2016, 13267 Request for Information requires a plan to exclude deer or any wildlife from accessing the surface impoundment liner and requires a burrowing animal management plan. The Cambria CSD failed to submit a report with all of the information required by the 13267 Request for Information (see attached).

The Cambria CSD's September 30, 2016, submittal includes plans to hire a pest control contractor to eradicate burrowing animals, but fails to include a burrowing animal management plan as required in the 13267 Request for Information. The Cambria CSD must develop and implement a burrowing animal management plan that includes corrective actions to remediate existing damage to the surface impoundment berms, and a training component to ensure Cambria CSD staff identify and correct burrowing animal activity. The Cambria CSD's submittal did not address corrective actions or future efforts to identify and correct burrowing animal issues. It is important that the Cambria CSD not only eliminate existing burrowing animals from the surface impoundment berms, but also repair damage to the berms to prevent potential slope failure or liner damage.

In addition, the Cambria CSD intends to install a new fence along Van Gordon Creek to keep deer from accessing the surface impoundment liner. The Cambria CSD's submittal states that trees have grown through the old fencing thereby limiting its effectiveness, but the submittal does not indicate if the entire fence perimeter was inspected or whether the height of the fence in relation to surrounding areas was evaluated. The Cambria CSD must verify that the entire fence line was evaluated and must document that the effective fence height (the height of the fence in relation to surrounding areas) is sufficient to prevent wildlife access. The California Department of Fish and Wildlife recommends a minimum eight-foot-tall fence to deer proof an area (<https://www.wildlife.ca.gov/Keep-Me-Wild/Deer>).

The Cambria CSD must comply with all applicable state and federal wildlife requirements while operating and maintaining the surface impoundment. The selection and implementation of the required corrective action measures must consider the potential presence of protected species. Consequently,

Mr. Jerry Gruber

- 2 -

October 24, 2016

the Cambria CSD must coordinate with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service on the selection and implementation of appropriate methods to eliminate burrowing animals to ensure that any protected or endangered species, such as the California red-legged frog, are properly protected.

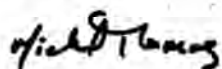
Failure to comply with the request for the technical information as outlined in our August 9, 2016, 13267 Request for Information subjects the Cambria CSD to monetary penalties pursuant to California Water Code Section 13268. This Notice of Violation is to inform you of your violation of the request for technical information pursuant to Water Code Section 13267, and of the associated liabilities that accrue for each day of violation from the compliance due date identified above.

You are required to immediately provide the requested technical report as specified in the August 9, 2016, 13267 Request for Information. Pursuant to California Water Code Section 13268, your violation of Water Code Section 13267 subjects you to administrative civil liabilities up to \$1,000 for each day for which the violation occurs with respect to the above noted compliance date (i.e., \$1,000 for each day the requested technical report is late or incomplete). As of October 24, 2016, and based on the provisions of California Water Code Section 13268, the maximum liability that the Water Board may impose upon the Cambria CSD is up to \$24,000 for the late technical report.

The Cambria CSD invested significant resources in constructing and maintaining the surface impoundment and should make every effort to protect the integrity of the surface impoundment berms and liner system. Proper operation and maintenance activities should be in place to identify and correct issues with burrowing animals and to prevent deer or other wildlife from accessing the surface impoundment. Please review the attached August 9, 2016 letter thoroughly and submit a technical report with all requested information to the Water Board Executive Officer for review and approval as soon as possible.

If you have any questions or comments regarding this letter, please contact **Ryan Lodge at (805) 549-3506** or Matthew Keeling at (805) 549-3685.

Sincerely,



Michael Thomas
Assistant Executive Officer

Digitally signed by Michael Thomas
Date: 2016.10.24 16:01:56 -07'00'

Attachment: Water Code Section 13267 Request for Information, August 9, 2016

cc: Bob Gresens, bgresens@cambriacsd.org
Todd Tognazzini, todd.tognazzini@wildlife.ca.gov
Melissa Boggs, Melissa.boggs@wildlife.ca.gov
Lena Chang, lena_chang@fws.gov
Doug Barker, Doug.Barker@parks.ca.gov
Matthew Keeling, Matt.Keeling@waterboards.ca.gov
Todd Stanley, Todd.Stanley@waterboards.ca.gov
Ryan Lodge, ryan.lodge@waterboards.ca.gov



Central Coast Regional Water Quality Control Board

August 9, 2016

Jerry Gruber, General Manager Cambria
Community Services District
jgruber@cambriacsd.org

Dear Mr. Gruber:

WATER CODE SECTION 13267 REQUEST FOR INFORMATION: CAMBRIA COMMUNITY SERVICES DISTRICT

Central Coast Regional Water Quality Control Board (Water Board) staff conducted a site inspection at the Cambria Community Services District (Cambria CSD) class II surface impoundment (surface impoundment) on August 4, 2016. The Cambria CSD surface impoundment is regulated through Waste Discharge Requirements Order No. R3-2014-0047. The Site inspection was conducted to follow-up on a citizen's report indicating deer were grazing next to the surface impoundment within the fenced impoundment area. During the inspection Cambria CSD staff acknowledged observing deer within the fenced area in the past. The fence appeared intact around the surface impoundment and Cambria CSD staff indicated gates are closed and locked when staff are not onsite. It appears that the deer may be jumping over the fence to gain access to vegetation surrounding the surface impoundment. Deer entering the surface impoundment area could damage the surface impoundment liner with their hooves. Wildlife, such as deer, should be excluded from the surface impoundment area to prevent liner damage, and to protect them from the wastes stored in the impoundment.

The Cambria CSD must determine the effectiveness of the surface impoundment exclusion fencing to prevent wildlife access to the surface impoundment. Cambria CSD staff must evaluate the fence height and integrity; verify the fence completely surrounds the impoundment and has no gaps, especially along Van Gordon Creek where it is difficult to visually verify the fence is intact due to extensive vegetation. The Cambria CSD should also verify that hills or sloped areas located near the fence do not render it's effective height low enough to allow deer to jump over the fence,.

During the August 4, 2016 inspection, Water Boards staff noted burrowing animal activity within the gopher fenced area surrounding the surface impoundment. Numerous mounds and holes were documented on the surface impoundment berm. Burrowing animals could damage the surface impoundment liner from below grade and could undermine the integrity of the surface impoundment berm. The Cambria CSD installed a gopher fence intended to keep burrowing animals away from the surface impoundment liner and berm. It is not clear whether the burrowing animals were not properly eradicated from the surface impoundment area prior to the gopher fence installation and are now populating the area inside the fence or whether the burrowing animals entered below the gopher fence. The Cambria CSD needs to develop and

implement a burrowing animal management plan to eliminate the burrowing animal population within the gopher fence area.

The Cambria CSD is required maintain the liner system as designed and approved by Water Board Executive Officer. Excluding wildlife that could potentially damage the liner system is a required part of operation and maintenance activities for the Class II Surface Impoundment. Monitoring and Reporting Program section D.1.iv requires the Cambria CSD inspect and perform routine maintenance. There was no indication that the animal burrows were noted during daily site inspections or are part of a scheduled maintenance program. Cambria CSD staff must inspect the liner system including the surface impoundment berms for integrity and document any issues and resolution of those issues.

Water Board staff understand that the Cambria CSD is exploring options to haul brine offsite for disposal rather than maintain the surface impoundment. Water Board staff encourage the Cambria CSD to find alternative brine disposal options. However, the Cambria CSD is still required to comply with the WDR Order No. R3-2014-0047 until an alternative disposal option is in place and the WDRs are rescinded.

The Cambria CSD must submit a technical report by **September 30, 2016**, that includes, at a minimum, the following information:

1. A plan to exclude deer or any wildlife that could damage the liner from accessing the surface impoundment liner system. The Cambria CSD must evaluate the current exclusion fencing and determine how to improve the system to effectively keep deer or other wildlife from accessing the surface impoundment area.
2. A burrowing animal management plan. The plan should outline measures to control and eliminate burrowing animals from within the gopher perimeter fencing. The Cambria CSD must propose corrective actions to remediate damage to the surface impoundment berms to maintain surface impoundment integrity. The plan should include ongoing training requirements for Cambria CSD staff to ensure that any evidence of burrowing animal activity is immediately documented and corrective actions are implemented to remedy identified issues.

The technical report shall be submitted to the Water Board Executive Officer for review and approval prior to plan implementation. The Water Board needs the required information to evaluate and ensure compliance with Waste Discharge Requirements. The Cambria CSD is required to submit this information because on August 4, 2016, Water Board staff inspected the Cambria CSD Class II Surface Impoundment and found maintenance issues associated with protecting the liner system from potential wildlife damage. Water Board staff discussed the evidence supporting this requirement with Cambria CSD staff on August 4, 2016. More detailed information is available in the Water Board's public file on this matter.

The Water Board's requirement that the Cambria CSD submit a technical report is made pursuant to Section 13267 of the California Water Code. Pursuant to section 13268 of the California Water Code, a violation of a California Water Code section 13267 requirement may subject the Cambria CSD to civil liability of up to \$1,000 per day for each day in which the violation occurs. If the Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$5,000 per day for each violation (California Water Code section 13268(b)(2)). Days of violation and the associated potential civil liability

continue to accrue for each day of non-compliance. The Water Board reserves its right to take any enforcement action authorized by law.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00p.m. on the next business day. Copies of the law and regulations applicable to filing petitions will be provided on request, or may be found on the internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality/

If you have any questions or comments regarding this letter, please contact **Ryan Lodge at (805) 549-3506** or Matthew Keeling at (805) 549-3685.

Sincerely,

Matthew T. Keeling

for John M. Robertson
Executive Officer

cc: Bob Gresens,
bgresens@cambriacsd.org
Todd Tognazzini,
todd.tognazzini@wildlife.ca.gov Melissa
Boggs, Melissa.boggs@wildlife.ca.gov
Matthew Keeling,
Matt.Keeling@waterboards.ca.gov Ryan
Lodge, ryan.lodge@waterboards.ca.gov

Digitally signed by Matthew T. Keeling
Date: 2016.08.09 15:19:20 -07'00'

**EXHIBIT 3:
BRINE HAULING COSTS**

From: Lodge, Ryan@Waterboards <Ryan.Lodge@waterboards.ca.gov>
Date: Fri, Oct 14, 2016 at 12:55 PM
Subject: Cambria CSD Brine Hauling Cost
To: "Tina Dickason (tenacioustina2000@gmail.com)" <tenacioustina2000@gmail.com>

Tina,

You had asked about the cost associated with hauling brine to Kettleman Hills for disposal yesterday on the phone and I couldn't recall the numbers we had received from the District. I have attached the costs the District provided to haul the waste in the event that a leak developed in the liner system and they had to remove the brine in order to repair the liner. The Water Board required the analysis and financial assurance in case the liner leaked and the impoundment was full. Hopefully this helps answer your question regarding brine hauling costs. This information is also available on our Geotracker website for the Cambria project. This page is located in the Report of Waste Discharge Appendices 2A – 3A and is Attachment 3. Let me know if you have any questions.

Ryan Lodge, PE
Water Resource Control Engineer
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Phone: (805) 549-3506
Fax: (805) 543-0397

Attachment A

Calculations: Estimated Costs to Pump and Haul Brine Waste From the Evaporation Pond

Assumptions:

- 1) At the time of pumping, the evaporation pond will be at max capacity (6.96 million gallons, i.e., maximum capacity plus 1,000 year storm)
- 2) All Class II designated liquid waste will be pumped out by a Vacuum Tanker Truck (4,800 gallons/truck) and hauled to Kettleman Hills Landfill
- 3) The cost to dispose Class II designated liquid waste at Kettleman Hills Landfill is approximately \$0.20/gallon
- 4) Each truck can make two trips between Cambria and Kettleman Hills Landfill per day
- 5) The cost per trip (Cambria to Kettleman Hills and back) will cost \$575/truck load
- 6) At the end of the project, each truck used will require washout, costing \$450/truck

Volume to be pumped	6,960,000	gallons
Tanker Truck Volume	4,800	gallons/truck
Haul Cost per Load	\$ 575	per truck load
Cost of Disposal	\$ 0.20	per gallon
Washout Cost	\$ 450	per truck used

---Max Brine Level (6.2 Million Gallons plus 1,000 year storm)

Number of Truck Loads Needed = 1,450 truck loads

Cost of Hauling Liquid Waste = \$ 833,750

Cost to Dispose of Liquid Waste at Landfill = \$ 1,392,000

Number of Truck Days = 725 Truck-days needed

Number of Days to Remove Brine = 50 working days --- Estimated time to remove the liquid brine from the pond

Number of Trucks Needed = 15 trucks needed to haul waste in allotted time

Cost for Washout of each Truck = \$ 6,750

Summary

Cost of Hauling Liquid Waste = \$ 833,750

Cost of Disposal at Landfill = \$ 1,392,000

Cost of Truck washout = \$ 6,750

Sub Total = \$ 2,232,500

20% Contingency = \$ 446,500

**EXHIBIT 4:
NOTICE VIOLATION FEBRUARY 2015**



Central Coast Regional Water Quality Control Board

February 27, 2015

Jerry Gruber, General Manager
Cambria Community Services District
jgruber@cambriacsd.org

VIA ELECTRONIC AND CERTIFIED MAIL
Certified Mail No. 7008 1140 0003 4708 8902

Bob Gresens, District Engineer
Cambria Community Services District
bgresens@cambriacsd.org

Dear Mr. Gruber and Mr. Gresens:

NOTICE OF VIOLATION AND WATER CODE SECTION 13267 REQUEST FOR INFORMATION: CAMBRIA COMMUNITY SERVICES DISTRICT

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.

Following a complaint received from the public on the afternoon of February 9, 2015, Water Board staff observed a discharge of water originating from the Cambria Emergency Water Supply project into Van Gordon Creek. The pipe discharging water to Van Gordon Creek had been moved from its original permitted location to the west, where it had been connected to a diffuser intended to facilitate overland flow into the San Simeon Creek. Van Gordon Creek was dry upstream of the observed discharge point, and we estimated that a flow of approximately 100 gallons per minute (gpm) was discharging into the dry creek bed. A sample of the discharge into Van Gordon Creek contained 0.61 mg/L residual chlorine (sampled collected by Water Board staff and analyzed at ELAP certified laboratory Moore Twining Associates, Inc.). Also, we observed extensive erosion in the location of the Van Gordon discharge as a result of the discharge.

On February 20, 2015, Water Board staff conducted a site inspection at the CCSD Class II surface impoundment. Water Board staff observed brine drift from the blower system operation extending outside of the surface impoundment lined area.

While on the site, Water Board staff asked to review the daily log book of surface impoundment available freeboard. The log book contained information from February 10th up to the February 20th inspection, but no information from plant start-up on January 20th to February 9th.

Dr. David Paulson, Water Board Chair | Kathleen A. Harbo, Executive Director

895 Aero Vista Place, Suite 101, San Luis Obispo, CA 93401 | www.waterboards.ca.gov/centralcoast



Also on February 20, 2015, Water Board staff asked the site operator if the leachate collection and recovery system (LCRS) and the vadose zone monitoring system (VZMS) had been inspected for the presence of liquid. The onsite operator did not know if the LCRS or VZMS had been inspected for the presence of liquid. On February 26, 2015, CCSD contract staff verified that the LCRS and VZMS had not been inspected prior to February 10th. WDR Order No. R3-2014-0047 requires weekly LCRS and VZMS inspections when brine is present in the surface impoundment.

Specific violations relative to each Order are described below.

WDR Order No. R3-2014-0050

Section VI of WDR Order No. R3-2014-0050, entitled STATE WATER RESOURCES CONTROL BOARD DIVISION OF DRINKING WATER (DDW) REQUIREMENTS, states in part:

“The CCSD must operate the treatment facility in compliance with an OMMP approved by the DDW and the Water Board.”

The OMMP approved by both DDW and the Water Board states in relevant parts:

Section 5.1 “A new conveyance pipeline will be routed southwest to a surface discharge structure at San Simeon Creek.”

Section 18.3.5 “Significant changes in the approved OMMP must be approved by the DDW and the RWQCB prior to instituting changes. The CCSD is responsible for ensuring that the OMMP is, at all times, representative of the current operations, maintenance, and monitoring of the Cambria AWTP.”

Because the location of the discharge was moved without the express approval or knowledge of DDW and the RWQCB, this constitutes a violation of WDR Order No. R3-2014-0050 Section VI.

NPDES Order No. R3-2011-0223

On December 8, 2014, the Water Board sent the CCSD a Notice of Applicability for the CCSD's enrollment in the NPDES Order No. R3-2011-0223 for the discharge of membrane filtration (MF) product water to San Simeon Creek. A monitoring and reporting program (MRP) specific to the CCSD's project, as described in the application package (Notice of Intent), was transmitted with the Notice of Applicability.

The CCSD's Notice of Intent described discharging up to 100 gpm to San Simeon Creek to maintain fresh water conditions in San Simeon Creek Lagoon. The Notice of Intent (Section 2.1 Technical Memorandum dated November 25, 2014) also specifically states, “[t]here will not be chemicals added into the MF feed water nor in the MF filtrate stream that will be discharged in the San Simeon Creek. Sodium hypochlorite and aqueous ammonia will be added only in the MF filtrate stream that will be further treated through RO to protect the RO membranes from bio-fouling.” During a site inspection on February 24, 2015, CCSD staff and representatives told Water Board staff that reverse osmosis treated water had been discharged to the creek. No waste stream, other than the MF product water, is permitted to be discharged to the creek. Furthermore, the CCSD cannot use reverse osmosis treated water in an attempt to dilute

concentrations to meet effluent or receiving water limitations under NPDES Order No. R3-2011-0223. These diluted waste streams are specifically prohibited from enrollment in the Order.

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

1. NPDES Order Section B.1 Discharge Prohibitions: "The discharge of any waste at a location or in a manner different from that described in the approved NOI or regulated by this General Permit is prohibited."
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."
3. NPDES Order Section C.1 Effluent Limitations: "Effluent shall not have detectable chlorine residual greater than or equal to 0.02 milligrams per liter (mg/L)."
4. MRP Section D.1 Start-up Phase Monitoring and Reporting: "Notification: The Discharger shall notify Executive Officer in writing of the start-up date 7 to 14 days prior to start up beginning."
5. MRP Section D.2 Start-up Phase Monitoring and Reporting: "Monitoring: During the initial effluent discharge, sampling of the effluent must occur on the first day... Prior to receipt of the results of the initial samples, all effluent shall be discharged into a holding tank (that is contained, not discharged to the receiving water) until the results of the analyses show the discharge to be within the effluent limits established in this Order and/or in the authorization letter."
6. MRP Section E.3 Discharge Monitoring: "The Discharger will perform monitoring within the first 24 hours of the wastewater discharge system startup and thereafter as directed by the following table." (Table 1, MRP)
7. MRP Section G.1 Reporting: "A report on the start-up phase shall be submitted to the Central Coast Water Board no more than 15 days after the end of the start-up phase."
8. MRP Section G.6 Reporting: "If the Discharger introduces chemical additives in a manner that will change effluent characteristics originally not reported in the NOI then the Discharger shall submit to the Central Coast Water Board a report describing the need, method of chemical application and disposal. The Discharger shall submit a Chemical Additives Report at least 30 days before the use of any chemicals in the operation and maintenance of the wastewater discharge system."

WDR Order No. R3-2014-0047

The CCSD violated the following sections of WDR Order No. R3-20145-0047:

1. WDR Discharge Prohibition B.1: "Discharge of waste to areas outside the approved and permitted Class II surface impoundment as illustrated in Figure 3 is prohibited, unless approved by the Executive Officer. This includes drift from mechanical blowers designed to increase surface impoundment evaporation efficiency. No material from the surface impoundment shall be allowed to drift, drain, or otherwise discharge to any area other than within the surface impoundment."

2. MRP Section D.1.ii: "Daily – Measure and record freeboard, as measured from the top of the lowest part of the berm to the brine surface. Observations and measurements must be recorded in a permanent log book kept onsite."
3. MRP Section D.2.i: "Weekly - Inspect all systems for the presence of liquid and collection system integrity, record volume of leachate collected (gallons)."

Technical Report Requirements

Water Board staff has received differing reports regarding the length of time the discharge to Van Gordon Creek occurred. In order to assess the potential impacts to Van Gordon Creek, Water Board staff needs to know the date, duration, volume, and quality of any and all of the discharges that have occurred. Therefore pursuant to Section 13267 of the California Water Code, you are required to provide a technical report to the Water Board by March 27, 2015, addressing the following:

1. Document the dates, durations and volumes of all discharges to Van Gordon Creek or any other surface water body, and provide all monitoring data for all pollutants collected during those discharges, from all sources of water (MF filtered water and RO product water) that were discharged to Van Gordon Creek or any other surface water body. The documentation is to include copies of the actual data logged by the facility's SCADA and other automated monitoring systems. Such data shall include pump run times and flow rates for the full 24 hour periods of the days when the subject discharges occurred. All data are to be clearly labeled so as to easily allow the reader to understand where and when each data point was collected.
2. Provide information detailing how and when you intend to resolve the issue of the San Simeon Creek water supply augmentation potentially interfering with monitoring well 16D1. Please note that you will need DDW and Regional Board approval before deviating from the discharge methodology described in the OMMP and NPDES Permit NOI.
3. Provide information regarding measures the CCSD will take to prevent brine drift outside of the surface impoundment liner system and how the CCSD is verifying brine drift is not occurring. The blowers were in operation since January 20th; provide data, observances, or other measures utilized by CCSD to verify whether brine drift was occurring prior to the February 20th site inspection and how or if those measures were adjusted to ensure brine drift is no longer occurring. Provide specific examples of the measures previously employed by the CCSD to determine brine drift and measures currently employed to verify brine drift is not occurring.

Pursuant to section 13268 of the California Water Code, a violation of a California Water Code section 13267 requirement may subject you to civil liability of up to \$1,000 per day for each day in which the violation occurs. If the Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$5,000 per day for each violation (California Water Code section 13268(b)(2)). Days of violation and the associated potential civil liability continue to accrue for each day of non-compliance. The Water Board reserves its right to take any enforcement action authorized by law.

We realize and appreciate that the CCSD has been working diligently to design, build, and test this new system in an emergency situation, and that you are dealing with multiple challenges simultaneously. Some of the enforcement actions we take are mandatory per the California Water Code, while others are more discretionary. Our discretionary enforcement actions beyond this Notice of Violation will be determined based on your responses to this Notice of Violation and your future compliance with Orders regulating this facility.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions will be provided on request, or may be found on the internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality/

If you have any questions regarding this Notice of Violation, please contact Thea Tryon at 542-4776 or by email at thea.tryon@waterboards.ca.gov.

Sincerely,

Michael Thomas
Assistant Executive Officer

cc: Jeff Densmore, DDW
Jeff.Densmore@waterboards.ca.gov

Todd Stanley, Water Board
Todd.stanley@waterboards.ca.gov

Chris Park, CDM Smith
parkce@cdmsmith.com

Todd Tognazzini, CA DFW
Todd.Tognazzini@wildlife.ca.gov

Melissa Boggs, CA DFW
Melissa.Boggs@wildlife.ca.gov

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ECM: CW-809684

EXHIBIT 5: DATA AND DOCUMENTATION ON RESERVOIR

EXHIBIT 5:
WATER SUPPLY ALTERNATIVE: WARREN RESERVOIR DATA

From: **Clyde Warren** <ctwarren@hotmail.com>
Date: Mon, Jan 13, 2014 at 10:59 AM
Subject: Reservoir
To: "gyates@toddengineers.com" <gyates@toddengineers.com>
Cc: Tina Dickason <tenacioustina2000@gmail.com>, Clyde Warren <ctwarren@hotmail.com>

Hi Gus,

We may be calling on you so I wanted to give you a heads up on the reservoir site. Here some photos to refresh your memory. The designs are two for elevations. 610 acre feet at 240' high and 704 acre feet at 255' high.

Clyde

----- Forwarded message -----

From: Clyde Warren <ctwarren@hotmail.com>
Date: Thu, Jan 9, 2014 at 1:38 PM
Subject: Fw: Pond on Warren property
To: Tina Dickason <tenacioustina2000@gmail.com>

Hi Tina, I sent this to Jerry and a copy of the photos I sent to Bill and you.

Clyde

Sent from Windows Mail

From: Clyde Warren
Sent: Thursday, January 9, 2014 1:36 PM
To: Jerry Gruber
Cc: Clyde Warren

Hi Jerry,

I showed the CCSD this site over ten years ago. I never did hear what the capacity is for it. So I hired AT Geo to find out. It will hold 610 acre feet of water. You have existing wells and permit to fill it. It does not involve a blue line stream and it is the drainage above your well field. I'll send you photos next. I will be presenting this to the Cambria For Change meeting on the 20th.

I would like to meet with you first at your convenience before this meeting.

Clyde

927-3588

From: Bill@VolbrechtSurveys.com
To: ctwarren@hotmail.com
CC: bill@atgeosys.com; Alan@atgeosys.com
Subject: Pond on Warren property
Date: Tue, 3 Dec 2013 20:23:25 +0000

Clyde,
Alan noted the title block was not printed. Here are copies with the title block printed.

Here is an update of Exhibit 2 and Exhibit 2G. This update shows the existing contours from the quad sheet. The explanation of Exhibit 2 and 2G has been updated to show the proposed volumes with the higher dam height.

Exhibit 1 : With the water surface at an elevation of 240 feet, this is about 200 feet above the yard.
The Pond volume is 610 af and the disturbed area is 30 acres and moves 851,000± cy.
Exhibit 1G: is the same basin with a google photo as a background.

