

# Appendix A

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Notice of Preparation and Scoping Meeting Materials



City of Pismo Beach  
Public Works Department  
760 Mattie Road  
Pismo Beach, California 93449  
T: (805) 773-4658

[www.pismo-beach.org](http://www.pismo-beach.org)

## Notice of Preparation

**TO:** Responsible Agencies & Interested Parties

**SUBJECT:** NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

**NOTICE IS HEREBY GIVEN** that the City of Pismo Beach will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project, if applicable. The public review and comment period for this Notice of Preparation begins Friday, December 20, 2019 and ends Tuesday, February 4, 2020 at 5:00 p.m. A detailed project description with location maps are contained in the attached materials and are available online at <https://centralcoastblue.com/recent-updates>. No Initial Study is attached because the lead agency has already determined that an EIR is clearly required for the project and is therefore not required to prepare an Initial Study per CEQA Guidelines Section 15063(a). Because the project is of regional and areawide significance, a scoping meeting will be held by the City of Pismo Beach on Wednesday, January 22, 2020, at 6:00 p.m. at the City of Pismo Beach Council Chamber, located at 760 Mattie Road, Pismo Beach, California 93449.

**Project Title:** Central Coast Blue Project

**State Clearinghouse #:** *Pending*

**Project Location:**

The project would be located on several properties in the cities of Grover Beach and Pismo Beach in San Luis Obispo County and portions of unincorporated San Luis Obispo County, including the community of Oceano, which is a census-designated place. A specific map of the known project components is attached and available online at <https://centralcoastblue.com/recent-updates>. Additional project components will be located at yet to be determined locations within the cities of Grover Beach and Pismo Beach in San Luis Obispo County and portions of unincorporated San Luis Obispo County.

**Project Sponsors:** City of Pismo Beach, Public Works Department  
760 Mattie Road, Pismo Beach, CA 93449  
South San Luis Obispo County Sanitation District  
1600 Aloha Place, Oceano, CA 93445

**Brief Project Description:**

The proposed project is a regional advanced purified water project intended to enhance supply reliability by reducing the Santa Maria Groundwater Basin's (SMGB) vulnerability to drought and seawater intrusion. The project would involve injection of advanced purified water into the SMGB via a series of injection wells installed at various locations to create a seawater intrusion barrier. Water for the project would be sourced from two of the region's wastewater treatment facilities - the Pismo Beach Wastewater Treatment Plant (WWTP) and the South San Luis Obispo County Sanitation District (SSLOCSD) WWTP. Prior to injection to the SMGB, water would be treated to an advanced level of purification at a proposed Advanced Treatment Facility (ATF) constructed at a yet to be determined location in the northern portion of the SMGB. The proposed ATF would treat a combination of flows from the Pismo Beach WWTP and flows from the SSLOCSD WWTP for injection in the SMGB and/or for agricultural irrigation. In addition to the ATF, project components include an advanced purified water storage tank, an equalization tank, a pump station, distribution pipelines, injection wells, monitoring wells, and one new production well. The project would alter the pumping regime of existing, operational production wells in the project area and also would include construction of one new production well to optimize groundwater production in the area. Potential environmental effects include but are not necessarily limited to, impacts related to air quality, biological resources, cultural and tribal cultural

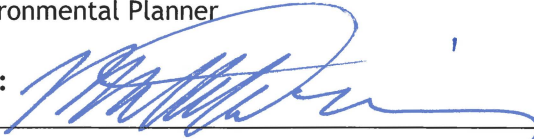
resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use, noise, and transportation.

**Consulting firm retained to prepare draft EIR:**

**Firm Name:** Rincon Consultants, Inc.  
**Address:** 180 N. Ashwood Avenue, Ventura, California 93003  
**Contact:** Annaliese Miller, Associate Environmental Planner

**Date:** December 18,  
2019

**Signature:**



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Matthew Downing, AICP

**Title:** Planning Manager, City of Pismo Beach

**Phone:** (805) 773-7044

# Project Description

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## 1. Project Title

Central Coast Blue

## 2. Lead Agency Name and Address

City of Pismo Beach  
Community Development Department, Planning Division  
760 Mattie Road  
Pismo Beach, California 93449

## 3. Contact Person and Phone Number

Matthew Downing, AICP, Planning Manager  
(805) 773-7044

## 4. Background and Project Overview

The cities of Pismo Beach, Grover Beach, and Arroyo Grande and the Oceano Community Services District (OCS D) obtain water from a combination of three sources: the California State Water Project, Lopez Reservoir, and local groundwater. Each of these sources is highly variable, with supply fluctuations on the order of thousands of acre-feet per year over the past decade (City of Pismo Beach 2016). The primary source of groundwater for these agencies is from the Northern Cities Management Area (NCMA) of the Santa Maria Groundwater Basin (SMGB). The cities of Pismo Beach, Grover Beach, and Arroyo Grande and OCS D (NCMA agencies) manage groundwater extraction in their portion of the basin to protect long-term sustainable use and to prevent seawater intrusion.

Historically, elevated fresh water levels along the coastline and natural outflow to the ocean have prevented seawater from intruding into the groundwater basin. However, groundwater elevations along the coastline have dropped due to changing climatic conditions, including more frequent periods of extended drought resulting in reduced inflow into the groundwater basin and increased demands on groundwater supplies resulting in a higher rate of groundwater extraction. These lower levels reduce the flow of freshwater out toward the ocean, which reduces the effectiveness of groundwater as a barrier to seawater. If conditions worsen, seawater will draw toward the freshwater zone of the aquifer, contaminating it with elevated salt concentrations.

Central Coast Blue (herein referred to as the “proposed project” or “project”) is a regional advanced purified water project intended to enhance supply reliability by reducing the SMGB’s vulnerability to drought and seawater intrusion. The project is a multi-agency collaboration between the City of Pismo Beach, the South San Luis Obispo County Sanitation District (SSLOCS D), and the other NCMA agencies. The project would involve injection of advanced purified water into the SMGB via a series

of injection wells, installed at various locations in the SMGB, to develop a seawater intrusion barrier. Water for the project would be sourced from two of the region's wastewater treatment facilities - the Pismo Beach Wastewater Treatment Plant (WWTP) and the SSLOCSD WWTP. Prior to injection to the SMGB, water would be treated to an advanced level of purification at a proposed Advanced Treatment Facility (ATF) constructed at a yet to be determined location in the NCMA. The proposed ATF would treat a combination of flows from the Pismo Beach WWTP and flows from the SSLOCSD WWTP for injection in the SMGB and/or for agricultural irrigation. The blend of source water treated at the ATF would depend on the amount of water available from each WWTP, the water quality characteristics of each of the water flows, the production capacity of the ATF, and the demand for advanced purified and/or irrigation water. The amount of water from each WWTP treated at the ATF would be adjusted periodically based on operational needs.

Because the location, engineering, and construction details are not known for several of the project components at this time, this analysis evaluates the environmental impacts of those improvements at a programmatic level. Once these details are known, project activities will be examined in light of this EIR to determine what, if any, additional CEQA documentation needs to be prepared. However, this analysis evaluates some of the proposed project components, including the injection wells, at a more detailed, project-specific level because they would be constructed in the near-term and the construction details, locations, and component specifications are generally well-known at this time. Project components are described in detail below under *Project Features*.

## **Project Objectives**

The objectives for the proposed Central Coast Blue project are as follows:

- A. Produce advanced purified water of a quality that can safely be used to augment groundwater supply while maintaining or improving existing groundwater quality
- B. Create a sustainable, drought-resistant, local water supply and improve water supply reliability for southern San Luis Obispo County
- C. Provide a new source of recharge to the SMGB to protect the basin from degradation via seawater intrusion
- D. Reduce wastewater discharges to the ocean and maximize utilization of local water supplies
- E. Facilitate continued water resources collaboration in the NCMA

## **5. Project Location**

The project area is in the cities of Grover Beach and Pismo Beach, and portions of unincorporated San Luis Obispo County, including the community of Oceano, which is a census-designated place. Figure 1 shows the regional location of the project site, which is approximately seven miles south of the city of San Luis Obispo. The project site is regionally accessible from U.S. Highway 101 (U.S. 101) and locally accessible from California State Route (SR) 1. Figure 2 shows the boundaries of the NCMA agencies overlain on an aerial view of the project site and the surrounding area. The project site extends from Pismo Beach in the north, through Grover Beach, to unincorporated San Luis Obispo County and Oceano in the south. The total project area measures approximately nine miles north to south. With the exception of the existing production wells that would be used for the proposed project and one new production well likely in Grover Beach, all of the known project components would be located within one mile of the coast. Some project components (such as

Figure 1 Regional Location



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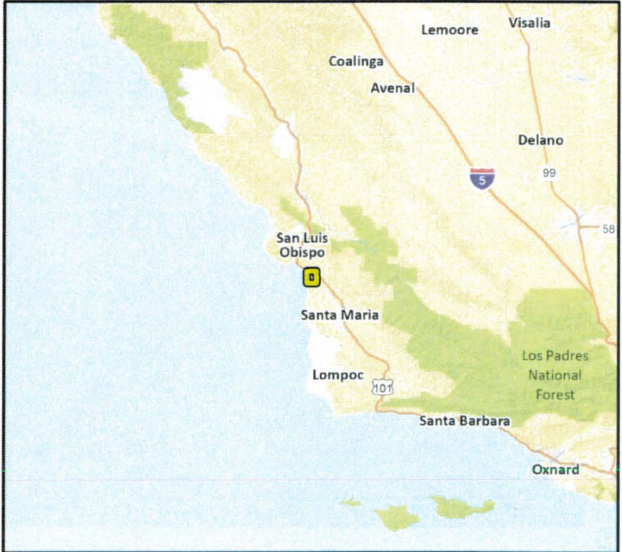


Figure 2 General Project Location



Imagery provided by Google and its licensors © 2018.  
Additional data provided by South San Luis Obispo County Sanitation District 2016

irrigated lands described in detail below) may be located further inland, but the precise location of those components is unknown at this time.

## 6. Project Sponsors' Name and Address

City of Pismo Beach  
Public Works Department  
760 Mattie Road  
Pismo Beach, California 93449

South San Luis Obispo County Sanitation District  
1600 Aloha Place  
Oceano, California 93445

## 7. General Plan Designation

See Figure 3 for General Plan land use designations of the known project components.

## 8. Description of Project

The proposed project consists of an ATF at a yet to be determined location in the NCMA, an advanced purified water storage tank, an equalization tank, a pump station, distribution pipelines, injection wells, monitoring wells, and one new production well. The project would alter the pumping regime of existing, operational production wells in the project area and also would include construction of one new production well to optimize groundwater production in the area. The project area, which is located approximately seven miles south of the city of San Luis Obispo, spans approximately nine miles to allow for appropriate spacing of the proposed injection wells. From west to east, the project site is approximately one mile wide or less (extending inland from the coast) for known project components other than the new production well. Some conceptual project components may be located further inland, as described in more detail below under *Project Features*.

The total acreage and parcel numbers for many of the project components, including the water distribution pipelines, injection wells, monitoring wells, the ATF, and potential agricultural irrigation areas, are either preliminary or not known at this time. The preliminary locations of known project components and locations of the existing production wells are shown on Figure 4. The location of the ATF is unknown at this time, but it would occupy approximately two acres of available land in the NCMA. Additional project components will include distribution pipelines to transport treated wastewater to the ATF, advanced purified water distribution pipelines to transport water from the ATF to the injection wells, and potentially agricultural irrigation and pipelines to transport water to those irrigated lands; however, those locations are unknown at this time.



**Figure 3 Project Site General Plan Land Use Designations**

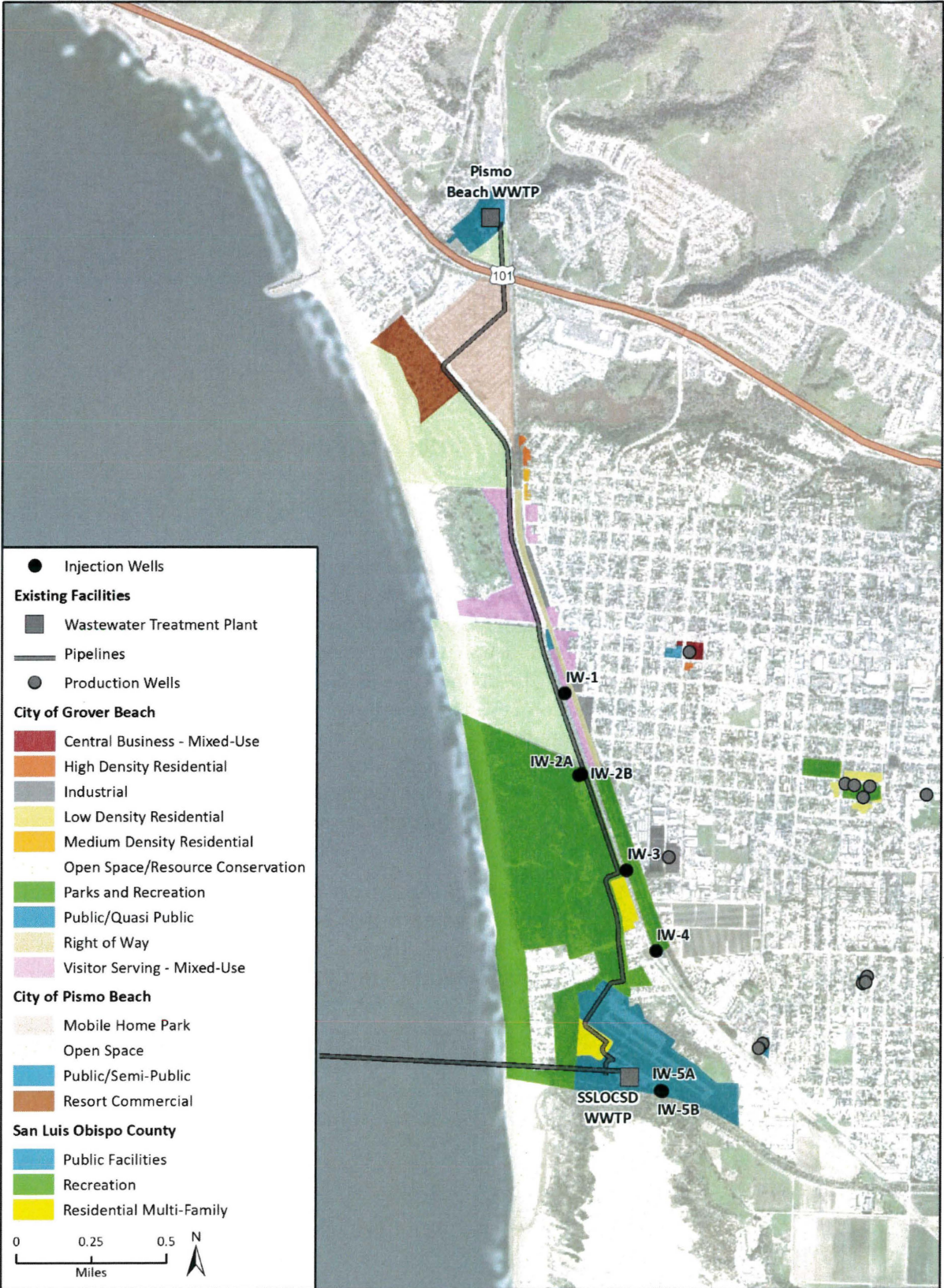


Figure 4 Preliminary Project Components



## Site Characteristics

The injection wells and associated monitoring wells would be located within several publicly-owned properties including the Coastal Dunes RV Park and Campground, Pismo State Beach, and the SSLOCSD WWTP property.

