

Addendum to the 2017 Subsequent Environmental Impact Report for the Cambria Water Reclamation Facility Project

SCH NO. 2014061073

JULY 2025

PREPARED FOR

Cambria Community Services District

PREPARED BY

SWCA Environmental Consultants

**ADDENDUM TO THE
2017 SUBSEQUENT ENVIRONMENTAL IMPACT REPORT
FOR THE CAMBRIA WATER RECLAMATION FACILITY
PROJECT**

SCH NO. 2014061073

Prepared for

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Appendix A. Cambria Sustainable Water Facility Project (2017 SEIR)

1 INTRODUCTION

In July 2017, the Cambria Community Services District (CCSD), serving as the lead agency under the California Environmental Quality Act (CEQA), certified a Subsequent Environmental Impact Report (EIR) for the Cambria Sustainable Water Facility Project (2017 SEIR) to evaluate the construction and operation of a Sustainable Water Facility (SWF) at the CCSD's existing San Simeon well field and percolation pond system property. The SWF (original project) was designed as a modification to the CCSD's Emergency Water Supply Project (EWSP), which was constructed in 2014 to treat brackish groundwater and treated wastewater using advanced treatment technologies, in order to augment the CCSD's potable water supply in response to the area's extreme drought (Michale Baker 2017; State Clearinghouse No. 2014061073; Appendix A).

The 2017 SEIR was prepared to analyze potential environmental impacts and identify feasible mitigation measures associated with converting the EWSP to a SWF. The 2017 SEIR for the SWF tiered from the Cambria Water Master Plan Program EIR (State Clearinghouse No. 2004071009) which was certified in August 2008. The 2017 SEIR was certified in July 2017 but no entitlements for the project were obtained and no work to convert the EWSP to a SWF was completed.

The CCSD is now seeking to modify the EWSP to operate as a Water Reclamation Facility (WRF; proposed project). The proposed project would include the installation of a Zero Liquid Discharge (ZLD) facility which would replace the EWSP's brine evaporation pond and mechanical spray evaporators. As such, this Addendum has been prepared to support the request by the CCSD for a Development Plan and Coastal Development Permit (CDP; DRC2013-00112) allowing regular operation of the proposed WRF. The EWSP was previously approved to operate on an emergency basis pursuant to an Emergency CDP (ZON2013-00589) issued May 15, 2014.

1.1 Purpose of Addendum

Pursuant to Section 21166 of CEQA and Section 15162(a) of the State CEQA Guidelines, when a lead agency has certified an EIR for a project, a subsequent EIR does not need to be prepared for the project unless the lead agency determines that one or more of the following conditions are met:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Additionally, State CEQA Guidelines Section 15164 provides the following guidance for preparation of an EIR addendum:

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This document is an Addendum to the 2017 SEIR and has been prepared to evaluate the impacts of modifications to the original project identified in the 2017 SEIR; those modifications are referred to herein as the "proposed project." As discussed in the following analysis, the proposed project modifications would not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact; therefore, preparation of a Supplemental or Subsequent EIR is not required.

1.2 Basis for Addendum

In accordance with Section 15164 of the State CEQA Guidelines, the CCSO has determined that this Addendum to the 2017 SEIR is necessary to document changes that have occurred to the project description since the 2017 SEIR was originally certified. The changes proposed are relatively minor in nature and, as documented in Chapter 4, Environmental Impact Analysis, of this Addendum, would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Additionally, no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified has been identified. The CCSO has reviewed and considered the information contained in this Addendum and finds that the preparation of subsequent CEQA analysis that would require public circulation is not necessary.

This Addendum does not require circulation because it does not provide significant new information that changes the certified EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. In addition, it is anticipated that the County of San Luis Obispo (County) will consider this

Addendum along with the 2017 SEIR as part of its discretionary review of the requested Development Plan and CDP (DRC2013-00112).

2 SUMMARY DESCRIPTION OF THE ORIGINAL PROJECT

2.1 2008 Program EIR for the Cambria Water Master Plan

The CCSD adopted the Recycled Water Distribution System Plan, Potable Water System Distribution Analysis, and Assessment of Long-Term Water Supply Alternatives in August 2008 to provide a framework for their long-term water supply strategy. Project components were analyzed together as part of CCSD's Water Master Plan (WMP) Program Environmental Impact Report, including the following elements: seawater desalination, recycled water system, water demand management, potable water distribution system improvements, and buildout reduction program. The Program EIR for the WMP (State Clearinghouse No. 2004071009) is herein referred to as the 2008 PEIR and was certified on August 21, 2008, by the CCSD.

2.2 2017 Subsequent EIR for the Cambria Sustainable Water Facility Project

The 2017 SEIR for the SWF tiered from the 2008 PEIR. The project site proposed for development of the SWF by the 2017 SEIR was the same as the site proposed for development of a Seawater Desalination Facility by the 2008 PEIR. Accordingly, the 2017 SEIR addressed site-specific conditions and focused its analysis on changes to the project and to circumstances with which the project was being undertaken that may have occurred since the certification of the 2008 PEIR.

The 2017 SEIR analyzed the environmental impacts resulting from the modification of the CCSD's existing EWSP to a SWF at the CCSD's existing San Simeon well field and percolation pond system property. The original project was designed to treat brackish groundwater using advanced treatment technologies to augment Cambria's potable water supply during the current epic drought, future droughts, and other dry periods by recharging the San Simeon well field aquifer with advanced treated water to meet State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW) standards for indirect potable reuse of recycled water via groundwater recharge. Also, membrane filtration effluent and/or de-chlorinated and oxygenated product water was to be surface discharged near the upstream end of San Simeon Creek Lagoon to protect San Simeon Creek Lagoon during dry weather conditions. The original project was designed to serve no more than 4,650 existing and future residential units. The SWF components are described below.

2.2.1 Source Water Extraction Well

Brackish source water is pumped from existing Well 9P7 and is a blend of native basin groundwater (San Simeon Creek underflow), deep aquifer brackish water (diluted seawater that occurs from the subterranean dispersion of salts from a deeper saltwater wedge into an overlying freshwater interface zone) and percolated secondary effluent from the CCSD's wastewater treatment plant (WWTP).

The source water for the SWF is the same as the EWSP and did not include modifications for the SWF.

2.2.2 *Advanced Water Treatment Plant (AWTP)*

The AWTP treats the brackish source water to advanced treated water quality standards suitable for injection further upstream into the groundwater basin to augment the CCSD's potable water supply. A portion of the advanced treated water is also conveyed to a point immediately upstream of the San Simeon Creek Lagoon to maintain water levels in the lagoon during dry weather conditions.

The AWTP uses three main treatment processes: membrane filtration (MF), reverse osmosis (RO), and advanced oxidation process (AOP) that utilizes ultraviolet (UV) light and hydrogen peroxide. The source water is first pumped from the existing CCSD well 9P7 and conveyed to the AWTP. The treatment process begins with MF, which removes fine particles from the source water. Next, reverse osmosis removes salt and other complex organic matter. The water then undergoes an advanced oxidation process where UV light and hydrogen peroxide are used to remove trace organic compounds that are not fully removed by the RO membranes. Finally, post-treatment stabilizes the water to prevent corrosion of the conveyance pipeline and pumping equipment. The AWTP process flow is shown in Figure 6.

The AWTP was constructed as part of the EWSP in 2014 and did not include modifications for the SWF.

2.2.3 *Recharge Injection Well (RIW-1)*

The AWTP-treated product water is pumped for injection into the groundwater basin at the San Simeon Well Field utilizing the recharge injection well (RIW-1) constructed as part of the EWSP and located west of the existing potable supply water Well SS-3. RIW-1 has a 5.0-foot stainless steel sediment trap below the well screen. A total of 425 gallons per minute (GPM) of treated product water is injected into RIW-1. The wellhead facilities are above grade and include steel pipe, a control valve to control the flow into RIW-1, a flow meter to measure the flow, and isolation valves to remove above-ground equipment. No pumps or noise-generating equipment are located at RIW-1. A small control panel is provided at the wellhead.

Reinjection of the AWTP treated product water, in addition to eventually being available for extraction as potable water, is intended to maintain the water elevation at the potable well field higher than the secondary effluent mound and higher than the mean sea level. This serves as a barrier to prevent secondary effluent and seawater (brackish water) from moving inland to the potable well field and freshwater water aquifer.

RIW-1 was constructed as part of the EWSP in 2014 and did not include modifications for the SWF.

2.2.4 *Brine Storage, Treatment, and Disposal*

AWTP-generated waste stream from the RO process (RO concentrate or RO reject water), as well as any chemical cleaning waste, is sent to the brine evaporation pond where the RO concentrate is evaporated naturally and by five mechanical spray evaporators located on the western side of the pond, approximately 25 feet apart, each surrounded by a three-sided sound enclosure. Concentrated salt build-up creates a slurry that is removed via submersible pumps and is temporarily sent to two 21,000-gallon Baker tanks for intermediate storage before being pumped to tanker trucks for offsite disposal at a properly licensed and regulated facility, such as the South San Luis Obispo County Sanitation District (SSLOCSO), which is in Oceano, approximately 53 miles south of the project site. The 2017 SEIR estimated that concentrated slurry would need to be removed once every decade.

Van Gordon Reservoir was converted into the brine evaporation pond and mechanical sprayers and Baker tanks were constructed as part of the EWSP in 2014. The SWF would modify the brine storage, treatment, and disposal process by instead discharging the RO concentrate or reject water to four Baker tanks for

storage and then hauling it offsite for disposal rather than evaporation. The four Baker tanks would be located immediately east of the AWTP. For purposes of the 2017 SEIR, it was assumed that 10 truck trips per day would be needed to haul RO concentrate or reject water to the Kettleman Hills Hazardous Waste Facility, approximately 85 miles east of the project site. Kettleman Hills Hazardous Waste Facility was used as a worst-case scenario for hauling distance and transportation-related impacts, but RO concentrate or reject water could also be hauled to SSLOCSD.