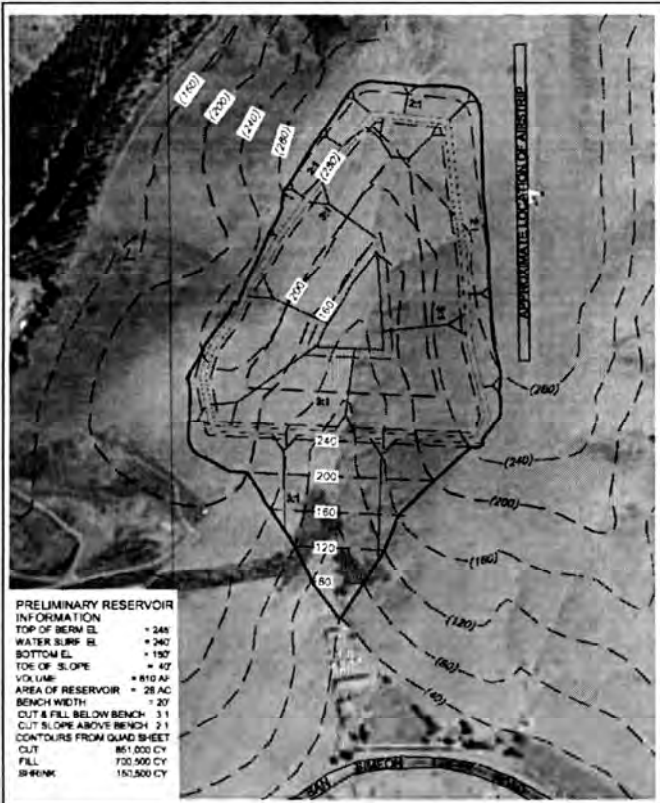
Exhibit 2 : With the water surface at an elevation of 255 feet, this is about 215 feet above the yard.
The Pond volume is 704 af and the disturbed area is 30.3 acres and moves 964,000± cy.
Exhibit 2G: is the same basin with a google photo as a background.

The existing ground is from quad sheet topography with 40 foot contour intervals.
The water surface could be raised more, and retain a greater volume but the fill required and the cut to generate that fill would also increase.

If you have any questions please contact me.

Thank You

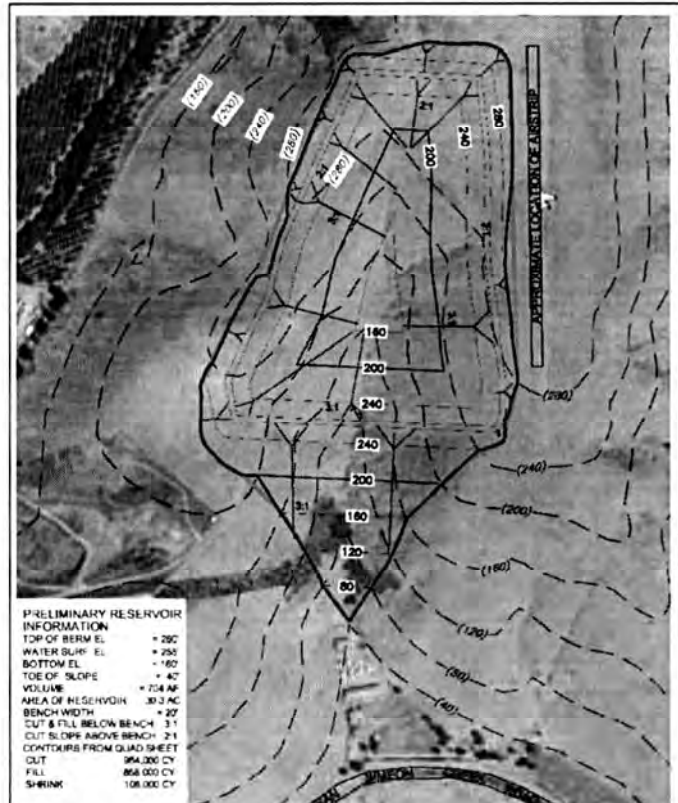
Bill Rebik,
PE, PLS, QSP/QSD
Sr. Engineer
AT GeoSystems, Inc.
dba Volbrecht Surveys
3590 Sacramento St., Ste 110
San Luis Obispo, CA 93401
Off 805.781.9296
Fax 805.781.8050
<http://www.atgeosys.com>



PRELIMINARY RESERVOIR INFORMATION
 TOP OF BERM EL. + 248
 WATER SURF EL. + 247
 BOTTOM EL. + 197
 TOE OF SLOPE + 47
 VOLUME + 810 AC
 AREA OF RESERVOIR + 28 AC
 BERM WIDTH + 20'
 CUT & FILL BELOW BENCH 3:1
 CUT SLOPE ABOVE BENCH 2:1
 CONTOURS FROM QUAD SHEET
 CUT 861,000 CY
 FILL 730,900 CY
 SHRINK 150,300 CY

EXHIBIT 1G
 PRELIMINARY RESERVOIR
 APN-013-062-003
 SAN LUIS OBISPO COUNTY
 PREPARED FOR CLYDE WARREN
 NOV. 2013

AT GeoSystems
 Civil Engineers Land Surveyors
 3350 Sacramento Dr. Suite 110 San Luis Obispo, CA 93401 (805)781-9294 atgeosys.com

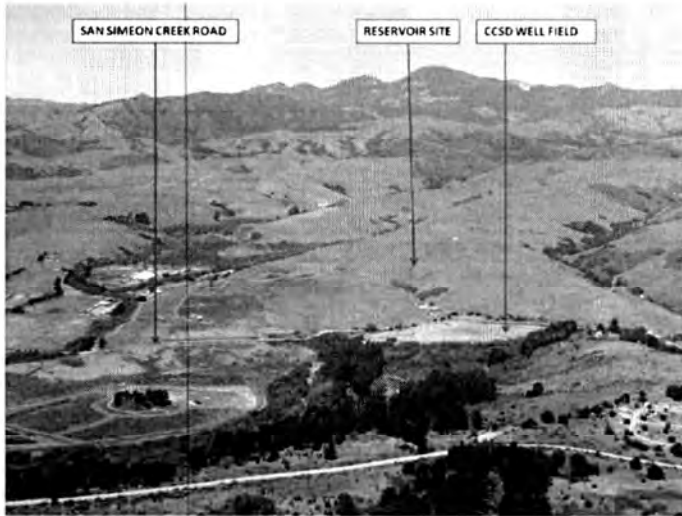
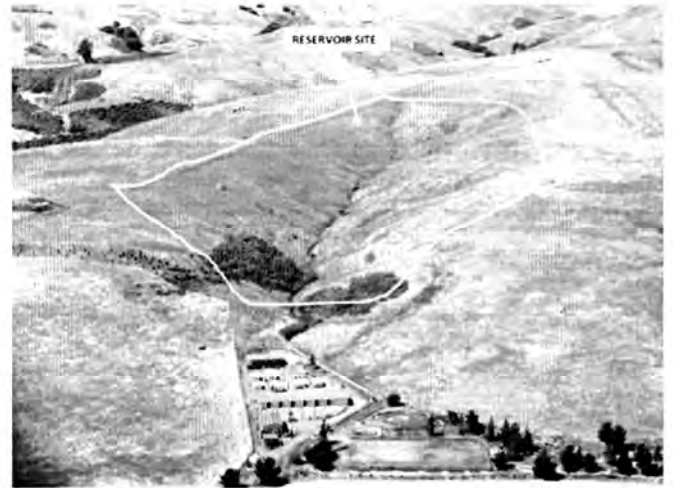
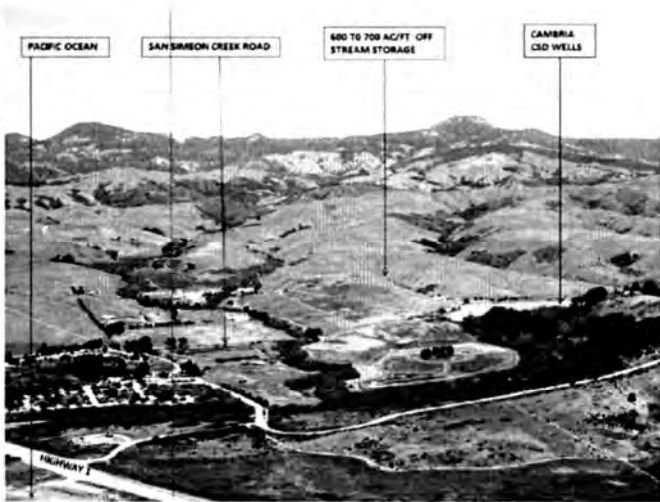


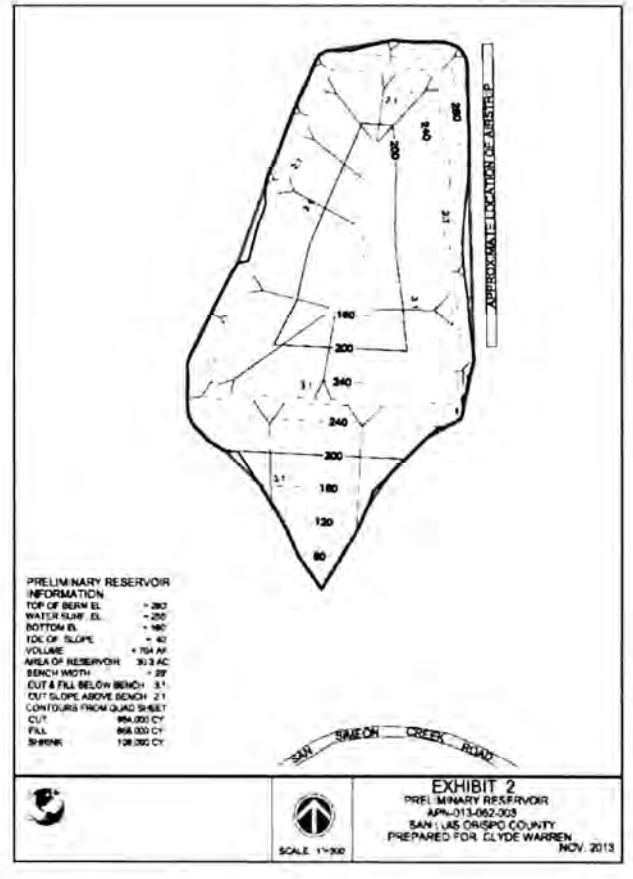
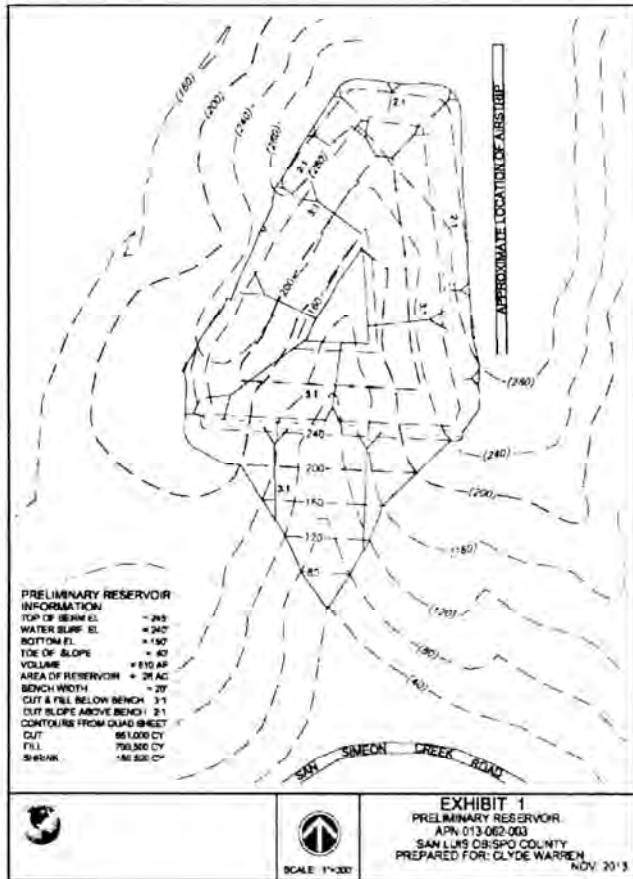
PRELIMINARY RESERVOIR INFORMATION
 TOP OF BERM EL. + 250
 WATER SURF EL. + 250
 BOTTOM EL. + 150
 TOE OF SLOPE + 47
 VOLUME + 754 AC
 AREA OF RESERVOIR + 30.2 AC
 BERM WIDTH + 20'
 CUT & FILL BELOW BENCH 3:1
 CUT SLOPE ABOVE BENCH 2:1
 CONTOURS FROM QUAD SHEET
 CUT 964,300 CY
 FILL 868,000 CY
 SHRINK 108,000 CY

EXHIBIT 2G
 PRELIMINARY RESERVOIR
 APN-013-062-003
 SAN LUIS OBISPO COUNTY
 PREPARED FOR CLYDE WARREN
 NOV. 2013

AT GeoSystems
 Civil Engineers Land Surveyors
 3350 Sacramento Dr. Suite 110 San Luis Obispo, CA 93401 (805)781-9294 atgeosys.com







GUS YATES CAPACITY STUDY OF RESERVOIR:

----- Forwarded message -----

From: **Clyde Warren** <cjwarren@hotmail.com>

Date: Wed, Jan 22, 2014 at 9:18 AM

Subject: Fw: Reservoir losses and operation

To: Tina Dickason <tenacioustina2000@gmail.com>, Jerry Gruber <jgruber@cambrnacs.org>, Bob Gresens <bgresens@cambrnacs.org>

Cc: Bruce Gibson <bbgibson@co.slo.ca.us>, Rick Hawley <rick@greenspacecambrnacs.org>, Russell M McGlothlin <RMcGlothlin@bhfs.com>

Hi everyone, Here is Gus Yates information on the reservoir.

Clyde

Sent from Windows Mail

From: Gus Yates

Sent: Tuesday, January 21, 2014 4:58 PM

To: Clyde Warren

Hi Clyde,

I have finally had a chance to look over the schematics and photographs of the proposed reservoir site in the gully adjacent to CCSD's San Simeon well field. It appears that there are two capacities under consideration. The smaller one has a maximum capacity of 610 AF, a maximum surface area of 28 acres and a 90-foot water-level range. The larger one has 704 AF of storage, 30 acres of surface area and a 105-foot water-level range. Here is a bit of information as well as questions/issues that would need to be addressed to further develop the concept of an off-stream storage reservoir at that location:

- Net evaporative losses are the difference between annual evaporation and annual rainfall, multiplied by the surface area. Annual rainfall is about 20 in/yr (Piedras Blancas gauge) and annual evaporation is about 33 in/yr (assumed equal to reference ET in CIMIS zone 1). Multiplying the difference (13 in/(12 in/ft) = 1.1 ft) by 30 acres equals 33 AFY of net loss, or about 5% of reservoir capacity per year.
- Seepage loss is much more difficult to predict because it would occur as flow through fractures in the underlying Franciscan mélangé bedrock. The occurrence of fractures can be highly variable, which means you would either want to do localized testing or plan to roller-compact clay over the bottom of the reservoir before filling it. If the areally-averaged seepage rate were 0.01 ft/d, it would take 25 years for it to drain the reservoir. If it were 0.1 ft/d (which seems high for an average), it would take only 2.5 years.
- Seepage out the bottom of the reservoir would just return to the basin deposits at the well field anyway, so the water would not be lost to CCSD. But the purpose of the reservoir is to store water for periods when the alluvial supply runs out, so you certainly don't want the water to seep out too quickly.
- I can't emphasize enough the importance of extremely dry years in determining the reliable yield of the alluvial groundwater supply and hence the circumstances under which the reservoir supply would be valuable. Groundwater yield can run out under two circumstances: 1) an exceptionally long dry season, or 2) a winter with too little stream flow to refill the aquifer (which has a probability of about 0.04, or 1 year out of 25 on average). This is frequent enough to justify a supplemental supply for those dry years. The probability of two

winters in a row with incomplete recharge is on the order of 1 year in more than 400 years, which is probably too rare an event to be worth planning for. So the water stored in the reservoir needs to remain available for up to 2 years between refill events to be truly valuable in terms of providing a reliable supplemental supply to CCSD. The attached figure illustrates the importance of infrequent but extremely dry years. It shows annual discharge in San Simeon Creek at the Palmer Flats gauge for 1971-1992. In 1976 and 1977 total discharge was less than current annual CCSD water use and in 1990 it was about equal to that use.

- The good news is that the annual net evaporation and seepage rates both appear to be relatively small percentages of total reservoir capacity, so that a substantial percentage of the stored water would still be in the reservoir after 2 years.
- The reservoir could be filled using CCSD's existing municipal wells (with a booster pump?), but how would the reservoir water be returned? Reservoir water is surface water, and to avoid the need for constructing a surface-water treatment plant, the water would have to be percolated into the aquifer sufficiently far upstream that it would meet subsurface residence-time criteria required by the California Department of Public Health. I investigated that question at one point in the early 1990s when there was a proposal to percolate recycled wastewater.
- You would need to do a reservoir operations and stream flow time series analysis to confirm yield and investigate steelhead migration impacts. It might be necessary to install an additional well to allow more rapid filling of the reservoir during periods of high stream flow. Fish passage impacts typically occur as periods of a few days to a week when natural stream flow recedes past the minimum flow required for adult or smolt passage over the critical riffle in the lower basin area. Stream flow depletion (from additional pumping at the well field) does not impact migration opportunity when flows are higher or lower than the critical passage flow by an amount equal to the additional pumping rate).

At first glance, I see no fatal flaws in this idea.

Gus

Gus Yates, PG, CHg

Senior Hydrologist

TODD GROUNDWATER

2490 Mariner Square Loop, Suite 215

Alameda, CA 94501

gyates@toddgroundwater.com

[510.747.6920 x108](tel:510.747.6920)

www.toddgroundwater.com

EXHIBIT 6: PHOTOGRAPHS OF FLOODING AT CCSD WELL FIELD

EXHIBIT 6:
IMAGES OF FLOODING AT BOTH CCSD WELL FIELD AND STATE PARKS PROPERTY January 19, 2016:



Figure 2: Flooded San Simeon Creek







RESPONSE TO COMMENT LETTER NO. PO-208

Tina Dickason

October 27, 2016

PO 208-1 This comment letter reiterates Comment Letter PO 200; see Responses to Comment Letter PO 200.

Your Name Thomas Hebert

Date 10/26/12

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 310 LEIGHTON
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-

209-1

out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

209-2

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature

A handwritten signature in black ink, appearing to read 'Thomas Nibert', with a long horizontal flourish extending to the right.

Print name

THOMAS NIBERT

Your Name

Thomas Albert

Date

11/26/16

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

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As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

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210-1

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210-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

(signature)

A handwritten signature in black ink, appearing to read "Thomas Nibert", written over a horizontal line.

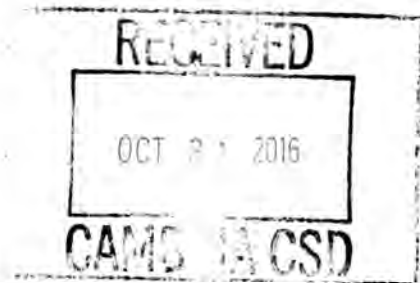
Print name

THOMAS NIBERT

Your Name Susan H. Holloway

Date Oct 15, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428



Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 1031 Hartford St.
I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

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211-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

/signature/

A handwritten signature in cursive script that reads "Susan H. Holloway". The signature is written in black ink and is positioned to the right of the "/signature/" label.

Print name

Susan H. Holloway



Allan Spitz

October 18, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am a part time resident of Cambria. My address is: 1945 Oxford, Cambria, CA 93428.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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212-1

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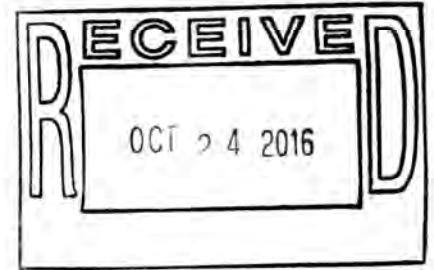
212-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,



Allan Spitz



Allan Spitz

October 18, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens,

I am the owner of a lot in Cambria, APN # 023-016-037.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

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213-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

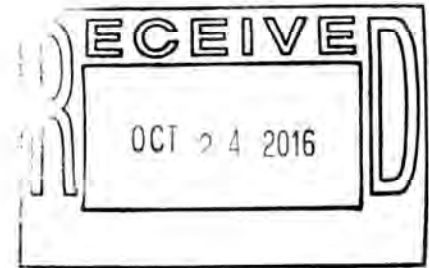
Very truly yours.

A handwritten signature in black ink, appearing to read "Allan Spitz", with a horizontal line extending to the right.

Allan Spitz

Lana Spitz

October 18, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

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214-1

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214-1

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Very truly yours,

A handwritten signature in cursive script that reads "Lana Spitz". The signature is written in dark ink and is positioned above the printed name.

Lana Spitz

Lana Spitz

October 18, 2016



Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

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I am the owner of a lot in Cambria, APN # 023-016-037.

I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. The CCSD constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of briny water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is relatively nonintrusive aesthetically. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water which helps to prevent saltwater intrusion up gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction over several years of the properties on the current CCSD wait list and

215-1

perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

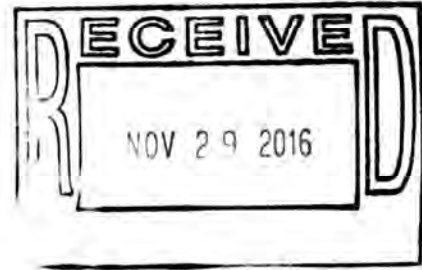
215-1

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours.

A handwritten signature in black ink, appearing to read "Lana Spitz". The signature is fluid and cursive, with a prominent loop at the end of the last name.

Lana Spitz



Karen Chrisman
324 Lancaster St.
Cambria, CA 93429
October 1, 2016

Mr. Robert C. Gresens, P.E., District Engineer
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Re: Subsequent Environmental Impact Report

Dear Mr. Gresens:

I am a part time resident of Cambria. My address is 324 Lancaster Street. I submit this letter to express my support for the Sustainable Water Facility (SWF), the application of the Cambria Community Services District (CCSD) for a regular coastal development permit, and the supporting Subsequent Environmental Impact Report (SEIR).

For decades, Cambria has suffered from a chronic shortage of potable water. During the current multi-year extraordinary drought, the town's lack of water became critical. Cambrians responded in two ways. First, we adopted severe conservation measures which placed Cambria at or near the top of California cities and towns for conserving water but also greatly diminished our quality of life. Second, through our CCSD, we constructed an emergency water plant to supplement water supplies from our two natural aquifers, San Simeon Creek and Santa Rosa Creek. The plant uses advanced water treatment reverse osmosis technology to convert a combination of brackish water and treated wastewater effluent into clean, fresh drinking water.

The CCSD's pending application for a regular coastal development permit would grant the District flexibility to use the plant, now known as the SWF, to avoid existing and future water shortages. (The emergency permit pursuant to which the plant was constructed and operates allows use only during Stage 3 emergencies.) Additionally, issuance of a regular permit would allow for the best use of existing groundwater supplies and for indirect potable use of recycled water. Providing the District such flexibility would give Cambria a reliable supplemental source of safe, clean potable water which would improve the quality of life of all Cambrians and assure economic viability for our town.

As demonstrated in the Subsequent Environmental Impact Report and by experience in using the plant during the current drought, the SWF does not harm the environment; in fact, it actually improves the environment. The SWF is remotely located and has a modest footprint. Thus, the plant is aesthetically non-intrusive. When in operation, the SWF recharges the environmentally sensitive San Simeon Creek lagoon with fresh water, which helps to prevent saltwater intrusion up-gradient during dry summer months and protects and preserves plant and animal habitats that depend on the lagoon.

Nor will the SWF result in substantial or rapid population growth. The plant will be used to accommodate only the 4,650 maximum existing and future single family units contemplated

by the North Coast Area Plan and Cambria's certified Water Master Plan. This maximum build-out allow construction of the properties on the current CCSD wait list and perhaps just a handful of other properties. The CCSD's Buildout Reduction Program will retire those residential lots that won't be developed. Existing local and County laws and regulations further provide that construction of additional single family units within the maximum number above will be spaced over the next twenty years or longer.

216-2

For the reasons stated above and in the SEIR, I urge the CCSD to adopt the SEIR as final and further urge the County of San Luis Obispo to grant the CCSD's application for a regular coastal development permit.

Very truly yours,

A handwritten signature in cursive script that reads "Karen Chrisman".

Karen Chrisman

/kc



RESPONSE TO COMMENT LETTER NOS. PO 209 THROUGH PO 216

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PO 209 through PO 216 These comments make up a form letter that is in support of the Project, and do not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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Elizabeth Bettenhausen, Ph.D.
345 Plymouth St.
Cambria, CA 93428
elizabethbettenhausen@gmail.com

11 June 2017

Board of Directors
Cambria Community Services District
www.cambriacsd.org

Re: Final Subsequent Environmental Impact Report on the "Sustainable Water Facility Project" ("Report")

Dear Directors:

I am aware that you have not solicited the public's comments about the FEIR Report. Nonetheless, I write to tell you that certifying the Report would be a serious mistake.

1. Offsite RO Concentrate Disposal

The claim is made that "the RO concentrate would be hauled away to Kettleman Hills for disposal" (Report 3.5.2.6, p. 3-64).