The locations of the ATF, equalization basin, storage tank, pump station, water distribution pipelines, and new production well are not known at this time. The new production well would be owned and operated by the City of Pismo Beach and likely would be located in Grover Beach on land leased or acquired by the City of Pismo Beach. The characteristics of the new production well would be similar to those of the City's existing production wells. It is likely that the ATF, equalization basin, storage tank, and pump station would be located east of SR 1 in Grover Beach. Water distribution pipelines would likely be located within the public rights-of-way along the majority of the pipeline alignments. In addition, because the ATF and associated facilities would likely be located in Grover Beach, several water distribution pipelines would be constructed under SR 1 and the Union Pacific Railroad tracks.

The General Plan land use designations for known preliminary component locations are shown in Figure 3. Most of the project components would be located in or adjacent to public rights-of-way, generally parallel to SR 1.

## Project Features

The proposed project consists of an ATF at a yet to be determined location in the NCMA, an advanced purified water storage tank, a pump station and distribution pipelines, injection wells, monitoring wells, and increased pumping from existing production wells. Each of these components of the proposed project is described below. While the project would lead to increased groundwater pumping over recent rates, groundwater pumping will still be below historical (i.e., 2009) levels.

### *Advanced Treatment Facility*

The ATF would treat flows from the Pismo Beach WWTP and the SSLOCSD WWTP. The proportion of the ATF source water that each of these flows comprises would be determined based on the operational needs of the project and the need for supplemental water for the participating agencies, among other factors.

The Pismo Beach WWTP currently treats an average of 0.9 million gallons per day (mgd) of wastewater to a secondary treatment level. The existing treatment process starts with a bar screen to remove debris. After the bar screen, the water flows through oxidation ditches. The oxidation ditches operate under anoxic and aerobic conditions to remove nitrogen/ammonia from the water. Next, the water flows to a clarifier, where solids are settled out. At this point, the water has been treated to a non-potable level and can be disinfected in the chlorine contact basins and conveyed to the SSLOCSD WWTP where it is discharged to the ocean through the existing ocean outfall, which is shared with SSLOCSD.

The existing treatment process at the SSLOCSD WWTP is slightly different than the process described above for the Pismo Beach WWTP. The SSLOCSD WWTP currently treats approximately 2.4 mgd of wastewater to a secondary level. Similar to the process at the Pismo Beach WWTP, the first step of treatment is a bar screen that physically separates solids and large debris from the flow. After the bar screen, the water is sent to the grit removal stage to remove sand, silt and grit. Then, the wastewater flows to the primary clarifier, which uses gravity to separate solid compounds out of the water. Next, the wastewater flowing out of the primary clarifier goes to the fixed film reactor.

The fixed film reactor is a large circular basin filled with a network of plastic media. Microorganisms grow on the plastic media. As the wastewater runs through the media, the microorganisms consume the dissolved organic matter in the water as their food supply. After the water leaves the fixed film reactor, it then goes to the secondary clarifier. The secondary clarifier performs the same process as the primary clarifier, using gravity to separate out any remaining solids or new solids that may have formed during the fixed film reactor stage of treatment. At this point, the water has been treated to a non-potable level and can be disinfected in the chlorine contact chambers before being discharged to the ocean through the existing ocean outfall.

Advanced treatment would add several additional treatment steps to further purify recycled water from the Pismo Beach WWTP and SSLOCSD WWTP. Additional treatment steps include microfiltration/ultrafiltration (MF/UF), reverse osmosis (RO), and ultraviolet (UV) disinfection with advanced oxidation. The first step in the advanced treatment process is MF/UF, which filters the wastewater that has already undergone secondary treatment through a physical membrane barrier with very small pores to remove turbidity, particles, and microorganisms. These pores range in size depending on the level of filtration; MF typically has a pore diameter of 0.1 micrometer ( $\mu\text{m}$ ) and UF typically has a pore diameter of 0.01  $\mu\text{m}$ . For comparison, 0.1  $\mu\text{m}$  is 1/600th the diameter of a human hair. In comparison, the smallest size of bacteria is approximately 0.3  $\mu\text{m}$ , which is 1/300th the diameter of a human hair. MF/UF removes very small particles and prepares the water for the next step of RO. The MF/UF membranes are permeable and retain suspended particulates, including bacteria, protozoa, and some organics and viruses, thereby removing these constituents from the water. The MF/UF membranes are designed to adapt to water quality conditions and flow with automatic adjustments to the filter system, which saves energy, chemical use, and manpower. Figure 5 provides an illustrated example of the MF process. The UF process is similar to that of the MF process; however, more organics and viruses are removed in the UF process due to the smaller pore size.

From the MF component, the water travels downstream to the RO component. RO removes dissolved solids, organic contaminants, sugars, salts, and sub-micron particles and pathogens, including viruses, bacteria, and protozoa, from the water. It also uses a physical membrane barrier with pore sizes that range from 0.02  $\mu\text{m}$  to 0.0001  $\mu\text{m}$  depending on the membranes used. Figure 6 provides an illustrated example of the RO process. Unlike MF/UF, RO produces a clean water stream (permeate) and a waste water stream (concentrate). This means that not all the water is recovered from this process as permeate water. A percentage of the water becomes concentrate (typically about 10 to 30 percent), which contains a higher concentration of the dissolved particles than were in the source water flow. This concentrate will ultimately be discharged to the ocean through the existing ocean outfall that currently receives all the flow from the Pismo Beach and SSLOCSD WWTPs. While the concentrate stream is more concentrated than typical drinking water, it is still much less salty than ocean water or concentrate from ocean desalination facilities. As discussed in the *RO Concentrate Sampling Plan Results* prepared by Carrollo Engineers (2018), the large majority of constituents present in RO concentrate produced using treated wastewater from the City's WWTP will not cause exceedances of the City of Pismo Beach's National Pollutant Discharge Elimination System permit effluent concentration limits. Although testing determined that Total Residual Chlorine concentrations would exceed the effluent concentration limits, the ATF would include a process to neutralize the chlorine, which would resolve the exceedance of Total Residual Chlorine concentrations. Testing of RO concentrate produced using the treated wastewater from the SSLOCSD WWTP has not been performed because the advanced treatment pilot plant was located at the Pismo Beach WWTP and the SSLOCSD WWTP effluent water quality is expected to change with implementation of the planned SSLOCSD WWTP Redundancy Project.

After the dissolved solids have been removed, the water that passed through the RO membranes is of very high quality and is ready for the UV disinfection/advanced oxidation treatment process. The UV disinfection component provides additional treatment by oxidizing trace chemical pollutants that may have passed through the MF and RO stages. Advanced oxidation uses UV light and oxidation chemicals to initiate a series of chemical reactions that break down compounds in the water that cannot be broken down by biological treatment or removed using the membranes. Figure 7 provides an illustrated example of the UV/advanced oxidation treatment process.

In addition to the advanced treatment components described above, the ATF would include staff support facilities that may include office space, a locker room, restrooms, file storage, a break room and kitchen, chemical storage and feed facilities, and an emergency power generator. The ATF would occupy approximately 0.85 acres, and the support facilities would occupy approximately 0.14 acres.

#### *Equalization Basin, Storage Tank, and Pump Station*

The project would involve construction of an equalization storage basin at a yet to be determined location in the NCMA, providing greater capacity and operational flexibility to the ATF. The 1.5 million gallons of storage is required for the secondary treated effluent from the Pismo Beach and SSLOCSD WWTPs prior to advanced purification in the ATF, allowing operations staff to address fluctuations in flow from the WWTPs without impacting the flow rate to the ATF. The storage would occupy approximately 7,500 square feet of area on land adjacent to the ATF in the NCMA.

Following advanced purification in the ATF, water would travel to the proposed advanced purified water storage tank and then to the pump station, where advanced purified water would be pumped to the injection wells. The advanced purified water storage tank would provide operational flexibility and help to maintain a consistent flow in the advanced purified water pump station. The storage tank is anticipated to be located below ground on land adjacent to the ATF in the NCMA. The pump station would occupy approximately 0.03 acre and would be located adjacent to the ATF. A conceptual drawing of the overall treatment process that would be used is shown in Figure 8.

#### *Water Distribution Pipelines*

Two sets of water distribution pipelines would be installed. One set would transport treated water from the Pismo Beach and SSLOCSD WWTPs to the proposed ATF, and the other set would transport advanced purified water from the proposed ATF to several groundwater injection wells located throughout the NCMA. While the alignments of those pipelines are unknown at this time, they are expected to generally be located in existing rights-of-way, such as beneath public streets, and in previously disturbed areas in the NCMA. Construction methods for the proposed pipelines would predominantly involve open trenching, with jack and bore or horizontal directional drilling methods used as needed.

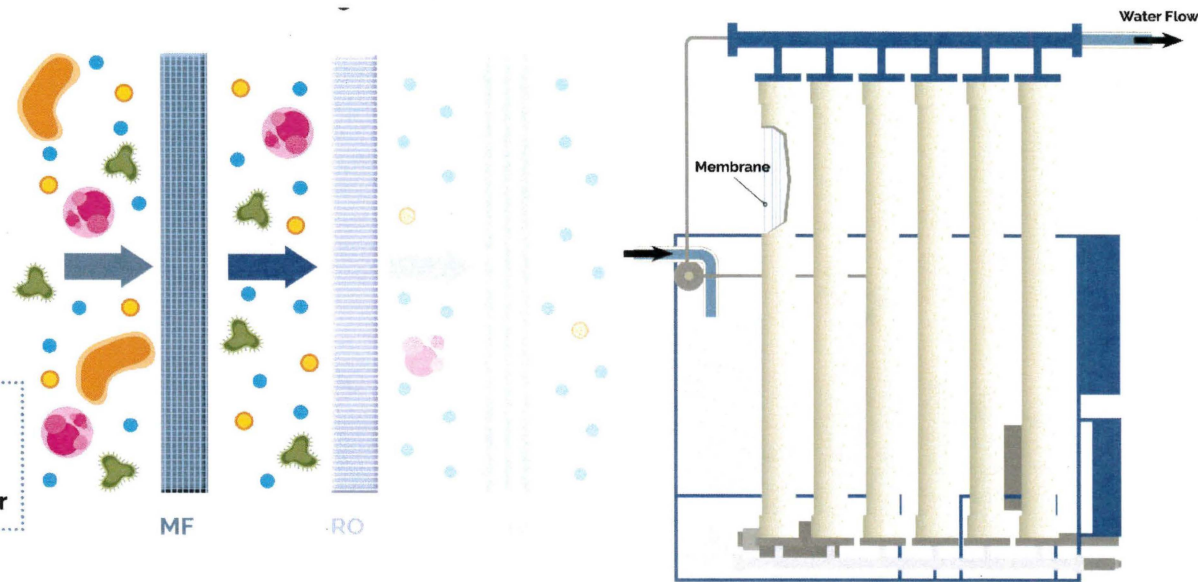
#### *Groundwater Injection and Monitoring Wells*

Seven injection wells would be installed at five locations throughout the NCMA, which are shown in Figure 4. The injection wells would be located generally within one-half mile of the coast. Each injection well would be capable of injecting approximately 200 to 300 acre-feet per year (AFY). The advanced purified water would be injected at a depth of approximately 200 to 600 feet below ground surface. Each injection well would be accompanied by up to two monitoring wells equipped to measure and monitor water level and water quality. Injection wells would include aboveground

Figure 5 Conceptual Microfiltration Process Detail

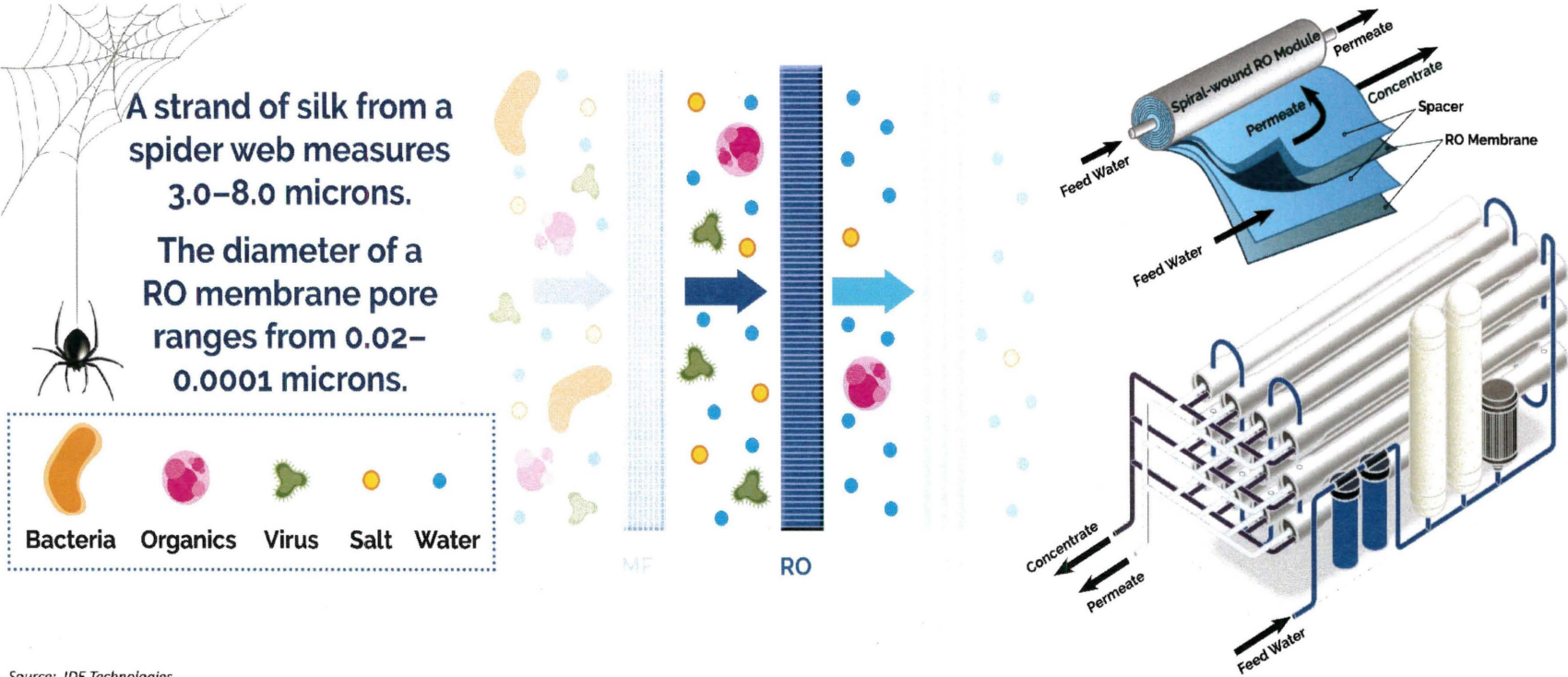
The smallest size of bacteria is approximately 0.3 microns or equal to about 1/300<sup>th</sup> of a diameter of human hair.