2.2.5 Van Gordon Reservoir

The original project proposed to convert the evaporation pond to a potable water supply storage basin by removing the RO concentrate and salt build-up and cleaning the liner. Water would be pumped from CCSD wells SS-1 and SS-2 to the basin during the wet season for storage. Approximately 6 to 7 million gallons of raw potable water could be stored and used for the CCSD's water supply (after treatment) and could also be used in the event of wildfire for fire-fighting helicopters. A pump station would pump water from the basin to a surface water treatment plant (SWTP) to improve water quality.

2.2.6 Surface Water Treatment Plant (SWTP)

The original project proposed to construct a SWTP adjacent to the AWTP and additional Baker tanks to treat the surface water from the Van Gordon Reservoir potable water supply storage basin. The SWTP would be sized to treat 500 GPM of water. The SWTP would include an MF influence break tank, MF feed pump, MF system, treated water transfer tank, and pump station. The MF system would be installed as a container system, similar to the AWTP, approximately 8.5 feet by 53 feet, with a height of approximately 10 feet. A new pad mount transformer would be installed to power the SWTP.

2.2.7 San Simeon Creek Lagoon Surface Discharge

To maintain and enhance the San Simeon Creek Lagoon, MF effluent and/or de-chlorinated and oxygenated treated AWTP product water is pumped during dry weather conditions for surface discharge to the upstream end of San Simeon Creek Lagoon. The filtrate (lagoon water) pipeline (constructed with the EWSP) delivers the lagoon water from the AWTP to a surface discharge structure. The discharge structure, located just north of the San Simeon Creek tree line (Figure 3), dissipates velocity to create a sheet flow of lagoon water before entering the upstream end of the San Simeon Creek Lagoon. The quantity of lagoon water delivered depends on the results of monitoring and surveys performed under the Adaptive Management Plan (AMP) but is anticipated to be approximately 100 GPM when the creek is dry.

The Lagoon Surface Discharge was constructed as part of the EWSP in 2014. The 2017 SEIR considered extension of the filtrate pipeline to relocate the discharge point further south to the San Simeon Creek bank (Figure 4). The filtrate pipeline would be routed/placed by hand to protect the riparian habitat. This discharge location was identified to avoid interfering with Well 16D1 water quality samples and more efficiently deliver surface water into the upper San Simeon Creek Lagoon area. At the relocated discharge point, articulating concrete block (ACB; ArmorFlex) lining or similar erosion prevention measures (approximately 87 square feet) would be installed to protect the San Simeon Creek channel bank. ArmorFlex would further protect the channel from potential erosion.

2.2.8 Monitoring Wells

Five monitoring wells installed as part of the EWSP (MW-1, MW-2, MW-3, MW-4, and MIW-1; Figure 3). MW-1, MW-2, and MW-3 are up-gradient and down-gradient from the existing brine evaporation pond. MW-4 was installed outside the tree drip line and approximately 150 feet up-gradient from the

lagoon water discharge structure to replace the existing Well MW-16D1. MW-4 was constructed in response to RWQCB concerns over the 100 GPM filtrate product water potentially biasing its testing towards higher quality results. MW-4 is used to monitor groundwater quality downgradient of the percolation ponds. These wells are approximately 3.0 feet in height. MIW-1 is located between RIW-1 and the existing production wells at the well field. No modifications to the monitoring wells were proposed for the SWF.

2.2.9 *Production Flows*

The AWTP source water flow rate is approximately 629 GPM. Assuming process-associated losses and a 100 GPM flow of treated product water to recharge San Simeon Creek Lagoon, the AWTP's daily average treated product water flow rate is approximately 452 GPM. Therefore, 452 GPM of treated product water would be pumped to RIW-1 and would incur at least 60 days residence time before reaching existing potable production Wells SS-1 and SS-2. A total of 400 GPM extraction from existing potable production Wells SS-1 and SS-2 (or a combination of both) could occur during WRF operation.

2.2.10 *Hours of Operation*

The 2017 SEIR assumed the SWF would operate at maximum capacity for 24 hours per day, 7 days per week, during the driest time of the year, for approximately 6 months. It was anticipated that the average operation of the SWF would be 9 hours per day, 4 days per week, over the entire year.

3 PROPOSED PROJECT

The project site is located at 990 San Simeon Creek Road, approximately 0.65 miles north of the Cambria urban reserve line and 1.23 miles south of the San Simeon urban reserve line, and is within the Agriculture land use category (designated per the County's General Plan) and the California Coastal Zone. This is the same location as the original project.

The proposed project would convert the EWSP to a WRF, similar to the original project. The WRF would continue to treat brackish groundwater in the lower San Simeon Creek aquifer. The water would continue to go through several stages of treatment to remove solids, salt, organic chemicals, and other contaminants before being reinjected into the aquifer's freshwater supply. While the EWSP is approved to operate only during declared emergency water shortages, the WRF would operate during water shortages and also proactively to prevent water shortages, consistent with the intent of the SWF. The proposed project would serve the CCSD's existing service commitments, which includes 4,075 residential, commercial, and parks/landscape/irrigation existing commitments for water service. This is less than the 4,650 existing and future residential units contemplated by the 2017 SEIR. Several modifications to the existing EWSP and the analyzed SWF are needed to achieve this goal. The following infrastructure and components are proposed to be modified, installed, and/or constructed as part of this project.

- Removal of the five mechanical spray evaporators, leachate collection and removal system, and pond lining from Van Gordon Reservoir (included as Mitigation Measure AES-2 in the 2017 SEIR)
- Installation of permanent ZLD facility and associated infrastructure
- Operation of the WRF up to 24 hours a day, 5 days a week, for 7 months (maximum) during normal and dry precipitation years
- Extension of the San Simeon Creek Lagoon Surface Discharge pipeline to relocate the discharge point further south to the San Simeon Creek bank

Approval of the proposed project would allow the WRF to operate up to 24 hours per day, 5 days per week, for 7 months per year, depending on precipitation. The WRF would produce 425 gallons per minute (GPM) of treated water that would be injected into an existing reinjection well (RIW-1) and would migrate at least 60 days before reaching existing CCSD potable production Wells SS-1 and SS-2. Additionally, approximately 100 GPM of treated and de-chlorinated water would be discharged into San Simeon Creek to maintain and enhance the San Simeon Creek Lagoon during the dry season. The WRF is primarily designed to meet the current demands of the community and ensure a reliable water supply for the existing service connections of the CCSD. However, as part of future operations, evaluations will be conducted through research studies, biological assessments, and consideration of impacts on other stakeholders. These assessments will determine whether the WRF is sufficient to fulfill existing commitments. The project would result in approximately 50 cubic yards of new earthwork and would result in approximately 3.83 acres of new site disturbance on the approximately 95-acre CCSD-owned site (3.6 acres for removal of the pond liner and 0.23 acres for installation of the ZLD facility).

3.1 Proposed Project Components Analyzed in the 2017 SEIR

The following components of the proposed project have already been constructed as a part of the EWSP, were analyzed in the 2017 SEIR's analysis of the SWF, and would be utilized by the proposed project without modification:

- Source Water Extraction Well
- Advanced Water Treatment Plant
- Recharge Injection Well (RIW-1)
- San Simeon Creek Lagoon Surface Discharge
- Monitoring Wells (MW-1, MW-2, MW-3, MW-4, and MIW-1)

3.2 Project Modifications

The proposed project would include the following changes from the existing EWSP and previously analyzed SFW project.

3.2.1 *Brine Storage, Treatment, and Disposal*

3.2.1.1 ZERO LIQUID DISCHARGE FACILITY

The project proposes one of two methods for brine removal. The CCSD-preferred method includes the installation of a new ZLD facility. The ZLD facility would reduce the amount of brine that must be disposed of by removing virtually all of the liquid from the brine, leaving behind a semi-solid brine concentrate. If the ZLD proves to be inefficient, ineffective, or is otherwise unable to be utilized, the CCSD would collect brine concentrate in storage tanks and once full would haul the waste offsite to an approved disposal facility.

Assuming the CCSD's current ZLD pilot program is successful, the CCSD anticipates constructing a permanent ZLD facility to treat the RO wastewater. Construction of the ZLD facility is anticipated to require the pouring of an approximately 100' by 100' concrete pad that would house two 40-foot-long trailers that contain the ZLD equipment. The ZLD facility would be located on a previously graded and disturbed area immediately adjacent (northeast) to the AWTP originally intended for the SWTP and the

four additional Baker tanks. With the ZLD facility, the CCSD would collect the brine wastewater from the AWTP in the two existing 21,000-gallon Baker tanks for intermediate storage before pumping the brine to the ZLD.

If the ZLD facility is not utilized, the CCSD would collect, store, and dispose of brine as described in the 2017 SEIR. The CCSD would acquire four additional brine storage (Baker) tanks. The tank(s) would be double walled with a capacity of approximately 60,000 gallons (the final tank selection will be sized based on maximum RO concentrate volume during peak operation). The RO concentrate pipeline would connect from the third stage RO unit to the intermediate storage tank(s) with a four-inch pipeline.

3.2.1.2 OFFSITE RO CONCENTRATE DISPOSAL

As noted above, the project proposes a ZLD facility, which would significantly reduce the amount of waste that is needed to be hauled offsite. Until the ZLD pilot program is completed, it is unknown how much concentrate will be produced during normal and dry-year operations. However, CCSD estimates that semi-solid brine concentrate disposal would require approximately one truck trip per month, rather than the ten truck trips per day that would be required for liquid brine disposal for similar operations analyzed in the 2017 SEIR. The CCSD would likely haul the brine for disposal to the SSLOCSD; however, if the CCSD were to reach the SSLOCSD daily brine disposal limit, currently set at 50,000 gallons per day (GPD), an alternative disposal site, such as Kettleman Hills Hazardous Waste Facility, would be utilized.

3.2.2 Van Gordon Reservoir

The 2017 SEIR analyzed the reuse of Van Gordon reservoir as a potable water supply storage basin. After removal of the RO concentrate, the pond liner would be cleaned and potable water from groundwater wells SS-1 and SS-2 would be pumped into the basin during the wet season for storage.