Then the Report states, "A specific ocean outfall for the RO concentrate has not been identified by CCSD at this time" (Report 7.3, p. 7-15).

However, the CCSD has already obtained the Brine Disposal Waste Permit from South San Luis Obispo County Sanitation District and paid the deposit of \$10,000, the one-time application fee of \$500, and the initial annual permit fee of \$500. The first page of the permit is on page 2 here. All of it was sent to me on Feb. 23, 2017 in a CCSD response to my PRR.

Further, the South San Luis Obispo County Sanitation District agreement is not analyzed at all for environmental impact.

This constitutes erroneous, contradictory information, superficial analysis, and no study of environmental effects of a major component of the facility.

217-1



SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT

Post Office Box 339 Oceano, California 93475-0339
1600 Aloha Oceano, California 93445-9735
Telephone (805) 489-6666 FAX (805) 489-2765
<http://www.sslcscd.org>

BRINE DISPOSAL WASTE PERMIT

PERMIT ISSUED TO: Cambria Community Services

PHONE: 805-927-6223

EMERGENCY: 805-927-6223

DATE OF ISSUANCE: February 2017

EXPIRATION DATE: February 2018

WASTE TYPE: Salt Brine

FEE RATE: \$111.25/1000 gal (subject to change)

\$10,000 DEPOSIT OR BOND

DATE: 2/15/17

CHECK NUMBER: 064159

\$425.00 ONE-TIME APPLICATION FEE:

DATE: 01/31/17

\$500.00 INITIAL ANNUAL PERMIT FEE:

DATE: 01/31/17

\$500.00 ANNUAL PERMIT FEE:

DATE:

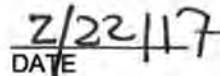
COMMENTS:

Special condition: Brine trucks will deliver brine only through the District's rear entrance access.

The Permittee is authorized to discharge salt brine to the turn-out structure pipeline connection and metering facilities in compliance with the conditions outlined in Attachment A. The permittee has an Application and Agreement on file with the District, which by reference is incorporated herein as if fully set forth.

SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT


DISTRICT ADMINISTRATOR


DATE

217-1

2. Evaporation Pond modifications

Fortunately the FEIR recognizes the inadequacy of the evaporation pond in the prior version of the facility.

Changes proposed in the Final SEIR don't shrink like proverbial violets.

- Convert evaporation pond to a potable water supply storage basin
- Add a surface water transfer pump station
- Add a surface water treatment plant
- Add a new power supply
- Add 5,500 ft. of piping
- Add 4 Baker tanks
- Add lagoon surface discharge extension
- Add concrete blocks to San Simeon Creek banks

Did I miss anything?

The Surface Water Treatment Plant will not be more than 15 ft. high, but I've failed to find the width and length. How big will this new plant be?

Placing four Baker tanks, each 8 ft. wide, 46.5 ft. long, and 13 ft. high, next to the existing AWTP building erodes even more the view from the upper level of San Simeon State Park campground. How will stripping at least 87 sq. ft. of San Simeon Creek banks and placing cement blocks in the space look? Claiming that the aesthetic effects of all this would be mitigated and minimal is offensive.

3. Adaptive Management Plan

If sufficient environmental analysis were done on these modifications, what new mitigation/modification steps would need to be proposed? The original design came apart because of very bad design and simplistic understanding of fauna, flora, and ecology. Intervening in the groundwater aquifer, creek, and lagoon in this new way promises to reach the same low standards.

The modifications and mitigations for biological effects loom large. One stands out at the moment.

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.

217-2

217-3

The reputation of the CCSD for developing and implementing Adaptive Management Plans and operational and maintenance plans is not good. Monitoring and reporting are not the CCSD's forte.

Perhaps hiring a full-time employee to manage the AWTP will solve the problem. At certain times the Report states that consultants will be responsible for the Adaptive Management Plans. Once again, the Board of Directors is asked to certify vague notions with about responsibility and accountability.

217-3

4. Truth

As I read through the responses to Public Comments, two sentences appear very frequently. "This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary."

In reply, I revise the sentences. This Response does not address the DSEIR's adequacy and ignores a significant environmental point. As such, pertinent response is omitted.

These days much discussion arises about what the word "truth" means. As always, interpretation of texts and statements depends on the motives, interests, and objectives of the reader or hearer. Terms like "adequate" and "significant" mean what the writer or reader intends them to mean.

217-4

The authors of the FEIR have a clear objective. Interpret the situation so that the meaning of facts and statements supports constructing, revising, and running the Sustainable Water Facility. Environment is defined as narrowly as possible.

My Public Comments have a clear objective. Interpret the situation so that the meaning of facts and statements supports protecting the environment first and foremost. Environment is defined as inclusively as possible.

Your meetings disclose several blocks of interests and objectives. A majority of the directors of CCSD interpret the situation so that the meaning of facts and statements supports awarding new water meters to at least ten landowners a year for the foreseeable future. One or two directors interpret the situation so that the meaning of facts and statements gives infrastructure repair highest priority.

How unfortunate it is that substantial discussion among the five directors of interests and objectives rarely takes place. Any substantial discussion between two directors on ad hoc committees never gets adequately reported to the public. No standing committee exists to address finance, long-range planning, or resources, for example.

Workshops in which the public fully participates float in the great realm called Elsewhere.

Please know that I intend to keep analyzing

- usage of water in Cambria,
- efficiency of water distribution by the CCSD,
- percentage of usage ratio between residential and commercial,
- assignment of authority to General Manager by the Board of Directors,
- procedure for Board's selection of priorities and enacting them,
- CCSD's attention to climate change and ecological specificity,
- conservation's staff, program, and budget,
- et cetera.

Fortunately, activities other than oversight of CCSD mitigate my pessimism.

Sincerely,

Elizabeth Bettenhausen [signature available upon request]

cc:

Stephen Provost, the Cambrian

Jerry Gruber, CCSD General Manager

Bruce Gibson, SLO County Supervisor

Dan Falat, District Superintendent, California State Parks

Jon Rokke, RWQCB

Tom Luster, California Coastal Commission

a variety of Cambrians

217-4

**RESPONSE TO COMMENT LETTER NO. PO-217**

Elizabeth Bettenhausen, Ph.D.

June 11, 2017

PO 217-1 The commenter takes quotes out of context regarding the RO concentrate disposal. The first quote, *“the RO concentrate would be hauled away to Kettleman Hills for disposal”* from the Project Description describes the Project as analyzed in the DSEIR. The Project that is analyzed in DSEIR Sections 5.1 to 5.7 involves RO concentrate being stored onsite in above-ground tanks, then transported by truck to a disposal site, *such as* (emphasis added) the Kettleman Hill Hazardous Waste Facility.

The commenter’s statement indicates a misunderstanding regarding the proposed Project and Project Alternatives. DSEIR Section 7.3, “RO Concentrate Ocean Outfall Disposal” Alternative, discusses environmental impacts of a proposed Project Alternative. Ocean outfall disposal is not proposed as part of the Project, but instead considered as an Alternative. Thus, a specific outfall does not need to be identified at this time, as it is not part of the proposed Project.

The CCSD has obtained a Brine Waste Disposal Permit from South San Luis Obispo County Sanitation District (SSLOCSD) for the purposes of RO concentrate disposal. See following from DSEIR Section 3.5.2.6, Offsite RO Concentrate Disposal:

“Concentrate from the RO treatment process would be hauled away to a disposal site, such as the Kettleman Hills Hazardous Waste Facility (Kettleman Hills), which is located in Kings County, California, southwest of Kettleman City on State Route 41, approximately 85 miles from the Project site. For purposes of assessing the worst case scenario in terms of hauling distance and transportation impacts, the Kettleman Hills disposal location has been used within this SEIR.”

As noted above, environmental analysis regarding RO concentrate disposal at Kettleman Hills represents the worst case scenario. The DSEIR does not state with certainty that this would be the facility where RO concentrate would ultimately be disposed of. As the SSLOCSD is significantly closer to the Project site than the Kettleman Hills facility (approximately half the distance), the DSEIR’s analysis is a conservative, worst case scenario. Assuming SSLOCSD as the ultimate destination for RO concentrate disposal, impacts would be less significant than analyzed in the DSEIR.



PO 217-2 This comment lists components of the SWF and Project Modifications. None of the Project elements were proposed in the FSEIR; they were all part of the proposed Project outlined in DSEIR Section 3.0.

The SWTP is smaller than the Advanced Water Treatment Plant (AWTP); see DSEIR Exhibit 3-15. The SWTP and above-ground RO concentrate storage tanks would appear generally similar in nature and character to the existing onsite water and wastewater facilities (that is, pre-SWF construction). Additionally, Mitigation Measures AES-2 through AES-4 would further mitigate aesthetic impacts.

The commenter further inaccurately states that the Project proposed “stripping at least 87 square feet of San Simeon Creek banks and placing cement blocks in the space.” The Project proposes to reinforce San Simeon Creek with Armorflex blocks (or similar), which is a preferred engineering option from the regulatory agencies. The blocks are flexible with open faces, which allow for full replanting of streambed vegetation – often growth is so successful the Armorflex is no longer visible. Armorflex is a preferred erosion control method by regulatory agencies (US Army Corps of Engineers, California Department of Fish and Wildlife, and others). Further information can be found the Contech website, here: <http://www.conteches.com/products/erosion-control/hard-armor/Armorflex>.

PO 217-3 This comment alleges that the AMP would be unsuccessful because “the reputation of the CCSD for developing and implementing Adaptive Management Plans and operational and maintenance plans is not good.” The assumption that the AMP would be unsuccessful is speculative, which CEQA discourages. Additionally, the commenter does not provide any substantive references or documentation confirming her assertion.

The comment concerning hiring a full time employee to manage the AWTP does not address the DSEIR’s adequacy or raise a significant environmental point. As such, no further response is necessary. It is noted, the CCSD (and any consulting entities hired by the CCSD) would be required to comply with mitigation measures set forth in the EIR.

PO 217-4 This comment alleges that the FSEIR was written to narrow the scope of the term “environment.” Both of the DSEIR and FSEIR were written in accordance with CEQA Guidelines, which specifically define terms that the commenter alleges are vague (adequate, significant, etc.).

CEQA requires response to comments that raise significant environmental points or directly relate to the draft EIR. CEQA does not require a response to every comment conceivable. Many comments received on the DSEIR did not relate to



environmental issues (for example, CEQA guidelines do not consider economic impacts to be significant environmental issues) or did not relate to the Project (for example, broader water-related issues outside of the Project scope). CEQA Guidelines define specific thresholds of significance, which were followed by the DSEIR. The commenter does not provide specific instances where significant environmental concerns as defined by CEQA were “ignored” or “omitted”.



To: Cambria Community Service District Board of Directors

C/O: Bob Gresens bgresens@cambriacsd.org

Dt: June 11, 2017

Re: *Sustainable Water Facility Project DSEIR response to comment letter No. PO-124*

Honorable Directors,

The Surfrider Foundation is dedicated to the protection of our ocean, waves, and beaches. Our chapter submitted a comment letter on October 13th, 2016 to the Cambria CSD supporting the "No project alternative". We have reviewed the district's responses to our comment letter, shown as PO 124-1 through PO 124-6. Though we do not oppose the district's pursuit of supplemental water sources, our opposition to this project remains unchanged for the reasons outlined below. We ask the board to deny certification of the SWFP's Final SEIR until the concerns outlined below can be more fully addressed.

PO 124-3: Per the project's Final SEIR dated May 2017, *"... disposal of RO concentrate in an existing ocean outfall is being considered by the CCSD, as of the writing of this response"*. This statement indicates that analysis on how and where the project's waste will be disposed of is uncertain. However, one of the purposes of documenting and performing environmental impact analysis is to assure an "uncertainty" such as this is addressed. Our chapter asks the Board of Directors to deny certification until this important environmental impact can be fully documented and addressed through the Environmental Impact Report process.

218-1

PO 124-4: Per the project's Final SEIR dated May 2017, *"Due to time constraints and uncertain permitting requirements, a constructed wetland for RO concentrate disposal was not considered feasible"*. This response is confusing and inadequate. The SWFP is no longer an "Emergency" project, so time constraints are not an immediate issue. Regarding "permitting", many facets of the existing project remain problematic. A constructed wetland could reduce the permitting problems of the RO concentrate drying pit and RO concentrate disposal problems (as outlined above in 124-3). Our chapter asks the Board of Directors to deny certification until the feasibility of a constructed wetland project, potentially built as part of the SWFP, can be completely analyzed.

218-2

PO 124-5: Per the project's Final SEIR dated May 2017, *"A rancher located to the north of Cambria (Warren) sells water from his well to private individuals wishing to haul water onto their property. The CCSD does not track water diversions from this private business venture"*. The inability or unwillingness of the CCSD to quantify available water resources, thus calling into question any justification for the SWFP, will be an ongoing concern until the proper analysis and quantification is performed. **Is the SWFP necessary?** Our chapter asks the Board of Directors to deny certification until a full quantification and

218-3

updated analysis of other available supplemental water resources available to the community (regardless of whether the water comes from the CCSD) is performed.

Thank you for your consideration,

Brad Snook

Chair, Surfrider Foundation San Luis Obispo

E-mail: chair@slo.surfrider.org

**RESPONSE TO COMMENT LETTER NO. PO-218**

Brad Snook
Surfrider Foundation
June 11, 2017

PO 218-1 The commenter has taken the following quote out of context: "... *disposal of RO Concentrate in an existing ocean outfall is being considered by the CCSD, as of this writing*". To clarify, ocean outfall is being considered as an Alternative, as discussed in DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative. The Alternatives analysis compares the "RO Concentrate Ocean Outfall Disposal" Alternative to the Project on applicable CEQA Thresholds (Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hydrology and Water Quality, Land Use and LCP Compliance, and Noise). Thus, the claim that there is uncertainty in this analysis is unfounded.

The Project analyzed in this DSEIR involves RO concentrate from the Project's RO treatment processes being stored onsite in above-ground tanks, and then transported by truck to a disposal site, such as the Kettleman Hill Hazardous Waste Facility. This aspect of the Project is thoroughly analyzed in Sections 5.1 – 5.7. Ocean Outfall disposal is not currently proposed as part of the Project, but is instead being considered as an Alternative to the Project.

As the waste disposal environmental impacts is fully documented and addressed in the EIR, no further response is necessary.

PO 218-2 The commenter claims that Response PO 124-2 is confusing and inadequate. The comment requests an additional alternative to be added, constructing a wetland for the disposal of RO concentrate. See Section 7.5, Alternatives Considered but Rejected, for a brief history of Alternatives Considered but Rejected.

The Surfrider Foundation states: "A constructed wetland could reduce the permitting problems of the RO concentrate drying pit and RO concentrate disposal problems." It is noted that "reduced permit times" is speculative in nature. It is unknown if a undertaking a project such as a saline treatment wetland would be beneficial at the Project site.

A constructed wetland for the purposes of saline treatment is a relatively new water treatment method (with research and studies dated around the 2000's), the most notable California example being the Oxnard Saline Treatment Wetlands. This project is run from by the Bureau of Reclamation's Research and Development Office. Per the Oxnard Saline Treatment Wetlands website, accessed on June 12, 2017 (<https://www.usbr.gov/research/projects/detail.cfm?id=9424>), this project is still listed as a research project with publications dating 2012 and



2013. The Oxnard Saline Treatment Wetlands Monitoring Plan also includes approximately 20 additional research topics that need to be further defined to determine facility capability, monitoring need and research collaborations. Researchers must monitor the project daily to ensure that pollutants in the water are not negatively affecting wildlife in and around the engineered wetland.

The time constraints discussed in the Response to Comments does not relate to the Project's previous emergency nature. Time constraints relate to the proposed Project's need to dispose of RO Concentrate. A number of feasibility studies, along with engineering and landscape work would need to occur before a saline treatment wetland could be constructed, and even then there is no guarantee that it would be successful. In order to provide potable water to CCSD customers, RO concentrate must be disposed of in a timely manner. Thus, due to the scientific uncertainties and time constraints, it is determined that constructing a saline treatment wetland is not appropriate at this time and does not need to be included as an Alternative in the DSEIR.

The "RO concentrate drying pit" or RO concentrate evaporation pond would be decommissioned, and repurposed as a raw water storage basin. As this pond water is raw (untreated), not brine, it does not pose a toxicity danger to the environment or wildlife; refer also to Response PA 12-18.

There is no "RO concentrate disposal problem" as the commenter alleges. As noted above, the Project proposes to dispose of RO concentrate by storage in onsite above-ground tanks, and then transported to a proper disposal site, such as the Kettleman Hills Hazardous Waste Facility. This comment indicates that the author believes that ocean outfall is proposed as part of the Project, when it instead was analyzed as a Project Alternative. Additionally, there is no "problem" with this solution to RO concentrate disposal, and it is thoroughly analyzed in the DSEIR.

PO 218-3 The comment concerning the rancher who sells water to private individuals mentioned in the Surfrider's letter does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.

The CCSD has completed a number of technical reports regarding water supply and water supply alternatives, including the following: Cambria Water Supply Alternatives Engineering Technical Memorandum (CDM Smith, 2013); Cambria Community Services District Groundwater Management Plan (2015), Urban Water Management Plan (2015). CCSD research into long term water supply dates back to 1995. Thus, the allegation that the CCSD has not performed "proper analysis and quantification" is unfounded and incorrect. See DSEIR [Section 3.2.1, Project History](#), for a description regarding the SWF's history and need.

June 11, 2017

Mr. Bob Gresens
Cambria Community Services District
1316 Tamson Dr Suite 201
Cambria, CA 93428

Re: Comments to FEIR

Bob,

This is not a form letter, so extra credit should be given. I have thought some about the EIR, SEIR and now FEIR. It is true that as a small community on the central coast of California, that Cambria is challenged by resource limitations. It is also true that all human habitations come with limitations, and ours is no different. Further, many locations that attract people are home to species and environments that support wildlife and plants. The history of people cohabiting with nature is replete with conflicts, abuses and occasionally harmony. Cambria is a resource rich environment. The ocean, creeks, Santa Lucia range have created abundant animal and plant species. Environmental awareness is not new, and stewardship should be the evolving role we play.

A small town is a wonderful community in which to live. Not all small towns are destined to become big cities. There is no a priori economic destiny that dictates growth as a necessary condition of continued sustainability. Some small towns are financially sound and some large towns are bankrupt. This is especially true of locales that are geographically constrained or resource limited. For example, it is unlikely that Catalina will ever grow to become the next Santa Barbara; it is also unlikely that Catalina will go bust. While Cambria is in an environmentally rare Monterey Pine forest, it is hemmed in by mountains to our east, rough geography to our north, ocean to the west and a cascade of population centers that increase in size to the south. Cambria is in many ways an ideal candidate to remain a small town. Many residents have sought it out precisely for this reason and hope that it remains this way. Choices for other types of urban housing are abundant in California. Not all towns are destined to be all things to all people.

Cambria's eclectic atmosphere is reflected in its housing. Large, small, bungalows, farms and a small commercial offering provide all basic needs to the community. Wildlife roam the neighborhoods, surrounding hills and streams. People who live here generally come to appreciate this variety and would feel a loss with their absence. We grieve at the dead deer on the highway. We cheer at the fawns in our front yard. We count on local creeks for our water and the flow of tourists for commerce. An ideal setting in many respects. But our presence here is not without its effects on the local environment.

The USGS has studied our area for years and in 1998 published some of their findings in document 4061. On page 1 we are told that "municipal pumpages are the largest outflows and cause dry-season water level declines throughout the San Simeon Basin". A disturbing conclusion given Cambria's reliance on this creek as part of a water supply. The second page is no better, "rapid growth in Cambria resulted in a fourfold increase in municipal pumpage between 1968 and 1988...These increases in pumping resulted in larger seasonal water level declines during summer".

Attempts to triage these undesirable trends, by using Santa Rosa Creek water have still left the USGS to conclude that "two long-term water level trends have occurred in recent years...The first is a small, gradual decline in winter water levels in the middle part of San Simeon Basin...The most likely cause of the decline was increased winter pumping rates in the

219-1

219-2

CCSD well field." The second trend is a "steady increase in the dry season water level decline near the CCSD well field on San Simeon Creek. This trend is caused largely by the steady increase in dry-season pumpage at the well field"(Pg. 28)

The magnitude of these deficits have caused local planners to try and develop alternative water sources to reverse these trends. In the same document we learn that "municipal pumpage decreased dry-season water levels throughout the San Simeon Basin by quantities ranging from 1 foot at the upper end of the valley to 7 feet in the CCSD well field."

They found also that the "municipal pumping rates that remained high in winter prevented ground water levels from recovering completely." (Pg. 82) This left the town's hope for a 'good rain year' replenishing supplies with less substantiation.

More people meant less water per person and the more we pump the less there is for wildlife. This has been a problem throughout California. One result has been the decimation of salmon and steelhead runs that require adequate stream flow for breeding success. Local creeks are specifically protected from water diversion. "Steelhead stream protection- net loss stream diversions prohibited" (Pg.42 EIR). Then how could this continue to occur? There are exceptions to this rule, the most obvious being to limit diversions. But two other exceptions are "treating diverted water after use and returning it to the watershed of origin" or supplementing flows with imported water. Cambria is trying to do both by recycling waste water from San Simeon and Santa Rosa creeks.

The treated water is then returned to San Simeon Creek via a series of percolation ponds. This was hoped to provide some protection to the wildlife in the creek and protection of well fields upstream. But plagued by years of drought, more creative approaches have been developed, such as the emergency water system of treating non-potable water from well 9P7. This project does not overcome the USGS observations previously noted, in fact it makes them worse by increasingly pumping more groundwater. Like a hapless sailor bailing out a boat with a cup when the leak is in gallons.

To address the effects of this pumping on the lower creek and lagoon ecosystems, the CCSD proposes to pump 100 GPM of filtered groundwater, or less, back into the creek. The EIR confidently notes (Pg.55) "the 100 GPM mitigation flow would maintain lagoon levels similar to conditions without the SWF". This sounds like the 'returned water' exception mentioned previously. But will it be enough to allow steelhead and other creatures to survive? EIR planners say 'yes'. Where is there a study showing that this amount of water produced intermittently can support any type of aquatic animal?

In earlier comments, I raised concerns about this and the adequacy of this measure to ensure success. One area of concern centered on the amount of area being deemed 'lagoon' and the impact of 100 GPM intermittent flow on it. I say intermittent flow because the emergency water facility was not destined to operate 24/7 or 365 days a year. I learned from the response to my comments that the area being deemed 'lagoon' was about 3.9 acres in the lower creek. I still wonder what impact, if any, this water will have.

Consider for the sake of argument that the facility is operating night and day and pumping out 100 life saving gallons per minute of filtered groundwater. Google tells me that one acre equals 43,560 square feet, so 3.9 acres equals 169,884 square feet. This is over 24 million square inches. 100 GPM of water is 2,310 square inches of water a minute. Dividing 24 million by 2310, should mean that it takes 10,590 minutes to cover 3.9 acres with one inch of water or about 7.3 days. This assumes the water just sat there, but that would not happen. Evaporation would probably occur and a good deal of water would sink into the ground. This would have no helpful effect on steelhead survival.

Common sense would surely raise some concern about this tiny volume of water lasting long enough to provide any benefit to any species. Add to this the fact that to produce that

219-2

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amount of water requires pumping nearly four times that amount out of 9P7. It would be like depositing \$100 every minute to your checking account while simultaneously withdrawing \$400 from the ATM machine. While the deposit is laudable, the net effect is laughable. You can't pump more than 450 GPM of groundwater and expect returning 100 GPM to maintain the same environment. The environment and animals which evolved to survive in it will suffer from decreased water supplies.

People are fortunate to have many places to live in California. Steelhead can only survive in fresh water that is not too hot or polluted, and they can not move elsewhere. To ensure their survival we must maintain creek levels to facilitate their continued existence. We can control what the fish can not control. For some people this is not a priority, for the fish it is existential. We can not imperil these fish just to accommodate the few who judge this result as either unlikely or acceptable. Much talk in town has been spent on the 'moral' rationale to allow lot buyers in Cambria to build and use additional water supplies. However you judge the morality of this assertion, if indeed it is a moral dilemma , few would portray the conflict as being one of life and death.

The proposed AMP is to insure that measures like the 100GPM "mitigation water" in fact succeeds in mitigating the ongoing effects of running the emergency water system. How will this work? I see that the CCSD has applied for a permit to place a fish counting device on San Simeon Creek (near the foot bridge in the park). If approved, will the results of this device inform the AMP about the success of the "mitigation water". In other words, if the fish count goes down does the water amount increase? If the fish count is zero does the project get turned off? How will operators of this equipment respond to fluctuations in populations of this endangered species?

Best of luck moving carefully forward.



JIM WEBB
1186 Hartford St.
Cambria, CA 93428

**RESPONSE TO COMMENT LETTER NO. PO-219**

Jim Webb

June 11, 2017

- PO 219-1 This comment describes Cambria's community, environment, and economy. This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.
- PO 219-2 See Responses PA 3-4, PA 3-6, and PA 4-7 for clarification concerning the Project Design Feature's (PDF) approximate 100 gpm flow to San Simeon Creek Lagoon.
- PO 219-3 See Responses PA 3-4, PA 3-6, and PA 4-7 for clarification concerning the PDF's approximate 100 gpm flow to San Simeon Creek Lagoon. See Response PA 4-18, for further discussion concerning Central Coast steelhead protection. The Project's effects on Central Coast steelhead and their habitats are discussed in detail in DSEIR Section 5.3.5, [Biological Resources] Impacts and Mitigation Measures.