The pore diameter of the MF membrane is 0.1 microns, which is smaller than bacteria.



Source: IDE Technologies.

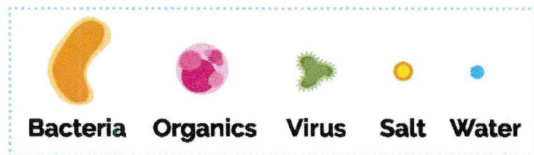
Figure 6 Conceptual Reverse Osmosis Process Detail



Source: IDE Technologies.

Figure 7 Conceptual Ultraviolet/Advanced Oxidation Process Detail

Advanced oxidation uses UV light and electrodes to initiate a series of chemical reactions, which break down compounds in the water that may have passed through the MF/RO stages. This is an added measure to provide safe water.



Source: IDE Technologies

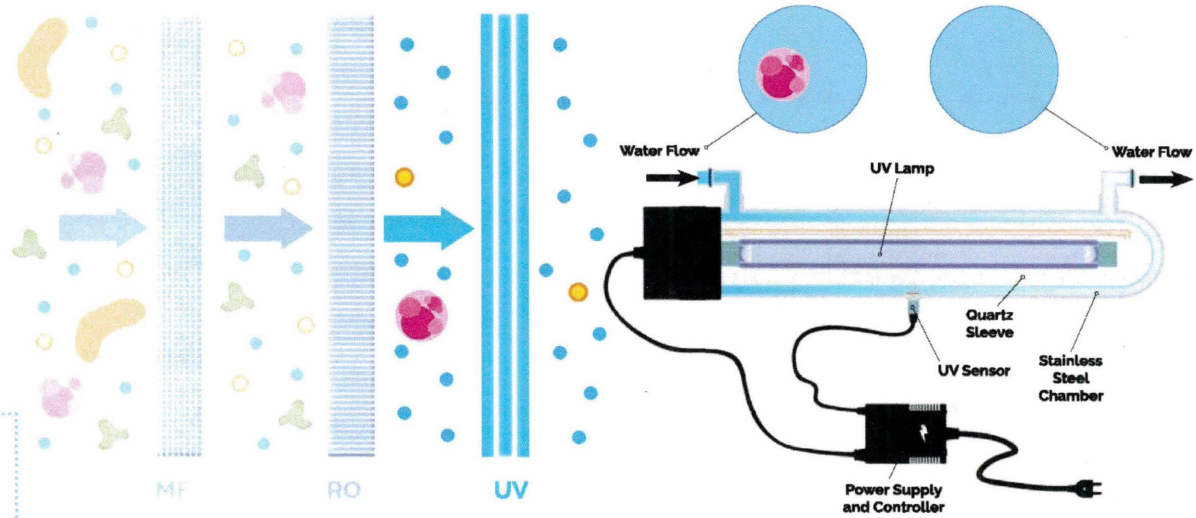
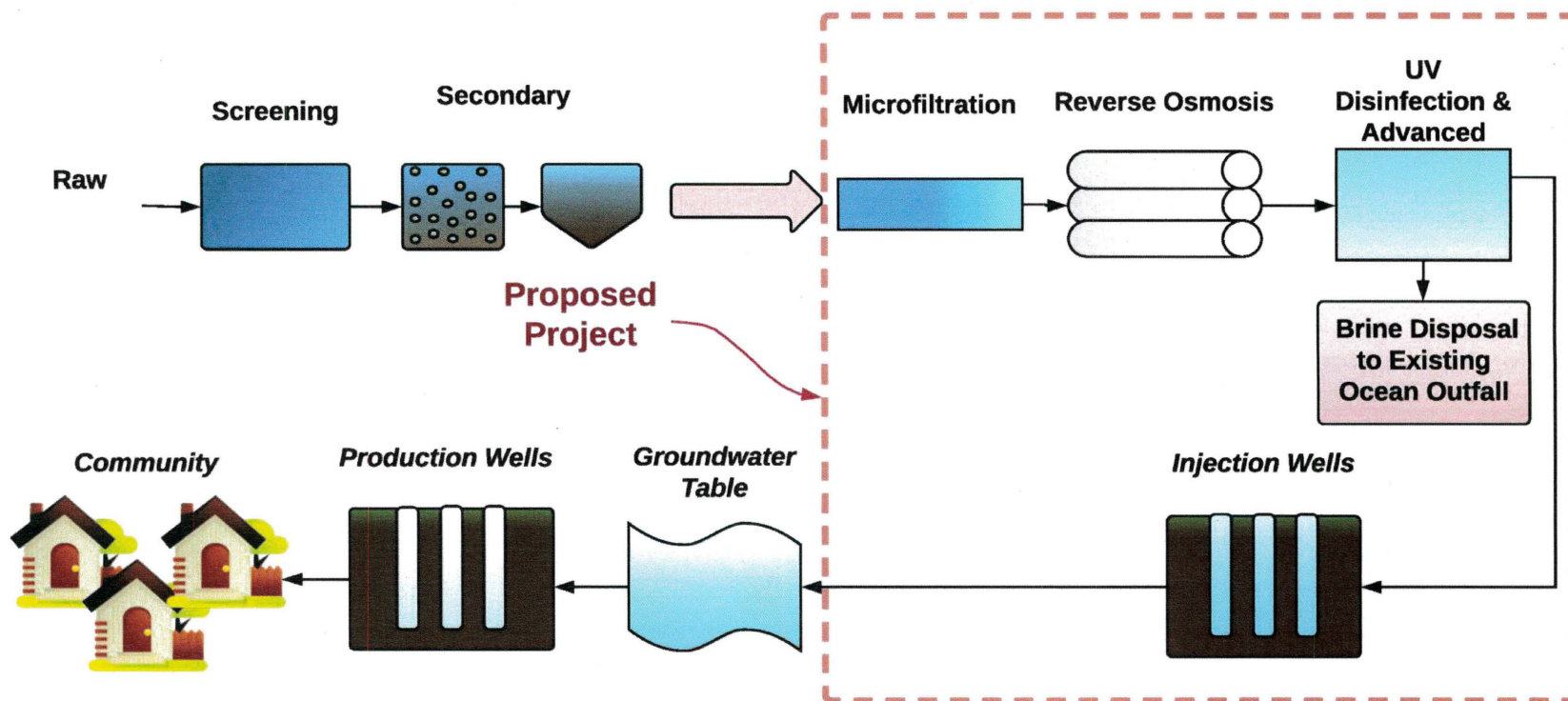




Figure 8 Conceptual Advanced Treatment Process



pipng and infrastructure such as electrical panels, control panels, and storage facilities. Maintenance of the injection wells would involve monitoring of pressures, frequent inspections, cleaning out the well casings, and removing microbial build-up once every two years.

### *Production Wells*

Several existing production wells would be available for extraction of the injected advanced purified water. The project would involve increased pumping at these wells but would not involve modification of these existing production wells or any associated ground disturbance. Figure 4 shows the existing production wells that are anticipated to be used. One new production well will need to be constructed to optimize the system, but the precise location of that new well has not been determined at this time. The new production well likely would be located in the Grover Beach, likely on land leased or acquired by the City of Pismo Beach. The characteristics of the new production well would be similar to those of the City's existing production wells.

### *Agricultural Irrigation*

A portion of the advanced purified water may be used for agricultural irrigation. Potential agricultural irrigation areas include agricultural lands located generally south of Oceano. If agricultural irrigation is included in the proposed project, additional distribution pipelines would be constructed to carry advanced purified water from the ATF to the irrigated lands.

## **Grading and Construction**

Construction of the known project components identified above under *Project Features* is anticipated to last approximately 24 months. During the construction period, portions of the project area would be closed to public access.

The location of the ATF would likely need to be graded to provide a level base for the ATF and appurtenant structures, to provide site access, and to provide appropriate stormwater drainage. If the location is within a designated 100-year Special Flood Hazard Area, site preparation and grading for the ATF and appurtenant structures would also include necessary improvements to provide adequate flood protection, which may include raising structural foundations above the base flood elevation.

It is assumed that a moderate amount of existing soil would be excavated and exported, and a moderate amount of clean engineered fill or another suitable substrate would be imported to provide geotechnical stability for the ATF and appurtenant structures. No substantial soil import or export beyond that required for geotechnical improvements is anticipated. Excavation depth is not anticipated to exceed 20 feet for any of the project components other than the injection wells, which would be excavated to a depth of up to 600 feet.

Construction of the project components is not expected to result in removal of large numbers of mature trees. Also, the project would include planting trees for accenting, screening, or other purposes as space allows, with a preference for native trees.

### *Injection and Monitoring Wells*

Construction activities would occur from 7:00 a.m. to 7:00 p.m., Monday through Friday with the exception of a two to three-week period during which well drilling activities would occur for 24 hours per day, Monday through Sunday. Temporary lighting would be required during 24-hour

drilling activities and would consist of several lights adhered to the mast of the drill rigs that would be pointed downward and portable lights that would be placed around the working areas.

Construction equipment would include a drilling rig, a gradall forklift, four diesel-powered generators, a compressor, and a backhoe. Additional construction components would include a pipe trailer, water storage tanks, a tool trailer for supply storage, a mud tank, and a roll-off bin. Construction equipment would be up to 50 feet in height. Approximately seven construction workers would be on the project site at any given time. Approximately 392 cubic yards of soil would be excavated and exported during well drilling activities.

Project construction would require groundwater pumping activities during well development at a rate of approximately 100 to 300 gallons per minute (gpm) for the monitoring wells and 100 to 1,500 gpm for the injection wells. Well development would produce approximately 300,000 gallons (0.9 acre-feet) of water per monitoring well and approximately 3,500,000 gallons (10.8 acre-feet) of water per groundwater well. Groundwater produced during well development would be disposed of via connections to the existing Pismo WWTP ocean outfall pipeline that runs below SR 1.

### **Site Access**

Site access at the ATF would be provided via an entrance gate through the ATF fencing. Construction of the project components, including the water distribution pipelines and the injection and monitoring wells, would result in temporary access restrictions along public roadways throughout the project area. Operation of the project components would result in a minor increase in daily trips to and from the project site.

## **9. Surrounding Land Uses and Setting**

Land use west of the known project components is mainly open space associated with Pismo State Beach. A golf course, a campground, and residential development are located west of the northern portion of the project site. The southern portion of the project site is occupied primarily by the Oceano County Airport and single-family residences in Oceano. Industrial and agricultural development extends eastward from the southern portion of the project site. Residential development occupies most of the land east of the middle and northern portions of the project site, with some commercial and industrial development located along the SR 1 corridor.

## **10. Other Public Agencies Whose Approval is Required**

Other agencies whose approval is potentially required include the United States Bureau of Reclamation, the United States Army Corps of Engineers (USACE), the Federal Aviation Administration, the Federal Railroad Administration, the California Department of Fish and Wildlife (CDFW), the California Coastal Commission, the California Department of Parks and Recreation, the State Water Resources Control Board (SWRCB) Division of Funding Assistance and the Division of Drinking Water, the California Department of Water Resources, the Central Coast Regional Water Quality Control Board, SSLOCS, the County of San Luis Obispo, the California Department of Transportation (Caltrans), the City of Arroyo Grande, and the City of Grover Beach.

Several partner agencies, potentially including the City of Pismo Beach, SSLOCS, the County of San Luis Obispo, the City of Arroyo Grande, and the City of Grover Beach, may form a Joint Powers Authority (JPA) at a future time. Should a JPA be formed for the purposes of project funding,

management, and operation, that JPA likely would serve as a CEQA Responsible Agency for the proposed project.

## References

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Carollo Engineers. 2018. Appendix B of Technical Memorandum 3 RO Concentrate Sampling Plan Results. November 2018.