During a flood emergency in early January 2017, stormwater drained across San Simeon Creek Road, with a portion of the stormwater entering the EWSP brine evaporation pond. This resulted in a cease-and-desist order from the RWQCB directing the CCSD to stop using the pond for brine disposal. Accordingly, the brine disposal facilities associated with the brine evaporation pond were subsequently decommissioned. The RWQCB approved the final pond closure and termination of the related Title 27 permits at its regional meeting on December 13, 2019. The five mechanical spray evaporators have already been removed consistent with Mitigation Measure AES-2 of the 2017 SEIR.

As part of the proposed project, the CCSD would decommission the reservoir and restore the area to pre-EWSP conditions, without use as a potable water supply storage basin. To achieve this, the pond liner would be removed, and native vegetation would be planted. This would result in approximately 3.6 acres of site disturbance for removal of the pond liner, which was contemplated as part of the 2017 SEIR.

3.2.3 San Simeon Creek Lagoon Surface Discharge Extension

As discussed in Section 2.2.7, the original project included extending the existing filtrate pipeline approximately 300 linear feet to avoid biasing Well 16D1 water quality samples (as requested by the RWQCB). This extension was not completed with the EWSP and would be completed as part of the proposed project, as described in the 2017 SEIR.

3.2.4 *Production Flows*

The AWTP source water flow rate would be about 525 GPM. Assuming process-associated losses and a 100 GPM flow of treated product water to recharge San Simeon Creek Lagoon, the AWTP's daily average treated product water flow rate would be 425 GPM. Therefore, 425 GPM of treated product water would be pumped to RIW-1 and would incur at least 60 days residence time before reaching existing potable production Wells SS-1 and SS-2. A total of 400 GPM extraction from existing potable production Wells SS-1 and SS-2 (or a combination of both) could occur during WRF operation.

3.2.5 *Water Reclamation Facility Hours of Operation*

During normal precipitation years, it is anticipated that operation of the WRF would begin in July and run until September. Operating and maintaining the WRF equipment during normal precipitation years requires onsite full-time staff, although the AWTP is designed to operate with minimal operator intervention. The WRF would be staffed Monday through Friday, 12 hours per day, with two employees per shift for two consecutive shifts (6:00 AM to 12:00 PM and 12:00 PM to 6:00 PM). This operation schedule would generate approximately 17.67 acre-feet of water per month.

In response to a prolonged dry season, the WRF could run for up to 24 hours per day, 5 days per week, between May and October, subject to the AMP and the need to protect ESHA. Under less than average precipitation during a prolonged dry season, the WRF would be staffed Monday through Friday, 24 hours per day, with two employees per shift for three consecutive shifts (4:00 AM to 12:00 PM, 12:00 PM to 8:00 PM, and 8:00 PM to 4:00 AM). This operation schedule would generate approximately 35.4 acre-feet of water per month.

The plant would not need to be operated during wet or normal rainfall periods except for gradient control purposes to prevent saltwater intrusion into the freshwater water aquifer. During such periods of inactivity, the AWTP would be maintained in a ready state, which may include routine operation of equipment and valves and decalcifying the RO elements. Production start and end dates may vary due to well levels, previous wet season rainfall totals, date of flow cessation at Palmer Flats, and projected demands/supply shortfalls based on the CCSD Annual Water Supply and Demand Assessment. The CCSD may also adjust the WRF operational period based on the amount and timing of seasonal rainfall and the groundwater levels within the lower San Simeon aquifer. Other considerations that would influence the timing and duration of plant operation include the AMP, riparian water use, and licensed diversion totals.

4 ENVIRONMENTAL IMPACT ANALYSIS

The 2017 SEIR for the original project identified potentially significant impacts for the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Hydrology
- Land Use and LCP Compliance
- Noise

The 2017 SEIR for the original project identified no impact or a less than significant impacts for the following environmental issue areas:

- Agriculture and Forestry Resources
- Population and Housing

- Energy Conservation
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Mineral Resources
- Public Services and Recreation
- Traffic and Transportation
- Utilities and Service Systems

These environmental issue areas, and two new issues areas added to the CEQA Appendix G checklist since certification of the 2017 SEIR, Tribal Cultural Resources and Wildfire, have been evaluated in this EIR Addendum for the proposed project. This evaluation determines whether the proposed project would result in any new significant impacts or substantially more severe impacts than those identified in the 2017 SEIR for the original project.

4.1 Aesthetics

Section 5.1, *Aesthetics*, of the 2017 SEIR evaluated the original project's potential impacts related to aesthetic resources. The 2017 SEIR determined that the original project would have the potential to degrade the character/quality of the site and surrounding area and could have an impact on scenic vistas. However, with implementation of Mitigation Measures AES-1 through AES-4, the 2017 SEIR found that the original project would have less than significant impacts to aesthetic resources.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those analyzed for the SWTP and operation of the ZLD would not differ significantly from the original project or the existing EWSP.

Consistent with the findings of the 2017 SEIR, the proposed project would not degrade the character/quality of the site and surrounding area during construction. Construction activities would be limited to daytime hours (between 7:00 a.m. and 6:00 p.m.) and would not create a new source of substantial lighting that would affect nighttime views in the area. The proposed project would continue to be subject to Coastal Zone Land Use Ordinance (CZLUO) Sections 23.04.180, 23.04.190, and 23.04.320 to minimize impacts related to lighting and glare. During operations, the proposed project would be consistent with the existing facilities on the project site, and not result in long-term visual impacts related to the degradation of character/quality in the area. No trees would be removed by the proposed project, and exterior lighting would be similar to lighting described in the 2017 SEIR.

The 2017 SEIR found that the SWTP would be visible from Washburn Primitive Campground and hiking trail located to the south of the site, an open area visual resource that contributes to the scenic vistas in the project area. Therefore, the ZLD facility would also be expected to be visible from this location. The 2017 SEIR concluded that with implementation of 2017 SEIR Mitigation Measure AES-3, impacts pertaining to the degradation of character/quality as a result of the original project would be reduced to less than significant when viewed from the Washburn Primitive Campground and its associated hiking trail to the south of the project site. Therefore, the proposed project would require implementation of 2017 SEIR Mitigation Measure AES-3, which would reduce impacts to scenic vistas to less than significant. While the proposed project would be visible from public viewpoints, the proposed project would not result in substantial visual changes beyond the impacts described in the 2017 SEIR.

The 2017 SEIR determined the proposed SWTP would not be visible from Highway 1, an officially designated State Scenic Highway and All-American Road. As the ZLD facility would be constructed in the same location as the SWTP, it would not be visible from Highway 1, and therefore would not cause impacts to a scenic highway.

Further, the proposed project includes the removal of the five mechanical spray evaporators and their enclosures, in addition to the removal of the evaporation pond lining and the leachate collection system from the Van Gordon Reservoir. The removal of the spray evaporators was proposed in the 2017 SEIR through the implementation of 2017 SEIR Mitigation Measure AES-2, however, as the removal of the mechanical spray evaporators are now included as a feature of the proposed project, 2017 SEIR Mitigation Measure AES-2 would no longer apply.

The following mitigation measures described in the 2017 EIR would remain applicable to the overall project with minor revisions as noted:

- ***AES-1** Prior to commencement of construction activities for the Project ~~Mitigation Measures (Project modifications)~~, the CCSD shall confirm that the plans and specifications stipulate that, Project construction shall implement standard practices to minimize potential adverse impacts to the site's visual character, including the following:*
 - *Construction staging areas shall be located as far as practicable from sensitive receptors; and*
 - *Construction areas shall receive appropriate routine maintenance to minimize unnecessary debris piles.*
- ***AES-3** Within one year of completion of the SEIR process and completion of all necessary regulatory agency permits, the CCSD shall color treat the Advanced Water Treatment Plant (AWTP), where reasonable, such that the facilities blend into the surrounding area. Color treatments shall be recommended by a licensed Landscape Architect and by the County. Prior to installation, the Zero Liquid Discharge (ZLD) facility ~~Surface Water Treatment Plant (SWTP)~~ shall be color treated, where reasonable, consistent with the AWTP.*
- ***AES-4** Within one year of completion of the SEIR process and completion of all necessary regulatory agency permits, the CCSD shall hydroseed areas where native vegetation has been removed, where feasible. The County shall confirm that all species selected for hydroseed are indigenous to the area.*

The ZLD facility is comparable to the existing components at the project site and would be visually similar to the SWTP originally proposed by the approve project. Further, removal of the pond lining and discharge systems would restore the Van Gordon Reservoir to pre-development conditions, was contemplated by the 2017 SEIR, and could potentially improve the visual character of the site by reintroducing native vegetation. Therefore, with implementation of 2017 SEIR Mitigation Measures AES-1, AES-3, and AES-4, the proposed project would not create new or more severe impacts to aesthetic resources than previously analyzed in the 2017 SEIR, and no additional mitigation is required. Impacts would remain **less than significant with mitigation**.

4.2 Air Quality

Section 5.2, *Air Quality*, of the 2017 SEIR evaluated the original project's potential impacts related to air quality. The 2017 SEIR determined that after implementation of Mitigation Measure AQ-1, the original project would not conflict with relevant San Luis Obispo County Air Pollution Control District (SLOAPCD) air quality plans and would not exceed the relevant SLOAPCD criteria air pollutant

thresholds for short-term construction emissions or long-term operational emissions, and project impacts would be less than significant.

The proposed project would include the construction of a new 10,000-square-foot ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those required for the SWTP and operation would not differ significantly from the original project.

A quantitative air quality analysis was prepared for the 2017 SEIR which found that construction and operation of the original project, including construction and operation of the SWF, would not exceed any SLOAPCD emissions thresholds. The analysis included the construction of approximately 130,680 square feet of building area, and 250 cubic yards of cut and 250 cubic yards of fill.