From: Mary
To: [Bob Gresens](#); [Garcia, Rita](#); [Amanda Rice](#)
Cc: [Airlin Singewald](#); [Annette@Wildlife.Tennessee](#); [Barker Douglas](#); [harvey.packard@waterboards.ca.gov](#); [Harry Farmer](#); [Tom Luster](#)
Subject: Final Cambria "sustainable" water facility EIR
Date: Tuesday, June 13, 2017 1:43:08 PM
Attachments: [page_001.pdf](#)

Good afternoon Bob,

Please accept these comments and PDF list of 171 Cambria petitioners (attached) who oppose the Cambria CSD's fraudulent change from a temporary, portable 'emergency' water supply project for existing customers only, to a growth inducing water project without a vote of ratepayers. Substituting the word "Emergency" for "Sustainable" on biological documents and analysis and project descriptions does not constitute environmental review. This petition will continue to circulate and be submitted at all future hearings on this matter.

Thank you,
 Mary Webb
 1186 Hartford
 Cambria, CA

The Cambria Community Services District deceived Cambria ratepayers. In 2014 they claimed an emergency brackish water project would be temporary and portable, for existing customers only, costing between \$100,000 to \$4 million and would deliver water by July 1, 2014. The project construction was to be completed by November of 2014 and to run only during a Stage 3 water shortage declared by CCSD.

None of these claims proved to be true.

The district FAILED

- to analyze less expensive alternatives to this project such as mandated conservation
- to provide water by July of 2014
- to design and construct an affordable, temporary project to abate an emergency
- to complete construction of the project
- to analyze disposal of brine waste
- to complete the application for a Coastal Development Permit for the emergency project
- to complete an environmental impact report for three years
- to respond to three years of comments submitted by regulatory agencies and citizens
- to hold project contractor responsible for obvious hydrogeologic and design flaws
- to comply with Water Board discharge regulations and monitoring requirements
- to comply with County ordinances
- to adequately respond to neighbor complaints regarding noise and brine overspray
- to offset the \$9 million loan by applying a \$4 million grant as promised
- to provide competent operators to run the emergency project

Failing so much, the Cambria CSD must be held accountable.

Ratepayers support the Regional Water Quality Control Board's cease and desist action (see attachment) and support agency efforts to stop the Cambria CSD's rushed water project from causing serious harm to our local creeks and the wildlife that relies on this special habitat. We request that the Cambria CSD mitigate the full impacts of operating this project in a valid "emergency" situation, for existing customers only, which has never been done. If the Cambria District adds new water connections to our overstressed aquifers and the project actually had to provide water in the dry season, it would most likely dewater and pollute San Simeon Creek and place severe stress on Santa Rosa Creek.

San Simeon and Santa Rosa Creeks and wildlife must be protected.

Public Meeting Notice

The Cambria Community Services District Board of Directors will hold a Special Meeting to consider certifying the Final Subsequent Environmental Impact Report (SEIR) for the Cambria Sustainable Water Facility (SWF) Project on Wednesday, June 14th at 2:00 p.m. at the Cambria Veterans Hall, located at 1000 Main Street, Cambria, CA.

Copies of the Final SEIR for the SWF and supporting documents are available for public review and inspection at the following locations:

Cambria Community Services District 1316 Tamsen Drive, Suite 201 Cambria, CA 93428

Cambria Library 1043 Main Street Cambria, CA 93428

The Final SEIR for the SWF can be accessed online at: www.cambriacsd.org

For questions, please call the Cambria Community Services District at (805) 927-6223 or email bgresens@cambriacsd.org.

Dear Amanda Rice, President Cambria Community Services District, Cambria Community Services District Board of Directors and General Manager, Bruce Gibson, County Board of Supervisors District 2, Airlin Singewald, County Sr. Planner, and Ted Siegler, Chair North Coast Advisory Council,

We are pleased to present you with this petition affirming this statement:

"Ratepayers support the Regional Water Quality Control Board's cease and desist action and support their efforts to stop the Cambria CSD's rushed water project from causing serious harm to our local creeks and the wildlife that relies on this special habitat. We request that the Cambria CSD mitigate the full impacts of operating this project in a valid "emergency" situation, for existing customers only, which has never been done. If the Cambria District adds new water connections to our overstressed aquifers and the project actually had to provide water in the dry season, it would most likely dewater and pollute San Simeon Creek and place severe stress on Santa Rosa Creek.

220-2

San Simeon and Santa Rosa Creeks and wildlife must be protected."

Attached is a list of individuals who have added their names to this petition, as well as additional comments written by the petition signers themselves.

Sincerely,
Mary Webb

Steve and Pam Kurnik
Cambria, CA 93428
May 11, 2017

The EIR is incomplete--THAT should tell you something!

Theo Moreno
Cambria, CA 93428
Apr 29, 2017

Sally Marshall-Ensworth
Cambria, CA 93428
Apr 29, 2017

Michael Kenny
Cambria, CA 93428
Apr 28, 2017

Pat Riley
Cambria, CA 93428
Apr 28, 2017

Donn
Cambria, CA 93428
Apr 26, 2017

Barton Shaler
Cambria, CA 93428
Apr 25, 2017

Susan Shaler
Cambria, CA 93428
Apr 25, 2017

Let's tell the TRUTH about the failed water project and our irresponsible and incompetent CCSD board. And let's return to a town government that listens to its citizens and acts in the best interests of all: residents, visitors, wildlife, natural resources and the environment. Let's unite to preserve the unique place we can all enjoy and appreciate now and in the future.

Patricia Dorin
Cambria, CA 93428
Apr 23, 2017

Sharon Harvey
Cambria, CA 93428
Apr 21, 2017

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Richard Hawley
Cambria, CA 93428
Apr 21, 2017

Carol Painter PhD
Ithaca, NY 14850
Apr 21, 2017

rollie younger
cambria, CA 93428
Apr 21, 2017

Brian Robinson
Cambria, CA 94328
Apr 20, 2017

I seriously question the motives of a Board that ignored all the regulatory agencies and experienced service providers who opposed this project and informed them that it would not only seriously degrade the environment, but also not work. Not only can we not afford this mess financially, we have been placed in grave violation of environmental regulations and are now so overextended as to lack funds to perform desperately needed improvements to the existing infrastructure of water delivery and sewage treatment. I feel that what has been perpetrated upon the citizens of Cambria, possibly simply to set precedence (as to placement), is nothing short of criminal.

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Francesca Bolognini
Cambria, CA 93428
Apr 20, 2017

Linda L. Winans
Cambria, CA 93428
Apr 20, 2017

substandard subdivision with no incorporation possible thus no architectural review should not overbuild

Harold Lee Bailey
CAMBRIA, CA 93428
Apr 20, 2017

Roberta Teubner
Atascadero, CA 93422
Apr 20, 2017

Cheryl Broadhead
Cambria, CA 93428
Apr 20, 2017

Barbara Beuche
Cambria, CA 93428

Apr 19, 2017

What is it about contractual obligations that the CCSD does not understand? You sign for a grant and you follow up on the commitments. No capricious changes to time lines, costs, reporting, intended use, or effects on the environment. I am appalled by the path of this project.

Terry Philbin
Cambria, CA 93428
Apr 19, 2017

All this got so far and screwed up because the public was eliminated from true input to our water directors. They didn't wish to hear us.

Lauren Younger
Cambria, CA 93428
Apr 19, 2017

Kristin Philbin
Cambria, CA 93428
Apr 19, 2017

Jan Harris
Cambria, CA 93428
Apr 19, 2017

Richard Todd
Pensacola, FL 32503
Apr 19, 2017

seychelle cannes
newport beach, CA 92660
Apr 19, 2017

Lois Garney
Cambria, CA 93428
Apr 19, 2017

Greg Sesser
Cambria, CA 93428
Apr 19, 2017

FRANK DEPASQUALE
Cambria, CA 93428
Apr 19, 2017

hank Castignetti
Huntington Beach, CA 92646
Apr 19, 2017

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I support your petition, "CEASE and DESIST" from the other part of the world, South Korea!

Yong Ja Kim
South Korea
Apr 19, 2017

Peter Brede
Cambria, CA 93428
Apr 19, 2017

Patrice Rowe
Cambria, CA 93428
Apr 19, 2017

Glenn
Cambria, CA 93428
Apr 19, 2017

Keith Laster
Cambria, CA 93428
Apr 19, 2017

Duffy Burns
Cambria, CA 93428
Apr 19, 2017

Rob Koch
Cambria, CA 93428
Apr 18, 2017

Rita Benavides
Cambria, CA 93428
Apr 18, 2017

Gail ortenburger
Cambria, CA 93438
Apr 18, 2017

Does this mean that, after obtaining the proper permits and the blessing from the Water Board, and without residents approval to convert the emergency plant into a full time operation, Cambria's debt for the water plant and all future incidental costs will be transferred to new connections?

Roberto Olmos-Arreola
Cambria, CA 93428
Apr 18, 2017

Jennifer Holmberg
Cambria, CA 93428

220-2

Apr 18, 2017

Please don't let this go thru. Already CCSD in non compliance for their emergency project and now they want to start over. How about all the environmental problems with the old project??

DEBBY MIX
Cambria, CA 93428
Apr 18, 2017

ted armen
Cambria, CA 93428
Apr 18, 2017

Cindy
Cambria, CA 93428
Apr 18, 2017

Gerard Walbaum
Bakersfield, CA 93306
Apr 18, 2017

Patricia Schimberg
Cambria, CA 93428
Apr 18, 2017

Julie Blow
CAMBRIA, CA 93428
Apr 18, 2017

Don Canestro
Cambria, CA 93428
Apr 18, 2017

Christine Quinn
Cambria, CA 93428
Apr 18, 2017

Kathryn Keller
Cambria, CA 93428
Apr 18, 2017

Michael romansky
Cambria, CA 93428
Apr 18, 2017

Jeanne romansky
Cambria, CA 93428
Apr 18, 2017

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Janet Walbaum
Cambria, CA 93428-4539
Apr 18, 2017

Tracy Player
Cambria, CA 93428
Apr 18, 2017

Doug Hay
Cambria, CA 93428
Apr 17, 2017

Kathy Palmer
Cambria, CA 93428
Apr 17, 2017

Dan OConnor
Arroyo Grande, CA 93420
Apr 17, 2017

"Real change begins from the bottom up."

Christina Tobin
Cambria, CA 93428
Apr 17, 2017

Knock this off! Stressing residents and now stressing the wildlife that we live in harmony with...shame on you! Find a solution that works for all.

Sarah Mosby
Cambria, CA 93428
Apr 17, 2017

Mark Merrifield
Cambria, CA 93428
Apr 17, 2017

nancy merrifield
Cambria, CA 93428
Apr 17, 2017

CCSD has allowed General Manager Gruber to seriously endanger Cambria's environmental health and economic stability. No matter how they brand it, they have grossly indebted Cambrians to a spurious public work project without public or regulatory consent.

Lori Slater
Cambria, CA 93428
Apr 17, 2017

220-2

Lucia Capacchione
Cambria, CA 93428
Apr 17, 2017

Jennifer Jozwiak
Nipomo, CA 93444
Apr 17, 2017

You need to tell a straight story.

Marjorie R. Sewell
Cambria, CA., CA 93428
Apr 17, 2017

Jason Anderson
cambria, CA 93428
Apr 17, 2017

Gwynne Beatty
Cambria, CA 93428
Apr 17, 2017

Susan Kwasny
Cambria, CA 93428
Apr 17, 2017

People who visit Cambria want to see the wildlife and the beauty, not traffic lights, congestion and sprawl.
Protect the wildlife and preserve Cambria as a rural area.

Lucille Webb
Cambria, CA 93428
Apr 17, 2017

Terri Belfod
Cambria, CA 93428
Apr 17, 2017

Vari MacNeil
Cambria, CA 93428
Apr 17, 2017

Susan Silva-Treadwell
Avila Beach, CA 93424
Apr 17, 2017

220-2

The swf now appears to be a poorly conceived idea. The cost of the facility without grant money, the maintenance cost and the cost of removing the brine. This is just too much money for a community the size of Cambria. It needs to revert to an emergency water facility.

David
Cambria, CA 93428
Apr 17, 2017

Ronnie Kilroy
Cold Spring, NY 10516
Apr 17, 2017

Dan Golowka
Cambria, CA 93428
Apr 17, 2017

Merle Wurth
Evergreen, CO 80437
Apr 16, 2017

Please listen to the people !

Robert Henderson
Cambria, CA 93428
Apr 16, 2017

Jackie Hogan
Cambria, CA 93428
Apr 16, 2017

Carolyn Golowka
Cambria, CA 93428-1918
Apr 16, 2017

Karen Pearson
Cambria, CA 93428
Apr 16, 2017

June Goudey
Vallejo, CA 94589
Apr 16, 2017

Kevin O'Gorman
Arroyo Grande, CA 93420
Apr 16, 2017

220-2

The bait and switch methods of the CCSD and their supporting directors, moving from an emergency, temporary, mobile unit to a permanent, expensive, and dysfunctional plant, is an insult to all Cambrian residents. CCSD management and those directors need to be held accountable by the citizens of Cambria, as well as the State of California.

bob fountain
Cambria, CA 93428
Apr 16, 2017

mary
Cambria, CA 93428
Apr 16, 2017

Tim Maxwell
Atascadero, CA 93422
Apr 16, 2017

Keith Gordon
Arroyo Grande, CA 93420
Apr 16, 2017

William Robinson
Cambria, CA 93428
Apr 16, 2017

Marcy Mallette
Cambria, CA 93428
Apr 16, 2017

Owner 1830 Berwick Cambria Ca

Gary McDaniels
Bakersfield, CA 93314
Apr 16, 2017

Leslie Mark
Cambria, CA 93428
Apr 16, 2017

I have visited Cambria and have family who live there. Please stop the CSD from doing further harm.

Connie Blair
Seattle, WA 98115
Apr 16, 2017

Monie Hopkins
Cambria, CA 93428
Apr 16, 2017

220-2

We must review and take action as a community to find proper and cost effective solutions.

Diana Gorman Teetzel
Cambria, CA 93428
Apr 16, 2017

The CCSD's lack of transparency and incompetence is deeply troubling. I have been concerned from the beginning that this so-called 'emergency water project', now the 'sustainable water project' was railroaded through. The project has been misrepresented and disastrously executed. It seems that no one is really competent or in-charge—including the General Manager. The community has been put in jeopardy by the handling of this project. The CCSD must be held accountable. It may very well need a Grand Jury investigation.

Donald Archer
Cambria, CA 93428
Apr 16, 2017

Linda Mayer
Cambria, CA 93428
Apr 15, 2017

Sandra Valois
Cambria, CA 93428
Apr 15, 2017

I am not a ratepayer but I am a citizen of California and at stake are resources that support life in California and the nation in which I have an interest.

Cynthia Hawley
Morro Bay, CA 93443
Apr 15, 2017

Megan Dedic
Los Osos, CA 93402
Apr 15, 2017

Steve Brant
Cambria, CA 93428
Apr 15, 2017

I enjoy visiting Cambria as a refreshing getaway and its pristine environment is by far the most attractive feature.

Jeff Wood
Orange, CA 92866
Apr 15, 2017

Diana Novak

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Cambria, CA 93428
Apr 15, 2017

It's about time!

CHERYL ALVAREZ
Cambria, CA 93428
Apr 15, 2017

michael griffin
Cambria, CA 93428
Apr 15, 2017

Gordon Heinrichs
Cambria, CA 93428
Apr 15, 2017

catherine lekich
cambria, CA 93428
Apr 15, 2017

Stanley Stanert
cambria, CA 93428
Apr 15, 2017

220-2

The problems described in this petition have been created by the CCSD Board of Directors acting as a surrogate for the Cambria Chamber of Commerce with the obvious goal of promoting growth in spite of a lack of resources needed to support that growth.

Wayne & Tarika Ryburn
Cambria, CA 93428
Apr 15, 2017

julia stanert
cambria, CA 93428
Apr 15, 2017

Tori Thompson
Cambria, CA 93428
Apr 15, 2017

Raven Venturelli
Cambria, CA 93428
Apr 15, 2017

Gail Stevens
Cambria, CA 93428
Apr 15, 2017

Margaret Renz
Cambria, CA 93428
Apr 15, 2017

Sandra L. Hills
Cambria, CA 93428
Apr 15, 2017

Jan Moon
Cambria, CA 93428-4722
Apr 15, 2017

Complete mismanagement has bled Cambria ratepayers, mortgaged our future and jeopardized our habitat.

SANDI BROCKWAY
CAMBRIA, CA 93428
Apr 15, 2017

Jacqueline Griffin
Cambria, CA 93428
Apr 15, 2017

I've always been told to "follow the money" When something doesn't make good sense. This project has never made sense for the actual residents of Cambria. We all need to "follow the money" and find out who is the beneficiary of this failed project.

Victoria Krassensky
Cambria, CA 93428
Apr 15, 2017

Ian McLauchlan
Cambria, CA 93428
Apr 15, 2017

The mismanagement is staggering. And we are footing the bill. Is obeying the law an obligation for everyone or not?

Catherine Hyde
Cambria, CA 93428
Apr 15, 2017

Please do the right thing.

Claudia Worthen
Cambria, CA 93428
Apr 15, 2017

220-2

I own a home in Cambria, and am very concerned about the actions taken to date by the CSD regarding the drought and the "emergency water project" -- later renamed as the sustainable water project. It is apparent that CONSERVATION by the residents was key in surviving this drought -- as there was no other water source implemented immediately by the CSD. This is important in that it says that Cambria with its current population HAS the ability to survive. If many years ago the CSD had built a reservoir, it would now be full and would provide a backup to supplement the current system of wells.

Marvin Josephson
Huntington Beach, CA 92646
Apr 15, 2017

Patty Fox
Cambria, CA 93428
Apr 15, 2017

"... It contains no cost/benefit analysis, no analysis of traffic, noise, light, air quality impacts, no measurements of how this will affect our water and sewer rates, no details on how it might affect our Wastewater Treatment Plant, no details on how the hazardous waste will be handled in the future, no analysis of environmental impacts, and does not include responses to comments from the past three years." AREN'T ALL THESE ITEMS THAT THE DISTRICT'S PAID ENGINEER SHOULD HAVE EXAMINED? WHAT DOES HE DO?

Steve Figler
CARPINTERIA, CA 93013
Apr 15, 2017

Susan Piedra
Cambria, CA 93428
Apr 15, 2017

lucie ryan-mclauchla
cambria, CA 93428
Apr 15, 2017

Nancy
Cambria, CA 93428
Apr 15, 2017

The CCSD's deceptiveness and obfuscation on the desal plant are shameful. Stop it!

John Zinke, MD
Cambria, CA 93428
Apr 15, 2017

Mary Sue Northcutt
Poway, CA 92064
Apr 15, 2017

220-2

CCSD must be accountable and stop the. Violations and mismanagement, and and deception...as citizens we will not tolerate this!!

Tracey Cleeland
Cambria, CA 93428
Apr 15, 2017

Malfeasance in local government:

Tom Cochrun
Cambria, CA 93428
Apr 15, 2017

Kelly Cannon
Cambria, CA 93428
Apr 15, 2017

Rebecca Hendricks
Cambria, CA 93428
Apr 14, 2017

Barbara Burd
Cambria, CA 93428
Apr 14, 2017

Dianne Brant
Cambria, CA 93428
Apr 14, 2017

We need to be sure our water is safe and no wildlife is harmed.

Jone Ubbenga
Cambria, CA 93428
Apr 14, 2017

Margaret Wiborg
NEWTONVILLE, MA 02460
Apr 14, 2017

I have friends who live in Cambria, one of whom is a meticulous researcher, so I am writing in support of her concern about this matter.

Nancy Richardson
Cincinnati, MA 45224
Apr 14, 2017

Raul F. Sandoval
Cambria, CA 93428

220-2

Apr 14, 2017

CEASE AND DESIST THE CCSD NEEDS TO LISTEN TO THEIR CITIZENS AND STOP MAKING DECISIONS WE HAVE NOT APPROVED AND ARE NOT GIVEN THE RIGHT TO VOTE ON.

Johnnie Rhyne
Cambria, CA 93428
Apr 14, 2017

Linda Weesner
Cambria, CA 93428
Apr 14, 2017

The developers and their paid politicians are still out to ruin California!

Joyce Davis
Pleasanton, CA 94566
Apr 14, 2017

Stop the Cambria CSD's rushed water project from causing serious harm to our local creeks and the wildlife that relies on this special habitat. We request that the Cambria CSD mitigate the full impacts of operating this project in a valid "emergency" situation, for existing customers only, which has never been done.

anne winburn
Los Osos, CA 93402
Apr 14, 2017

Matthew Jochim
Cambria, CA 93428
Apr 14, 2017

Samuel
Cambria, CA 93428
Apr 14, 2017

Enough already!!!!

Ted Key
Cambria, CA 93428
Apr 14, 2017

William Knight
Altadena, CA 91001
Apr 14, 2017

We have had enough!

Lucia Capacchione
Cambria, CA 93428

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Apr 14, 2017

This is unacceptable

Amelia Reese
Cambria, CA 93428
Apr 14, 2017

Peter Frith
Cambria, CA 93428
Apr 14, 2017

WE have been lied to enough! You cannot lie to the Regional Water Quality Control Board. And you cannot fool Mother Nature either!!!

Teresa Lees
Cambria, CA 93428
Apr 14, 2017

The CCSD is attempting to transform what was intended as an emergency water source into a permanent supply, with no CEQA compliance and no public responses to the draft Environmental Impact Report. This willful disregard of State environmental regulations must be corrected and the plant used only as originally intended, with proper environmental monitoring.

Constance Higdon
Cambria, CA 93428
Apr 14, 2017

I thank the Regional Water Quality Control Board staff for taking the initiative on cease and desist. Many of us in Cambria have been calling the Cambria Community Services District to account for deceptive and incompetent actions with the emergency water plant. Please sign the petition to join in the call for trustworthy public service!

Elizabeth Bettenhausen
Cambria, CA 93428
Apr 14, 2017

I am a member of MoveOn.org and though I live in another West Coast state, I have family members in Cambria, Sebastopol, in Santa Rosa County, and San Diego. In signing this petition I back residents of Cambria and outlying areas affected, in desisting a rushed water project by CSD that could potentially harm the creeks and wildlife in their special habitat.

Dianna Eversole
Bremerton, WA 98312
Apr 14, 2017

willy kanariK
cambria, CA 93428
Apr 14, 2017

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Leslie Richards
Cambria, CA 93428
Apr 14, 2017

The Cost of this project just keeps increasing. This happens when you RUSH a project without proper planning and without the ratepayers approval.

Dewayne Lee
CAMBRIA, CA 93428
Apr 14, 2017

Stevan Rosenlind
Cambria, CA 93428
Apr 14, 2017

Jim Webb
Cambria, CA 93428
Apr 14, 2017

Janice M. & Paul A. Schmidt
Cambria, CA 93428
Apr 14, 2017

dan field
Cambria, CA 93428
Apr 14, 2017

Nancy Anderson
Cambria, CA 93428
Apr 14, 2017

Hetty Pearson
Cambria, CA 93428
Apr 14, 2017

Debbie Josephson
Huntington Beach, CA 92646
Apr 14, 2017

Eugene Blanck
Cambria, CA 93428
Apr 14, 2017

Enough incompetency!

MELVIN DORIN
CAMBRIA, CA 93428
Apr 14, 2017

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Stephen Burton
Cambria, CA 93428
Apr 14, 2017

This is not the right way to the solve the growth issues in Cambria...

Tobey Crockett
Morro Bay, CA 93442
Apr 14, 2017

Even though I don't reside in Cambria, I own property there and am a ratepayer.

Jutta Jacobs
Memphis, TN 38112
Apr 14, 2017

Allan Dean
Cambria, CA 93428
Apr 14, 2017

Christine Heinrichs
Cambria, CA 93428
Apr 14, 2017

Mary Webb
Cambria, CA 93428
Apr 14, 2017

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**RESPONSE TO COMMENT LETTER NO. PO-220**

Mary Web et. al.

June 13, 2017

- PO 220-1 This comment provides general introductory statements concerning the attached petition. See Responses PO 89-2 and PO 96-1 concerning the emergency project's regulatory framework. See DSEIR Section 5.3, *Biological Resources*, for an analysis of the Project's potential impact to biological resources. See Response PO 118-1 concerning providing water to existing CCSD customers. See Response PA 4-15 concerning RO concentrate disposal. See Responses PA 7-4 and PA 7-9 concerning the Emergency Coastal Development Permit. See Response PO 89-3 concerning economic impacts and CEQA requirements.
- PO 220-2 This comment is a list of petition signatures and individual notes. The comments are duly noted. No further response is required.

Tina S. Dickason
574 Leighton St.
Cambria, CA

6-13-17

Robert Gresens, PE
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Rita Garcia
Michael Baker International
5 Hutton Centre Dr., Suite 500
Santa Ana, CA 92707

RESPONSE to FINAL EIR and Responses to Comments on the DSEIR for CCSD's Proposed SWF

Dear Mr. Gresens and Ms. Garcia,

The responses to the comments in the DSEIR are evasive, to say the least. The EIR appears to be an expensive exercise in confounding and confusing in just about every aspect of its content. To actually have this document named an Environmental Impact Report, while showing such disregard for the environment, speaks volumes. I am responding to a few of the many inconsistencies found in the FSEIR, as well as to responses to the comments made in the DSEIR.