Northern Cities Management Area (NCMA) Technical Group. 2018. Northern Cities Management Area 2017 Annual Monitoring Report. April 22, 2018. Available online at: <https://www.pismo-beach.org/DocumentCenter/View/42377/NCMA-2017-Annual-Monitoring-Report?bidId=>

Pismo Beach, City of. 2016. 2015 Urban Water Management Plan for the City of Pismo Beach. June 29, 2016. Available online at: <https://pismo-beach.org/DocumentCenter/View/47720/Pismo-Beach-2015-UWMP-?bidId=>



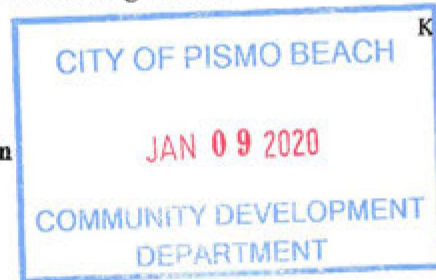
Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

Notice of Preparation



December 23, 2019

To: Reviewing Agencies  
Re: Central Coast Blue Project  
SCH# 2019120560

Attached for your review and comment is the Notice of Preparation (NOP) for the Central Coast Blue Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Matthew Downing**  
**Pismo Beach, City of**  
**760 Mattie Road**  
**Pismo Beach, CA 93449**

with a copy to the State Clearinghouse in the Office of Planning and Research at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov). Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019120560/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Lead Agency

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

**2019120560**

**Project Title:** Central Coast Blue Project

**Lead Agency:** City of Pismo Beach

**Contact Person:** Matthew Downing

**Mailing Address:** 760 Mattie Road

**Phone:** 805-773-7044

**City:** Pismo Beach

**Zip:** 93449

**County:** San Luis Obispo

**Project Location:** County: San Luis Obispo

City/Nearest Community: Oceano/Grover Beach

Cross Streets: SR 1 between Pershing Drive and West Grand Avenue

Zip Code: various

Longitude/Latitude (degrees, minutes and seconds): 35 ° 06 ' 46 " N / 120 ° 37 ' 33 " W Total Acres: 2.2

Assessor's Parcel No.: See attachment.

Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_

Within 2 Miles: State Hwy #: 1, 101

Waterways: See attachment.

Airports: Oceano County Airport

Railways: Union Pacific Railroad

Schools: See attachment.

**Document Type:**

- |   |  |                                    |  |
|---|--|------------------------------------|--|
| CEQA: <input checked="" type="checkbox"/> NOP | <input type="checkbox"/> Draft EIR                 | NEPA: <input type="checkbox"/> NOI | Other: <input type="checkbox"/> Joint Document |
| <input type="checkbox"/> Early Cons           | <input type="checkbox"/> Supplement/Subsequent EIR | <input type="checkbox"/> EA        | <input type="checkbox"/> Final Document        |
| <input type="checkbox"/> Neg Dec              | (Prior SCH No.) _____                              | <input type="checkbox"/> Draft EIS | <input type="checkbox"/> Other: _____          |
| <input type="checkbox"/> Mit Neg Dec          | Other: _____                                       | <input type="checkbox"/> FONSI     |  |

**Local Action Type:**

- |   |   |  |  |
|---|---|--|--|
| <input type="checkbox"/> General Plan Update    | <input type="checkbox"/> Specific Plan            | <input type="checkbox"/> Rezone                            | <input type="checkbox"/> Annexation                                |
| <input type="checkbox"/> General Plan Amendment | <input type="checkbox"/> Master Plan              | <input type="checkbox"/> Prezone                           | <input type="checkbox"/> Redevelopment                             |
| <input type="checkbox"/> General Plan Element   | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Use Permit                        | <input type="checkbox"/> Coastal Permit                            |
| <input type="checkbox"/> Community Plan         | <input type="checkbox"/> Site Plan                | <input type="checkbox"/> Land Division (Subdivision, etc.) | <input checked="" type="checkbox"/> Other: <u>funding approval</u> |

**Development Type:**

- |   |   |
|---|---|
| <input type="checkbox"/> Residential: Units _____ Acres _____                                       | <input type="checkbox"/> Government Office of Planning & Research |
| <input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____                           | <input type="checkbox"/> Mining: Mineral                          |
| <input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____                       | <input type="checkbox"/> Power: _____ MW                          |
| <input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____                       | <input type="checkbox"/> Waste Treatment: Type _____ MGD          |
| <input type="checkbox"/> Educational: _____   | <input type="checkbox"/> Hazardous Waste: Type _____              |
| <input type="checkbox"/> Recreational: _____  | <input type="checkbox"/> Other: _____                             |
| <input checked="" type="checkbox"/> Water Facilities: Type <u>advanced treatment</u> MGD <u>5.4</u> |   |

DEC 28 2019  
 STATE CLEARINGHOUSE

**Project Issues Discussed in Document:**

- |  |  |   |  |
|--|--|---|--|
| <input checked="" type="checkbox"/> Aesthetic/Visual         | <input type="checkbox"/> Fiscal                                | <input checked="" type="checkbox"/> Recreation/Parks                | <input checked="" type="checkbox"/> Vegetation               |
| <input checked="" type="checkbox"/> Agricultural Land        | <input checked="" type="checkbox"/> Flood Plain/Flooding       | <input checked="" type="checkbox"/> Schools/Universities            | <input checked="" type="checkbox"/> Water Quality            |
| <input checked="" type="checkbox"/> Air Quality              | <input checked="" type="checkbox"/> Forest Land/Fire Hazard    | <input type="checkbox"/> Septic Systems                             | <input checked="" type="checkbox"/> Water Supply/Groundwater |
| <input checked="" type="checkbox"/> Archeological/Historical | <input checked="" type="checkbox"/> Geologic/Seismic           | <input type="checkbox"/> Sewer Capacity                             | <input checked="" type="checkbox"/> Wetland/Riparian         |
| <input checked="" type="checkbox"/> Biological Resources     | <input checked="" type="checkbox"/> Minerals                   | <input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading | <input checked="" type="checkbox"/> Growth Inducement        |
| <input checked="" type="checkbox"/> Coastal Zone             | <input checked="" type="checkbox"/> Noise                      | <input checked="" type="checkbox"/> Solid Waste                     | <input checked="" type="checkbox"/> Land Use                 |
| <input checked="" type="checkbox"/> Drainage/Absorption      | <input checked="" type="checkbox"/> Population/Housing Balance | <input checked="" type="checkbox"/> Toxic/Hazardous                 | <input checked="" type="checkbox"/> Cumulative Effects       |
| <input type="checkbox"/> Economic/Jobs                       | <input checked="" type="checkbox"/> Public Services/Facilities | <input checked="" type="checkbox"/> Traffic/Circulation             | <input type="checkbox"/> Other: _____                        |

**Present Land Use/Zoning/General Plan Designation:**

Visitor serving - mixed use, parks and recreation, public facilities, public right-of-way

**Project Description:** *(please use a separate page if necessary)*

See attached project description.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

**NOP Distribution List**

County: San Luis Obispo SCH# 2019120560

Resources Agency

- Resources Agency  
Nadell Gayou
- Dept. of Boating & Waterways  
Denise Peterson
- California Coastal Commission  
Allyson Hitt
- Colorado River Board  
Elsa Contreras
- Dept. of Conservation  
Crina Chan
- Cal Fire  
Dan Foster
- Central Valley Flood Protection Board  
James Herota
- Office of Historic Preservation  
Ron Parsons
- Dept of Parks & Recreation  
Environmental Stewardship Section
- S.F. Bay Conservation & Dev't. Comm.  
Steve Goldbeck
- Dept. of Water Resources  
Resources Agency  
Nadell Gayou

Fish and Wildlife

- Depart. of Fish & Wildlife  
Scott Flint  
Environmental Services Division
- Fish & Wildlife Region 1  
Curt Babcock
- Fish & Wildlife Region 1E  
Laurie Harnsberger
- Fish & Wildlife Region 2  
Jeff Drongesen
- Fish & Wildlife Region 3  
Craig Weightman

- Fish & Wildlife Region 4  
Julie Vance
- Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program
- Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M  
William Paznokas  
Marine Region

Other Departments

- California Department of Education  
Lesley Taylor
- OES (Office of Emergency Services)  
Monique Wilber
- Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture
- Dept. of General Services  
Cathy Buck  
Environmental Services Section
- Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

Independent Commissions, Boards

- Delta Protection Commission  
Erik Vink
- Delta Stewardship Council  
Anthony Navasero
- California Energy Commission  
Eric Knight

- Native American Heritage Comm.  
Debbie Treadway
- Public Utilities Commission  
Supervisor
- Santa Monica Bay Restoration  
Guangyu Wang
- State Lands Commission  
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics  
Philip Crimmins
- Caltrans - Planning  
HQ LD-IGR  
Christian Bushong
- California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

Dept. of Transportation

- Caltrans, District 1  
Rex Jackman
- Caltrans, District 2  
Marcelino Gonzalez
- Caltrans, District 3  
Susan Zanchi
- Caltrans, District 4  
Patricia Maurice
- Caltrans, District 5  
Larry Newland
- Caltrans, District 6  
Michael Navarro
- Caltrans, District 7  
Dianna Watson
- Caltrans, District 8  
Mark Roberts

- Caltrans, District 9  
Gayle Rosander
- Caltrans, District 10  
Tom Dumas
- Caltrans, District 11  
Jacob Armstrong
- Caltrans, District 12  
Maureen El Harake

Cal EPA

Air Resources Board

- Airport & Freight  
Jack Wursten
- Transportation Projects  
Nesamani Kalandiyur
- Industrial/Energy Projects  
Mike Tollstrup
- California Department of Resources, Recycling & Recovery  
Kevin Taylor/Jeff Esquivel

State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

State Water Resources Control Board  
Cindy Forbes - Asst Deputy  
Division of Drinking Water

State Water Resources Control Board  
Div. Drinking Water # \_\_\_\_\_

State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

State Water Resources Control Board  
Phil Crader  
Division of Water Rights

Dept. of Toxic Substances Control Reg. # \_\_\_\_\_  
CEQA Tracking Center

Department of Pesticide Regulation  
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- RWQCB 1  
Cathleen Hudson  
North Coast Region (1)
- RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)
- RWQCB 3  
Central Coast Region (3)
- RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)
- RWQCB 5S  
Central Valley Region (5)
- RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office
- RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office
- RWQCB 6  
Lahontan Region (6)
- RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office
- RWQCB 7  
Colorado River Basin Region (7)
- RWQCB 8  
Santa Ana Region (8)
- RWQCB 9  
San Diego Region (9)
- Other \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- Conservancy





## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
  
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
  
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
  
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
  
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

[Andrew.Green@nahc.ca.gov](mailto:Andrew.Green@nahc.ca.gov).

Sincerely,



Andrew Green  
Staff Services Analyst

cc: State Clearinghouse



1/22/2020

Re: Central Coast Blue (CCB) Scoping Meeting

The Surfrider Foundation San Luis Obispo (Surfrider SLO ) is dedicated to the protection of the ocean, waves, and beaches through a powerful activist network. Surfrider is a supporter of wastewater recycling as a means of finding beneficial uses and reducing ocean outfall. We appreciate the opportunity to share our observations of challenges and potential opportunities for the project's design.

The opportunities are for Managed Retreat of vital infrastructure concerning South San Luis Sanitation District's Wastewater Treatment Plant are considered long term. However, as written in the chapter's July 24, 2018 support of CCB's Bureau of Reclamation WaterSMART Title XVI Water Reclamation and Reuse Grant Endorsement: "The project will be appropriately sited outside of areas subject to hazards so that it can provide long-term benefits to our communities while mitigating any potential negative impacts to our coast". The chapter sees short-term siting of wastewater recycling equipment outside the coastal zone as the first step in the long-range goal of Managed Retreat for the SSLOCSO's sewage plant.

The chapter has also observed challenges for the Northern Cities Management Area for managing and monitoring water storage within the Santa Maria Groundwater Basin. Primarily, the partners of CCB are not able to extract their allocations of groundwater without risking seawater intrusion. Thus, in a practical sense, existing allocations are meaningless. Increasing those allocations by recycled water injection to the groundwater basin just increases impractical expectations. However, we support injection to the groundwater basin in Phase 1 of the project to assist with short-term risks of seawater intrusion and to evaluate the efficiency of injection.

The injection increases Greenhouse Gas (GHG) emissions compared to "finding a home" at the surface. In Phase 2, we strongly support active outreach to local

agricultural interests, especially those positions over troubled portions of the aquifer. It would be optimal for injection to be available during rainy weather. But, whenever possible, recycled water should be utilized on the surface and CCB should plan for the long-term possibility of Direct Potable Reuse.

We encourage partners in CCB to create a community-based effort for educating the public on the great values of water recycling. We also see an opportunity for the leaders in the community to join together in a sub-committee effort which will take public comment and perform outreach to agricultural interests. After all, NCMA's 2018 report estimated agricultural groundwater use was 30% of the basin's production. If recycled water from the surface was used instead of groundwater, the CCB partners would not need to inject the recycled water into the ground, and the farmers would not need to pump it up. Better cooperation would save water and Greenhouse Gas emissions.

Thank you for your consideration,

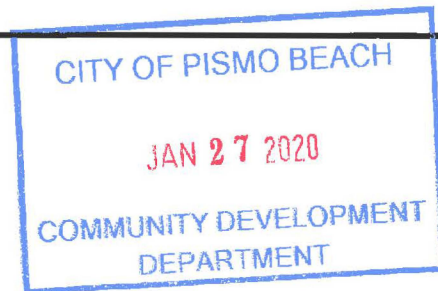
Brad Snook,  
Chair, Surfrider Foundation San Luis Obispo  
[chair@slo.surfrider.org](mailto:chair@slo.surfrider.org)  
(805) 440-9489



## Oceano Community Services District

1655 Front Street, P.O. Box 599, Oceano, CA 93475

(805) 481-6730 FAX (805) 481-6836



January 23, 2020

City of Pismo Beach  
Community Development Department, Planning Division  
Attn: Matthew Downing, AICP, Planning Manager  
760 Mattie Road  
Pismo Beach, CA 93449

**Subject: Comments on the scope and content of the environmental information included in the Draft Environmental Impact Report (EIR) for the Central Coast Blue Project.**

Dear Mr. Downing,

This letter is submitted by the Board of Directors of the Oceano Community Services District (District) in response to the Notice of Preparation of a Draft EIR for the Central Coast Blue Project (Project). We understand that the City of Pismo Beach will serve as the lead agency under the California Environmental Quality Act (CEQA).

The District supports the inter-agency regional project development efforts for the Project with the South San Luis Obispo County Sanitation District and the cities of Arroyo Grande, Grover Beach, and Pismo Beach. The District recognizes the importance of a transparent and thorough evaluation of the environmental impacts of the Project, including how those impacts may affect the community of Oceano. We understand that Pismo Beach will be working with several state and local agencies during the preparation and review of the proposed EIR. In addition to the County of San Luis Obispo, which has jurisdiction over land use planning and street and road maintenance for Oceano, the District's services could be impacted by the Project.

The District is responsible for fire and emergency services, which we provide through the Five Cities Fire Authority. We are also responsible for enterprise functions including water, wastewater collection, and solid waste and recycling. Lastly, the District has the jurisdictional authority to provide parks and recreation but lacks any funding to implement any such programs.