Construction of the proposed project ZLD would be similar to the original project's SWTP. The new ZLD facility would result in 10,000-SF of new building area, and 50 CY of cut and 50 CY of fill during construction. As such, the construction of the proposed project would be less intensive than construction of the SWF facility, which was found to not exceed the SLOAPCD emission thresholds. Additionally, the proposed project would implement Mitigation Measure AQ-1 as required by the 2017 SEIR, which would reduce construction-related emissions. The proposed project revisions would not expose sensitive receptors to substantial pollutant concentrations beyond those already discussed in the 2017 SEIR. Additionally, the CCSD estimates that disposal of the semi-solid brine concentrate produced by the ZLD would require approximately one truck trip per month. The 2017 SEIR estimated that the original project would require ten truck trips per day for disposal of the liquid RO concentrate generated by the AWTP. Thus, with the ZLD, the proposed project would result in significantly less daily truck trips, which would limit potential mobile-source air quality emissions during operations. Without the ZLD, the proposed project would result in similar number of daily truck trips and mobile-source air quality emissions during operations.

Construction activities associated with the proposed project could generate airborne odors from the operation of construction vehicles (i.e., diesel exhaust). However, any odors generated by construction activities would be intermittent and temporary and would dissipate considerably before leaving the boundaries of the project site. Thus, construction activities associated with the proposed project would not create objectionable odors affecting a substantial number of people. During operations the CCSD would collect the brine wastewater generated by the AWTP in two existing 21,000-gallon Baker tanks for intermediate storage before pumping the brine to the ZLD. The CCSD estimates that semi-solid brine concentrate disposal would require approximately one truck trip per month. As such, project operations would not generate any odorous emissions affecting a substantial number of people.

The following mitigation measures described in the 2017 SEIR would remain applicable to the overall project and would remain unchanged:

- **AQ-1** *The following measures shall be incorporated into the construction phase of the Project and shown on all applicable plans:*
 - a. *Maintain all construction equipment in proper tune according to manufacturer's specifications;*
 - b. *Fuel all off-road and portable diesel powered equipment, including but not limited to bulldozers, graders, cranes, loaders, scrapers, backhoes, generator sets, compressors,*

auxiliary power units, with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);

c. Maximize to the extent feasible, the use of diesel construction equipment meeting the ARB's 1996 or newer certification standard for off-road heavy-duty diesel engines;

d. Install diesel oxidation catalysts (DOC), catalyzed diesel particulate filters (CDPF) or other APCD approved emission reduction retrofit devices (determination of the appropriate CBACT control device(s) for the Project must be performed in consultation with APCD staff).

Additional Construction Equipment Measures:

e. Electrify equipment where feasible;

f. Substitute gasoline-powered for diesel powered equipment, where feasible;

g. Use alternatively fueled construction equipment on site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel;

h. Use equipment that has Caterpillar prechamber diesel engines;

i. Implement activity management techniques as follows:

i. Develop of a comprehensive construction activity management plan designed to minimize the amount of large construction equipment operating during any given time period;

ii. Schedule of construction truck trips during non-peak hours to reduce peak hour emissions;

iii. Limit the length of the construction workday period, if necessary;

iv. Phase construction activities, if appropriate.

Fugitive PM10 Mitigation Measures. All required PM10 measures shall be shown on applicable grading or construction plans. In addition, the developer shall designate personnel to insure compliance and monitor the effectiveness of the required dust control measures (as conditions dictate, monitor duties may be necessary on weekends and holidays to insure compliance); the name and telephone number of the designated monitor(s) shall be provided to the APCD prior to construction/ grading permit issuance.

j. Reduce the amount of the disturbed area where possible;

k. Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (nonpotable) water should be used whenever possible;

l. All dirt stock-pile areas should be sprayed daily as needed;

m. Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities;

- n. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading should be sown with a fast germinating native grass seed and watered until vegetation is established;*
- o. All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;*
- p. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used;*
- q. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;*
- r. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114. (E-CDP Condition 9)*

The activities associated with construction and operation of the proposed project would be minimal compared to the scope of development analyzed in the air quality analysis prepared for 2017 SEIR. Therefore, with implementation of 2017 SEIR Mitigation Measure AQ-1, the proposed project would not result in any new or more severe air quality impacts than were previously analyzed in the 2017 SEIR, and no additional mitigation is required. Impacts would remain **less than significant with mitigation**.

4.3 Biological Resources

Section 5.3, *Biological Resources*, of the 2017 SEIR evaluated the original project's potential impacts related to biological resources. The 2017 SEIR determined that the original project would have the potential to affect biological resources. However, with implementation of 2017 SEIR Mitigation Measures BIO-1 through BIO-19, the 2017 SEIR found that the original project would have less than significant impacts on biological resources.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP, and does not propose any additional vegetation removal beyond what was completed for the EWSP. Thus, the ZLD facility would not be expected to result in new or more severe impacts to biological resources than were previously analyzed in the 2017 SEIR.

50 cubic yards of cut and 50 cubic yards of fill would be required for construction of the ZLD facility, which is less than the 250 cubic yards of cut and 250 cubic yards of fill required for the SWTP. Implementation of the ZLD facility would also increase the amount of impermeable surfaces on the project site by 10,000 square feet. However, this slight increase would be negated by the removal of the 3.6-acres (156,000 square feet) of impermeable pond liner from the Van Gordon Reservoir, both of which were contemplated by the 2017 SEIR. Further, the proposed project includes the removal of the entire leachate collection system from the Van Gordon Reservoir, including the five mechanical spray evaporators and their enclosures. Removal of the pond liner from the Van Gordon Reservoir would restore the area to pre-EWSP conditions and would be beneficial for biological resources in the area through the planting of native vegetation.

The following mitigation measures described in the 2017 SEIR would remain applicable to the proposed project and would remain unchanged:

- **BIO-1 Special-Status Plants.** Prior to commencing site disturbing activities, a County approved biologist/botanist shall conduct a botanical survey for special-status plants, including, but not limited to, the Cambria morning glory, Carmel Valley bush mallow, compact cobwebby thistle, most beautiful jewel-flower, Obispo Indian paintbrush, and woodland woolly threads. The CCSD shall make every effort to avoid the removal of identified special status plants during construction activities. If the removal of such plants cannot be avoided, the CCSD shall transplant them on the subject property. (E-CDP Condition 23)
- **BIO-2 Upland Vegetation.** Prior to Project completion, whichever occurs first, disturbed areas within the Project boundaries shall be revegetated with an assemblage of native riparian, wetland, and upland vegetation suitable for the area. Locally collected plant materials shall be used to the extent practical. Invasive, exotic plants shall be prohibited. This measure shall apply to all disturbed areas unless determined not practical or feasible by the County. (E-CDP Condition 18)
- **BIO-3** Within one year of SEIR certification, and within 90 days following the completion of all regulatory approvals necessary to allow for the extension of the lagoon water discharge (whichever occurs last), and to avoid biasing Well 16D1 water quality samples (as requested by the RWQCB) and more efficiently deliver surface water into San Simeon Creek to maintain water levels at San Simeon Creek Lagoon, the CCSD shall remove the surface discharge structure and relocate the surface discharge point further south to the San Simeon Creek bank. At the discharge point, articulating concrete block (ACB) (Armorflex or similar) lining shall be installed to protect the northern San Simeon Creek channel bank from erosion. The lining shall allow for the continued growth of riparian vegetation, further protecting the channel from any potential erosion and avoiding/reducing any sedimentation within the water bodies.
- **BIO-4 Trash and Construction Debris.** During construction/ground disturbing activities, all trash that may attract CRLF predators shall be properly contained, removed from the work site, and disposed of regularly. Prior to Project completion, all trash and construction debris shall be removed from work areas. (E-CDP Condition 16)
- **BIO-5 Construction Equipment.** During construction/ground disturbing activities, all refueling, maintenance, and staging of equipment and vehicles shall occur at least 100 feet from riparian habitat or water bodies and not in a location from where a spill would drain directly toward aquatic habitat. The monitor shall ensure contamination of habitat does not occur during such operations. Prior to commencement of grading/construction activities, the monitor shall ensure that a plan is in place for prompt and effective response to any accidental spills. All workers shall be informed of the importance of preventing spills and appropriate measures to take should a spill occur. (E-CDP Condition 17)
- **BIO-6 Construction-Related Water Quality.** Best Management Practices (BMPs) shall be implemented during construction to minimize sediment from entering nearby water bodies or prominent drainage courses. During/after construction/ground disturbing activities, if these BMPs are ineffective, the CCSD shall work with the monitor/biologist and resident engineer, in consultation with USFWS, to install effective measures prior to the next rain event. (E-CDP Condition 20)
- **BIO-7 Adaptive Management Plan.** The CCSD shall develop and implement an Adaptive Management Program (AMP) for post construction operations upon commencement of ~~SWF~~ WRF operations. The AMP shall be incorporated while the ~~SWF~~ WRF is operating and indefinitely until the ~~SWF~~ WRF is no longer in use or until deemed no longer necessary by applicable regulatory agencies. The AMP is intended to monitor and protect the lagoon, creek, and riparian habitats adjacent to the Project site and, by extension, protect the species that

inhabit it. The AMP's primary goal shall be to monitor the response of the lagoon, creeks, and riparian habitats to ~~SWF~~ WRF operations. This shall include, but not be limited to, the following:

- Regular monitoring of groundwater levels, surface water levels, surface water flow, instream and riparian habitat extent and health, available in-stream and fish habitat, and water quality;
- Surveys for tidewater goby, steelhead, CRLF, western pond turtle, and/or two-striped garter snake a minimum of two times per year to measure population levels over time; and
- Monitoring of riparian vegetation in the water bodies and in their upland extents.

Based on the results of the biological monitoring and any noted adverse changes in these habitats, ~~SWF~~ WRF operations shall be adjusted such that the amount of treated water that is injected or discharged back into the system, is either increased or decreased to restore affected habitat features. It is expected that the minimum amount of water returned at any time would be 100 gpm.