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Section 1.5, p. 1-18 "RO Concentrate Ocean Outfall Disposal" Alternative

In this section, it is stated that RO concentrate will be stored in Baker Tanks on site and transported to Kettleman City. (Kettleman City is approx. 93 miles from San Simeon, not 81 miles, as stated in the EIR, and travel time is approx. 1 hour and 40 min. each way). The EIR states that as an alternative the RO can be transported by truck to a waste water treatment plant equipped with a permitted ocean outfall disposal system.

It also states on the same page that an open ocean outfall has not been identified at this time. Here I take issue, as the CCSD applied to the South San Luis Obispo County Sanitation District (SSLOCSO) and received a permit to dispose of brine waste at their facility, which is permitted to dispose of non-hazardous brine waste through an ocean outfall. (SSLOCSO is located in Oceano, approx. 60 miles from San Simeon; travel time is approx. one hour). In a quote from the EIR, (indented below in italics), Section PA 4-15, PA 12-113, confirms an agreement between CCSD and SSLOCSO, and is inconsistent with the language that an ocean outfall has not been identified at this time.

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As discussed in DSEIR Section 3.5.2.6, Offsite RO Concentrate Disposal, concentrate from the RO treatment process would be hauled away to a disposal site, such as the Kettleman Hills Hazardous Waste Facility (Kettleman Hills). While two operational scenarios are discussed, as stated on DSEIR Page 3-64, for purposes of conducting a conservative analysis of the Project's potential environmental impacts associated with offsite RO concentrate disposal (i.e., mobile emissions, transportation, etc.), this SEIR assumes the SWF would operate 24/7 for six months

per year, and the RO concentrate would be hauled away to Kettleman Hills for disposal. Therefore, all Project impact analyses assume the SWF would run for 24 hours per day seven days per week (24/7), during the driest time of the year (approximately six months). Under this scenario, ten truck trips per day (limited to operating within the SWF site between the hours of 7:00 AM and 7:00 PM) would be needed to haul the RO concentrate to Kettleman Hills, assuming a 6,000 gallon truck would be used. Since DSEIR release, the CCSD has confirmed that RO concentrate disposal could occur much closer. On February 22, 2017, the South SLO County Sanitation District (South-SLO SD) issued the CCSD a Brine Disposal Permit, which authorizes the CCSD to discharge the RO concentrate (salt brine) to the South-SLO SD's existing turn-out structure pipeline connection, pursuant to various permit conditions. The Brine Disposal Permit specifies the CCSD would utilize trucks to deliver RO concentrate (brine) to the South-SLO SD for disposal. Use of the South-SLO SD facility's existing permitted disposal system would result in fewer impacts than the worst-case, conservative analysis presented in the DSEIR; see also DSEIR Section 7.3, "RO Concentrate Ocean Outfall Disposal" Alternative, and Responses PA 4-33 and PA 4-34, concerning the RO Concentrate Ocean Outfall Disposal Alternative.

The total amount of brine requested in the CCSD's application, is 21,060 gpd/421,000 gallons per month, (see Appendix 1). While the EIR is stating that it will require 10 trucks per day, each carrying 6,000 gallons of brine waste during the driest months, with the plant running 24/7, the SSLOCSD's NPDES permit for brine waste, is 50,000 gallons per day, (see Appendix 2) which already includes several other permitted customers. 60,000 gpd would exceed the SSLOCSD's permit. (Even 4 trucks a day would exceed the gpd in the CCSD's application). It wasn't made clear in the EIR, referring to trucks transporting brine on a daily basis, how many days a week that implied, but in the CCSD's application to the SSLOCSD, 421,000 gallons per month calculates to 5 days a week/four weeks a month. I would assume, since the SSLOCSD operates M-F to receive waste disposal, deliveries would be made 5 days a week.

Whether the RO concentrate would be trucked to Kettleman City, or to SSLOCSD, both scenarios present significant environmental and hazardous impacts. The possibility of spillage, noise impacts, carbon monoxide emissions, road wear and tear, and safety issues, all present areas of concern. Scenic Pacific Coast Highway 1, Hwy. 46, and the areas and neighborhoods that the proposed trucks would be traversing, should not be subject to potentially dangerous and harmful situations. No environmental impact studies or data, to my knowledge, have been demonstrated in this EIR, related to the trucking of brine waste.

Errata: 12. 4-7

In this section, it is stated that the decommissioning of the evaporation pond would be achieved by the pond evaporating over "several seasons." The Regional Water Quality Control Board has issued a Cease and Desist Order for the evaporation pond, requiring the CCSD to empty the pond and clean the liner. I'm not under the impression that the Regional Board's intent is to have the pond emptied through evaporation over several seasons. Creating the possibility of increased environmental detriment, should not be given consideration in the EIR. (Interesting that this was included in the Errata, and not identified in the body of the EIR)?

WATER RIGHTS

In October, 2014, the District applied for time extensions to the State Water Resources Control Board (SWRCB) for their expired aquifer diversion San Simeon (SS) permit #17287, and Santa Rosa (SR) permit, #20387. After learning of the lengthy process involved for time extensions, revealed at a board meeting several months ago by CCSD lobbyist, Dean Florez, a request was made to the SWRCB, March 21, 2017,

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(see Appendix 3) to be licensed at the maximum annual amount of water put to beneficial use while the respective permit developed schedules were in effect. At this time, according to a conversation I had with staff at the SWRCB a few days ago, that process has not completed. It is also not clear at this time, if the District has officially withdrawn the time extension applications submitted, Oct., 2014.

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WATER SUPPLY

The EIR maintains that the demand for water supply will be close to approximately 700 AFY at build-out. (See PA response, PA-46, PA 12-107) Reference is made to a forecasted demand plot in Conservation Program B (DSEIR, page 3-5). With build-out at 4,650 and current water usage up for 2017, compared to years 2014-16, it is very difficult to believe that unless Cambrians continue the stringent conservation practices they have been adhering to, (which made it possible for the town to not run out of water, even though tourism has been at all time highs), 700 AFY seems unrealistic and I would venture to say, unachievable. Since the District recently lowered the Emergency Drought Condition from a Level III to a Level II, Cambrians are currently permitted to use more water. (Since there are no penalties or surcharges, Cambrians can actually use all the water they want, if they can afford to pay for it).

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The EWS/SWF plant has not been in operational mode long enough to know what to expect from it. The two Tracer Tests did not achieve the desired objective, only with modeling were the results considered acceptable. Additionally, Cambria has been experiencing significant amounts of water loss, due to leaks. The significant amount of water loss was not anticipated or configured in the EIR.

OTHER ISSUES

To see time and again, references in the EIR, to impacts on the environment as, less than significant impact; no significant impact; less than significant impact with mitigation incorporated, etc., etc., is mind boggling, when one considers the environment and habitat in which the current project exists, and the numerous proposed modifications and mitigation measures in the Final EIR. The numerous proposed mitigation measures signify a poorly designed and poorly managed project. The costs for the existing project have far exceeded what Cambrians were led to believe, and I've seen no projections to address what the numerous mitigation measures will cost for "proposed" projects.

1.4 In the **District's Goals and Objectives**, it was with disbelief when I read the list, but the last bullet point in particular, I found especially patronizing. (See in italics below)

Minimize economic hardship and losses to local residences and businesses including tourism.

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It is virtually inconceivable to see where a proposed project will minimize economic hardship and losses to local residences and businesses; the existing project has already created economic hardship. Proposed changes and mitigation measures in the EIR will make it difficult, if not impossible, for some Cambrians to remain here, many of whom are older and retired, and depend on a limited income. Many are young with families to support, who are working more than one job to make ends meet—how will they be able to afford to live in a community which depends on them for tourist industry employment? I understand that an EIR does not factor in cost, but costs have to be factored in, and as the bullet point referred to above, raises the issue of economics in the EIR itself.

Unfortunately, it won't be the folks who used such poor judgment in their decision making for this "superior water alternative," an alternative decided in November, 2013, (See ACE Technical Memo, 3-6), who suffer the consequences. The project described to Cambrians who voted for a rate increase to pay

for the project, was for an Emergency Water Supply (EWS) for current residents in times of drought, **not** for a repurposed project that has growth written all over it.

I will again reiterate what I have both written and said on a number of occasions: This project was a rush to judgment, and the ramifications of such, have proven over and over that when a project of this scope is rushed, significant environmental and costly consequences are invariably the result; we know that to be the case with the project that has been built. I include here for reference, a response to a comment I made in the DSEIR asking why the Adaptive Management Plan (AMP) was not included in the DSEIR.

***PO 200-17-PO 12-538** The comment states that the AMP should have been developed prior to DSEIR distribution. See Responses PA 3-4 and PA 4-5 concerning the AMP and update. The CCSD is committed to a robust AMP process that includes monitoring and performance criteria designed to carefully monitor changes and respond to them in real time; refer also to Mitigation Measure BIO-7. Pursuant to Mitigation Measure BIO-7, the CCSD is required to implement the AMP at commencement of SWF operations. The adaptive management process is a recognized method for "learning by doing" using best available data when there is such uncertainty in the response of an ecosystem to a proposed action. Thus, CCSD is not required to circulate its AMP a part of the CEQA process for the Project, and incorporation of the AMP as part of the DSEIR is not necessary.*

And based on this response, rests my case as to why any proposed project, described in the EIR, should not receive a regular Coastal Development Permit (CDP).

I cannot support the findings and proposals listed within the Final EIR. I am perplexed as to why the CCSD chose not to respond to comments made from agencies and the public on the IS/MND, or the NOP. It seems clear from reading the DSEIR comments and responses that very little has been absorbed into the Final EIR. As I stated above, the AMP should have been included in the EIR. I am requesting that the CCSD Board of Directors not certify the FEIR at their meeting on Wednesday, June 14, 2017.

Respectfully,
Tina S. Dickason,
Cambria resident

SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT

Operations Address:
1600 Aloha
Oceano, California 93445
(805) 489-6666

Business Address:
Post Office Box 339
Oceano, California 93445
(805) 481-6903

APPLICATION FOR BRINE DISPOSAL

(The following information must be completed in its entirety. Please type)

- 1.) Company Name: Cambria Community Services District
- 2.) Physical Address: 1316 Tamsen Dr. Suite 201, Cambria, CA 93428
- 3.) Mailing Address (if different from above): P.O. Box 65, Cambria, CA 93428
- 4.) Phone (business hours): 805-927-6223 Emergency Contact (business hours): 805-927-6223
(after hours): 805-927-6223
- 5.) Number of years at this location: 25
- 6.) Nature of business: Municipal Water Supply & Wastewater Treatment
- 7.) Current method used for Disposal: evaporation pond
- 8.) Current location of Disposal Site: San Simeon Creek Road
- 9.) Deposit or bond: \$10,000.00
(see paragraph 10 below)
- 10.) **Bond:** A bond or other securities such as a dedicated account in the name of the District shall be provided to secure applicant's performance under this agreement. The proceeds of said bond shall be available to reimburse the District for all expenses associated with the District's response including but not limited to a response from the Regional Water Quality Control Board or other state or federal agency for a violation of any obligation of applicant as provided for in this application or in the permit. Said proceeds would be available to cover all response costs including but not limited to attorney's fees, staff time, testing, and payment of any fine or obligation due to the Regional Water Quality Control Board or other agency. Said bond is not a limitation upon the liability of the applicant under the indemnity agreement provided for in this agreement.
- 11.) Estimated gallons per day to be disposed: 21,060
- 12.) Estimated gallons per month: 421,200
- 13.) Applicant shall provide a list of the constituent chemicals and shall provide a list of constituents and relative concentrations of each constituent in said brine. Said documentation shall provide a complete designation of all constituents of the brine. Further, this applicant shall provide a complete analysis of the brine to verify this information. Recipient will be limited in the permit to those constituents identified and the relative concentrations provided for in the application and analysis.

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14.) Delivery method:

9 Company Owned Truck/Trailer

9 Third party (if Third Party, list name, address, vehicle license number, driver names, and license number)

The CCSD does not own a water truck and would make arrangements for hauling with a licensed hauling firm.

Applicant is liable for any violation by third party trucker or deliverer of permit requirements or for any violation of District, State or Federal rules regulating discharge of waste materials into the outfall line.

15.) Method of Contaminate Prevention:

Routine sampling and analyses of hauled liquid, as well as using equipment that is properly maintained and suited to the task.

Personnel would also be properly trained and licensed and subject to drug testing.

16.) Applicant will be required as a part of the permit process to agree to the following indemnity language:

Indemnity

1. Except as otherwise provided in subparagraphs (b) and (c) below, Applicant shall defend, indemnify and save harmless the District, its officers and employees, from any and all claims, demands, damages, costs, expenses, judgements, attorney fees or any liability arising out of this contract or attempted performance of the provisions hereof predicated upon theories set forth below in subparagraph (a) below:

A. The theories referred to above are theories based on any of the following committed by the Applicant, or its agents, employees, or for independent contractors including but not limited to trucking companies and their employees directly responsible to Applicant;

- 1. Violation of statute, ordinance or regulation.
- 2. Willful, intentional or other wrongful acts, or failures to act.
- 3. Negligence or recklessness.

B. Nothing contained in the foregoing indemnity provision shall be construed to require indemnification for claims resulting from the sole or active negligence or willful misconduct of the District, provided however, this exception shall not apply to claims, demands, damages, costs, expenses, judgments, or attorney fees arising from any design defects.

C. Nothing contained in the foregoing indemnity provisions shall be construed to require Applicant to indemnify District, against any responsibility or liability in contravention of Civil Code 2782.

17.) Signature of Applicant:



Date: 1-12-17

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Applicant's Checklist

- Application Fee
- Bond certificate or certificate of deposit
- Lab Analysis
- Identification of trucker

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- Application Fee
- Bond certificate or Certificate of deposit
- Lab Analysis of all salt brine constituents including concentrations of each

- Sample
- Onsite Inspection

- Approved
- Issued

The following waste characterization information is from an Oct. 20, 2014 CCSD Commissioned Study by CDM Smith entitled "Cambria Emergency Water Supply Project Title 27 Report of Waste Discharge". See Section 2.7

Section 2 • Physical Setting and Waste Characterization

Table 2-2: Summary of Depth of Groundwater Data

Well ID	Groundwater Depth	Surface Elevation *	Groundwater Elevation
MW-1	27.0	39	12
MW-2	21.3	37	15.7
MW-3	23.0	43	20

* The surface elevation is estimated and has not yet been surveyed

The anticipated capillary rise of water was calculated as shown in Attachment 2G. In summary, at a height of 1 meter above the water table, the effective saturation is 40%.

Attachments 2H and 2I map both the springs and groundwater wells, respectively, within a one-mile radius of the site.

2.6 Land and Water Use (21750[h])

The Project site is located just north of CCSD's effluent percolation pond system. These percolation ponds are used to treat secondary effluent from the District's wastewater treatment plant. However, the lands surrounding the Project site are primarily agricultural and recreational. Agricultural lands are predominant both to the north and east of the Project site. The California State Parks' Washburn Primitive Campground and San Simeon Creek Campground lie to the south and west, respectively, of the site.

2.7 Waste Characterization

As summarized in TM 1 – General Descriptions and Requirements of Title 27, provided in Section 1 of this document, the waste stream to the evaporation ponds will include concentrate from the reverse osmosis (RO) process as well as waste water from analytical instruments and spent membrane cleaning solutions on an intermittent basis. The waste stream will be discharged at a flow rate of up to 39 gallons per minute (gpm) to the evaporation pond. Table 2-3 summarizes the source water quality and the predicted evaporation pond brine quality. It should be noted that no projections could be made on expected brine concentrations for constituents with non-detectable levels in the source water.

Table 2-3: Waste Characterization

Constituent	Unit	PQL	Source water	Expected Evaporation Pond Brine Influent
<i>Metals</i>				
Silica (SiO ₂)	mg/L	-	20 ⁽³⁾	200
Aluminum (Al)	mg/L	0.010	ND ⁽¹⁾	-
Arsenic (As)	mg/L	0.002	ND ⁽²⁾	-
Barium (Ba)	mg/L	0.0002	0.08 ⁽³⁾	1.1
Boron (B)	mg/L	0.010	0.32 ⁽³⁾	2.9
Cadmium (Cd)	mg/L	0.0002	ND ⁽²⁾	-
Calcium (Ca)	mg/L	1	72 ⁽³⁾	940
Chromium (Cr), Total	mg/L	0.001	ND ⁽²⁾	-
Copper (Cu)	mg/L	0.001	0.003 ⁽²⁾	0.040
Iron (Fe)	mg/L	0.050	0.150 ⁽³⁾	1.7

Table 2-3:Waste Characterization

Constituent	Unit	PQL	Source water	Expected Evaporation Pond Brine Influent
Lead (Pb)	mg/L	0.005	0.0002 ⁽³⁾	0.003
Magnesium (Mg)	mg/L	1	58 ⁽³⁾	760
Manganese (Mn)	mg/L	0.0005	0.0039 ⁽¹⁾	0.094
Mercury (Hg)	mg/L	0.00002	ND ⁽²⁾	-
Nickel (Ni)	mg/L	0.001	0.003 ⁽²⁾	0.040
Potassium (K)	mg/L	1	26 ⁽³⁾	270
Silver (Ag)	mg/L	0.001	ND ⁽²⁾	-
Sodium (Na)	mg/L	1	247 ⁽¹⁾	2,700
Strontium (Sr)	mg/L	0.005	0.58 ⁽¹⁾	7.1
Zinc (Zn)	mg/L	0.010	ND ⁽²⁾	-
Wet Chemistry				
Ammonia N (NH ₃)	mg/L as N	0.2	0.3 ⁽²⁾	2.8
Alkalinity	mg/L as CaCO ₃	10	210 ⁽¹⁾	2,400
Bicarbonate (HCO ₃)	mg/L	10	260 ⁽¹⁾	1,600
Carbonate (CO ₃)	mg/L	10	ND ⁽¹⁾	1.1
Hydroxide (OH)	mg/L	10	ND ⁽¹⁾	-
Bromide (Br)	mg/L	0.03	ND ⁽¹⁾	-
Carbon Dioxide (CO ₂)	mg/L	1	12 ⁽¹⁾	38
Chloride (Cl)	mg/L	5	347 ⁽¹⁾	6,000
Chlorine, Total	mg/L	0.1	ND ⁽¹⁾	3.0
Specific Conductance	umhos/cm	1	1,940 ⁽²⁾	26,000
Cyanide (CN), Total	mg/L	0.004	ND ⁽²⁾	-
Fluoride (F)	mg/L	0.1	0.1 ⁽¹⁾	0.90
Nitrate-N (NO ₃)	mg/L as N	4	4 ⁽¹⁾	17
Nitrite-N (NO ₂)	mg/L as N	0.3	ND ⁽¹⁾	-
Nitrogen, Total Kjeldahl	mg/L	1	ND ⁽¹⁾	-
Oxygen, Dissolved	mg/L	0.5	6.3 ⁽¹⁾	6.3
pH	units	-	7.6 ⁽¹⁾	7.8
Phosphate	mg/L	0.3	18 ⁽¹⁾	220
Solids, Total Dissolved (TDS)	mg/L	20	1,110 ⁽¹⁾	14,000
Solids, Total Suspended (TSS)	mg/L	1	ND ⁽¹⁾	-
Sulfate (SO ₄)	mg/L	2	107 ⁽¹⁾	1,800
Sulfide (S), Total	mg/L	0.1	ND ⁽¹⁾	-
EPA Method 608 Constituents				
Chlordane	µg/L	2	ND ⁽²⁾	-
Toxaphene	µg/L	0.5	ND ⁽²⁾	-
PCB 1016	µg/L	0.5	ND ⁽²⁾	-
PCB 1221	µg/L	0.5	ND ⁽²⁾	-

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Table 2-3:Waste Characterization

Constituent	Unit	PQL	Source water	Expected Evaporation Pond Brine Influent
PCB 1232	µg/L	0.5	ND ⁽²⁾	-
PCB 1242	µg/L	0.5	ND ⁽²⁾	-
PCB 1248	µg/L	0.5	ND ⁽²⁾	-
PCB 1254	µg/L	0.5	ND ⁽²⁾	-
PCB 1260	µg/L	0.5	ND ⁽²⁾	-
<i>EPA Method 625 Constituents</i>				
Acenaphthene	µg/L	1	ND ⁽²⁾	-
Acenaphthylene	µg/L	1	ND ⁽²⁾	-
Anthracene	µg/L	1	ND ⁽²⁾	-
Benzidine	µg/L	10	ND ⁽²⁾	-
Benzo(a)anthracene	µg/L	1	ND ⁽²⁾	-
Benzo(b)fluoranthene	µg/L	1	ND ⁽²⁾	-
Benzo(k)fluoranthene	µg/L	1	ND ⁽²⁾	-
Benzo(g,h,i)perylene	µg/L	1	ND ⁽²⁾	-
Benzo(a)pyrene	µg/L	1	ND ⁽²⁾	-
4-Bromophenylphenylether	µg/L	1	ND ⁽²⁾	-
Butylbenzylphthalate	µg/L	2	ND ⁽²⁾	-
bis(2-Chloroethoxy)methane	µg/L	1	ND ⁽²⁾	-
bis(2-Chloroethyl)ether	µg/L	1	ND ⁽²⁾	-
bis(2-Chloroisopropyl)ether	µg/L	1	ND ⁽²⁾	-
bis(2-Ethylhexyl)phthalate	µg/L	2	ND ⁽²⁾	-
4-Chloro-3-methylphenol	µg/L	2	ND ⁽²⁾	-
2-Chloronaphthalene	µg/L	1	ND ⁽²⁾	-
2-Chlorophenol	µg/L	2	ND ⁽²⁾	-
4-Chlorophenylphenylether	µg/L	1	ND ⁽²⁾	-
Chrysene	µg/L	1	ND ⁽²⁾	-
Dibenzo(a,h)anthracene	µg/L	1	ND ⁽²⁾	-
Di-n-butylphthalate	µg/L	2	ND ⁽²⁾	-
1,2-Dichlorobenzene	µg/L	1	ND ⁽²⁾	-
1,3-Dichlorobenzene	µg/L	1	ND ⁽²⁾	-
1,4-Dichlorobenzene	µg/L	1	ND ⁽²⁾	-
3,3'-Dichlorobenzidine	µg/L	2	ND ⁽²⁾	-
2,4-Dichlorophenol	µg/L	2	ND ⁽²⁾	-
Diethylphthalate	µg/L	1	ND ⁽²⁾	-
2,4-Dimethylphenol	µg/L	2	ND ⁽²⁾	-
Dimethylphthalate	µg/L	1	ND ⁽²⁾	-
4,6-Dinitro-2-methylphenol	µg/L	1	ND ⁽²⁾	-
2,4-Dinitrophenol	µg/L	5	ND ⁽²⁾	-
2,4-Dinitrotoluene	µg/L	1	ND ⁽²⁾	-

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Table 2-3:Waste Characterization

Constituent	Unit	PQL	Source water	Expected Evaporation Pond Brine Influent
2,6-Dinitrotoluene	µg/L	1	ND ⁽²⁾	-
Di-n-octylphthalate	µg/L	1	ND ⁽²⁾	-
Fluoranthene	µg/L	1	ND ⁽²⁾	-
Fluorene	µg/L	1	ND ⁽²⁾	-
Hexachlorobenzene	µg/L	1	ND ⁽²⁾	-
Hexachlorobutadiene	µg/L	1	ND ⁽²⁾	-
Hexachlorocyclopentadiene	µg/L	1	ND ⁽²⁾	-
Hexachloroethane	µg/L	1	ND ⁽²⁾	-
Indeno(1,2,3-c,d)pyrene	µg/L	1	ND ⁽²⁾	-
Isophorone	µg/L	1	ND ⁽²⁾	-
Naphthalene	µg/L	1	ND ⁽²⁾	-
Nitrobenzene	µg/L	1	ND ⁽²⁾	-
2-Nitrophenol	µg/L	2	ND ⁽²⁾	-
4-Nitrophenol	µg/L	2	ND ⁽²⁾	-
N-Nitrosodimethylamine	µg/L	2	ND ⁽²⁾	-
N-Nitrosodiphenylamine	µg/L	1	ND ⁽²⁾	-
N-Nitrosodi-n-propylamine	µg/L	1	ND ⁽²⁾	-
Pentachlorophenol	µg/L	2	ND ⁽²⁾	-
Phenanthrene	µg/L	1	ND ⁽²⁾	-
Phenol	µg/L	1	ND ⁽²⁾	-
Pyrene	µg/L	1	ND ⁽²⁾	-
Pyridine	µg/L	10	ND ⁽²⁾	-
1,2,4-Trichlorobenzene	µg/L	1	ND ⁽²⁾	-
2,4,6-Trichlorophenol	µg/L	1	ND ⁽²⁾	-
1,2-Diphenylhydrazine	µg/L	1	ND ⁽²⁾	-
2,4,5-Trichlorophenol	µg/L	2	ND ⁽²⁾	-
EPA Method 625 Pesticides				
Aldrin	ng/L	5	ND ⁽²⁾	-
Alpha BHC	ng/L	5	ND ⁽²⁾	-
Beta BHC	ng/L	5	ND ⁽²⁾	-
Delta BHC	ng/L	5	ND ⁽²⁾	-
alpha-Chlordane	ng/L	5	ND ⁽²⁾	-
gamma-Chlordane	ng/L	5	ND ⁽²⁾	-
p,p'-DDD	ng/L	5	ND ⁽²⁾	-
p,p'-DDE	ng/L	5	ND ⁽²⁾	-
p,p'-DDT	ng/L	5	ND ⁽²⁾	-
Dieldrin	ng/L	5	ND ⁽²⁾	-
Endosulfan I	µg/L	5	ND ⁽²⁾	-
Endosulfan II	µg/L	5	ND ⁽²⁾	-

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Table 2-3:Waste Characterization

Constituent	Unit	PQL	Source water	Expected Evaporation Pond Brine Influent
Endosulfan Sulfate	ng/L	5	ND ⁽²⁾	-
Endrin	ng/L	5	ND ⁽²⁾	-
Endrin Aldehyde	ng/L	5	ND ⁽²⁾	-
Endrin Ketone	ng/L	5	ND ⁽²⁾	-
Heptachlor	ng/L	5	ND ⁽²⁾	-
Heptachlor Epoxide	ng/L	5	ND ⁽²⁾	-
Lindane (Gamma BHC)	ng/L	5	ND ⁽²⁾	-
Methoxychlor	ng/L	5	ND ⁽²⁾	-
cis_Nonachlor	ng/L	5	ND ⁽²⁾	-
o,p - DDD	ng/L	5	ND ⁽²⁾	-
o,p - DDE	ng/L	5	ND ⁽²⁾	-
o,p - DDT	ng/L	5	ND ⁽²⁾	-
trans-Nonachlor	ng/L	5	ND ⁽²⁾	-
TOC				
TOC	mg/L	0.3	3.9 ⁽¹⁾	47

Notes:

PQL = Practical Quantification Limit

ND = Non Detected

1: Sample taken for 9P7 by CCSD on April 7, 2014. Parameter was not measured in July 8, 2014 sample. Chloride, sulfate, conductivity, and TDS based on more conservative secondary effluent sample.