At a minimum, the EIR should address any environmental impacts to any one of the services provided by our District, both during the construction period and during the operational period of the Project. The most likely environmental impact of the Project is the impact to the groundwater basin used by the Project participants and the District to provide water supply to Oceano. We request that the evaluation of impacts to the groundwater





## Oceano Community Services District

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basin be sufficient to determine the optimal locations for groundwater recharge in the basin and sufficient to evaluate any degradation or potential degradation to the water quality of the basin. In addition, we feel the EIR should include co-equal analysis of site alternatives for the Project.

Sincerely,

A handwritten signature in blue ink that reads "Linda Austin".

Linda Austin, President



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D., Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Gavin Newsom**  
Governor

January 3, 2020

Mr. Matthew Downing  
City of Pismo Beach  
760 Mattie Road  
Pismo Beach, California 93449

### NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR CENTRAL COAST BLUE PROJECT – DATED DECEMBER 18, 2019 (STATE CLEARINGHOUSE NUMBER: UNKNOWN)

Dear Mr. Downing:

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation for a Draft Environmental Impact Report (EIR) for Central Coast Blue Project.

The proposed project is a regional advanced water purification project intended to enhance supply reliability by reducing the Santa Maria Groundwater Basin's (SMGB) vulnerability to drought and seawater intrusion. The project would involve injection of advanced purified water into the SMGB in a series of injection wells, installed at various locations in the SMGB, to develop a seawater intrusion barrier. Water for the project would be sourced from two of the region's wastewater treatment facilities. Engineering and construction details are not known for several of the project components at this time.

DTSC recommends that the following issues be evaluated in the EIR, Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for project site activities to result in the release of hazardous wastes/substances. In instances in which releases may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC

recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook ([https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml\\_handbook.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml_handbook.pdf)).

3. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 *Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers* ([https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance\\_Lead Contamination\\_050118.pdf](https://dtsc.ca.gov/wpcontent/uploads/sites/31/2018/09/Guidance_Lead Contamination_050118.pdf)).
4. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to *DTSC's 2001 Information Advisory Clean Imported Fill Material* ([https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP\\_FS\\_Cleanfill-Schools.pdf](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf)).
5. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (<https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf>).

DTSC appreciates the opportunity to review the EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: [https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/VCP\\_App-1460.doc](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/VCP_App-1460.doc). Additional information regarding voluntary agreements with DTSC can be found at: <https://dtsc.ca.gov/brownfields/>.

Mr. Matthew Downing  
January 3, 2020  
Page 3

If you have any questions, please contact me at (916) 255-3710 or via email at [Gavin.McCreary@dtsc.ca.gov](mailto:Gavin.McCreary@dtsc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Gavin McCreary". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gavin McCreary  
Project Manager  
Site Evaluation and Remediation Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research  
State Clearinghouse  
[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Ms. Lora Jameson, Chief  
Site Evaluation and Remediation Unit  
Department of Toxic Substances Control  
[Lora.Jameson@dtsc.ca.gov](mailto:Lora.Jameson@dtsc.ca.gov)

Mr. Dave Kereazis  
Office of Planning & Environmental Analysis  
Department of Toxic Substances Control  
[Dave.Kereazis@dtsc.ca.gov](mailto:Dave.Kereazis@dtsc.ca.gov)



**COUNTY OF SAN LUIS OBISPO**

**DEPARTMENT OF AGRICULTURE / WEIGHTS & MEASURES**

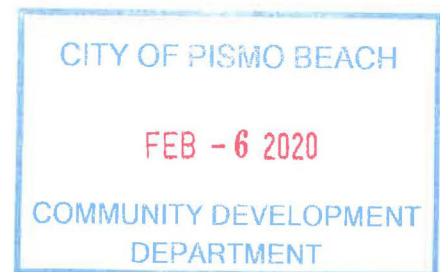
Martin Settevendemie, Agricultural Commissioner / Sealer of Weights & Measures

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**DATE:** January 30, 2020  
**TO:** Matthew Downing, Planning Manager City of Pismo Beach  
**FROM:** Lynda L. Auchinachie, Agriculture Department  
**SUBJECT:** Central Coast Blue Notice of Preparation of a Draft Environmental Impact Report (3186)

Thank you for the notice of preparation of a draft environmental impact report for the Central Coast Blue project and the opportunity to review the project description. The project description indicates that the specifics of the project have not all been identified although there is the possibility that project injection wells, pipelines or other infrastructure may be located on or near agricultural resources. For this reason, the draft environmental impact report should include an analysis of potential direct and indirect impacts to agricultural resources associated with the project.

Thank you for your consideration. If you have questions, please call 781-5914.



February 3, 2020

City of Pismo Beach Community Development Department  
Planning Division  
760 Mattie Road Pismo Beach  
California, 93449

Attention: Matthew Downing, AICP, Planning Manager

**Subject:** Comments on the scope and content of the environmental information included in the Draft Environmental Impact Report (DEIR) for the Central Coast Blue Project (CCB).

Dear Mr. Downing,

Thank you for this opportunity to comment on the Central Coast Blue Notice of Preparation for the Draft Environmental Impact Report.

### **Seawater Intrusion**

The project claims to become a sustainable water source that prevents seawater intrusion. First and foremost, there is no conclusive evidence that seawater is intruding into the basin at this time. Two samples from two monitoring/sentry wells in the past have been anomalies with no data indicating any trends. There is no reference to best management practices being followed after each “spike” was found, to determine if the samples were flawed. Furthermore, the projects lead agency is relying on modeling that is based on antiquated science and technology.

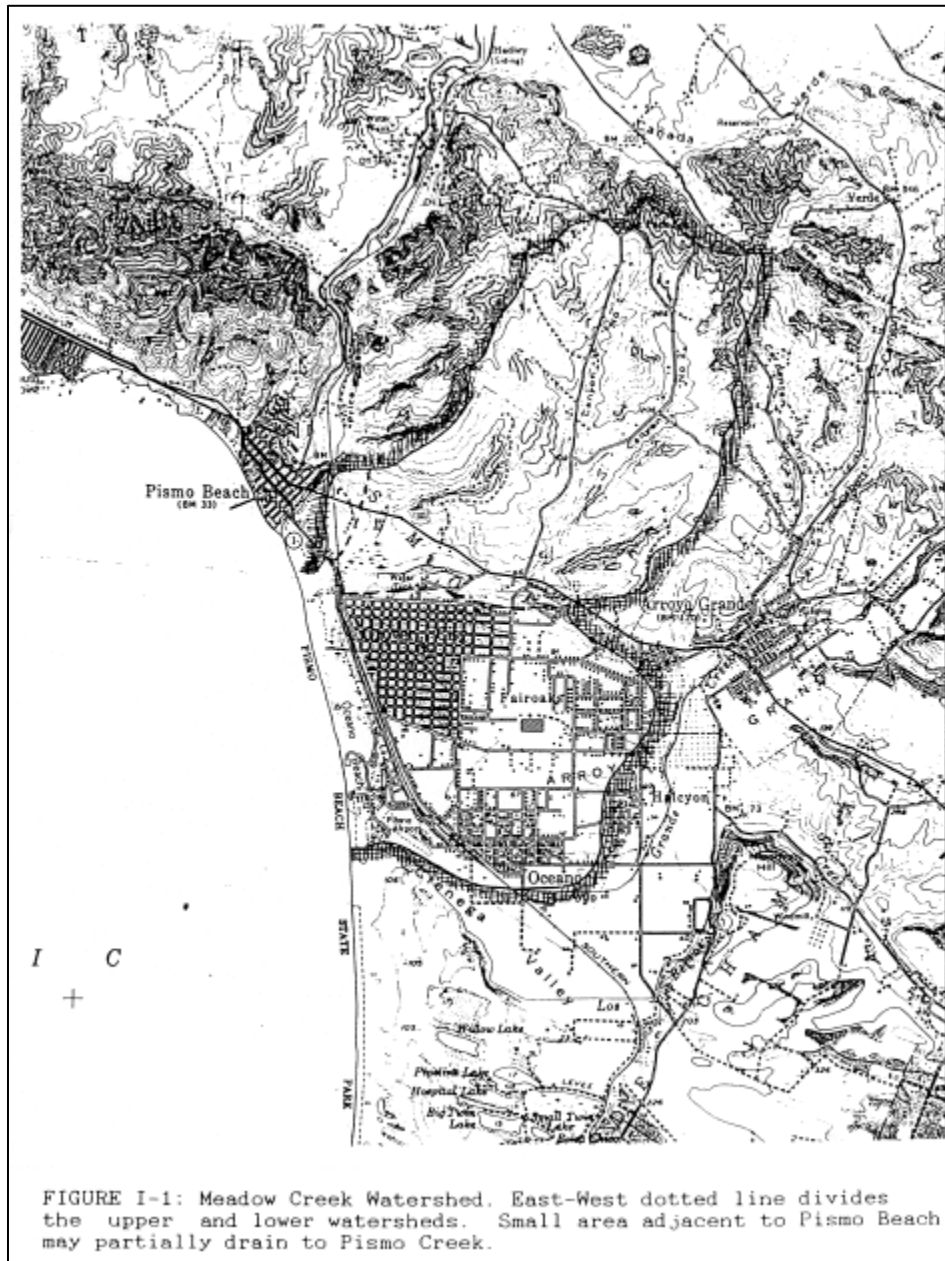
The project proponent points to a spike in sentry well No. 32S/13E-30N02 in 2009 when the well had false positive readings after years of neglect and degradation. The impetus for the subject project appears to be based upon a situation resulting from this potential threat of seawater intrusion at this sentry well located on Pier Ave. in Oceano. The well in question is located near the shoreline and had been in a state of disrepair until early 2010. Since then the well has been cleaned and sealed to ensure the accuracy of water samples taken. In the report to the NCMA participants, dated October 20, 2009, Water Systems Consulting Inc. indicates “Although the groundwater elevations at several of the listed wells were near or below sea level during 2000 and 2008, the report (2008) concluded that the seawater interface appeared to be offshore, and there was no indication of seawater intrusion.”

The proposed NOP provides no evidence of ongoing seawater intrusion or continuing threats to the groundwater aquifer, especially in times of drought. In fact, it is questionable whether, or not, there was sound evidence of seawater intrusion at the Pier Ave. well or any other sentry well at any time.

In 2012, the Oceano Community Services District Board of Directors wrote a letter to the County Board of Supervisors explaining the circumstances surrounding well No. 32S/13E (see attached).

### Sensitive Species

The Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) fails to discuss an analysis under the National Environmental Protection Act (NEPA). The lead agency for the project continues to pursue grant funding, yet fails to include analysis under NEPA. As you are surely aware, any grants or low interest loans that are funded wholly, or in part, by any federal funds will require this level of analysis. In light of the fact that the Federally Endangered Red Legged Frog has been identified in the vicinity (Meadow Creek Watershed) of the project, it would be prudent to perform CEQAplus.



Please find the 2012 Biological Resources Assessment Meadow Creek Lagoon report attached. In this report State and Federal sensitive species in the CCB project vicinity are identified, which may help in your review. It is likely this project will be required to obtain an Incidental Take Permit for affected species under either, Section 7 or Section 10 of the Act.

The project is contemplated in two phases; see the section below on Piecemealing or Segmenting CEQA:

### **Piecemealing or Segmenting**

The State CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment.

Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than- significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.

In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

CEQA case law has established the following general principles on project segmentation for different project types:

- For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.
- For a linear project with multiple segments such as a highway, individual segments may be evaluated in separate CEQA documents if they have logical termini and independent utility. *Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712.
- For a planning approval such as general plan amendment, the project description must include reasonably anticipated physical development that could occur in view of the approval. *City of Redlands v. County of San Bernardino* (2002) 96 Cal. App. 4th 398.
- For a project requiring construction of offsite infrastructure (e.g., water and sewer lines), the offsite infrastructure must be included in the project description. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App. 4th 713.
- For modification of a permit for an existing facility, the scope of the project description can be limited to the scope of the permit modification and does not cover the entire facility. *Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App. 4th 549.



### **California Coastal Commission**

It has been said at public meetings that the Coastal Commission will not have jurisdiction over the project because the CCB “Advanced Treatment Facility location is outside the coastal zone.” However, it is my opinion; do not underestimate the California Coastal Commission’s jurisdiction over the numerous injection well sites as they are proposed on the west side of Hwy 1 which is contiguous with the Coastal Zone boundary. The Environmentally Sensitive Habitat Area’s (ESHA) in the Coastal Zone are protected; wetland mitigation is complicated and expensive, avoidance is recommended.

### **Ocean Outfall**

Today, all treated wastewater from the Cities of Pismo Beach, Grover Beach, Arroyo Grande and the community of Oceano enters the ocean through a shared pipe that is open to the ocean some 1,000 feet offshore. Phase 1 of CCB estimates a reduction in outflow commensurate to its wastewater treatment plant flows, failing to quantify or qualify the projects brine waste that will continue to be dumped in the ocean. Based upon 1,300 AFY, and an assumed 25% brine waste, this equates to approximately 300,000 gallons per day of concentrated brine waste. Furthermore, discussions of Phase 2 of the project suggest that there will be no further ocean outfall, but project proponents say nothing of the commensurate brine waste that would result from Phase 2 and the necessary dilution factors to continue to dispose of brine to the ocean. Additionally, CCB’s partner South San Luis Obispo County Sanitation District has several commercial accounts for brine disposal that would need to be calculated in the dilution and/or new disposal scheme should the final project cease to dispose to the ocean.

### **Alternatives**

If this is not a seawater intrusion prevention project, than it must be a water availability project. The DEIR should fully analyze alternatives to the CCB project that include options to secure additional water supplies. The range of options should include project wide conservation and/or as a State Water Project (SWP) subcontractor, Pismo Beach could seek additional State Water “Excess Allocation”.

Clearly, the region has made efforts to conserve water, but with the continued development of high efficiency plumbing fixtures, it appears substantial water savings from both commercial and residential uses can be achieved at lower cost and little, to no environmental impacts. A water conservation target for the region should be on the order of 50 gallons per capita per day (gpcd) for interior residential use. By all indications, the member agencies of the NCMA are substantially above that number, perhaps in the range of 70-90gpcd. With conservation in that neighborhood, it equates to approximately 1,000AFY (45,000 people x 20gpcd conservation = 900,000 gpd or 1,008AFY)

Alternatively or in combination, there is almost 15,000AFY of unallocated State Project water from the annual allocation of 25,000AFY and 3,000AFY of excess pipeline capacity in the CCWA coastal branch. There is currently an effort to exchange and transfer this allocation to SWP subcontractors, of which Pismo Beach is a participant.