- **BIO-8 Construction Fencing.** Sturdy and highly visible protective fencing shall be placed around all existing trees and riparian vegetation within 50 feet of the Project site. Plan notes shall indicate this fence shall remain in place for the duration of Project construction. (E-CDP Condition 12)
- **BIO-9 CRLF Pre-Construction Survey.** Prior to commencement of grading activities, a USFWS approved biologist shall survey the Project site 48 hours before the onset of work activities. If any life stage of the California Red-legged Frog (CRLF) is found and these individuals are likely to be killed or injured by work activities, the biologist shall be allowed sufficient time to move them from the site before work activities begin. The biologist shall relocate the CRLF the shortest distance possible to a location that contains suitable habitat and shall not be affected by activities associated with the proposed Project. The biologist shall maintain detailed records of any individuals that are moved (e.g., size, coloration, distinguishing features, digital images, etc.) to assist in determining whether translocated animals are returning to the original point of capture. (E-CDP Condition 13)
- **BIO-10 Construction Personnel Training.** Prior to commencement of grading activities, a USFWS approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the CRLF and its habitat, the specific measures that are being implemented to conserve the CRLF for the current Project, and the boundaries within which the Project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions. (E-CDP Condition 14)
- **BIO-11 CRLF Monitor.** A USFWS-approved biologist shall be present at the work site until all CRLF have been removed, workers have been instructed, and disturbance of habitat has been completed. After this time, the County shall designate a person to monitor onsite compliance with all minimization measures. The biologist shall ensure that this monitor receives the training outlined above and in the identification of CRLF. If the monitor/biologist determine CRLF impacts are greater than anticipated or approved, work shall stop until the issue is resolved. The monitor/biologist shall immediately contact the resident engineer (the engineer overseeing and in command of the construction activities), where the resident engineer shall either resolve the situation by eliminating the effect immediately, or require that all actions which are causing these effects be halted. If work is stopped, the County/ USFWS shall be notified as soon as is reasonably possible. (E-CDP Condition 15)

- **BIO-12 Site Topography.** Prior to Project completion, whichever occurs first, to the extent practical, contours shall be returned to as close to original, unless it is determined by the biologist that the new contours provide greater benefit for the CRLF. (E-CDP Condition 19)
- **BIO-13 Water Impoundment.** Unless approved by the USFWS, water shall not be impounded in a manner that may attract CRLF. (E-CDP Condition 21)
- **BIO-14 Project Completion Report.** Prior to Project completion, the CCSD shall submit to the County and USFWS, a Project completion report form, completed by the USFWS-approved biologist. The report form shall identify any recommended modifications or protective measures, if additional stipulations to protect CRLF are warranted, or if alternative measures would facilitate compliance with the provisions of this consultation. (E-CDP Condition 22)
- **BIO-15 Groundwater Pumping – Biological Monitoring.** Ongoing during ~~SWF~~ WRF operations, the CCSD shall continue with its existing efforts to monitor the creek habitat adjacent to, and downstream from the Project area, as required by the AMP. Should migrating steelhead reappear within the San Simeon Creek, the CCSD shall implement efforts to avoid potentially impacting their movement prior to the creek naturally running dry and flowing as subsurface flow during the dry season. Such efforts may include alternating the use of production wells between the San Simeon and Santa Rosa aquifers, discussing possible curtailments and/or coordination to pumping regimes being practiced by/with other riparian irrigators during such migration periods, invoking conservation/demand management measures, as well as operating the ~~SWF~~ WRF to provide its lagoon water discharge.
- **BIO-16 Pre-Construction Bird Survey.** No more than one week prior to construction, a qualified biologist shall conduct a preconstruction nesting bird clearance survey in all work areas and all areas within 500 feet of the general construction zone. Active nests shall be given an avoidance buffer, typically 300 feet for non-listed, non-raptor species, and 500 feet for listed or raptor species. This buffer shall remain in place until the young fledge or the nest otherwise becomes inactive, and may be reduced with approval from CDFW and/or USFWS.
- **BIO-17 Pre-Construction Bat Survey.** If deemed necessary by the CDFW, a preconstruction roosting bat survey shall be conducted within one week prior to construction. Any bat roosts found in the Project vicinity shall be protected with coordination from CDFW.
- **BIO-18** The lagoon surface discharge structure shall be designed to avoid impacts to riparian habitat to the greatest extent feasible, while taking into account site and engineering constraints, including incorporating design revisions to relocate features and/or reduce water quality impacts. If riparian impacts cannot be avoided, the following measures shall be implemented within 180 days of SEIR certification (or Prior to Regular CDP issuance), to reduce identified impacts to less than significant:
 - The CCSD shall comply with all applicable local, state, and federal regulations concerning impacts to riparian habitat, including Clean Water Act (CWA) Sections 401 and 404, and/or California Fish and Wildlife Code Section 1602. Specifically, the CCSD shall obtain a Section 401 Permit under the federal CWA from the RWQCB, a Section 404 Permit under the federal CWA from ACOE, and a Section 1602 Permit under the FGC from the CDFW. All permit requirements shall be followed.
 - In support of the regulatory agency wetland permitting process described above, a wetland delineation shall be conducted for the Project modifications (filtrate pipeline extension and discharge structure) to determine the presence and extent of jurisdictional wetlands and other waters of the U.S., and the Project impacts. The wetland delineation shall be conducted according to the protocols set forth by the ACOE.

- *Impacted riparian habitat shall be mitigated at a 1:1 replacement-to-loss ratio; the final mitigation amounts shall be determined during the regulatory agency permitting process through the preparation of a Habitat Mitigation and Monitoring Plan (HMMP) by a qualified biologist. It is expected that the riparian mitigation site can occur within the Project boundaries. The HMMP shall include but not be limited to a planting plan, success criteria, monitoring protocols to determine if success criteria have been met, adaptive management protocols in the event success criteria are not met, and funding assurances.*
- **BIO-19** *The CCSD shall minimize to the extent possible the disturbance and removal of riparian vegetation in the vicinity of San Simeon Creek Lagoon during the construction and placement of the mitigation water pipeline. All efforts shall be made to avoid creating a permanent pathway through the vegetation while constructing the pipeline. The pipeline shall in addition contain an adequate velocity dissipation mechanism to avoid creating any scour or deterioration of the upland habitat.*

The ZLD facility would be located within a previously disturbed area in the project site and would result in a similar level of disturbance as the SWTP originally considered by the 2017 SEIR. Further, removal of the pond lining and discharge systems were contemplated by the 2017 SEIR, would restore the Van Gordon Reservoir to pre-development conditions, and could be potentially beneficial for biological resources in the area. Therefore, with implementation of Mitigation Measures BIO-1 through BIO-19, the proposed project would not create new or more severe impacts to biological resources than were previously analyzed in the 2017 SEIR, and no additional mitigation is required. Impacts would remain **less than significant with mitigation**.

4.4 Cultural Resources

Section 5.4, *Cultural Resources*, of the 2017 SEIR evaluated the original project's potential impacts related to historical, archaeological, and paleontological resources. The 2017 SEIR determined that the original project would not result in any impacts to historical resources because there are no historic buildings or structures within the project area. Further, it was determined that the original project would not result in an adverse change to the significance of any archaeological, paleontological, or human resources through implementation of 2017 SEIR Mitigation Measures CUL-1 through CUL-4. Therefore, with implementation of 2017 SEIR Mitigation Measures CUL-1 through CUL-4, the 2017 SEIR concluded that the original project would result in less than significant impacts related to cultural resources.

As summarized in the 2017 SEIR, implementation of the original project could cause an adverse change in the significance of an archaeological/paleontological resource. Although not anticipated, implementation of the original project could also disturb unknown locations of human remains. Compliance with State and County standards, and 2017 SEIR Mitigation Measures CUL-1 through CUL-4 would ensure project impacts to archaeological resources and human remains would be reduced to less than significant. Based on the results of the Paleontological Resources Assessment prepared for the 2017 SEIR, the original project is anticipated to have a negligible impact on paleontological resources. Therefore, the original project's effects to cultural resources were found to be less than significant.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally evaluated by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those for the SWTP and operation would not differ significantly from the original project.

Therefore, impacts to unknown archaeological resources, paleontological resources, and human remains would remain consistent with the original project.

In the event of the discovery of archaeological resources, or the unlikely discovery of human remains, and to safeguard potential buried archaeological remains, the following mitigation measures described in the 2017 SEIR would remain applicable to the proposed project and would remain unchanged:

- **CUL-1** *The CCSD shall retain a qualified archaeological monitor, approved by the County Environmental Coordinator, to be present during all site disturbance activities. Monitoring reports shall be retained by the CCSD and shared with the Environmental Coordinator's Office upon request.*
- **CUL-2** *In the event archaeological resources are unearthed or discovered during any site disturbance activities, the CCSD, or the applicant's successor, shall be responsible to follow protocol and procedures described in Section 22.10.040 of the Land Use Ordinance.*
- **CUL-3** *Prior to the start of construction, earthmoving personnel shall receive a cultural and paleontological sensitivity training detailing the types of artifacts and fossils that may be encountered and procedures to follow if finds occur.*
- **CUL-4** *The CCSD shall retain a qualified archaeological monitor and Native American monitor, approved by the County Environmental Coordinator, to be present during all site disturbance activities within the boundaries of previously recorded sites. Monitoring reports shall be retained by the CCSD and shared with the Environmental Coordinator's Office upon request.*

The ZLD facility would be located within a previously disturbed area in the project site and would result in a similar level of disturbance as the SWTP originally proposed by the original project. Therefore, with implementation of 2017 SEIR Mitigation Measures CUL-1 through CUL-4, the proposed project would not create new or more severe impacts to cultural resources than were previously analyzed in the 2017 SEIR, and no additional mitigation is required. Impacts would remain **less than significant with mitigation**.

4.5 Hydrology

Section 8.5, *Hazards and Hazardous Materials*, of the 2017 SEIR evaluated the original project's potential impacts related to hydrology and water quality. According to the 2017 SEIR, implementation of the original project could impact hydrology and water quality. Short term impacts to stormwater quality during grading, excavation, and construction activities could occur due to sheet erosion and subsequent deposition of particles and pollutants within drainage areas. The analysis concluded short term impacts to water quality would be less than significant following compliance with federal, state, and County regulatory requirements. Also, impacts to existing drainage patterns or the rate/amount of surface runoff may require construction of local drainage facilities and impacts to hydrology and drainage were concluded to be less than significant following compliance with federal, state, and County regulatory requirements.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally evaluated in the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those for the SWTP and operation would not differ significantly from the original project.