2: Based on average of April 7 and July 8, 2014 results. Where ND is shown, samples from both days had ND results. Copper based on average of January 21 and July 8, 2014 results, and was not analyzed with April 7 sampling.

3: Based on Annual Report Summary from Cambria WWTP for 2012 through 2013

221-7

As described in TM 1 – General Descriptions and Requirements of Title 27, this waste stream is considered a “designated waste” as per the California Water Code, Section 13173. A liquid designated waste must be contained in Class II surface impoundment with a double liner and a leachate collection and removal system (Title 27, Section 20210). A detailed description of the pond design and construction is provided in TM 4 – Design Report, Operations, and Construction Quality Assurance (CQA) (see Section 4 of this document).



SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT

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Telephone (805) 489-6666 FAX (805) 489-2765
www.sslocsd.org

STAFF REPORT

Date: February 15, 2017
To: Board of Directors
From: Gerhardt Hubner, District Administrator
Subject: **DISTRICT'S BRINE DISPOSAL PROGRAM AND CAMBRIA COMMUNITY SERVICE DISTRICT'S APPLICATION FOR A BRINE WASTE DISPOSAL PERMIT**

RECOMMENDATION:

Receive and File Report

DISCUSSION

The District owns and operates a brine disposal station utilized by a variety of local water softening companies, water purveyors, vineyards and one local community service district for disposal of brine. The District Board approved brine disposal program has been in existence for many years, and provides a local and regional public service for disposal of salt brine from San Luis Obispo County and beyond.

In order for a Permittee (or discharger of brine) to truck and discharge/dispose of brine to the District facility the Permittee must:

1. Submit a complete application and fee;
2. Deposit or Bond of \$10,000; and
3. Provide laboratory analysis of the proposed brine to be disposed of.

The Permittee must also meet and acknowledge the following District Brine Disposal Permit conditions:

1. Disposal is a privilege, not a right.
2. Non-hazardous waste manifest must accompany all loads. Hazardous waste prohibited.
3. Permit suspension can occur at the discretion of the District or upon violation of permit requirements.
4. Subject to annual review.
5. Chain of custody required with all discharges.
6. District hours of operation Monday through Friday 8-3 pm.
7. 50,000 gallon per day brine discharge limitation. Discharges above this limitation will not be

- allowed.
8. First come, first come basis, with no guarantee of discharge once daily limitation reached.
 9. District under no obligation to provide access on a continuous basis.
 10. Brine cannot cause the District to exceed its NPDES Permit limitations from RWQCB. The District's Brine Waste Disposal Permit identifies and lists those chemical constituents that cannot be exceeded.
 11. Submittal of monthly reports from a CA Certified ELAP laboratory for discharge brine samples.
 12. District has the right to sample brine.
 13. Permittee must provide a dedicated delivery vehicle.
 14. Permittee to defend, indemnify and save harmless the District.

If a Permittee meets and acknowledges all the above conditions, the Permittee is enrolled under the District's Brine Disposal Program, and a Brine Disposal Waste Permit is issued by the District Administrator. No further action by the Board is needed or required.

As part of our administrating our Brine Disposal Program a log book is maintained, recording the date and time of every truckload that brings brine for disposal. The log describes the volume of brine waste, owner of each truckload, and the source of each truckload (water softener waste, reverse osmosis waste, etc.). Before the truck unloads, a sample is grabbed and the pH is analyzed for compliance. Once the District's laboratory and technician determines permit compliance is met, the station is unlocked and the brine truck is allowed to discharge the brine into our system. The brine is then mixed with the District's treated effluent and both discharged together into the ocean through the District's outfall.

A sample from each truckload is kept for fourteen (14) days in case of an identified problem with the brine. The brine monitoring requirements as also outlined on Page E-14 of our NPDES permit from the RWQCB, and conducted at a minimum annually.

In Calendar Year 2016, the District received at its brine disposal station 627 truckloads of brine, totaling 2,636,120 gallons. Currently we have twelve brine generators/Permittees enrolled in the Brine Disposal Program with six active customers.

Cambria Community Service District (CSD)'s Application for Permit to Discharge Brine

At a past Board meeting, the Board directed staff that when a brine disposal application was received from the Cambria CSD for proposed discharge of brine to the District facility, that the Board be notified. Today's staff report is providing that notification.

Recently, Cambria CSD submitted a signed Application for Brine Disposal, fee and deposit for discharge of brine from its groundwater desalter/treatment facility. They also provided us with laboratory analysis of their proposed brine. Cambria's application states that a maximum daily volume of 21,061 gallons a day is proposed from their facility.

Staff's review of the Application, and laboratory analysis provided, indicate the Application complete and meets the requirements of the District's Brine Disposal Program. Thus, it is eligible for a District Brine Waste Disposal Permit.

Furthermore, historical review of District records indicates sufficient volumetric capacity (within the 50,000-gallon limitation per day) under the District's Brine Disposal Program to accommodate Cambria CSD's Application. For example, in Calendar Year 2016, daily brine volumes received

ranged from zero to a maximum of 32,800 gallons per day (one day in January 2016). Most days' brine received at our facility is 10,000 gallons per day or less. This past January we had one Permittee who brought significant brine to our facility (the highest day combined was 45,600 gallons per day). In any event, we did not exceed during any one day the 50,000 gallon per day limitation for the entire calendar year 2016.

In addition, Cambria CSD truck(s) will be required to access the District's facility from our back-facility entrance, avoiding disruption to the adjacent Oceano community. Since the District's Permittees must renew annually, no Permittee, including Cambria CSD, are guaranteed brine disposal at our facility beyond what our Brine Disposal Program allows, as described on page 1 of this staff report. A future reclamation or recycling project by the District, one of its member agencies or in partnership with others (Regional Groundwater Sustainability Project) will not be jeopardized with this enrollment for all the reasons described above.

Therefore, for all the reasons stated above it is our intent to issue a Brine Waste Disposal Permit to the Cambria CSD.

FISCAL CONSIDERATIONS

The District's Brine Disposal Program provides the District approximately \$300,000 annually as revenue. We currently charge \$111.25/per 1000 gallons or 11 cents per gallon of brine disposed. The addition of Cambria CSD brine may realize the District an additional monthly revenue of \$46,332 based upon the volumetric values stated in its Application. We understand the volume of brine may or may not be received each and every month (or be seasonal).

Finally, the Board may want to direct staff to examine its current brine per gallon fee, and determine whether or not to adjust it. It may also want to explore developing a tiered charge or fee system, and/or volumetric limit for brine disposal haulers outside of the County vs. those from San Luis Obispo County.

221-7

CAMBRIA COMMUNITY SERVICES DISTRICT

DIRECTORS:

AMANDA RICE, President
GREG SANDERS, Vice President
MICHAEL THOMPSON
JIM BAHRINGER
HARRY FARMER



OFFICERS:

JEROME D. GRUBER, General Manager
MONIQUE MADRID, District Clerk
TIMOTHY J. CARMEL, District Counsel

1316 Tamsen Street, Suite 201 • P.O. Box 65 • Cambria CA 93428
Telephone (805) 927-6223 • Facsimile (805) 927-5584

March 21, 2017

Mitchell Moody, P.E.
Water Resource Control Engineer
Coastal Lahontan Unit
Division of Water Rights
State Water Resources Control Board
1001 I St., 14th Floor, P.O. Box 2000
Sacramento, CA 95814

221-7

Re: Licensure of Water Rights Permits Nos. 17287 and 20387

Dear Mr. Moody:

The Cambria Community Services District would like to initiate the process of obtaining licenses for the above-referenced water rights permits based on the maximum annual amount of water put to beneficial use while the respective permit development schedules were in effect. As we have previously shared with you, our records indicate these amounts to be 798.82 AFY under Water Rights Permit No. 17287 for the San Simeon Creek aquifer wells, and 217.92 AFY under Water Rights Permit No. 20387 for the Santa Rosa Creek aquifer wells.

Your time and assistance are appreciated. Should you have any questions, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerome D. Gruber".

Jerome D. Gruber
General Manager

Cc: Timothy Carmel, District Counsel
Encl.

**RESPONSE TO COMMENT LETTER NO. PO-221**

Tina Dickason

June 13, 2017

- PO 221-1 The FSEIR and DSEIR were both prepared according to CEQA Guidelines, and industry standards regarding EIR preparation. This comment also provides general introductory statements, and as such no further comment is required.
- PO 221-2 See Response PO 217-1 concerning RO concentrate disposal and the “RO Ocean Outfall Disposal” Alternative. See DSEIR Section 7.3, “RO Concentrate Ocean Outfall Disposal” Alternative, for further description of this alternative. It is noted that DSEIR Section 1.0, is the Executive Summary. All concepts presented in this section are summaries, and more detailed explanations can be found in the applicable EIR sections.
- RO concentrate disposal was analyzed in the DSEIR. See Section 3.5.2.6, Offsite RO Concentrate Disposal, for information regarding truck trips used in the Project Description. See DSEIR Section 8.5, Hazards and Hazardous Materials, for environmental analysis regarding RO concentrate truck transport. Hazardous materials transport would comply with all regulatory requirements for transport; also see Response PA 4-15.
- PO 221-3 See Response PA 12-8 concerning evaporation pond decommissioning. The RO concentrate would be vacuumed, removed, and hauled away.
- PO 221-4 See Responses PA 4-6 and PA 7-5 concerning water rights.
- PO 221-5 The 700 AFY demand at build-out is based on data from the 2015 Urban Water Management Plan. The commenter does not provide data or other substantiation for the claim that this is an unrealistic estimate. Thus, no further response is necessary.
- PO 221-6 See CEQA Guidelines Section 15064 (e). Economic and social changes resulting from a project shall not be treated as significant effects on the environment; see also Response PO 89-3 concerning fiscal and economic impacts.
- PO 221-7 This comment provides appendices that substantiate claims made by the commenter. See Responses PO 221-1 to 221-6.



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Biodiversity First!

"To keep every cog and wheel is the first precaution of intelligent tinkering."
Aldo Leopold 1938

3650 Gillis Canyon Road, Shandon, CA 93463

June 14, 2017

Cambria Community Services District (CCSD)
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Jim Bahringer
Gregory Sanders
Amanda Rice
Harry Farmer
Michael Thompson

Dear Members:

Biodiversity First!, a local 501(c)3 nonprofit corporation headquartered in Shandon, CA, works to preserve biodiversity in the lands of San Luis Obispo County and beyond. We have deep concerns over the Cambria Sustainable Water Project SEIR, formerly scoped as the Cambria Emergency Water Supply Project.

The Ventana Wildlife Society releases young condors into the wild in the vicinity of the brine pond. The chemicals and concentration of dissolved toxins in the aeration basins could be harmful, if not fatal, to this precious wildlife resource. Young condors are attracted to water and can drown in open ponds.

The San Simeon Creek is designated as steelhead habitat, as verified in the Watershed Management Plan of 2012. A thorough analysis of the effects upon steelhead needs to be made in order to evaluate the worthiness of this project.

The lack of baseline information upon which the SEIR is based to evaluate project impacts is deeply troubling. No creek habitat typing was completed to generate datasets upon which to gauge project impacts. No comprehensive watershed-wide Steelhead Abundance and Distribution Survey was conducted to evaluate how population changes related to the project's actions would be reflected in population numbers in the future. Such a study provides strong representation of the general distribution and relative abundance of steelhead and presence/absence of other species for San Simeon Creek. The approach is repeatable and would provide a good baseline.

222-1

222-2

222-3

In addition, it is incumbent upon the CCSD to demonstrate a pattern of drying in reaches downstream of the project footprint that conforms with data provided to substantiate claims of historically dry reaches downstream of the project. Regular flow monitoring and mapping of drying reach downstream of the project site would establish a robust baseline.

222-3

Biodiversity First! is also troubled by the lack of comments from California State Parks, whose land is just adjacent to this project. Have comments been submitted by them? If so, where can we find the comments?

222-4

Sincerely,
///
Linda Seeley
Secretary
Biodiversity First!

CC: Michael Jencks, Esq.
Patrick McGibney
Greg McMillan
Elizabeth Johnson

**RESPONSE TO COMMENT LETTER NO. PO-222**

Linda Seeley
Biodiversity First!
June 14, 2017

PO 222-1 This comment provides general introductory information.

The comment on California condors in the Project vicinity. The Ventana Wildlife Society website does not provide information concerning condor release in the Cambria community. The website notes condor release in southern California, Grand Canyon (Arizona), and Monterey County. It also notes that the Ventana Wildlife Society partnered with Pinnacles National Monument, which is approximately 100 miles north of the Project site.

A number of biological resource reports were completed for the Project; see DSEIR Appendix E. California condor was not listed on the Sensitive Habitats and Potentially Occurring Sensitive Plant and Wildlife Species matrix or the Flora and Fauna Compendium.

Additionally, the evaporation pond is to be decommissioned, and it would be repurposed as a raw water storage basin.

PO 222-2 See Response PA 4-18 concerning Central Coast steelhead protection. The Project's effects on Central Coast steelhead and their habitats are discussed in detail in DSEIR Section 5.3.5, [Biological Resources] Impacts and Mitigation Measures.

PO 222-3 Baseline studies were completed on this Project, and are the basis for environmental analysis. See Section 5.3, Biological Resources, for information regarding technical studies used and sources cited. See Response PA 4-18 for further discussion concerning steelhead protection. See Section 5.5, Hydrology and Water Quality, concerning the Project's potential impacts. Regular monitoring would occur under Mitigation Measure BIO-7, *Adaptive Management Plan*.

PO 224-4 No comments have been submitted by California State Parks on the DSEIR. All comment letters received have been included as part of the FSEIR.



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June 14, 2017

Amanda Rice, President, Board of Directors
Cambria Community Services District
1316 Tamsen Street Ste. 201
Cambria, CA 93428

Dear President Rice and Directors Behringer, Farmer, Sanders and Thompson:

I am writing today as Executive Director of Greenspace – The Cambria Land Trust to express the organization's opposition to the certification of the Final Subsequent Environmental Impact Report for the Cambria Sustainable Water Facility Project. The FSEIR does not adequately address a number of biological, hydrological and cultural questions regarding 1) the manner in which the existing project was built; 2) the operational problems that have been uncovered in the subsequent 2 1/2 years, including the accidental spills and the presence of potentially dangerous chemicals that reports from regional and state water agencies have detailed; and 3) the proposed expansions of the existing facility.

223-1

In October 2016, Greenspace submitted a letter of comments on the draft version of this EIR. (October 26, 2016). We have read the response to our comments and questions in 12.3.2, PO Comments and Responses, of the FEIR. We do thank CCSD staff for responding and for taking into consideration our requested mitigation measures. However, as a whole we do not find the responses to our specific points satisfactory. We believe that ongoing impacts on animal and plant species, including those that have taken place during the last two and a half years, and the lack of baseline hydrological and biological research must be addressed in the EIR. By way of example, I point to the potential trucking of boron-laced water to South County or the alternative, piping the brine effluent into near-shore ocean waters, as serious environmental concerns which we raised in our letter that are not analyzed for impact in the FEIR.

223-2

Thank you for your attention to these comments. We look for a denial of certification of the FEIR until these issues are properly addressed and reported to regulatory agencies and the citizens of Cambria.

Sincerely,

Constance Higdon Gannon
Executive Director

Constance Higdon Gannon

Executive Director

PO Box 1505
Cambria, CA 93428
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THE GREENSPACE BOARD OF DIRECTORS

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Arthur Van Rhyen



**RESPONSE TO COMMENT LETTER NO. PO-223**

Constance Higdon Gannon

Greenspace: The Cambria Land Trust

June 14, 2017

PO 223-1 The term “Sustainable Water Facility” involves the built and operational Project components, whereas the “Mitigation Measures (Project Modifications)” involve proposed Project components, including modifications to Project components required for compliance with evaporation pond and lagoon surface discharge operations-related mitigation measures.

See DSEIR Section 3.5.1, *Sustainable Water Facility* for a description of already constructed Project elements. See DSEIR Section 8.5, *Hazards and Hazardous Materials*, for environmental analysis regarding potential accidental spills and chemicals used onsite.

There is no “expansion” of the Project. All project aspects are discussed in DSEIR Section 3.0, *Project Description*. See DSEIR Section 3.5.2, *Mitigation Measures and Project Modifications*, concerning Project Design Features (PDF) and other mitigation measures intended to improve Project operations.

PO 223-2 See Response PO 221-2 regarding trucking hazardous materials. See DSEIR Section 5.3, *Biological Resources*, regarding potential biological impacts on animal and plant species. Impacts were considered at both the SWF construction and current conditions. See Response PO 217-1 regarding the Ocean Outfall Alternative.

Received at
6/14/17 special meeting

14 June 2017

Cambria CSD Board

To the Board:

Many Cambrians and public agencies submitted comments on the Draft Environmental Impact Report. Overwhelmingly, the Final EIR's notation in response is that

"This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary."

Simple and succinct. Unfortunately, it also ignores the many issues raised by the DSEIR and the public's concerns.

The requirements for construction of permanent public works projects are promulgated to protect the public and the environment. This project, originally constructed under an Emergency Permit from San Luis Obispo County, was able to rush into place without the usual oversight. It obviously overstepped the limits of the Emergency Permit, "... to serve existing authorized water connections only (to abate the emergency), within the CCSD's service area (i.e. not to serve new development)."

224-1

The CSD Board, in convoluted reasoning which effectively misled the public, built a permanent public works water project. That was never authorized or permitted. This Final EIR is one of the steps required for the application for a regular Coastal Development Permit, for which the District was required to apply within 30 days after May 15, 2014, more than three years ago.

Changing the name from an Emergency Water Plant to a Sustainable Water Facility took place without public discussion, or even notice. Although the board now says it changed the name in March 2015, the first time that name appeared in the local newspaper, The Cambrian, was on December 23, 2015.

224-2

The board has pursued construction of a permanent water plant despite lacking the legal and reasonable requirements to do so. That single-minded pursuit has resulted in environmental damage as well as economic costs.

Several features of the plant have already failed: The blower fans and the Brine Pond stand out. The CSD's inability to manage the project was brought to public notice by the Regional Water Quality Control Board's hundreds of Notices of Violation. Hundreds of thousands of dollars in public money were wasted on those aspects alone.

224-3

The many ways in which this project was unnecessary and poorly considered do "address the DSEIR's adequacy or raise [a] significant environmental point[s]."

The project currently being evaluated includes many aspects that are new and have not previously been considered. The Surface Water Treatment Plant, with its pump station, power supply, additional piping, Baker Tanks and ancillary features is all new. It has not been subjected to discussion in the community. It should be removed from this EIR and a separate document written.

224-4

The Brine Pond continues to be in violation of regulations. The proposal to truck its contents to the Wastewater Treatment Plant for dilution and treatment, then returned to the percolation ponds, is inadequate. The percolation ponds have not been evaluated for efficacy. Water runs through them, without the beneficial effects of true percolation through the soil. The old canard about 'The solution to pollution is dilution' has never been accurate. In this case particularly, the solution instead is not to apply these chemicals in a sensitive environment at all.

Sometimes overlooked in the discussion of expensive, high-tech water resources, is the fact that Cambrians managed the drought 'Emergency' for which the plant was deemed necessary without any water from the plant, which has never operated in a production mode. It has operated only for two tests. The test had to be repeated because the plant was not able to meet the required standards, as shown by the first test. By re-writing the standards and manipulating the requirements, the plant was able to be construed to meet the required 60-day migration.

The economic impact of this plant is yet to be fully felt. The original Installment Sale Agreement, an unusual method of financing a public works project, is another result of the rush to construct the plant without adequate preparation. Cambria's small population is now encumbered with \$9 million in debt. The \$4 million grant, which the board promised would be applied to the principle loan amount, was instead used for the many cost over-runs for the project.

Costs continue to escalate. In April 2017 alone, a month during which the plant did not operate, it cost over \$123,000. There's no end in sight.

While dollar costs are not specifically part of the EIR, the economic impact is. These continuing costs will inevitably drain Cambrian residents' finances. The effects will ripple through the community.

So we've come to this decision point of certifying this unresponsive document to ignore the environmental impact of this project. I strongly urge the board to vote against certifying it.

Thank you.

Christine Heinrichs
1800 Downing Ave.
Cambria

**RESPONSE TO COMMENT LETTER NO. PO-224**

Christine Heinrichs

June 14, 2017

- PO 224-1 CEQA Guidelines require responses to comments challenging the DSEIR or raising significant environmental concern. If a comment raised concerns that are not considered significant per CEQA Guidelines, or raises non-environmental concerns (such as economic or social concerns), no response is necessary. As this FSEIR was written in compliance with CEQA Guidelines, no significant environmental issues were ignored.
- See Responses PO 89-2 and PO 96-1 concerning the emergency project's regulatory framework. See Responses PA 7-4 and PA 7-9 concerning the Emergency Coastal Development Permit.
- PO 224-2 See DSEIR Section 3.2.1, Project History, for a summary of the emergency project's history.
- PO 224-3 The "brine pond" or evaporation pond is proposed to be decommissioned and repurposed as a raw water storage basin. The evaporators would be removed.
- PO 224-4 See Response PO 224-1 concerning CEQA Guidelines and responses to comments.
- The Project evaluated in the SEIR includes the SWF (previously constructed facilities), described in DSEIR Section 3.5.1, and Project Modifications (including mitigation measures, which are proposed to avoid or lessen operational impacts). Thus, the SWTP, above-ground storage tanks, raw water storage basin, etc. are all analyzed in the DSEIR; see DSEIR Section 3.5.2.
- PO 224-5 See Response PO 224-3 regarding evaporation pond decommissioning. The Project does not propose to truck RO concentrate to a waste water treatment for "dilution and treatment" and then return it to the percolation ponds. The Project proposes to truck RO concentrate to a permitted hazardous waste facility, where it would be treated and disposed of; see DSEIR Section 3.5.2.
- PO 224-6 As mentioned in Response PO 224-1, economic concerns are not considered a CEQA topic of concern; see CEQA Guidelines §15088. See Responses PO 89-2 and PO 96-1 concerning the emergency project's regulatory framework. See Responses PA 7-4 and PA 7-9 concerning the Emergency Coastal Development Permit.



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June 14, 2017

Robert Gresens, PE
Cambria Community Services District
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Rita Garcia
Michael Baker International
5 Hutton Centre Dr., Suite 500
Santa Ana, CA 92707

Dear Mr. Gresens and Ms. Garcia:

This letter will address my concerns regarding the FSIER and the SWF project and why it should not be approved: this project is about growth rather than sustainability, and there has never been any public referendum on this project on that basis. A considerable number of fellow ratepayers I have spoken agree that is completely unacceptable.

To go on record, I am not a no-growth supporter; in fact, I have spoken out that with proper infrastructure care and repair, we can build Cambria's future while being able to bring on moderate levels of new construction. Eliminating leaks (like the recent one which wasted millions of gallons of water), we can ensure all ratepayers and businesses the service they need while still having reserves to add a dozen or so new homes a year.

While I believe that there were better ways to develop water source than the current de-sal plant (over budget and clearly plagued with many problems, fines and other Water Board infractions), I am reconciled to this plant as an emergency system, should we find ourselves in another drought. It should be noted the current plant did nothing to help us out of that recent peril. Cambria will not ever run out of water with the plant used as an emergency system. On that basis, to save our town, those costs must now be absorbed.

225-1

Another contention in the FSEIR is that residents have been 'suffering with bucket hauling' and other extreme measures to meet basic needs. I fail to understand this. For the last two years, my wife and I have had an allotment of eight units bi-monthly and we typically use four. We flush, take reasonable showers, use the dishwasher and laundry regularly, and refill a 350-gallon hot tub (every four months) with zero hardships. We wash our cars at the local gas station in minutes for \$8 using recycled water; this seems to be typical for the other residents I speak to.