### **Greenhouse Gas**

By its nature, the project will be highly energy intensive. The Reverse Osmosis system uses electricity to force treated wastewater through fine fabric membranes and electric Ultra Violet lights to disinfect the water before pumping to the injection well sites. Electricity will be used to inject the polished water into the ground. The water will later be pulled out of the ground by wells using electricity, treated by additional electric powered filtration systems and electric systems for adding chemicals to the water to account for any contamination. Then, using electric pumps, the water will be pumped into the cities conveyance systems.

The combined use of electricity should be calculated and mitigated. A site larger than 2 acres for the ATF would provide for alternative energy sources; wind, solar and/or cogeneration.

The DEIR must specify its measurable, feasible, mitigation.

### **Construction**

Construction of injection wells on the Sanitation District property adjacent to the County's Oceano Airport and Campground is of concern. Drill rigs as tall as 50 feet for 24/7 days-long periods of time, could cause the closure of the airport. These temporary structures will need the California Department of Transportation Aeronautical Division oversight. Please analyze and describe mitigation for the impacts of closing the airport at different times of the year (there are busier times of the year than others that would have more impact to airport and campground users).

Additional drilling of injection and/or supply wells constructed 24/7 with all night lighting may have impacts on wildlife, camping and residential neighbors.

### **Summary**

It is my recommendation that preparation of the DEIR wait for the Memorandum of Agreement which deals with cost sharing, to be signed by all parties. Also, wait for the related governance structure to be adopted by all parties. Finally, wait for the completion of the state-of-the-art technology investigating the seawater/freshwater interface. The project proponent has plans to do an aerial survey to map the seawater/freshwater boundary. Once the results of the aerial mapping are provided in the future, the project may be found to be unnecessary, premature or a take a new course of action or direction to secure additional water resources.

Thank you again for this opportunity to comment.  
Please feel free to contact me with any questions you may have.

Sincerely,





## Oceano Community Services District

1655 Front Street, P. O. Box 599, Oceano, CA 93445 (805) 481-6730 FAX (805) 481-6836

Board of Supervisors  
County of San Luis Obispo  
County Government Center  
San Luis Obispo, California 93408

February 8, 2012

RE: Sea Water Intrusion In Oceano

Dear Sirs,

The Oceano groundwater supply is not threatened with seawater intrusion. We are aware that there has been information provided to the public that Oceano's groundwater supply is threatened by seawater intrusion. The incident in 2009 exhibited characteristics of saltwater intrusion but it has since to be repeated and it also should be noted that the well in question was in great disrepair. This was corrected by the county maintenance crew and at no time since has it exhibited anymore characteristics of seawater intrusion.

At the time that this sentry well was tested, there were significant external contaminants. The Board at the time was directed by its contracted engineer to take a position that the event was actually a benefit because it would elevate the priority level in case of any state water contractor allocation cutbacks. This same engineer is on contract with several San Luis Obispo agencies to which this information has been exploited to their benefit.

We normally would have accepted this without comment, but the level of exploitation of this anomaly has reached critical mass and is being quoted from everything from commercial development, other agencies needs and willful suspensions of the truth.

Sincerely,

MATTHEW G. GUERRERO  
President

RICHARD SEARCY  
Director

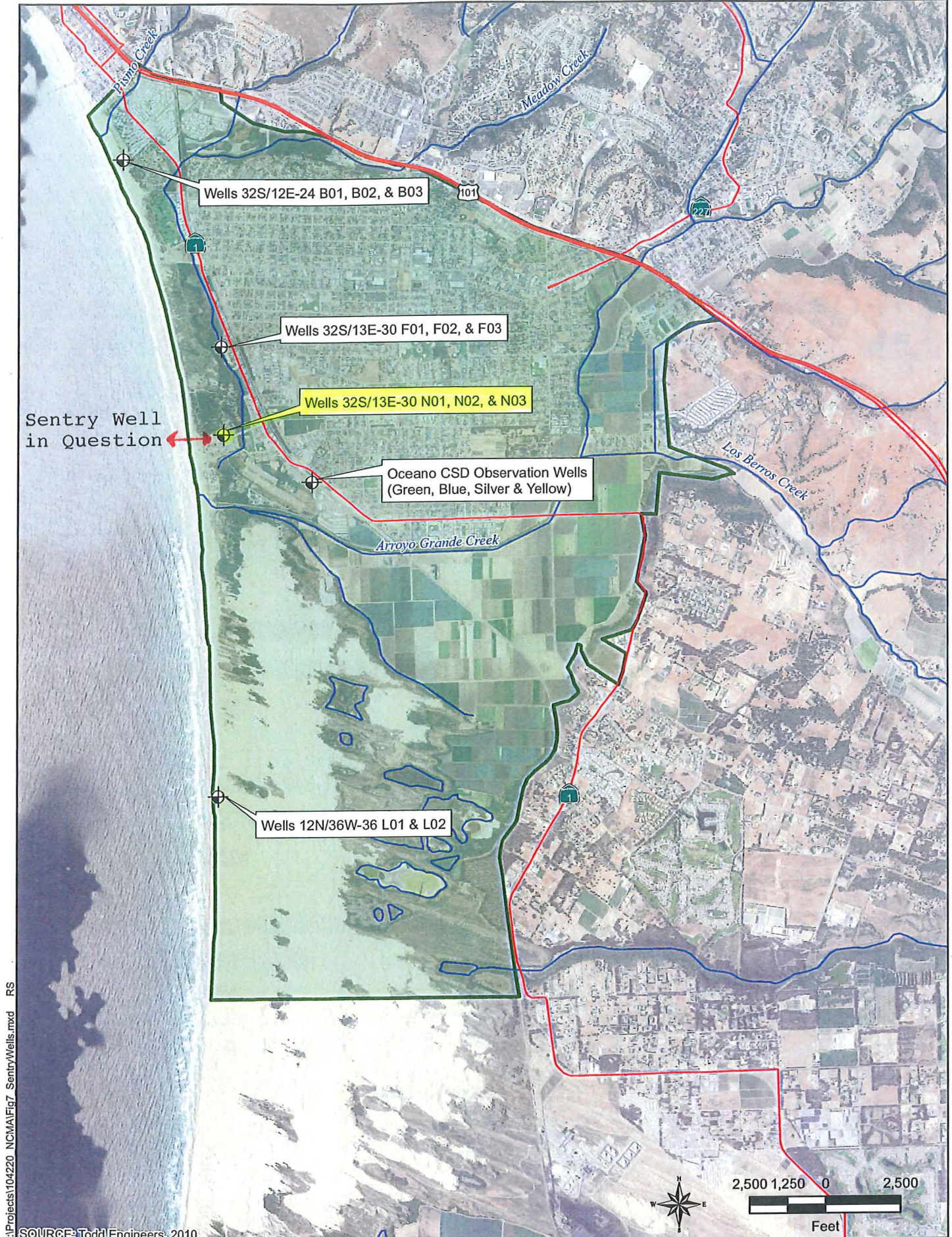
LORI ANGELLO  
Director

MARY LUCEY  
Vice-President

FELMA HURDLE  
Director

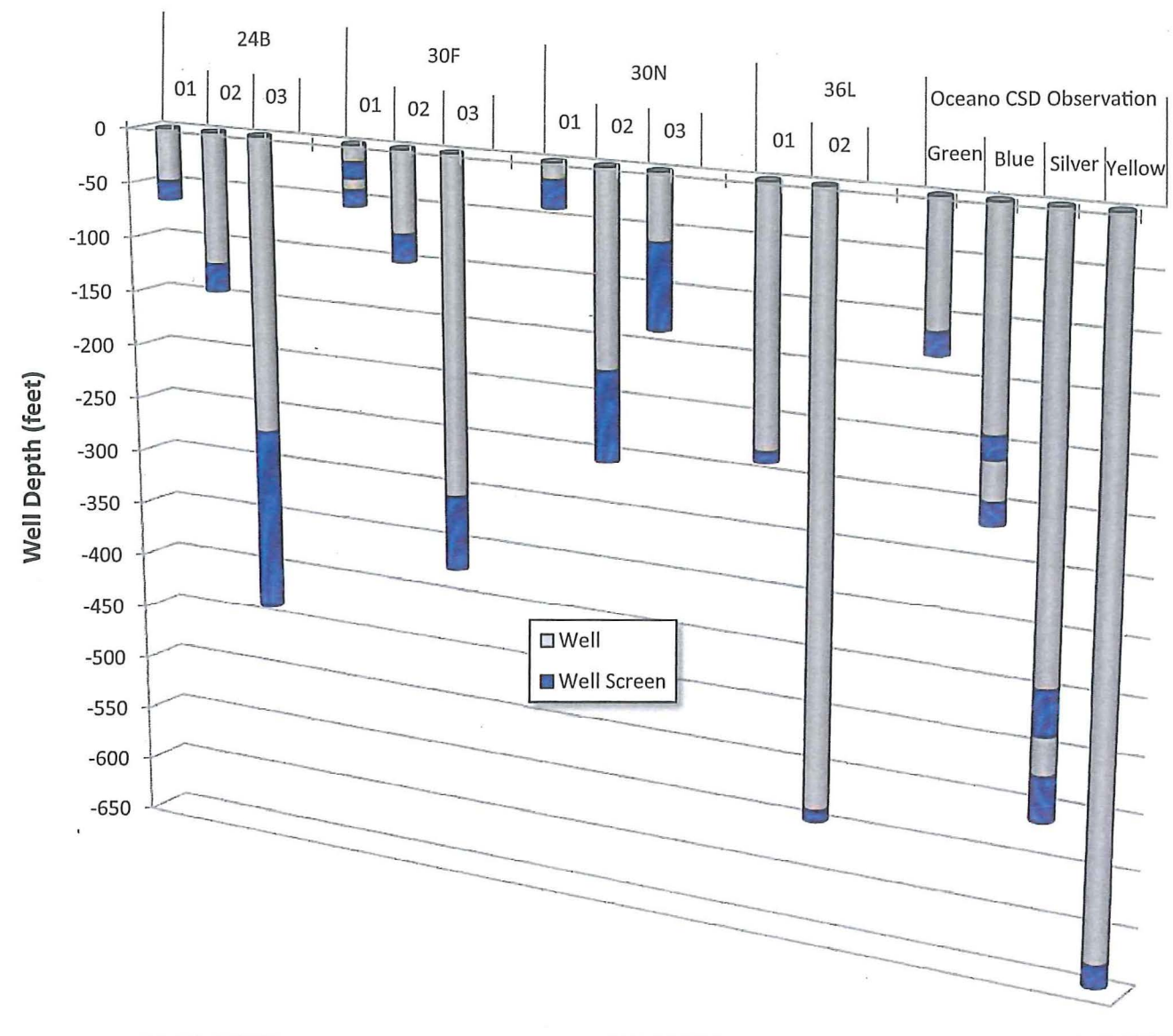
TOM GEASLEN  
Interim General Manager

attachments



SOURCE: Todd Engineers, 2010.

Figure 8 - Depths of Sentry Wells



**Table 6b: Northern Cities Sentry Well Water Quality Data Summary**

Well	Production Interval	Date	Depth to Water (feet)	Groundwater Elevation (feet NAVD)	Total Dissolved Solids (mg/L)	Chloride (mg/L)	Sodium (mg/L)
32S/13E-30F03	Screened from 305-372'	1/24/2011	12.67	10.64	650	46	36
		10/28/2010	NA	NA	650	46	37
		10/21/2010	6.62	16.69	NA	NA	NA
		7/26/2010	17.32	5.99	608	45	43.8
		4/27/2010	11.38	9.02	668	48	40.8
		1/28/2010	10.98	9.42	656	40	43.1
		10/19/2009	14.18	6.22	626	48	43.3
		8/19/2009	20.23	0.17	672	45	43.1
		5/12/2009	17.68	2.72	678	49	44.8
		3/27/1996	NA	NA	686	41	40
		6/7/1976	NA	NA	616	43	41
1/19/1966	NA	NA	642	69	49		
32S/13E-30N01	Screened from 15-40'	1/24/2011	8.18	7.35	870	180	100
		10/21/2010	9.99	5.54	890	190	120
		7/27/2010	8.97	6.56	917	200	130
		4/27/2010	6.14	7.36	808	150	130
		1/26/2010	4.90	8.60	902	210	155
		10/20/2009	6.53	7.00	828	200	159
		8/20/2009	6.71	6.82	835	160	150
		5/11/2009	6.03	7.50	960	180	175
		1/24/2011	6.68	8.75	570	76	48
32S/13E-30N03	Screened from 60-135'	10/21/2010	10.76	4.67	550	69	59
		7/27/2010	9.53	5.90	528	72	55.1
		4/27/2010	6.14	7.36	672	89	60.6
		1/26/2010	5.88	7.62	606	110	75.0
		10/20/2009	6.56	6.94	806	180	93.3
		8/20/2009	7.50	6.00	1,070	190	151
		5/12/2009	6.33	7.17	602	97	63.4
		3/27/1996	NA	NA	624	70	62
		6/7/1976	NA	NA	705	90	54
		1/21/1966	NA	NA	804	57	54
		32S/13E-30N02	Screened from 175-255'	1/24/2011	3.67	11.76	1,050
10/21/2010	10.42			5.01	1,040	48	52
7/27/2010	10.02			5.41	777	57	67.6
4/27/2010	5.26			8.27	800	93	71.9
2/25/2010	1.72			11.78	1,000	48	71.4
2/25/2010	1.72			11.78	1,010	74	76.9
1/26/2010	3.72			9.78	970	50	74.2
10/20/2009	7.38			6.12	2,080	690	274
8/20/2009	11.94			1.56	1,350	500	199
5/11/2009	6.98			6.52	1,290	170	129
3/27/1996	NA			NA	1,050	50	71
6/7/1976	NA			NA	1,093	48	62
1/21/1966	NA			NA	1,069	54	71
12N/36W-36L01	Screened from 227-237'	1/24/2011	17.61	8.68	890	41	55
		10/21/2010	20.75	5.54	910	38	76
		7/27/2010	21.18	5.11	707	36	64.2
		4/26/2010	15.94	8.06	860	42	70.3
		10/21/2009	17.72	6.28	856	38	72.0
		8/20/2009	19.16	4.84	890	39	78.0
		5/11/2009	17.68	6.32	832	63	83.8
		3/26/1996	NA	NA	882	35	66
		6/8/1976	NA	NA	936	38	72