The proposed project would not result in significant impacts pertaining to the impediment or redirecting of flood flows, as ZLD facility would not be located within the 100-year flood zone. Further, as the proposed project does not include habitable structures, or people residing at the site, impacts pertaining to risk associated with tsunami inundation would be less than significant.

The proposed project would also include the same changes to the San Simeon Creek Lagoon Surface Discharge system as included in the original project. The filtrate pipeline would be extended by 300-feet to relocate the discharge point further south to the San Simeon Creek bank. The filtrate pipeline would be routed or placed by hand to protect the riparian habitat. This discharge location was identified to avoid interfering with Well 16D1 water quality samples and more efficiently deliver surface water into the upper San Simeon Creek Lagoon area. At the relocated discharge point, articulating concrete block lining or similar erosion prevention measures would be installed to protect the San Simeon Creek channel bank.

Therefore, the proposed project would not create new or more severe impacts related to hydrology and water quality than were previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts related to hydrology and water quality would remain **less than significant**.

4.6 Land Use and LCP Compliance

Section 5.6, *Land Use and Planning*, of the 2017 SEIR evaluated the original project's potential impacts associated with division of an established community and inconsistency with land use plans, policies, and zoning. According to the 2017 SEIR, the original project would not physically divide an established community. In addition, the original project was found to be consistent with the California Coastal Act, San Luis Obispo County General Plan, North Coast Area Plan, Local Coastal Program (LCP), and CZLUO with implementation of 2017 SEIR Mitigation Measures AES-1, AES-3, and AES-4; BIO-2 through BIO-19; and CUL-1 through CUL-4, as discussed above. Therefore, the original project was determined to have less than significant impacts related to land use and planning.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally evaluated by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSO San Simeon well field and percolation pond system property, adjacent to the existing AWTP, and does not include any features that could physically divide an established community. The project site has an Agriculture (AG) land use designation by the County of San Luis Obispo General Plan. However, according to Costal Table O, Public Utility Facility projects are allowable uses in AG designated sites (County of San Luis Obispo 2018). Consistent with the original project, the proposed project involves construction of water facilities entirely within an existing public facility site. Thus, the proposed project does not include establishment of new activities that would be inconsistent with the project site's Agricultural land use designation or provisions of the San Luis Obispo County General Plan.

Therefore, the proposed project would not create new or more severe impacts to land use and planning than previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts to land use and planning would remain **less than significant**.

4.7 Noise

Section 5.5, *Noise*, of the 2017 SEIR evaluates the original project's potential impacts related to noise. The 2017 SEIR identified the original project's potential to increase noise and short-term groundborne vibration at the project site; however, it was concluded that this increase in noise would remain below the County's noise thresholds and there are no noise sensitive land uses within the immediate vicinity of the project site that would be adversely affected by the marginal increase in noise. Additionally, the project

site is not located within close proximity to an airport or within an airport land use plan. Therefore, the original project was determined to have less than significant impacts related to noise.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally evaluated by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those for the SWTP. Additionally, operation of the proposed project would not differ significantly from the original project. Thus, the ZLD facility would not be expected to result in new or more severe noise impacts than were previously analyzed in the 2017 SEIR.

Consistent with the original project, construction noise and vibration associated with the proposed project would typically be generated by on-site equipment and mobile trips to and from the site. It is anticipated that construction truck traffic would access the project site using San Simeon Monterey Creek Road. The closest noise-sensitive use to San Simeon Monterey Creek Road is the San Simeon Creek Campground located approximately 75 feet from the San Simeon Monterey Creek Road roadway centerline. However, once on the project site, the trucks would utilize internal roadways that would be further away from the sensitive receptors. Construction-related truck trips would occur during the allowable hours for construction specified in CZLUO Section 23.06.042. These permitted hours of construction are specified in recognition that construction activities undertaken during daytime hours are typical and do not cause a significant disruption. Given the sporadic nature of noise levels generated during construction of proposed project and following compliance with CZLUO-specified time limits, construction related noise and vibration impacts from the proposed project would be less than significant.

Further, according to the 2017 SEIR, the original project would require a total of ten truck trips per day to transport the RO concentrate to Kettleman Hills for offsite disposal. The 2017 SEIR concluded that ten daily truck trips would not represent a substantial percentage of current daily traffic volumes along access routes, and the original project would result in a less than significant impact from mobile noise sources. As previously discussed, the CCSD estimates that disposal of the semi-solid brine concentrate produced by the ZLD would only require approximately one truck trip per month. As such, implementation of the proposed project facility would further reduce the number of heavy-duty trucks accessing the project which would reduce noise generated during operations. Further, the removal of the mechanical spray evaporators is now included as a feature of the proposed project and noise associated with the spray evaporator noise would not occur.

The proposed project would not generate any increase in temporary or permanent ambient noise levels nor result in ground-borne vibration beyond what was analyzed in the 2017 SEIR. Noise generated by the ZLD would be similar to the noise generated by the original project and would be consistent the noise environment of the existing facilities at the project site. Compliance with County CZLUO requirements would reduce construction and long-term operation noise impacts associated with the proposed project to less than significant.

Therefore, the proposed project would not result in any new or more severe noise impacts than were previously analyzed in the 2017 SEIR, and no mitigation is required. Noise impacts would remain **less than significant**.

4.8 Effects Found Not to Be Significant

4.8.1 *Agricultural and Forest Resources*

Section 8.1, *Agricultural Resources*, of the 2017 SEIR evaluated the original project's potential impacts related to agricultural resources. As identified in the 2017 SEIR, the project site is not located on property subject to a Williamson Act contract, nor is it currently used for agriculture. Further, there are no areas designated for forest or timber land within the county; therefore, it was concluded that the original project would not result in impacts related to those resources.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Thus, the ZLD facility would not be expected to result in new or more severe impacts to agricultural and forest resources than were previously analyzed in the 2017 SEIR.

As discussed in the 2017 SEIR, portions of the project site are designated as "Prime Farmland if Irrigated" and "Farmland of Statewide Importance." However, the project site is not currently used for agriculture and, according to the 2017 SEIR, has not been used for irrigated agricultural production during at least the last 36 years. As such, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Further, the project site is not under a Williamson Act contract and does not contain forest land. The project site is zoned as Agriculture (AG) by the County of San Luis Obispo General Plan. However, according to Costal Table O, Public Utility Facility projects are allowable uses in AG designated sites (County of San Luis Obispo 2018). Consistent with the original project, the proposed project involves construction of water facilities entirely within an existing public facility site. Further, AG-designated areas outside of the project site would not be disturbed.

Therefore, the proposed project would not create new or more severe impacts to agriculture and forest resources than previously analyzed in the 2017 SEIR, and no new mitigation is required. There remain **no impacts** related to agriculture and forestry resources.

4.8.2 *Energy*

Section 6.4, *Energy Conservation*, of the 2017 SEIR evaluated the original project's potential energy-related impacts. The 2017 SEIR concluded that the original project would not result in the inefficient, wasteful, and unnecessary consumption of energy and therefore would not create a significant impact on energy resources.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. As indicated in by the 2017 SEIR, the overall fuel consumption for construction of the original project would involve approximately 34,700 gallons of gasoline, which would increase fuel use in SLO County by approximately 0.22 percent. Construction fuel use would be temporary and cease upon completion of construction activities. Construction activities required for the ZLD facility would be similar to those for the SWTP and the original project. As such, the construction of the proposed project would have a nominal effect on the local and regional energy supplies.

Additionally, operations of the proposed project would not differ significantly from the original project. As indicated in by the 2017 SEIR, operation of the original project is estimated to consume approximately 20,289 gallons of gasoline per year, which would increase Countywide automotive fuel consumption by 0.01 percent. The CCSD estimates that disposal of the semi-solid brine concentrate produced by the ZLD would require approximately one truck trip per month. The 2017 SEIR estimated that the original project

would require up to ten truck trips per day for disposal of the RO concentrate generated by the AWTP. As such, implementation of the ZLD facility would reduce the number of heavy duty truck trips generated by the project, which would reduce overall fuel consumption of the project

The proposed project does not include any growth-inducing land uses that would significantly increase energy consumption in the community. Rather, the proposed project provides the community of Cambria a local water supply instead of relying on external sources (e.g., trucking in water or importing water) that would require significant energy consumption. The proposed project would operate only when necessary to augment Cambria's potable water supply during dry periods. The proposed project is intended to provide long-term drought protection and seasonally augment Cambria's potable water supply for existing service connections of the CCSO. Further, the proposed project is subject to compliance with all federal, state, and local requirements for energy efficiency. As such, the proposed project would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand, or cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance, or preempt future energy development or future energy conservation.

Therefore, the proposed project would not result in any new or more severe energy-related impacts than were previously analyzed in the 2017 SEIR, and no additional mitigation is required. Impacts would remain **less than significant**.

4.8.3 *Geology and Soils*

Section 8.3, *Geology and Soils*, of the 2017 SEIR evaluated the original project's potential impacts related to geology and soil resources. According to the 2017 SEIR, although the project site is located near the Nacimiento Fault Zone, it does not traverse the project site. Further, there is no published evidence of Holocene movement on strands of the Cambria fault within 200 feet of the project site. Potentially active traces of the Cambria fault are mapped south of Santa Rosa Creek, 3.25 miles south of the project site. Additionally, the Cambria Fault is not included on the State of California Alquist-Priolo Earthquake Fault Zone Map for the Cambria Triangle. Therefore, the original project would not expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault. Further, based on required compliance with County building standards, the 2017 SEIR determined that the original project would result in less than significant impacts related to geology and soils.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered in the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSO EWSP site, adjacent to the existing AWTP, and would comply with County building standards. Thus, the ZLD facility would not be expected to result in new or more severe impacts to geology and soils resources than were previously analyzed in the 2017 SEIR.