At a recent NCAC meeting, President Rice claimed no knowledge of plans for an ocean effluent outfall (even though the option is included in the FSEIR). Yet she clearly expressed that option as 'off the table;' I will take her at her word that an ocean outfall into the marine sanctuary is indeed out of the question.

225-2

This leaves the trucking option for effluent. From what I can determine from the FSEIR, operation of the plant as proposed would result in ten daily truckloads of effluent, thus twenty trips to and from any site. One disposal option - trucking waste to the SLO waste outfall is not feasible - as SLO cannot handle that volume of effluent.

225-3

The Kettleman Hills disposal site 93 miles away seems the only option. While this amount of diesel exhaust surprisingly falls below county mandated air quality regulations, trucking and disposal costs as well as system power, staffing, upkeep, and repair will provide Cambria with some of the most expensive commercial water known to existing communities.

225-3

The cited environmental 'benefits' in the FSEIR are completely bizarre. For millions of years, the affected streams have been doing fine without human 'aid;' this argument is a reach at best. Further, the latest Coastal Commission response letter states that this project will dangerously drain the San Simeon Creek and not have the recharge capacity to meet expectations. Additionally, The California Department of Fish and Game response outlines severe threats to several species.

225-4

It is clear that the objective is to produce water for greatly accelerated growth in our town, with costs left to existing ratepayers. During some of the CCSD meetings, I became aware of one home that received an Intent to Serve letter under 'irregular circumstances.' Upon further research, I found that this home was water use rated at forty-four units bimonthly! Are existing ratepayers to finance this kind of service to hundreds of new homes with these kinds of calculations? If so, all ratepayers will certainly want to be informed of their future fiscal burden for those mansions and estates.

225-5

What makes sense for our community is to realize this plant is what it was originally intended to be - an emergency supply. The CCSD should end this folly, and focus on our real needs - infrastructure repairs, upgrades, and financial preparations to relocate and replace our 50 year old waste treatment plant.

Respectfully,

Ted Key
325 Dorset Street
Cambria, CA 93428

**RESPONSE TO COMMENT LETTER NO. PO-225**

Ted Key

June 14, 2017

PO 225-1 In compliance with CEQA Guidelines §15126(d), *Growth Inducing Impact of the Proposed Project*, the County of San Luis Obispo Growth Management Ordinance (GMO) and the Project's potential growth-inducing impacts are discussed in detail in DSEIR Section 6.3, *Growth-Inducing Impacts*. See Responses PA 4-32 and PA 6-7 concerning the Project's water output and potential growth-inducing impacts. See Response PA 4-32 concerning the Buildout Reduction Program (BRP) and growth management regulations already in place. See Response PO 89-3 concerning increased water rates and construction/operational costs.

The DSEIR makes no claim of residents "suffering with bucket hauling," as the comment alleges. DSEIR Section 3.3 provides the Project's purpose and objectives, one of which is to improve the quality of life for local businesses and residents who often resort to extraordinary measures to obtain water supply. The objective then lists what would be considered extraordinary efforts such as physically hauling water or constructing other water storage means. The Project's objective aims to respond in a timely and efficient manner by providing Cambria with adequate water supply for drinking and sanitary needs.

PO 225-2 See Response PO 218-1 concerning Project Alternatives including the Ocean Outfall Alternative.

PO 225-3 The Project's average operations would require four (4) truck trips per day. If the plant was to run 24/7, it would require 10 truck trips per day. However, it is unlikely that the Project would require 24/7 operation for extended periods of time; see DSEIR Section 3.5.2.6.

See DSEIR Section 5.2 for all analyses regarding potential air quality impacts. Economic concerns are not considered a CEQA topic of concern; see CEQA Guidelines §15088.

PO 225-4 See Response PA 12 concerning clarifications to the California Coastal Commission comments. The DSEIR refers to the modified surface discharge as Mitigation Measure BIO-3, not a project "benefit" but is intended to mitigate or lessen Project impacts.

PO 225-5 See Response PO 225-1.



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Received at
6/14/17 Special Meeting

June 14, 2017

Cambria Community Services District (CCSD)
1316 Tamson Drive, Suite 201
Cambria, CA 93428

Please accept the following comments on the Cambria Sustainable Water Supply Project SEIR, formerly scoped as the Cambria Emergency Water Supply Project. I am contributing comments as a private citizen interested in steelhead trout impacted by the project.

Baseline Information

The lack of baseline information upon which the SEIR is based to evaluate project impacts is deeply troubling. No creek habitat typing was completed to generate datasets upon which to gauge project impacts. No comprehensive watershed-wide Steelhead Abundance and Distribution Survey was conducted to evaluate how population changes related to the project's actions would be reflected in population numbers in the future. Such a study provides strong representation of the general distribution and relative abundance of steelhead and presence/absence of other species for San Simeon Creek. The approach is repeatable and would provide a good baseline. In addition, it is incumbent upon the CCSD to demonstrate a pattern of drying in reaches downstream of the project foot print that conforms with data provided to substantiate claims of historically dry reaches downstream of the project. Regular flow monitoring and mapping of drying reach downstream of the project site would establish a robust baseline.

226-1

Protocols for Reappearance of Steelhead Trout

The SEIR states,

Additionally, Mitigation Measure BIO-15 requires that the CCSD continue with its existing efforts to monitor the creek habitat adjacent to, and downstream from the Project area, as required by the AMP, and specifies provisions, in the event migrating steelhead reappear within the San Simeon Creek.

226-2

How does the District intend to determine whether or not Steelhead reappear? What protocol will be used? Will the District employ a Didson camera to monitor and record steelhead presence/absence? Will a human monitor be present 24/7 to determine reappearance? If a mechanism of detection is not specified, mitigation measure BIO-15 is meaningless.

Operational Considerations

Steelhead redds have been regularly found in coastal San Luis Obispo County watersheds as late as April. During the development of a Watershed Management Plan for San Simeon Creek, adult Steelhead were observed in San Simeon Creek in May/June 2012.

226-3

Critical Habitat

The SEIR asserts that lower San Simeon Creek is not critical habitat steel head because it typically goes dry naturally 50% of the time during the spring and summer. This assertion is based on the County's gage located approximately 1 mile upstream from the mouth. County data utilized is from the time period 1987-2013. The analysis and conclusions as currently reported raise a number of significant concerns as follows:

226-4

- The County rating curve is located in an erodible cross-section that regularly experiences changes in cross-sectional form. Rating curves in erodible cross-sections must be surveyed and maintained regularly to remain accurate.
- The County rating curve at San Simeon has been neither maintained nor validated by the County (i.e.: the rating curve is not valid).
- The County rating curve does not cite the source of the data utilized in development the curve.

- Clarification of where the data utilized to develop the County rating curve came from and the period of time for which the County rating curve is valid should be obtained from the County.
- If the rating curve is invalid, then any flow analyses and conclusions based on the rating curve could be invalid.
- In an erodible cross-section, the stage value at which the creek has no flow or goes dry would change over time.
- The historical stage value at which the creek has no flow or goes dry could potentially be corrected for; however, no such correctional analysis is reported.
- Analysis of the spring and summer periods should be separated not lumped together. Currently, if Table 1 in Appendix E is correct, spring flows have historically met EWD near 100% of the time in the spring. The potential impact of proposed operations on spring rearing habitat needs to be addressed separately from its impact on summer rearing habitat.
- A summary of known historical surface and groundwater withdrawals near the county gage for the time period 1987-2013 should be summarized and reported. Flows recorded during the time period 1987-2013 may be significantly impacted by human withdrawals.

226-4

Absence of Comments

I find the absence of comments from California State Parks deeply troubling as this agency is responsible for the public trust resources, including steelhead trout, which utilize habitat within the San Simeon State Park. Evidence lacking, I surmise that actual comments from State Parks have been seen as fatal flaws and have therefore been prevented from entering the public record by forces that prevail politically.

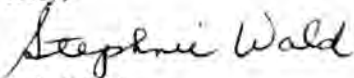
Looking Ahead

Given the combined usage of Santa Rosa Creek and San Simeon Creek to provide water to the community of Cambria, I believe it is in the best interest of the community and the District to pursue a Habitat Conservation Plan that covers both watersheds and enables the District to protect itself from incidental take of Steelhead trout. Grant funds are potentially available to pursue to fund an effort such as this.

226-5

I will continue to urge public trust resource agencies to follow up on the comments they've previously made and to strongly recommend they respond to the District's comments to their comments to ensure that a continuous record of jurisdictional matters remains in play.

Sincerely,



Stephnie Wald
1776 Tierra Nueva Lane
Oceano, CA 93445
swaldcoho@hotmail.com

cc:

Julie Vance, Annette Tenneboe, Joshua Grover, Linda Connolly, Charles Walbridge, Brandon Sanderson and Eric Wilkins, CDFW
Matt McGoogan, NMFS
Tom Luster, California Coastal Commission
Lena Chang and Steve Henry, US Fish and Wildlife Service
Doug Barker, California Department of Parks and Recreation

**RESPONSE TO COMMENT LETTER NO. PO-226**

Stephanie Wald

June 14, 2017

- PO 226-1 The DSEIR is based on appropriate baseline environmental documentation; see DSEIR page 5.3-1 for a list of resources used in the environmental analysis of Biological Impacts. A comprehensive Steelhead Abundance and Distribution Survey was not requested by the regulatory agencies, and was not deemed necessary for DSEIR completion. No steelhead have been observed in San Simeon Creek, San Simeon Creek Lagoon, or Van Gordon Creek during the habitat assessment, CRLF or tidewater goby focused surveys. Additionally, the Project would discharge approximately 100 gpm to the lagoon, and would not “dry out” downstream San Simeon Creek; see Response PA 4-7.
- PO 226-2 See Response PO 226-1 for information regarding steelhead. BIO-15 refers to the AMP (see BIO-7) implementation as the mechanism of detection. If steelhead are identified, management techniques outlined in the AMP would then be implemented.
- PO 226-3 See Responses PO 226-1 and PO 226-2.
- PO 226-4 See Responses PO 226-1 and PO 226-2.
- PO 226-5 No comments were provided by California State Parks on the proposed Project. If such comments were received, they would be included in the FSEIR along with the other comment letters, per CEQA Guidelines Section 15088, *Evaluation of and Response to Comments*. The commenter’s allegations that comments were excluded from the public record are incorrect and unfounded.
- Mitigation Measure BIO-7 ensures implementation of the AMP; see Responses PA 4-7 and 4-8.



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"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

June 16, 2017

Re: Sustainable Water Supply EIR

Honorable Board of Directors
Cambria Community Services District
1316 Tamsen Street Ste. 201
Cambria, Calif. 93428

Honorable Board:

I represent 356 members of the Cambria Chamber of Commerce. A major majority of the chamber members support the Board in approving and certifying the EIR for the sustainable water supply plant. This new water supply is absolutely essential to the residents and businesses in Cambria. I have been a part of several droughts in the past thirty years and it was a severe problem to the economy of Cambria and life style of our residents.

The latest drought which ended this past winter was so severe many of our local business had to use paper and plastic to serve customers and close their rest rooms. This caused a reduction in our tourist business. Several businesses had to close.

Again, we support the approval and certification of the Sustainable Water Supply Plant.

Thank you for your positive vote on the EIR.

A handwritten signature in blue ink that reads "Mel McCulloch". The signature is written in a cursive, slightly slanted style.

Mel McCulloch
President
Cambria Chamber of Commerce

cc: Jerry Gruber

227-1

**RESPONSE TO COMMENT LETTER NO. PO-227**

Mel McColloch

June 16, 2017

PO 227-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

FRANK SCOZZARI

1070 Cleveland Lane
Nipomo, CA 93444
(805) 714-8767
fgscozzari@yahoo.com

CCSD Board of Directors
1316 Tamsen Street, Suite 201
Cambria, CA 93428

June 19, 2017

Re: Certification of EIR

Dear Board Members,

I am a resident of San Luis Obispo County and I have been on the Water Wait List for 29 years now (next year will be 30!). Yes, I've ridden the roller coaster ride that long. I've seen all the projects come and go. I've seen the droughts come and go. I've seen a lot of good ideas and a lot of money wasted. I've paid my taxes all along, paid the wait-list fee, and complied with weed abatement.

The current water project is the best compromise I've seen yet. It balances the need for a sustainable water source with growth control, and does so in the most environmentally friendly way possible.

California will always have its droughts and rainy years. They will come and go. And yes, there will certainly be another drought—that's an absolute. It is sad that it took a prolonged drought to finally get a water project that works. As unfortunate as it might be, sometimes government is reactive rather than proactive.

So now, I urge you to approve the EIR and move forward with this project. When the next drought comes, let us look back upon our leaders who had foresight, and smile.

Sincerely,


Frank Scozzari
Phone: (805) 714-8767

228-1



**RESPONSE TO COMMENT LETTER NO. PO-228**

Frank Scozzari

June 19, 2017

PO 228-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

Greetings CCSD Board,

I would like to urge you to vote to **approve** the EIR.

Twenty years ago, my wife and I purchased a lot in Cambria (parcel 022-071-042). Cambria was going to be our home after retirement. Our position on the wait list improved for a couple of years then the moratorium hit and for the last 16 years or so we have watched patiently while Cambria has struggled to find a common sense solution to the availability of water for its citizens and lot owners, some of whom have waited for decades.

Our governor Jerry Brown has given California the momentum and opportunity to show the world that embracing new technology and innovation is not something to be feared but embraced.

This new plant is an important step in our evolution in dealing with environmental challenges and long term planning. We must not be hindered by fear and paralyzed by our desire to wall off communities under the guise of environmentalism. It is too precious a concept to be used by geographical segregationists.

Let's all work to make Cambria a better place for all of its property owners. This is the fair and right thing to do.

Sincerely,



Nathan Maragoni



229-1

**RESPONSE TO COMMENT LETTER NO. PO-229**

Nathan Maragoni

June 23, 2017

PO 229-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
To: [Rocky Beckner](#)
Cc: [Monique Madrid](#); [Amanda Rice \(directorrice.ccsd@gmail.com\)](#); [Michael Thompson](#); [jim@fogsend.com](#); [Harry Farmer](#)
Subject: RE: Sir
Date: Friday, June 16, 2017 10:38:26 AM

Thank you very much for your email, I will pass this on to the CCSD Board of Directors.

Best regards,

Jerry Gruber.

-----Original Message-----

From: Rocky Beckner [<mailto:rbeckner53@gmail.com>]
Sent: Thursday, June 15, 2017 8:49 PM
To: Jerry Gruber
Subject: Sir

Hi, I would like to urge you to vote to approve the EIR.

My wife and I have a lot in Cambria (parcel 022-226-016) and have watched patiently while Cambria has struggled to find a common sense solution to the availability of water for it's citizens and lot owners, some of whom have waited for decades. Our governor Jerry Brown has given California the momentum and opportunity to show the world that embracing new technology and innovation is not something to be feared but embraced. This new plant is an important step in our evolution in dealing with environmental challenges and long term planning. We must not be hindered by fear and paralyzed by our desire to wall off communities under the guise of environmentalism. It is too precious a concept to be used by geographical segregationists. Let's all work to make California the leader in adopting innovation!

Rocky Beckner

Sent from my iPad

**RESPONSE TO COMMENT LETTER NO. PO-230**

Rocky Beckner

June 15, 2017

PO 230-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
To: GGray18@aol.com
Cc: [Monique Madrid](mailto:Monique.Madrid@ccsd.org); [Amanda Rice \(directorrice.ccsd@gmail.com\)](mailto:Amanda.Rice@ccsd.org); [Greg Sanders](mailto:Greg.Sanders@ccsd.org); [Michael Thompson](mailto:Michael.Thompson@ccsd.org); jim@fogsend.com; [Harry Farmer](mailto:Harry.Farmer@ccsd.org)
Subject: RE: EIR
Date: Monday, June 19, 2017 1:17:05 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)

Thank you ,I will pass this on.

Best regards,

Jerry Gruber, MPA
General Manager
Cambria Community Services District
p: (805) 927-6223
f: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w: www.cambriacsd.org e: jgruber@cambriacsd.org

From: GGray18@aol.com [mailto:GGray18@aol.com]
Sent: Friday, June 16, 2017 9:52 PM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: EIR

Good evening,

My husband and I have been lot owners in Cambria for over 20 years. We have waited patiently for a solution to the water availability problem for residents and lot owners. I ask that you approve the EIR and bring an end to this long drawn out process.

Thank you.

Sincerely,

Sharon Ellington

**RESPONSE TO COMMENT LETTER NO. PO-231**

Sharon Ellington

June 16, 2017

PO 231-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
Sent: Friday, June 16, 2017 10:05 AM
To: Joan Linton <joan@re-pro.com>
Cc: bruce@argusology.com; Amanda Rice (directorrice.ccsd@gmail.com) <directorrice.ccsd@gmail.com>; Greg Sanders <gsanders@nossaman.com>; Michael Thompson <hnybrs@gmail.com>; Harry Farmer <harry@hfastrologer.com>; jim@fogsend.com; Monique Madrid <mmadrid@cambriacsd.org>
Subject: RE: Please certify the EIR

Thank you very much. I will pass this on to the Board of the Directors.

Best regards,

Jerry Gruber.

-----Original Message-----

From: Joan Linton [<mailto:joan@re-pro.com>]
Sent: Friday, June 16, 2017 9:33 AM
To: Jerry Gruber
Cc: joan@re-pro.com; bruce@argusology.com
Subject: Please certify the EIR

To the many this may concern,

My husband and I have owned a parcel on Windsor Blvd for 16 years with the hope that the water issue would have been resolved long ago. We never dreamed that a matter as important as the availability of water to community residents could be so controversial.

Although there has been progress, apparently there is still a devout and resolute contingent that will go to great lengths to keep the matter from being resolved. I can't even imagine all the money and human hours this battle has consumed through the years!

Please certify the EIR so that Cambria and its property owners can get on with their lives. It will be one step closer to ending this water moratorium. We have learned that each baby step is vital. All of Cambria's property owners deserve to be able to utilize their property.

--

Best Regards,

Joan Linton
Remax C.C.Connection
2950 Buskirk Ave. Ste 140
Walnut Creek, CA 94597
925-890-7475
joan@re-pro.com

**RESPONSE TO COMMENT LETTER NO. PO-232**

Joan Linton
June 16, 2017

PO 232-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
To: Diane J. Scaife
Cc: Monique Madrid; Amanda Rice (directorrice.ccsd@gmail.com); Greg Sanders; Michael Thompson; jim@fogsend.com; Harry Farmer
Subject: RE: approving EIR
Date: Monday, June 19, 2017 1:15:27 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)

I will pass this .

Best regards,

Jerry Gruber, MPA
General Manager
Cambria Community Services District
p: (805) 927-6223
f: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w: www.cambriacsd.org e: jgruber@cambriacsd.org

From: Diane J. Scaife [mailto:dscaille@calpoly.edu]
Sent: Friday, June 16, 2017 12:31 PM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: approving EIR

Good afternoon,

I would like you to vote to approve the EIR.

I am a lot owner for many years now. I also live in the central coast so I am very familiar with local resident concerns.

I have been patiently waiting for a healthy and just solution that would allow a slow but steady growth in Cambria. Growth that would take 20 yrs, or more can not be defined as rapid or reckless.

I believe "Michael Baker International" to be very qualified and their report to be thorough, honest and objective. I believe the report should be approved.

It is time for the CCSD to take this step and start a healthy forward process in a long overdue

issue. Cambria is only at 45% of its development now and a large per cent are vacation homes. The fear that Cambria would lose its charm and quaintness is unfounded; everyone I know who is a lot owner would always strive to protect and preserve that, no one interested in Cambria would ever want to change that. But this unfounded phobia is causing a reduction in population, a stagnated economy and some believe a deliberate attempt to put any obstacle, to block the process under the heading of the water issue.

There have been other California coastal towns with the same issue who have been able to overcome it! Standing behind the water issue instead of working to resolve the water issue is unjust, unfair to the people of Cambria, their businesses, and it does nothing to honor the obligation of land purchased from the community to families in order to build their long awaited home.

I have noticed there have been many reasonable solutions to the water problem over the years only to be shot down by activist in the community who find any and all items to object to, whether those items are valid or not, just to stall or discourage the process. I am hoping that this time will not be the same. It's time for all to come together, home owners and lot owners, and proceed with a positive outlook and positive solution. I believe approving the EIR is an essential step to that cooperative goal.

Sincerely,
Diane Scaife
dscaife@calpoly.edu
#023-261-032



RESPONSE TO COMMENT LETTER NO. PO-233

Diane Scaife

June 16, 2017

PO 233-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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From: Jerry Gruber <JGruber@cambriacsd.org>
Sent: Monday, June 19, 2017 1:14 PM
To: Bradley
Cc: Amanda Rice (directorrice.ccsd@gmail.com); Greg Sanders; Michael Thompson; jim@fogsend.com; Harry Farmer; Monique Madrid
Subject: RE: EIR Comment

Thank you Sir, I will pass this on.

Best regards,



Jerry Gruber, MPA
General Manager
Cambria Community Services District
D: (805) 927-6223
F: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w: www.cambriacsd.org e: jgruber@cambriacsd.org

From: Bradley [mailto:skibz@earthlink.net]
Sent: Friday, June 16, 2017 5:31 PM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: RE: EIR Comment

Jerry, Thanks for your reply. Just reread my letter and noticed a significant error (or two) in my composition. I imagine you have the gust of our support and concerns, however if accuracy and gammer count I've edited the letter. Thanks and thank you for all your time and work. Bradley

To CCSD,

My wife are full time Cambria residents. We own and live at 1737 Berwick Dr., Cambria. We also own the property directly behind us at 1730 Benson. The purpose of this email is voice our support for the swift completion of the desalination project and to that end urge the CCSD to approve the Supplemental EIR.

We feel the new water desalination plant is the best solution for protecting property values and insuring a dependable source of municipal potable water. A dependable source also limits potential ownership cost by insuring it would not become necessary for homeowners to construct potable water storage systems along with the associated costs to purchase and haul fresh water. Our children look forward to following our footsteps to Cambria when they are older. It would be a considerable loss for us and our children should property values plummet as a result of an ongoing series of water crises.

234-1

We support the CCSD in their efforts to construct and complete a desalination plant and thank you for your efforts. We urge the approval the Supplemental EIR without further delay.

Most Sincerely,

Bradley and Regina Zane
1737 Berwick Dr
Cambria, CA 93428
805-772-3302

-----Original Message-----

From: Jerry Gruber
Sent: Jun 16, 2017 10:28 AM
To: Bradley
Cc: "Amanda Rice (directorrice.ccsd@gmail.com)" , Greg Sanders , Michael Thompson , "jim@fogsend.com" , Harry Farmer , Monique Madrid
Subject: RE: EIR Comment

Thank you very much. I will pass this on to the CCSD Board of Directors.

Best regards,

Jerry Gruber.

From: Bradley [<mailto:skibz@earthlink.net>]
Sent: Friday, June 16, 2017 10:18 AM
To: Jerry Gruber
Subject: EIR Comment

To CCSD,

My wife are full time Cambria residents. We own and live at 1737 Berwick Dr., Cambria. We also own the property directly behind us at 1730 Benson. The purpose of this email is voice our support for the swift completion of the desalination project and to that end urge the CCSD to approve the Supplemental EIR.

We feel the new water desalination plant is the best solution for protecting property values and insuring a dependable source of municipal potable water. A dependable source also limits potential ownership cost by insuring it would not become necessary for homeowners to construct potable water storage systems along with the associated costs to purchase and haul fresh water. Our children look forward to following our footsteps to Cambria when they are older. It would be a considerable loss for us and our children should property values plummet as a result of an ongoing series of water crises.

We support the CCSD in their efforts to construct and complete a desalination plant and thank you for your efforts. We urge the approval the Supplemental EIR without further delay.

Most Sincerely,

Bradley and Regina Zane
1737 Berwick Dr
Cambria, CA 93428
805-772-3302

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234-1



RESPONSE TO COMMENT LETTER NO. PO-234

Bradley and Regina Zane

June 16, 2017

PO 234-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



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From: Jerry Gruber
To: [Ron Keck](#)
Cc: [Monique Madrid](#); [Amanda Rice \(directorrice.ccsd@gmail.com\)](#); [Greg Sanders](#); [Michael Thompson](#); [jim@fogsend.com](#); [Harry Farmer](#)
Subject: RE: Please certify EIR
Date: Monday, June 19, 2017 1:50:13 PM

Thank you, I will pass this on.

Best regards,

Jerry Gruber, MPA
General Manager
Cambria Community Services District
p:
(805) 927-6223
f:
(805) 927-5584
a:
1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w:
www.cambriacsd.org e: jgruber@cambriacsd.org

-----Original Message-----

From: Ron Keck [<mailto:rdrk@sbcglobal.net>]
Sent: Saturday, June 17, 2017 3:17 PM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: Please certify EIR

We urge you to please certify the EIR of the SWF. As part time residents of Cambria since 2004 we are relieved to finally see progress in solving Cambria's longstanding water issues. Don't let the NO GROWTH minority in town kill the project by creating phony cost crisis and non realistic environmental concerns. This is a well thought out project which can be paid for two times over with the new water and sewer hookup fees to the 600 people on the building wait list. Thank you for your work on this project and please finish the job and secure the permanent permit !! Ron and Donna Keck, Wilcombe Rd , Cambria.