Period of Elevated NA/CL ←

Table 6a: Northern Cities Sentry Well Water Quality Data Summary

Well	Construction	Top of Casing Elevation (feet NAVD)	Date	Depth to Water (feet)	Groundwater Elevation (feet NAVD)	Total Dissolved Solids (mg/L)	Chloride (mg/L)	Sodium (mg/L)	Potassium (mg/L)	Calcium (mg/L)	Magnesium (mg/L)	Bicarbonate (as CaCO3) (mg/L)	Sulfate (mg/L)	Nitrate (mg/L)	Total Kjeldahl Nitrogen (mg/L)	Boron (mg/L)	Fluoride (mg/L)	Iodide (mg/L)	Manganese (mg/L)	Iron (mg/L)	Alkalinity, Total (as CaCO3) (mg/L)	Carbonate (as CaCO3) (mg/L)	Hydroxide (as CaCO3) (mg/L)	Specific Conductance (umhos/cm)	Iron (mg/L)	Bromide / Chloride Ratio	Chloride / Bromide Ratio				
32S/13E-30A03	Screened from 60-135' - 2-inch diameter Wellhead renovation in 6/2010 added to the TOC elevation Pad elevation NAVD 88 TOC elevation prior to renovation (Approximate)	15.43	1/24/2010	6.68	8.75	570	76	48	4.8	55	25	130	130	16	<1.0	0.12	0.2	<0.10	0.0088	1.7	130	<2.0	<2.0	600	<0.1	0.0224	45				
			10/21/2010	10.76	4.67	550	69	59	3.3	65	31	133	150	15	<1.0	0.12	0.1	NA	<0.005	1.1	133	<1.0	<1.0	696	<0.1	0.0159	63				
			7/27/2010	9.53	3.41	528	72	55.1	3.41	68.7	31.0	139	130	15.0	<0.50	0.0272	0.14	0.11	<0.00500	1.3	139	<1.0	<1.0	660	<0.100	0.0181	55				
			4/27/2010	6.14	7.35	672	89	60.6	3.65	70.6	32.5	134	130	14.0	<0.50	0.0779	0.18	0.11	<0.00500	1.2	134	<1.0	<1.0	870	<0.100	0.0135	74				
			1/25/2010	5.88	7.62	606	110	75.0	4.51	77.5	34.3	128	130	14	1.4	0.0654	0.15	<0.10	0.0120	1.3	126	<1.0	<1.0	990	0.633	0.0118	55				
			10/20/2009	6.56	6.84	606	160	93.3	25.5	92.3	41.5	167	150	17	2.4	NA	0.27	<0.10	0.151	1.6	160	<1.0	<1.0	1,200	0.344	0.0018	129				
			8/20/2009	7.50	6.00	1,070	190	151	61.6	112	44.2	130	130	16	NA	0.28	<0.10	0.245	1.4	130	<1.0	<1.0	1,700	1.93	0.0084	118					
			5/19/2009	6.33	7.17	602	97	63.4	3.96	72.9	32.2	122	120	NA	NA	NA	NA	0.24	NA	NA	1.2	122	<1.0	<1.0	900	2.24	0.0124	81			
			3/27/1996	NA	NA	624	70	62	4	78	35	150	161	106.8	NA	0.13	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
			6/7/1976	NA	NA	705	90	84	2.9	89	43	169	169	112.5	NA	0.08	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
			1/21/1966	NA	NA	604	57	54	3	132	69	410	250	1	NA	0.08	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
			32S/13E-30A02	Screened from 175-255' - 2-inch diameter Wellhead renovation in 6/2010 added to the TOC elevation Pad elevation NAVD 88 TOC elevation prior to renovation (Approximate)  Confirmation Sample Collected from Pump Discharge at End of Pump Confirmation Sample Collected by Standard Method (Baf)	15.43	1/24/2011	3.67	11.78	1,050	50	60	6.4	100	49	150	450	0.24	<1.0	0.17	0.17	<0.10	0.064	<0.1	160	<2.0	<2.0	1,390	0.12	NA	NA	
						10/21/2010	10.42	5.01	1,040	48	52	5.5	100	45	181	400	0.24	<1.0	<0.1	0.17	0.17	<0.10	0.064	<0.1	181	<1.0	<1.0	1,377	<0.1	NA	NA
7/27/2010	10.02	5.41				777	67	67.6	7.31	141	58.5	190	470	0.3	3.5	0.158	<0.10	0.21	0.102	0.28	190	<1.0	<1.0	1,500	3.43	0.0049	204				
4/27/2010	5.26	8.27				600	93	71.9	12.50	108	46.3	159	300	7.0	3.2	0.123	0.13	0.11	0.0778	0.7	159	<1.0	<1.0	1,100	3.27	0.0075	133				
2/25/2010	1.72	11.78				1,000	48	71.4	4.70	141	58.1	199	490	0.16	<0.50	0.15	0.15	<0.10	0.0033	0.16	195	<1.0	<1.0	1,300	3.30	0.0033	300				
2/25/2010	1.72	11.78				1,010	74	76.9	10.2	138	55.8	195	440	0.13	2.4	0.142	0.16	<0.10	0.0579	0.24	195	<1.0	<1.0	1,400	1.69	0.0032	308				
1/25/2010	3.72	9.78				910	90	74.2	4.77	152	62.2	155	310	0.14	<0.50	0.129	0.11	<0.10	<0.00500	0.16	195	<1.0	<1.0	1,500	<0.100	0.0032	313				
10/20/2009	7.38	6.12				2,060	690	274	151	239	101.0	220	400	<0.10	7.0	0.201	0.16	0.87	0.393	0.20	220	<1.0	<1.0	2,600	5.50	0.0029	345				
8/20/2009	11.94	1.56				1,350	500	189	82.2	123	49.0	199	220	6.4	6.3	NA	0.23	0.14	0.339	2.8	199	<1.0	<1.0	2,100	4.91	0.0056	179				
5/11/2009	6.98	6.52				1,290	170	129	52	137	66.9	176	470	NA	NA	NA	0.18	NA	0.128	0.56	176	<1.0	<1.0	1,800	5.24	0.0033	304				
3/27/1996	NA	NA				1,050	71	71	5.5	145	60	243	516	0.9	NA	0.23	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
6/7/1976	NA	NA				1,093	48	62	4.7	150	60	248	484	0	NA	0.13	0.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
1/21/1966	NA	NA				1,069	54	71	5	148	63	232	483	0	NA	0.12	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
12S/13W-36L01	Screened from 227-237' - 2-inch diameter Wellhead renovation in 6/2010 added to the TOC elevation Pad elevation NAVD 88 TOC elevation prior to renovation (Approximate)	26.29	1/24/2011	17.61	8.68	890	41	55	5.1	98	36	160	400	0.50	<1.0	0.28	0.15	<0.10	<0.005	<0.1	160	<2.0	<2.0	1,200	<0.1	NA	NA				
			10/21/2010	20.75	5.54	910	38	76	3.6	130	47	169	400	0.39	<1.0	0.10	<0.1	NA	<0.005	<0.3	169	<1.0	<1.0	1,213	<0.1	NA	NA				
			7/27/2010	21.18	5.11	707	36	64.2	3.70	127	47.4	162	420	0.40	<0.50	0.158	<0.10	<0.10	<0.00500	0.11	162	<1.0	<1.0	1,100	<0.100	0.0031	327				
			4/26/2010	15.94	8.05	860	42	70.3	4.13	129	48.9	191	400	0.45	0.77	0.223	<0.1	0.15	0.657	0.14	191	<1.0	<1.0	1,100	4.53	0.0033	300				
			10/21/2009	17.22	6.28	858	39	72.0	4.64	131	48.2	192	420	0.49	0.84	0.150	0.12	<0.10	0.0594	0.13	192	<1.0	<1.0	1,100	1.68	0.0034	292				
			8/20/2009	19.16	4.84	850	39	78.0	4.21	138	48.1	164	390	0.49	0.56	NA	<0.10	<0.10	0.165	0.14	164	<1.0	<1.0	1,200	2.03	0.0036	279				
			5/11/2009	17.68	6.32	832	63	83.8	4.88	111	45.4	204	330	NA	NA	NA	0.12	NA	0.551	0.22	204	<1.0	<1.0	1,200	4.02	0.0035	286				
			3/26/1996	NA	NA	682	35	66	4.8	124	47	233	408	2	NA	0.24	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
			6/8/1976	NA	NA	936	28	72	3.5	130	48	223	423	0.6	NA	0.15	0.7	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
			12S/13W-36L02	Screened from 535-545' - 2-inch diameter Wellhead renovation in 6/2010 added to the TOC elevation Pad elevation NAVD 88 TOC elevation prior to renovation (Approximate)	26.29	1/24/2011	9.37	16.92	800	120	95	7.6	75	30	300	190	<0.05	2.3	0.39	0.18	1.31	0.13	0.53	300	<2.0	<2.0	1,270	1.40	0.0044	226	
						10/21/2010	19.77	6.52	770	120	130	7.6	89	44	275	160	<0.1	3.4	0.48	<0.1	NA	0.15	0.54	275	<1.0	<1.0	1,293	0.12	0.0045	222	
						7/27/2010	20.53	6.76	737	110	78.1	9.1	38.9	268	190	<0.10	<0.50	0.427	0.10	0.77	0.189	0.80	268	<1.0	<1.0	1,200	0.845	0.0033	158		
						4/26/2010	9.24	14.76	720	100	116	6.88	85.4	32.4	215	210	1.5	0.77	0.382	0.2	0.28	0.167	0.7	215	<1.0	<1.0	1,100	3.870	0.0070	143	
10/21/2009	17.65	6.35				638	99	113	6.15	81.8	23.0	172	200	<0.10	3.2	0.268	0.33	0.7	0.128	0.61	172	<1.0	<1.0	940	0.255	0.0062	162				
8/20/2009	19.15	4.85				785	100	131	6.66	89.8	36.6	200	190	<0.10	3.8	NA	0.15	0.27	0.205	0.78	200	<1.0	<1.0	1,200	0.830	0.0075	133				
5/11/2009	14.38	9.62				778	120	122	7.24	84	39.7	294	180	NA	NA	NA	0.18	NA	0.426	0.79	294	<1.0	<1.0	1,300	0.958	0.0065	154				
3/26/1996	NA	NA				727	127	130	8.7	88	39	390	160	0.2	NA	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
6/8/1976	NA	NA				820	126	118	6.6	94	44	393	184	0	NA	NA	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Oceano MW-Green	Screened from 110-130' - 3-inch diameter Casing relative to concrete pad Pad elevation above MSL, approximate All elevations relative to MSL	30.85				1/24/2011	106.99	-71.26	310	98	22	6.1	34	9.2	18.0	53	<0.05	<1.0	<0.1	0.2	4.42	0.4	0.63	190	<2.0	<2.0	480	10	0.0064	156	
						10/21/2010	NA	NA	290	81	26	9.3	64	11	160.0	68	<0.1	<1.0	<0.1	0.2	NA	0.65	0.56	160.0	<1.0	<1.0	520	39	0.0044	225	
						10/21/2010	112.71	-81.83	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
						7/26/2010	95.61	-64.78	438	85	34.3	1.93	61.7	30.4	300	210	<0.10	<0.50	0.0435												



## Oceano Community Services District

1655 Front Street, P. O. Box 599, Oceano, CA 93445 (805) 481-6730 FAX (805) 481-6836

# Previous Photos

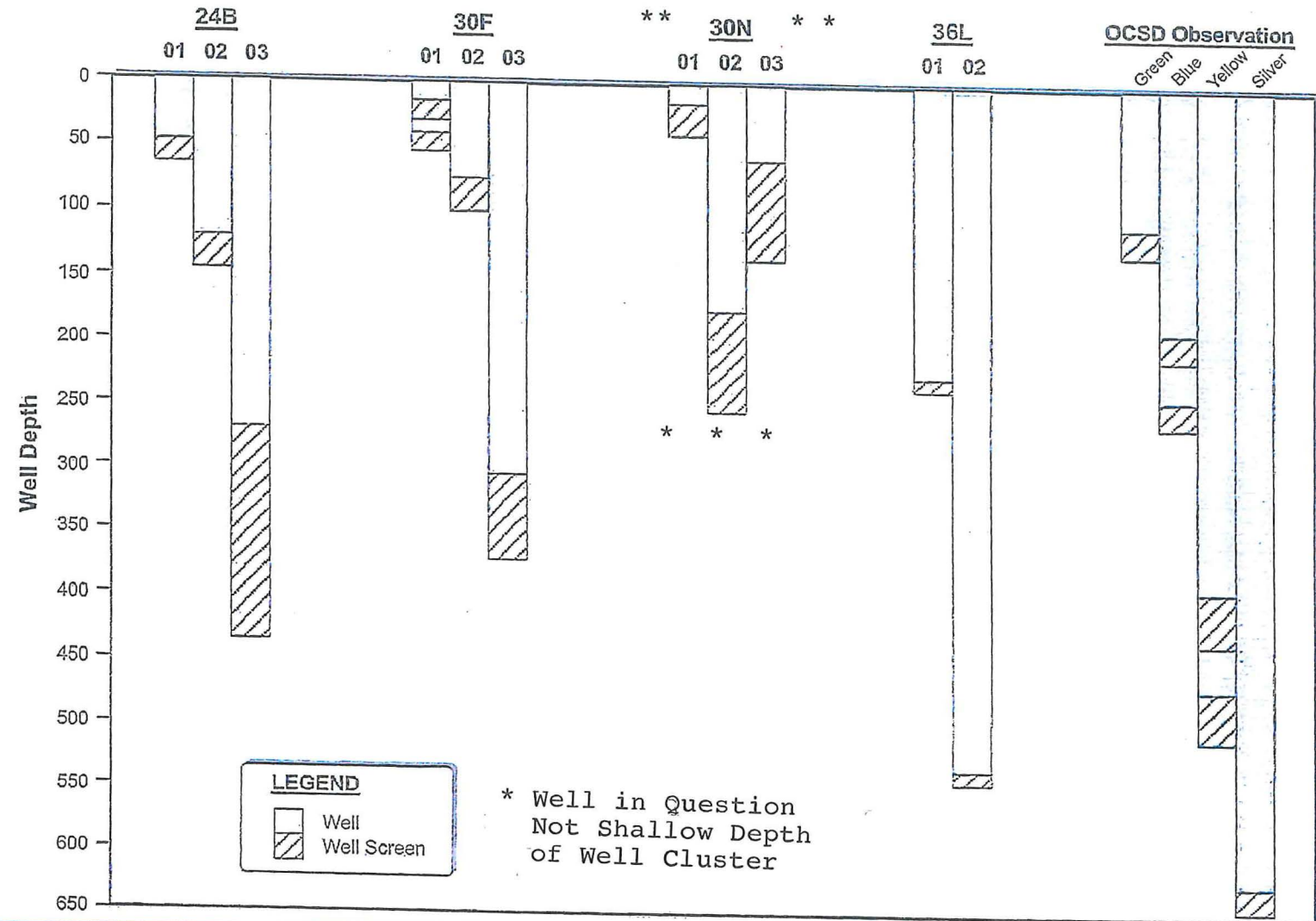
of

# Sentry Well





# Depth of Sentry Wells





## Sentry Wells N01, 2, and 3



Condition at Time of Test Exhibiting SW Characteristics



# Monitoring Casings



Well in Great Disrepair. Note High Level of Contamination.