The Geotechnical Evaluation prepared for the 2017 SEIR concluded that it is likely for at least one moderate to severe earthquake to occur at the site during the life of the project. During a moderate to severe earthquake occurring on the nearby faults, strong ground shaking of the site will likely occur. Earthquakes on regional and/or local causative faults could expose people or the project to strong seismic ground shaking. The intensity of ground shaking on the project site depends on the magnitude of the earthquake, distance to the epicenter, and geology of the area between the epicenter and the project site. The ZLD facility would be constructed in accordance with the Geotechnical Evaluation's recommendations, applicable regulations, and engineering practice guidelines for seismic design. As such, the project would result in a less than significant impact regarding the exposure of people or structures to substantial adverse effects involving strong seismic ground shaking.

Therefore, the proposed project would not create new or more severe impacts to geology and soils than previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts to geology and soils would remain **less than significant**.

4.8.4 Greenhouse Gas Emissions

Section 8.4, *Greenhouse Gas Emissions*, of the 2017 SEIR evaluated the original project's potential impacts related to greenhouse gas (GHG) emissions. The 2017 SEIR determined that the original project would not exceed the SLOAPCD annual GHG threshold and would not result in a conflict with an applicable plan or policy adopted for reducing greenhouse gas emissions.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally proposed by the original project. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those for the SWTP and operation would not differ significantly from the original project.

A quantitative greenhouse analysis was prepared for the 2017 SEIR which found that construction and operation of the original project, including construction and operation of the existing SWF, would not exceed SLOAPCD thresholds. As discussed in the 2017 SEIR, GHG emissions from implementation of the original project would total 909.93 MTCO₂e/yr, which is well below the SLOAPCD 10,000 MTCO₂e/year screening threshold. The analysis included the construction of approximately 130,680 square feet of building area, and 250 cubic yards of cut and 250 cubic yards of fill.

Construction of the proposed project would be minor in comparison to the SWF project. The new ZLD facility would only result in 10,000 square feet of new building area, and 50 cubic yards of cut and 50 cubic yards of fill during construction. As such, the construction of the proposed project would be less intensive than construction of the SWF facility, which was found to not exceed the SLOAPCD emission thresholds. Additionally, the CCSD estimates that disposal of the semi-solid brine concentrate produced by the ZLD would require approximately one truck trip per month. The 2017 SEIR estimated that the original project would require ten truck trips per day for disposal of the RO concentrate generated by the AWTP. As such, implementation of the ZLD facility would reduce the number of heavy duty truck trips generated by the project, which would reduce operational greenhouse gas emissions.

The activities associated with construction and operation of the proposed project would be similar to those analyzed in the 2017 SEIR. Implementation of the proposed project would not result in GHG emissions which would exceed the SLOAPCD annual threshold and would not result in a conflict with an applicable plan or policy adopted for reducing greenhouse gas emissions. Therefore, the proposed project would not result in any new or more severe greenhouse gas impacts than were previously analyzed in the 2017 SEIR, and no additional mitigation is required. Impacts would remain **less than significant**.

4.8.5 Hazards and Hazardous Materials

Section 8.5, *Hazards and Hazardous Materials*, of the 2017 SEIR evaluated the original project's potential impacts related to hazards and hazardous materials. According to the 2017 SEIR, the project site is not located within 0.25 mile of an existing or proposed school, the vicinity of an airstrip or airport. Further, the original project would not impair implementation of an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk. As such, the 2017 SEIR concluded that the SWF project would have less than significant impacts related to hazards and hazardous materials without the incorporation of any mitigation measures.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Construction activities required for the ZLD facility would be similar to those for the SWTP and operation would not differ significantly from the original project.

The original project analyzed the hauling of RO concentrate materials to the Kettleman Hills Hazardous Waste Facility (Kettleman Facility) for treatment and disposal. Kettleman is a fully permitted 1,600-acre hazardous waste treatment, storage, and disposal facility operated by Waste Management, Inc. The proposed project would likely dispose of the semi-solid waste generated by the ZLD facility at the SSLOCSD, which is in Oceano, approximately 53 miles south of the project site. SSLOCSD is a fully permitted 7.6-acre wastewater treatment, storage, and disposal facility. If the CCSD were to reach the SSLOCSD daily brine disposal limit, currently set at 50,000 GPD, an alternative disposal site, such as Kettleman Hills Hazardous Waste Facility, could be utilized. The CCSD estimates that disposal of the semi-solid brine concentrate produced by the ZLD would require approximately one truck trip per month. The 2017 SEIR estimated that the original project would require ten truck trips per day for disposal of the RO concentrate generated by the AWTP. Thus, the proposed project would result in significantly less daily truck trips, which would reduce the potential for an accidental release of any potentially hazardous materials in transport. With adherence to the laws and regulations regarding the handling, transport, and disposal of hazardous materials, the proposed project would not create a significant hazard to the public or the environment. As such, impacts related to the offsite hauling and disposal of RO concentrate materials during operations would be less than significant.

Therefore, the proposed project would not create new or more severe impacts related to hazards and hazardous waste than previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts related to hazards and hazardous waste would remain **less than significant**.

4.8.6 Mineral Resources

Section 8.8, *Mineral Resources*, of the 2017 SEIR evaluated the original project's potential impacts related to mineral resources. The 2017 SEIR determined that the original project would not impact mineral resources because there are no known mineral resources or existing mining operations in the immediate vicinity of the project site. According to the 2017 SEIR, the County's Energy or Extractive Resource Area and Extractive Resource Area Combining Designations include areas that have been identified as containing or likely to contain significant mineral resources, and shows that the project site does not contain known mineral resources. Therefore, the original project was determined to have no impacts related to mineral resources.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally proposed by the original project. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. Therefore, the proposed project would not result in impacts related to mineral resources because there are no known mineral resources or existing mining operations in the immediate vicinity of the project site.

Therefore, the proposed project would not create new or more severe impacts to mineral resources than were previously analyzed in the 2017 SEIR, and no mitigation is required. There would remain **no impacts** related to mineral resources.

4.8.7 Population and Housing

Section 8.9, *Population and Housing*, of the 2017 SEIR discussed the original project's potential impacts related to population growth. As determined in the 2017 SEIR, the original project would not increase the number of employees, and short-term construction-related positions would be expected to be filled by members of the local workforce. Further, the original project would not require the removal of existing housing or construction of replacement housing elsewhere. Therefore, the 2017 SEIR concluded that the original project would result in less than significant impacts related to population and housing.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be entirely located within the footprint of the CCSD San Simeon well field and percolation pond system property, adjacent to the existing AWTP. The proposed project does not propose new homes or businesses and would not directly induce substantial population growth as the project is intended to meet the current demands of the community and ensure a reliable water supply for the existing service connections of the CCSD. Further, there is no housing or other residential developments on the project site and the proposed project would not displace existing housing or persons or necessitate the construction of replacement housing elsewhere.

Therefore, the proposed project would not create new or more severe impacts to population and housing than were previously analyzed in the 2017 SEIR, and no mitigation is required. There would remain **no impacts** related to population and housing.

4.8.8 Public Services

Section 8.10, *Public Services*, of the 2017 SEIR discussed the original project's potential impacts related to an increase in demand on public services, including fire protection services, police protection services, public schools, and parks. According to the 2017 SEIR, the original project would not result in an increase of the number of employees and, therefore, would not increase demand on police protection services, schools, parks, or other public facilities. As such, the 2017 SEIR determined that the original project would result in less than significant impacts related to public services.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Consistent with the original project, the ZLD facility would be located within the footprint of the existing CCSD San Simeon well field and percolation pond system property and would not require any additional employees for operation. Therefore, the proposed project would not create new or more severe impacts to public services than previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts to public services would remain **less than significant**.

4.8.9 Recreation

Section 8.11, *Recreation*, of the 2017 SEIR discussed the original project's potential impacts related to an increase in demand on public services, including fire protection services, police protection services, public schools, and parks. The 2017 SEIR found that the original project would not increase the use of existing recreational facilities in a manner that would lead to substantial deterioration of existing recreational facilities or require the development of new or expanded recreational facilities. As such, the 2017 SEIR determined that the original project would result in less than significant impacts related to recreation.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally proposed by the original project. Consistent with the original project, the ZLD facility would be

located within the footprint of the existing CCSD San Simeon well field and percolation pond system property and would not require any additional employees for operation. Therefore, the proposed project would not create new or more severe impacts to recreation than previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts to recreation would remain **less than significant**.

4.8.10 Transportation

Section 8.12, *Traffic and Transportation*, of the 2017 SEIR evaluates the original project's potential impacts associated with traffic and transportation. It was determined that the original project would result in a short-term increase in construction-related trips and approximately ten truck trips per day for disposal of the RO concentrate and concluded the daily truck trips would not represent a substantial percentage of current daily traffic volumes along access routes. Further, the original project would not interfere with air traffic patterns, increase roadway hazards, interfere with emergency access, or be inconsistent with applicable plans or policies related to bicycle, transit, or pedestrian circulation. Therefore, the 2017 SEIR concluded that the original project would result in less than significant impacts related to traffic and transportation.

Since certification of the 2017 SEIR, revisions to the State CEQA Guidelines have occurred, including the change from Level of Service (LOS) to VMT as the preferred metric for evaluating a project's transportation impacts, in compliance with SB 743. While VMT was not specifically analyzed in the 2017 SEIR, its current inclusion in the CEQA checklist does not warrant an analysis of the entire project unless the project changes would result in new or more severe significant environmental impacts or unless there is new information of substantial importance that was not known at the time of the 2017 SEIR certification.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally considered by the 2017 SEIR. Construction activities required for the ZLD facility would be similar to those for the SWTP and operation would not differ significantly from the original project. Construction access to the project site would continue to be provided along the northern site boundary via San Simeon - Monterey Creek Road, and along the western site boundary Van Gordon Creek Road. Additionally, the CCSD estimates that disposal of the semi-solid brine concentrate produced by the ZLD would require approximately one truck trip per month. The 2017 SEIR estimated that the original project would require ten truck trips per day for disposal of the RO concentrate generated by the AWTP. As such, implementation of the ZLD facility would reduce the number of heavy-duty truck trips generated by the project. The elimination of these trips would also eliminate the corresponding VMT associated with the trips, in addition to the VMT reduction associated with disposal of RO concentrate at SSLOCS instead of Kettleman Hills Hazardous Waste Facility.