Sent from my iPhone

**RESPONSE TO COMMENT LETTER NO. PO-235**

Ron Keck

June 17, 2017

PO 235-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
To: michael.rost@latcomm.com
Cc: [Monique Madrid](mailto:Monique.Madrid@ccsd.org); [Amanda Rice \(directorrice.ccsd@gmail.com\)](mailto:Amanda.Rice@ccsd.org); [Greg Sanders](mailto:Greg.Sanders@ccsd.org); [Michael Thompson](mailto:Michael.Thompson@ccsd.org); jim@fogsend.com; [Harry Farmer](mailto:Harry.Farmer@ccsd.org)
Subject: RE: Please support the EIR and move forward with sustainable water facility for Cambria
Date: Monday, June 19, 2017 1:42:39 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)
[image004.jpg](#)

I will pass this on.

Best regards,

Jerry Gruber, MPA
General Manager
Cambria Community Services District
p: (805) 927-6223
f: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w: www.cambriacsd.org e: jgruber@cambriacsd.org

From: michael.rost@latcomm.com [mailto:michael.rost@latcomm.com]
Sent: Saturday, June 17, 2017 1:17 PM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: Please support the EIR and move forward with sustainable water facility for Cambria

TO: CCSD Board of Directors
1261 Tamsen Street, Suite 201
Cambria CA 93428

Dear Board of Directors:

I am writing to encourage you to support the recent EIR and move forward with sustainable water facility for Cambria.

As a property owner in Cambria, I urge you to support his sensible action. We have been paying property taxes on a property in Cambria, awaiting the legal provision of water rights.

Sincerely,
Michael Rost

Pierce Avenue
Parcel 024-161-007
Michael Rost
Director of Research and Development
Language Education
+1 925 212 6263

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**RESPONSE TO COMMENT LETTER NO. PO-236**

Michael Rost

June 17, 2017

PO 236-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber <JGruber@cambriacsd.org>
Sent: Monday, June 19, 2017 1:23 PM
To: Benjamin Schick
Cc: Monique Madrid; Amanda Rice (directorrice.ccsd@gmail.com); Greg Sanders; Michael Thompson; jim@fogsend.com; Harry Farmer
Subject: RE: EIR

Thank you, I will pass this on.

Best regards,



Jerry Gruber, MPA
General Manager
Cambria Community Services District
p: (805) 927-6223
f: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w: www.cambriacsd.org e: jgruber@cambriacsd.org

From: Benjamin Schick [mailto:benjamin.schick@telesproperties.com]
Sent: Monday, June 19, 2017 6:39 AM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: EIR

CCSD Board of Directors,
Please approve the EIR and move forward.
Thank you,

Benjamin Schick
Property owner
310-266-8367
Benjamin.schick@telesproperties.com

**RESPONSE TO COMMENT LETTER NO. PO-237**

Benjamin Schnick

June 19, 2017

PO 237-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
To: [Allan Spitz](#); [Amanda Rice](#)
Cc: [Monique Madrid](#); [Amanda Rice \(directorrice.ccsd@gmail.com\)](#); [Greg Sanders](#); [Michael Thompson](#); [jim@fogsend.com](#); [Harry Farmer](#)
Subject: RE: Certifying the EIR
Date: Tuesday, June 20, 2017 12:53:11 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)

Thank you very much. I will forward your email to the CCSD Board of Directors.

Best regard,

Jerry Gruber, MPA
General Manager
Cambria Community Services District
p: (805) 927-6223
f: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
w: www.cambriacsd.org e: jgruber@cambriacsd.org

From: Allan Spitz [<mailto:allancspitz@yahoo.com>]
Sent: Tuesday, June 20, 2017 12:48 PM
To: Jerry Gruber <JGruber@cambriacsd.org>; Amanda Rice <ARice@cambriacsd.org>
Subject: Certifying the EIR

Hello:

I would like to request that you please vote to certify the EIR.

My wife & I have owned our lot in Cambria for many, many years which we bought with a view to building our retirement home which dreams appear to have been crushed by the water moratorium? We are now both in our 70's.

Please don't destroy our dreams!

Thank you in anticipation.

Sincerely,

Allan & Lana Spitz
Cambria Lot APN # 023.016.037

**RESPONSE TO COMMENT LETTER NO. PO-238**

Allan Spitz

June 20, 2017

PO 238-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

From: Jerry Gruber
To: [Bill](#)
Cc: [Monique Madrid](#); [Amanda Rice \(directorrice.ccsd@gmail.com\)](#); [Greg Sanders](#); [Michael Thompson](#); [jim@fogsend.com](#); [Harry Farmer](#)
Subject: RE: Request for Approval of the EIR Supplemental
Date: Tuesday, June 20, 2017 12:01:22 PM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)

Thank you very much. I will pass your information on to the CCSD Board of Directors.

Best regards,

Jerry Gruber, MPA
General Manager
Cambria Community Services District
p: (805) 927-6223
f: (805) 927-5584
a: 1316 Tamsen Street, Suite 201 Cambria, CA 93428
P.O. Box 65 Cambria, CA 93428
W: www.cambriacsd.org e: jgruber@cambriacsd.org

From: Bill [mailto:bmundt@msn.com]
Sent: Monday, June 19, 2017 6:29 PM
To: Jerry Gruber <JGruber@cambriacsd.org>
Subject: Request for Approval of the EIR Supplemental

Dear Mr. Gruber,

As a property owner in Cambria (of Parcel # 024-262-025) I am asking that you please consider the attached copy of a letter that I also sent (via USPS) to the **CCSD Board of Directors** at their address on Tamsen St.

Thank you so much for your consideration of my letter!

Best regards,

Bill Mundt
(303) 475-6288

BTW: I was wondering if, by some very remote chance, you may have any relatives in the Visalia/Tulare area? My grandfather's last name was Gruber and his brother (my mother's uncle who raised her after her mother's death), by the name of John Andrew Gruber, lived in Visalia from the 1930's until his death in the 70's. Just wondered if you might be related to him since Cambria is relatively close to that area.

**RESPONSE TO COMMENT LETTER NO. PO-239**

Bill Mundt

June 26, 2017

PO 239-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.

Emil James Crescenzi Jr.
3000 Galloway Ridge, Apt. K209
Pittsboro, NC 27312
(805)458-3331

CCSD Board of Directors
1316 Tamsen Street, Suite 201
Cambria, CA 93428

June 18, 2017

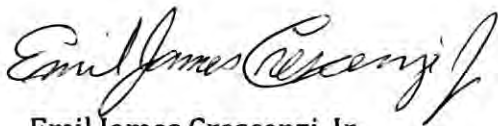
Re: Certification of the Sustainable Water Facility Environmental Impact Report

Dear CCSD Board Members:

We (Elaine and Jim Crescenzi) were residents of Cambria for 15 years, and currently own a lot in Cambria (632 Ashby Lane, Assessment 022-083-055). We left Cambria due to health reasons, to be near family in North Carolina, and to reside in a Continuing Care Retirement Community. We still have a strong interest in and love of Cambria.

We have supported the construction of the Emergency Water Facility (now the Sustainable Water Facility), and strongly urge that the EIR (Environmental Impact Report) be approved. It is an example of applying proven technology to supporting future water needs of Cambria, while also supporting the environment is a very positive way.

Very truly yours,



Emil James Crescenzi, Jr.

240-1

**RESPONSE TO COMMENT LETTER NO. PO-240**

Bill Mundt

June 18, 2017

PO 240-1 This comment makes up a letter that is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



RESPONSE TO PUBLIC COMMENT SESSION COMMENT NOS. PC 01 THROUGH PC 05

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comment letters.

PC 1 These comments did not address the DSEIR's adequacy or raise a significant
through environmental point. CEQA Guidelines §15088(a) requires that a lead agency only
PC 5 evaluate and respond to comments raised on environmental issues. As such, no
 further response is necessary.



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**RESPONSE TO BOARD MEETING COMMENT NOS. BMC 01 THROUGH 28**

See FSEIR Section 12.2, *Lists of Public Agencies, and Persons and Organizations Commenting on the DSEIR*, for a listing of public agencies, persons, and organizations commenting on the DSEIR and the dates of their comments.

BOARD MEETING COMMENT NO. BMC-1

Mike Lyons

Commenter spoke in support of the Project and addressed deficiencies in a local petition.

BMC-1 This comment is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. Comment so noted and will be considered by the decision-makers during their deliberations on the Project. No further response is necessary.

BOARD MEETING COMMENT NO. 2

Christine Heinrich

Commenter does not believe the FSEIR adequately responds to public comments. She stated the Project was rushed through the emergency permit, and now is building a permanent Project. She states several Project components have failed, and the economic impact of the Project will be significant. She recommended against EIR certification.

BMC-2 The comments do not introduce new environmental issues not previously raised and addressed in detail in the Draft and Final SEIRs; see Responses to PO 224.

BOARD MEETING COMMENT NO. 3

John Rokke

Regional Water Quality Control Board

Commenter spoke concerning Section 3.5.3.2, which would allow RO concentrate to naturally evaporate instead of physical removal during the evaporation pond decommissioning. He informed that the RWQCB cease and desist order would, if adopted as proposed, require the CCSD to submit a detailed work plan within 30 days of the adoption. He recommended references pertaining to evaporating liquids being removed.



BMC-3 Comment so noted and will be considered by the decision-makers during their deliberations on the Project. See Response PA 12-18 concerning evaporation pond repurposing.

BOARD MEETING COMMENT NO.4

Thea Tryon
Regional Water Quality Control Board

Commenter spoke concerning the tentative cease and desist order related to how the evaporation pond will be decommissioned. She stated that the RWQCB meeting will be held on July 13th in Watsonville, and the public has the opportunity to provide comments until June 21st. She also stated that this information is available on the Central Coast Regional Water Quality Control Board website.

BMC-4 Comment so noted and will be considered by the decision-makers during their deliberations on the Project. See Response PA 12-18 concerning evaporation pond repurposing.

BOARD MEETING COMMENT NO. 5

Crosby Swartz

Commenter objects to the Project because fiscal impacts have not been identified. He states that purchasing new equipment could add over a million dollars or more to the cost of operating the Project. Acknowledges that Project cost is not an environmental issue, but a problem the community should be aware of.

BMC-5 As discussed in Response PO 89-3, CEQA does not require an analysis of fiscal and economic impacts, as this topic of concern is not a significant effect on the environment (CEQA Guidelines Section 15131, *Economic and Social Effects*). As such, no further response is necessary.

BOARD MEETING COMMENT NO. 6

Steph Wald

Commenter spoke to her concerns regarding steelhead trout in the Project vicinity. She expressed concerns regarding lack of biological and hydrological baseline data. She questioned the effectiveness of BIO-15, how the CCSD will determine if steelhead trout reappear in San Simeon Creek, and what protocol will be used if they do reappear.

BMC-6 The comments do not introduce new environmental issues not previously raised and addressed in detail in the Draft and Final SEIRs; see also Responses to PO 224.



Existing environmental baseline conditions are described in DSEIR Section 3.4, Environmental Setting, and in the *Environmental Setting* sections of each topical area; see DSEIR Sections 5.1 to 5.7. Further, both DSEIR Section 5.3, Biological Resources, and Section 5.5, Hydrology and Water Quality, include detailed baseline data (existing conditions discussions), including listings of previously completed technical studies.

BOARD MEETING COMMENT NO. 7

Leslie Richards

Commenter chose not to speak.

BMC-7 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.

BOARD MEETING COMMENT NO. 8

Susan Johnson

Commenter owns the schoolhouse property across from the Project, said APN referenced in DSEIR and PA 4-6 and PA 4-8 are incorrect, and water right allotment listed is incorrect. She also stated that PA 12-13 downplays the extent of flooding issues on the Project site. She states the different water use reports using fiscal years and calendar years skews the data to be advantageous to the CCSD.

BMC-8 Comments so noted and will be considered by the decision-makers during their deliberations on the Project. See Responses PA 4-29 and PA 12-16 concerning potential impacts associated with flooding. See Responses PA 4-6 and PA 7-5 concerning water rights.

BOARD MEETING COMMENT NO. 9

Tina Dickason

Commenter spoke to her concerns regarding CCSD communication with regulatory agencies (particularly the Coastal Commission) during the DSEIR process. She expressed concern that letters from Coastal Commission on the IS/MND were not addressed. She predicted it will be a long road to permit the project with Coastal Commission, and said she finds the EIR confusing.

BMC-9 Comments so noted and will be considered by the decision-makers during their deliberations on the Project. See Response PO 140-1 concerning the public review and comment period, which is for the Project evaluated in the DSEIR, and not the



IS/MND; see also Response PA 7-4 concerning the IS/MND. The comments do not introduce new environmental issues not previously raised and addressed in detail in the Draft and Final SEIRs; see Responses to PO 200 and PO 221.

BOARD MEETING COMMENT NO. 10

Laura Swartz

Commenter expressed desire to go back with the Coastal Commission and apply for an emergency permit instead of applying for a permanent permit. She expressed desire to do a review of the costs, and how they will be recuperated. She is concerned that the BRP will not be effective if there is a lack of funding, and that will affect the Project.

BMC-10 See Response PA 7-9 concerning the E-CDP. As discussed in Response PO 89-3, CEQA does not require an analysis of fiscal and economic impacts, as this topic of concern is not a significant effect on the environment (CEQA Guidelines Section 15131, *Economic and Social Effects*). See Response PA 4-32 concerning the BRP and WMP.

BOARD MEETING COMMENT NO. 11

Jeff Hellman

Commenter spoke to concerns regarding the Coastal Commission letter from Tom Luster, and concerns regarding the Project and EIR cost. He would like the District to respond to Tom Luster's letter, along with cooperating with the Coastal Commission.

BMC-11 See responses to Letters PA 2 and PA 9, which address the Coastal Commission's letters. CEQA does not require an analysis of fiscal and economic impacts, as this topic of concern is not a significant effect on the environment (CEQA Guidelines Section 15131, *Economic and Social Effects*).

BOARD MEETING COMMENT NO. 12

Elizabeth Bettenhausen

Commenter spoke to ecosystem connectedness, and does not believe in autonomous individualism. She is concerned about the conflict between Project waste at Kettleman or at the southern SLO facility. She expressed concern about a lack of biological baseline, and difficulty enforcing BIO-15. She is also concerned about economic impacts. She does not believe public comments were adequately addressed in the FSEIR and brought up concerns with water leaks.



BMC-12 See Responses PA 4-15, PA 4-19, PA 4-33, and PA 7-10 concerning potential impacts associated with the routine transport, use, and disposal of hazardous materials for the Project and RO Concentrate Ocean Outfall Disposal Alternative. See Response BMC-6 concerning baseline data. See Response PO 191-8 concerning the Project's Mitigation Monitoring and Reporting Program (MMRP), which would ensure compliance with BIO-15, which was developed by a qualified biologist. CEQA does not require an analysis of fiscal and economic impacts, as this topic of concern is not a significant effect on the environment (CEQA Guidelines Section 15131, *Economic and Social Effects*). Overall, the comments raised are similar in nature to comments previously raised; see also Responses to PO 185 and PO 217.

BOARD MEETING COMMENT NO. 13

Mary Webb

Commenter summarized comments from the Coastal Commission letter (PA 12), and expressed concerns regarding the AMP not being available to the public. She is concerned that the Project changed from an emergency Project to a growth inducing Project. She expressed desire for stream flow studies, water quality monitoring program, and biological mitigation measures. She is also concerned about economic impacts.

BMC-13 See Responses PA 12-1 to PA 12-12, which address the Coastal Commission letter. See Response PA 9-1 concerning the AMP being made available to the public. Additionally, the AMP includes an extensive monitoring program. The Project's potential growth-inducing impacts are discussed in detail in DSEIR [Section 6.3, Growth-Inducing Impacts](#); see also Responses PA 4-32 and PA 6-7. CDM Smith completed an instream flow study of the San Simeon Creek, which is provided as DSEIR [Appendix E6](#). See Response PO 191-8 concerning the Project's MMRP, which would ensure compliance with biological mitigation measures. CEQA does not require an analysis of fiscal and economic impacts, as this topic of concern is not a significant effect on the environment (CEQA Guidelines Section 15131, *Economic and Social Effects*).

BOARD MEETING COMMENT NO. 14

James Spencer, UnClog Cambria

Commenter is a member of UnClog Cambria and spoke in support of the Project. He urged for EIR certification, as it would benefit the community's economy and quality of life.

BMC-14 This comment is in support of the Project, and does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.

**BOARD MEETING COMMENT NO. 15**

Constance Gannon

Commenter represented Greenspace: The Cambria Land Trust, and expressed concern regarding San Simeon Creek. She urged for a San Simeon Creek Watershed Management Plan, and for more hydrological and biological research to be used as a baseline for the adaptive management plan.

BMC-15 The comments raised are similar in nature to comments previously raised; see Responses to PO 191 and PO 223. Potential impacts to San Simeon Creek area addressed in DSEIR Section 5.3, *Biological Resources*, and in the FSEIR. A Watershed Management Plan is a regional/watershed-wide issue that is beyond the Project's scope. See Response BMC-6 concerning baseline data.

BOARD MEETING COMMENT NO. 16

Director Jim Bahringer

Director Bahringer requested information from Michael Baker International's qualifications and experience with similar environmental impact reports.

BMC-16 Michael Baker International completes environmental documentation for a range of public agencies (including cities, counties, special districts and public utilities) and private sector clients. Rita Garcia and Glenn Lajoie each have 30 years of experience in the environmental field, and a 20-year plus professional relationship with the CCSD. Rita Garcia is also working on an EIR for a 60 million gallon per day desalination facility in Los Angeles. Michael Baker possesses sufficient qualifications and experience to prepare the EIR.

BOARD MEETING COMMENT NO. 17

President Amanda Rice

President Rice explained there were previous attempts to create a San Simeon Creek Watershed Management Plan in the past, but there was resistance from riparian landowners. She indicated desire to have a discussion regarding the Project's purpose and objectives. She asked a question regarding updates to the regular CDP application, and what kind of modifications would be needed.

BMC-17 Comment so noted concerning the Watershed Management Plan. It is also noted a Watershed Management Plan is a regional/watershed-wide issue that is beyond the Project's scope. The Project's purpose and objectives are discussed in DSEIR Section 3.3, *Project Purpose and Objectives*, and DSEIR Section 7.0, *Alternatives to the Proposed Project*, as well as in DSEIR Section 1.0, *Executive Summary*. To ensure



consistency between DSEIR [Section 3.3](#) and DSEIR [Section 7.0](#), DSEIR Page 7-2 is revised in the FSEIR as follows:

PROJECT OBJECTIVES

The proposed Project objectives, as referenced in [Section 3.3, *Project Purpose and Objectives*](#), are as follows:

- 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 (Cambria Community Services District (CCSD) wait list), pursuant to the NCAP and mitigation set forth in the CCSD's certified 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 District'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).
- Improve water use efficiency by avoiding the need to periodically pump groundwater into the Van Gordon Creek to maintain a positive gradient between the up-gradient potable well field and the treated wastewater percolation ponds.



- 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 and disposing of reverse osmosis (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 and its potential impacts.
- 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 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 residents and business owners and operators, 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.
- Enhancing local fire protection resources for residences and businesses, as well as the surrounding highly vulnerable forest.
- 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.

See Responses PA 7-9 and PO 89-2 for detailed discussions concerning the E-CDP, R-CDP, and NOE. As stated, the CCSD submitted its application to the County for an R-CDP on June 13, 2014. An update to the R-CDP application is necessary to reflect, among other updates, the proposed Project modifications (including mitigation measures) concerning evaporation pond and lagoon surface discharge operations.

BOARD MEETING COMMENT NO. 18

Tim Carmel

Tim Carmel clarified that the Project permits are currently pending, and applications would need to be revised to reflect the Project modifications.

BMC-18 See Response BMC-17.

BOARD MEETING COMMENT NO. 19

President Amanda Rice

President Rice asked which Project modifications are included in the Project, and is unclear why the Project is not the environmentally superior alternative as described in the EIR alternatives section.

BMC-19 The Project modifications discussed in Section 3.5.2, Project Characteristics – Mitigation Measures (Project Modifications), and updated through FSEIR Section 12.4, Errata to the Draft Subsequent EIR, are included in the Project. As concluded in Section 7.4, “Environmentally Superior” Alternative, the environmentally superior alternative is the RO Concentrate Ocean Outfall Disposal Alternative, since it addresses 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). See following from DSEIR Section 3.5.2.6, Offsite RO Concentrate Disposal:

“Concentrate from the RO treatment process would be hauled away to a disposal site, such as the Kettleman Hills Hazardous Waste Facility (Kettleman Hills),



which is located in Kings County, California, southwest of Kettleman City on State Route 41, approximately 85 miles from the Project site. For purposes of assessing the worst case scenario in terms of hauling distance and transportation impacts, the Kettleman Hills disposal location has been used within this SEIR."

As noted above, environmental analysis regarding RO concentrate disposal at Kettleman Hills represents the worst case scenario. Since DSEIR release, the CCSD has obtained a Brine Waste Disposal Permit from South San Luis Obispo County Sanitation District (SSLOCSD) for the purposes of RO concentrate disposal. As the SSLOCSD is significantly closer to the Project site than the Kettleman Hills facility (approximately half the distance), the DSEIR's analysis is a conservative, worst case scenario. Assuming SSLOCSD as the ultimate destination for RO concentrate disposal, impacts would be less significant than analyzed in the DSEIR.

The Project considered by the CCSD Board can ultimately include the components described in Section 3.0, Project Description, (as updated through FSEIR Section 12.4, Errata to the Draft Subsequent EIR), as well as ultimate disposal at SSLOCSD.

BOARD MEETING COMMENT NO. 20

Vice President Gregory Sanders

Vice President Sanders explained that Michael Baker International was unfairly maligned, as the company is known for producing legally defensible EIRs in compliance with CEQA. He asked Glenn Lajoie how many EIRs have been challenged in court. He indicated the CCSD has been communicating with the Coastal Commission. He also stated that the time for public comment period last October was the appropriate time to bring comments to the Board, and now it is too late in the game to raise new issues.

BMC-20 There have been a nominal number of legal challenges on Michael Baker environmental documentation, and Michael Baker was successful in each challenge.

BOARD MEETING COMMENT NO. 21

President Amanda Rice

President Rice expressed desire to discuss the Project purpose and objectives, as they are different than the original purposes approved in 2014.

BMC-21 See Response BMC-17.

**BOARD MEETING COMMENT NO. 22**

Director Harry Farmer

Director Farmer spoke to impacts listed as “less than significant,” and is concerned about the Coastal Commission letter from Tom Luster, indicating several significant concerns. He is concerned about the financial dilemma. He does not want waste trucked to Kettleman Hills due to pollution generated by 10 truck trips a day. He is concerned the Project will only be paid for through “will serve” letters and that will greatly impact the community.

BMC-22 See also responses to Letters PA 2 and PA 9, which address the Coastal Commission’s comments in detail. Comments regarding Coastal Commission concerns are noted and will be considered by the CCSD Board during their deliberations on the Project. Further, the Project’s potential impacts are addressed in detail in the Draft and Final SEIRs. Comment concerning how Project will be paid will be considered by the CCSD Board during their deliberations on the Project.

DSEIR Table 5.2-7, Total Operational Air Emissions with Mitigation Measures (Project Modifications), provides estimates of the operational emissions from the proposed mitigation measures (Project modifications), which include SWTP energy consumption emissions and RO concentrate disposal hauling/mobile (truck trip) emissions. DSEIR Table 5.2-7 also shows the total operational air emissions generated by the Project, which includes the AWTP energy consumption (see DSEIR Table 5.2-6) emissions plus the SWTP energy consumption and RO concentrate disposal hauling/mobile (truck trip) emissions. It is noted, the evaporator system energy consumption operational emissions would not occur, since the evaporators would be decommissioned, as part of the Project modifications. As presented in DSEIR Table 5.2-7, the Project’s total operational emissions (SWF plus the mitigation measures (Project modifications)) would not exceed SLOAPCD thresholds. Therefore, the combined total Project operations would result in less than significant impacts concerning operational air emissions.

BOARD MEETING COMMENT NO. 23

Director Michael Thompson

Director Thompson spoke to property owners on the waitlist, explaining they contribute to the community through taxes but do not get to enjoy the benefits of the community. He explains the population is declining, and business is down. He believes there should be some degree of growth so more can afford to live in Cambria, and the community could pay for needed improvements.



BMC-23 Comments regarding waitlist, population, and growth are noted and will be considered by the CCSD Board during their deliberations on the Project.

BOARD MEETING COMMENT NO. 24

Director Jim Bahringer

Director Bahringer spoke to balancing public safety needs with keeping Cambria rural. He explains Cambria will not remain a great place to live if scarcity drives up prices.

BMC-24 Comments regarding balancing public safety with keeping Cambria rural and price increases will be considered by the CCSD Board during their deliberations on the Project.

BOARD MEETING COMMENT NO. 25

President Amanda Rice

President Rice called for a motion on the continuum, with a clarification to a date uncertain. She asked if there were any public comment on closed session.

BMC-25 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.

BOARD MEETING COMMENT NO. 26

Mary Webb

Commenter indicated the Board's discussion and decision making in closed session is not brought back to the community. She indicated the community has the right to know who is suing the CCSD and how much it will cost to defend the community.

BMC-26 This comment does not address the DSEIR's adequacy or raise a significant environmental point. CEQA Guidelines § 15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues. As such, no further response is necessary.



BOARD MEETING COMMENT NO. 27

President Amanda Rice

President Rice announced the time of the next regular board meeting, and adjourned the session.

BMC-27 This comment does not address the DSEIR's adequacy or raise a significant environmental point. As such, no further response is necessary.



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