Therefore, the proposed project would not result in any new or more severe transportation impacts than were previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts would remain **less than significant**.

4.8.11 Tribal Cultural Resources

AB 52 went into effect on July 1, 2015. It specifies that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. A lead agency is required to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The provisions of AB 52 are applicable to projects that have a Notice of

Preparation (NOP) (or a notice of Negative Declaration or Mitigated Negative Declaration) filed on or after July 1, 2015. The original project's NOP was filed on March 6, 2015; thus, it was not subject to the provisions of AB 52. Further, this EIR Addendum does not require public circulation and is not subject to tribal consultation pursuant to AB 52.

The 2017 SEIR was certified prior to the inclusion of tribal cultural resources-related questions in the current State CEQA Guidelines Appendix G, Environmental Checklist Form. These questions ask whether the project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a-i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or
- a-ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

While this analysis was not incorporated into the 2017 SEIR, their current inclusion in does not warrant an analysis of the entire project unless the project changes would result in new or more severe significant environmental impacts or unless there is new information of substantial importance that was not known at the time of the 2017 SEIR certification. Section 5.4, *Cultural Resources*, of the 2017 SEIR evaluated the original project's potential impacts related to historical, archaeological, and paleontological resources, which partially address tribal cultural resources, as discussed below.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a-i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

The 2017 SEIR determined that the original project would not result in any impacts to historical resources because there are no historic buildings or structures within the project area. Further, the proposed project does not include the demolition or removal of any built resources; therefore, the project would not have the potential to adversely affect any historical resources, and *no impacts* would occur.

a-ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The 2017 SEIR states that a Sacred Lands File search was requested from the Native American Heritage Commission (NAHC) on April 24, 2014. On April 29, 2015 the NAHC replied that there are no known sacred lands within 0.5-mile of the project site. The NAHC provided a list of seven Native American individuals, representing five separate Native American organizations to contact for further information regarding the general Project vicinity. Letters were sent to the seven Native American contacts on April 30, 2014, requesting any information related to cultural resource or heritage sites within or adjacent to the project site. Additional contact attempts were made by telephone on August 31, 2015, and September 9, 2015. Three responses were received.

- On May 13, 2014, Ms. Patti Dunton of the Salinan Tribe of Monterey and San Luis Obispo Counties responded, stating that the Tribe has concerns that the project has the potential to impact known cultural resources within the project site around San Simeon Creek. Ms. Dunton requested a monitor be present during any ground disturbance activities.
- On August 31, 2015, Ms. Judith Bomar-Grindstaff responded that she does not have concerns regarding the project.
- On September 9, 2015, Mr. Robert Duckworth of the Salinan Nation Cultural Preservation Association responded requesting a list of the artifacts encountered during project construction. A list was mailed to Mr. Duckworth on September 10, 2015, regarding construction of the EWSP.

Further, ground disturbance associated with the proposed project would occur in a previously disturbed area within the footprint of the developed existing CCSD San Simeon well field and percolation pond system property, which would reduce the potential to encounter intact tribal cultural resources. As identified in Section 5.4, *Cultural Resources*, of the 2017 SEIR, and in Section 4.5, *Cultural Resources*, of this Addendum, implementation of Mitigation Measures CUL-1 through CUL-4, and would reduce the potential to disturb unknown archaeological or human resources during proposed ground-disturbing activities. Therefore, the proposed project would not result in any new or more severe impacts related to tribal cultural resources than were previously analyzed in the 2017 SEIR, and no new mitigation is required. Impacts would remain **less than significant** after incorporation of 2017 SEIR Mitigation Measures CUL-1 through CUL-4 as discussed in the 2017 SEIR.

4.8.12 Utilities and Service Systems

Section 8.10, *Public Services*, of the 2017 SEIR discussed the original project's potential impacts to utilities and service systems. According to the 2017 SEIR, the original project would result in a nominal increase in demand for water. However, the purpose of both the original project and the proposed project is to address local water supply issues and increase water supply stability. As such, the 2017 SEIR determined that the original project would result in less than significant impacts related to utilities and service systems.

The proposed project would include the construction of a new ZLD facility in place of the SWTP originally evaluated by the 2017 SEIR. Construction activities required for the ZLD facility would be

similar to those for the SWTP. Additionally, operations of the proposed project would not differ significantly from the original project.

The original project required the hauling of RO concentrate materials to the Kettleman Hills Hazardous Waste Facility (Kettleman Facility) for treatment and disposal. Kettleman is a fully permitted 1,600-acre hazardous waste treatment, storage, and disposal facility operated by Waste Management, Inc. The Kettleman Facility was evaluated as a worst-case scenario for purpose of impact analysis of the original project and would be the case for the proposed project. However, it is more likely that the proposed project would likely dispose of the semi-solid waste generated by the ZLD facility at the South San Luis Obispo County Sanitation District (SSLOCSD), which is in Oceano, approximately 53 miles south of the project site. SSLOCSD is a fully permitted 7.6-acre wastewater treatment, storage, and disposal facility. If the CCSD were to reach the SSLOCSD daily brine disposal limit, currently set at 50,000 GPD, an alternative disposal site, such as Kettleman Hills Hazardous Waste Facility, could be utilized. With adherence to the laws and regulations regarding the disposal of solid waste, the proposed project would result in a less than significant impact to utilities and service systems.

Therefore, the proposed project would not create new or more severe impacts to utilities and service systems than previously analyzed in the 2017 SEIR, and no mitigation is required. Impacts to utilities and service systems would remain **less than significant**.

4.8.13 Wildfire

The 2017 SEIR was adopted prior to the inclusion of wild wildfire-specific related questions in the CEQA checklist. Wildfire was partially discussed under Section 8.5, *Hazards and Hazardous Materials*, of the 2017 SEIR. Changes to the State CEQA Guidelines approved as part of the 2018 State CEQA Guidelines Update identifies wildfire as a separate environmental resource area, breaking it out so it is no longer a subset of hazards and hazardous materials. As such, the analysis of the proposed project's impacts related to wildfire based on the current 2024 CEQA Guidelines is provided below.

While this separate analysis was not incorporated into the 2017 SEIR, their current inclusion in does not warrant an analysis of the entire project unless the project changes would result in new or more severe significant environmental impacts or unless there is new information of substantial importance that was not known at the time of the 2017 SEIR certification.

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone (FHSZ) Viewer, the project site and surrounding area is located in a State Responsibility Area (SRA) with a "High" fire risk (CAL FIRE 2024). The proposed project would not create new obstacles to emergency response or evacuation, exacerbate wildfire risks beyond what was anticipated in the 2017 SEIR, or require new or additional infrastructure beyond what was anticipated in the 2017 SEIR. Requirements of the CBC were created to reduce wildfire risk associated with development in High Fire Hazard Severity Zones (FHSZ). Due to the project's location in a High FHSZ, development would be required to comply with County Fire Code, which requires installation of automatic fire sprinklers, fire alarm systems, and portable fire extinguishers. As required by the County Fire Marshal, a fire protection engineer would review all fire protection system designs. The new ZLD facility would be required to comply with the building material requirements identified in the CBC. As such, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan; therefore, impacts would remain **less than significant**.

b) Due to slope, prevailing winds, and other factors, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project site and surrounding area is located in a SRA with a “High” fire risk (CAL FIRE 2024). The proposed project includes the construction of a new ZLD facility in place of the SWTP originally proposed by the original project. Consistent with the original project, the ZLD facility would be located within the footprint of the existing CCSD San Simeon well field and percolation pond system property and would not require any additional employees for operation. The level of development on the project site would be consistent with existing conditions. The new ZLD facility would be required to be constructed in accordance with the CFC to address fire risk. Based on required compliance with the CFC, the project would not exacerbate the risk of wildfire; therefore, impacts would remain **less than significant**.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project would not require the extension of any utility infrastructure, and would rely on existing connections. The new ZLD facility would be required to be constructed in accordance with the CFC to address fire risk. Based on required compliance with the CFC, the project would not exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; therefore, impacts would remain **less than significant**.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As described in Section 5.5, *Hydrology and Water Quality*, of the 2017 SEIR, the project site is not located within a flood hazard zone and would not be susceptible to flooding. As described by in Section 8.3, of the 2017 SEIR, *Geology and Soils*, the project site and surrounding areas have a low risk of landslide, and the generally flat topography of the project area further reduces landslide potential. Based on existing conditions at the project site, downslope or downstream flooding and landslides are not anticipated to occur in the event of a wildfire. The new ZLD facility would be required to comply with foundational and other building requirements identified in the CBC, which would further reduce the potential to expose people or structures to any post-fire ground instability. Therefore, based on existing conditions at the project site and required compliance with the CBC, development within a high FHSZ is not anticipated to expose people or structures to risk associated with downslope or downstream flooding or landslides and impacts would remain **less than significant**.

5 CONCLUSION

The proposed project revisions do not involve any conditions that require preparation of a Subsequent or Supplemental EIR. This Addendum demonstrates that the proposed project components will not require

major revisions to the 2017 SEIR because the changes do not result in any new or substantially increased significant environmental effects pursuant to State CEQA Guidelines Sections 15162(a)(1) and 15162(a)(2). The proposed project changes will not result in a new significant impact or a substantial increase in the severity of an impact identified in the 2017 SEIR pursuant to State CEQA Guidelines Sections 15162(a)(3)(A) and 15162(a)(3)(B). Furthermore, no new information of substantial importance exists that indicates that there are mitigation measures or alternatives that are considerably different from those analyzed in the 2017 SEIR that will substantially reduce one or more significant effects on the environment, and that the project proponents have declined to adopt the mitigation measure or alternative pursuant to State CEQA Guidelines Section 15162(a)(3)(D). Therefore, based on the criteria established in State CEQA Guidelines Sections 15162 and 15164, an Addendum is the proper CEQA documentation for proposed project revisions.

6 LITERATURE CITED

County of San Luis Obispo. 2018. Framework for Planning Coastal Zone. Available at:
<https://www.slocounty.ca.gov/departments/planning-building/forms-documents/plans-and-elements/elements/framework-for-planning-coastal-zone>. Accessed December 2024.