## Access Port



Close Up of Contamination



## Oceano Community Services District

1655 Front Street, P. O. Box 599, Oceano, CA 93445 (805) 481-6730 FAX (805) 481-6836

# Current Photos

of

# Sentry Well

















**CALIFORNIA STATE LANDS COMMISSION**

100 Howe Avenue, Suite 100-South  
Sacramento, CA 95825-8202



*Established in 1938*

JENNIFER LUCCHESI, *Executive Officer*  
(916) 574-1800 Fax (916) 574-1810  
California Relay Service TDD Phone 1-800-735-2929  
from Voice Phone 1-800-735-2922

**Contact Phone: (916) 574-1890**

February 4, 2020

File Ref: SCH # 2019120560

Attn: Matthew Downing  
City of Pismo Beach  
760 Mattie Road  
Pismo Beach, CA 93449

*VIA REGULAR & ELECTRONIC MAIL ([mdowning@pismo-beach.org](mailto:mdowning@pismo-beach.org))*

**Subject: Notice of Preparation (NOP) for an Environmental Impact Report (EIR)  
for Central Coast Blue Project, San Luis Obispo County**

Dear Mr. Downing:

The California State Lands Commission (Commission) staff has reviewed the subject NOP for an EIR for the Central Coast Blue Project (Project), which is being prepared by the City of Pismo Beach (City). The City, as the operator of the Pismo Beach Wastewater Treatment Plant and the public agency proposing to carry out the Project, is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land, the Commission will act as a responsible agency. Commission staff requests that the City consult with us on preparation of the Draft EIR as required by CEQA section 21153, subdivision (a), and the State CEQA Guidelines section 15086, subdivisions (a)(1) and (a)(2).

**Commission Jurisdiction and Public Trust Lands**

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The state holds these lands for the benefit of all people of the state for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line, except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court. On navigable non-tidal waterways, including lakes, the state holds fee ownership of the bed of the waterway landward to the ordinary low-water mark and a Public Trust easement landward to the ordinary high-water mark, except where the boundary has been fixed by agreement or a court. Such boundaries may not be readily apparent from present day site inspections.

Based upon the information contained in the NOP, and a review of in-house records, Commission staff has determined that the wastewater from the proposed Project will be discharged through the South San Luis Obispo County Sanitation District's existing outfall which is covered under Commission Lease No. PRC 3875.9. The wastewater flow will not cause exceedances of the current National Pollutant Discharge Elimination System (NPDES) permit effluent limits. However, any changes to the existing outfall or lease terms will require a lease amendment.

The proposed new production well and the Advanced Treatment Facility (ATF) locations are currently unknown at this time. Commission staff requests that the City contact Cheryl Hudson (see contact information below) with additional detailed information regarding their location to determine whether the components require a lease and formal authorization from the Commission for the use of State sovereign land.

The above determinations are without prejudice to any future assertion of State ownership or public rights, should circumstances change, or should additional information come to our attention. In addition, these comments are not intended, nor should they be construed as, a waiver or limitation of any right, title, or interest of the State of California in any lands under its jurisdiction.

### **Project Description**

The City proposes to enhance water supply reliability to meet its objective and need to reduce vulnerability of the Santa Maria Groundwater Basin (SMGB) to drought and seawater intrusion. From the Project Description, Commission staff understands that the Project would include the following components that have potential to affect State sovereign land:

- **Project Component 1.** Advanced treatment of water at the Pismo Beach Wastewater Treatment Plant and the South San Luis Obispo County Sanitation District at a yet to be constructed ATF
- **Project Component 2.** Injection of water from the ATF to the SMGB from injection wells

## Environmental Review

Commission staff requests that the City consider the following comments when preparing the EIR, to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the EIR to support a future lease approval for the Project.

### General Comments

1. Project Description: A thorough and complete Project Description should be included in the EIR in order to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all allowable activities (e.g., types of equipment or methods that may be used, maximum area of impact or volume of sediment removed or disturbed, seasonal work windows, locations for material disposal, etc.), as well as the details of the timing and length of activities. In particular, illustrate on figures and engineering plans and provide written description of activities occurring below the mean high tide line for Project area waterways. Thorough descriptions will facilitate Commission staff's determination of the extent and locations of its leasing jurisdiction, make for a more robust analysis of the work that may be performed, and minimize the potential for subsequent environmental analysis to be required.
2. Public Trust Resources: *Environmental Law Foundation v. State Water Resources Control Board* (2018) 26 Cal.App. 5th 844, made clear that the potential adverse effects to Public Trust resources, such as navigable surface waters, caused by direct impacts to groundwater systems must be considered by state agencies. Such effects may include impacts to biological resources, water quality, and recreation, among others. The EIR should include a discussion of potential impacts, if any, caused by the Project to surface water systems.

### Biological Resources

3. For land under the Commission's jurisdiction, the EIR should disclose and analyze all potentially significant effects on sensitive species and habitats in and around the Project area, including special-status wildlife, fish, and plants, and if appropriate, identify feasible mitigation measures to reduce those impacts. The City should conduct queries of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database and U.S. Fish and Wildlife Service's (USFWS) Special Status Species Database to identify any special-status plant or wildlife species that may occur in the Project area. The EIR should also include a discussion of consultation with the CDFW, USFWS, and National Marine Fisheries Service (NMFS) as applicable, including any recommended mitigation measures and potentially required permits identified by these agencies.
4. Invasive Species: One of the major stressors in California waterways is introduced species. Therefore, the EIR should consider the Project's potential to encourage the establishment or proliferation of aquatic invasive species (AIS) such as the quagga

mussel, or other nonindigenous, invasive species including aquatic and terrestrial plants. For example, construction boats and barges brought in from long stays at distant projects may transport new species to the Project area via hull biofouling, wherein marine and aquatic organisms attach to and accumulate on the hull and other submerged parts of a vessel. If the analysis in the EIR finds potentially significant AIS impacts, possible mitigation could include contracting vessels and barges from nearby or requiring contractors to perform a certain degree of hull-cleaning. The CDFW's Invasive Species Program could assist with this analysis as well as with the development of appropriate mitigation (information at <https://www.wildlife.ca.gov/Conservation/Invasives>).

In addition, in light of the recent decline of native pelagic organisms and in order to protect at-risk fish species, the EIR should examine if any elements of the Project would favor non-native fisheries.

5. Construction Noise: The EIR should also evaluate noise and vibration impacts on fish and birds from construction, restoration or flood control activities in the water, on the levees, and for land-side supporting structures. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and NMFS. Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

#### Cultural Resources

6. Submerged Resources: The EIR should evaluate potential impacts to submerged cultural resources in the Project area. The Commission maintains a shipwrecks database that can assist with this analysis. Commission staff requests that the City contact Staff Attorney Jamie Garrett (see contact information below) to obtain shipwrecks data from the database and Commission records for the Project site. The database includes known and potential vessels located on the State's tide and submerged lands; however, the locations of many shipwrecks remain unknown. Please note that any submerged archaeological site or submerged historic resource that has remained in state waters for more than 50 years is presumed to be significant. Because of this possibility, please add a mitigation measure requiring that in the event cultural resources are discovered during any construction activities, Project personnel shall halt all activities in the immediate area and notify a qualified archaeologist to determine the appropriate course of action.
7. Title to Resources: The EIR should also mention that the title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the state and under the jurisdiction of the California State Lands Commission (Pub. Resources Code, § 6313). Commission staff requests that the City consult with Staff Attorney Jamie Garrett, should any cultural resources on state lands be discovered during construction of the proposed Project. In addition, Commission staff requests that the following statement be included in the EIR's Mitigation and Monitoring Plan: "The final disposition of archaeological, historical, and paleontological resources recovered on



state lands under the jurisdiction of the California State Lands Commission must be approved by the Commission.”

#### Mitigation and Alternatives

8. Deferred Mitigation: As provided in State CEQA Guidelines, §15126.4, subd. (a), mitigation measures must be specific, feasible, and fully enforceable to minimize significant adverse impacts from a project, and “shall not be deferred until some future time.”
9. Alternatives: In addition to describing mitigation measures that would avoid or reduce the potentially significant impacts of the Project, the City should identify and analyze a range of reasonable alternatives to the proposed Project that would attain most of the Project objectives while avoiding or reducing one or more of the potentially significant impacts (see State CEQA Guidelines, § 15126.6). Please consider the impacts of each of the locations of injection wells and the ATF that were mentioned in the NOP.

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and responsible agency, Commission staff requests that you consult with us on this Project and keep us advised of changes to the Project Description and all other important developments. Please send additional information on the Project to the Commission staff listed below as the EIR is being prepared.

Please refer questions concerning environmental review to Christine Day, Environmental Scientist, at (916) 562-0027 or via email at [christine.day@slc.ca.gov](mailto:christine.day@slc.ca.gov). For questions concerning archaeological or historic resources under Commission jurisdiction, please contact Staff Attorney Jamie Garrett, at (916) 574-0398 or via email at [jamie.garrett@slc.ca.gov](mailto:jamie.garrett@slc.ca.gov). For questions concerning Commission leasing jurisdiction, please contact Cheryl Hudson, Public Land Management Specialist, at (916) 574-0732 or via email at [cheryl.hudson@slc.ca.gov](mailto:cheryl.hudson@slc.ca.gov).

Sincerely,



*signing for*

Eric Gilles, Acting Chief  
Division of Environmental Planning  
and Management

cc: Office of Planning and Research  
C. Hudson, Commission  
A. Kershen, Commission  
C. Day, Commission  
J. Garrett, Commission





Air Pollution Control District  
San Luis Obispo County

**Via Email**

February 4, 2020

Matthew Downing  
City of Pismo Beach  
760 Mattie Road  
Pismo Beach, CA 93449

SUBJECT: APCD Comments Regarding the Notice of Preparation of a Draft  
Environmental Impact Report for the Central Coast Blue Project

To Mr. Downing:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Central Coast Blue Project.

Central Coast Blue is a regional recycled water project that will develop a sustainable water supply and protect the Santa Maria Groundwater Basin (SMGB). Currently, water from the Pismo Beach Wastewater Treatment Plant (PBWWTP) and South San Luis Obispo County Sanitation District Wastewater Treatment Plants (SSLOCSDDWWTP) are being treated and discharged to the ocean. Central Coast Blue will provide an opportunity to capture this lost water and use it to recharge the SMGB.

Central Coast Blue will include construction of an Advanced Treatment Facility to treat water from the PBWWTP and SSLOCSDDWWTP to produce purified water. The purified water will be pumped to injection wells and injected into the groundwater basin to supplement the natural groundwater supply.

*The following are APCD comments that are pertinent to this project.*

1. Contact Person:

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

2. Environmental Information:

The potential air quality impacts should be assessed in the DEIR. For guidance, please refer to the [CEQA Air Quality Handbook](#) (April 2012).

- a. Include a description of existing air quality and emissions in the project area. Include the San Luis Obispo County attainment status for State and Federal air quality standards and any existing regulatory restrictions to development.
- b. A complete emission analysis should be performed using emission factors from approved emission calculation methods.
  1. Air quality mitigation measures should be included in the DEIR if APCD significance thresholds are exceeded.
  2. Provide calculations for all criteria air pollutants, fugitive dust, greenhouse gases and toxic air contaminants released from the project. Provide emissions data by quarter and on an annual basis.
  3. Construction and operational emissions should be quantified.
  4. A cumulative impact analysis should be performed to evaluate the combined air quality impacts of this project and impacts from existing and proposed future development in the area. This should encompass all planned construction activities within one mile of the project.
  5. Documentation of emission factors, the emission factor reference source and all calculation assumptions should be provided in the DEIR.
- c. The DEIR should include feasible alternatives to the proposed project that could effectively minimize air quality impacts. For each of the proposed alternatives, an emissions analysis should be included in the DEIR. Documentation of emission factors, emission factor reference source and all calculation assumptions should be provided for each alternative.
- d. A risk assessment may be necessary to determine the potential level of risk if toxic or hazardous air pollutants, such as diesel exhaust, are going to be emitted within 1,000 feet of sensitive receptors (such as residences, schools, hospitals, day care centers, etc.). Impacts may be significant due to increased cancer risk for the affected population, even at very low levels of emissions.

3. Permits:

Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. The following list is provided as a guide to equipment and operations that may have permitting requirements but should not be viewed as exclusive. For a more detailed listing, refer to the Technical Appendices, page 4-4, in the [CEQA Air Quality Handbook](#) (April 2012).

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

If you have any questions regarding APCD permitting requirements, contact the APCD Engineering and Compliance Division at 805 781-5912.

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

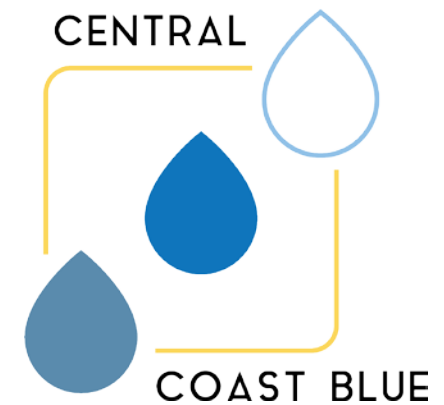
Sincerely,



GARY ARCEMONT  
Air Quality Specialist

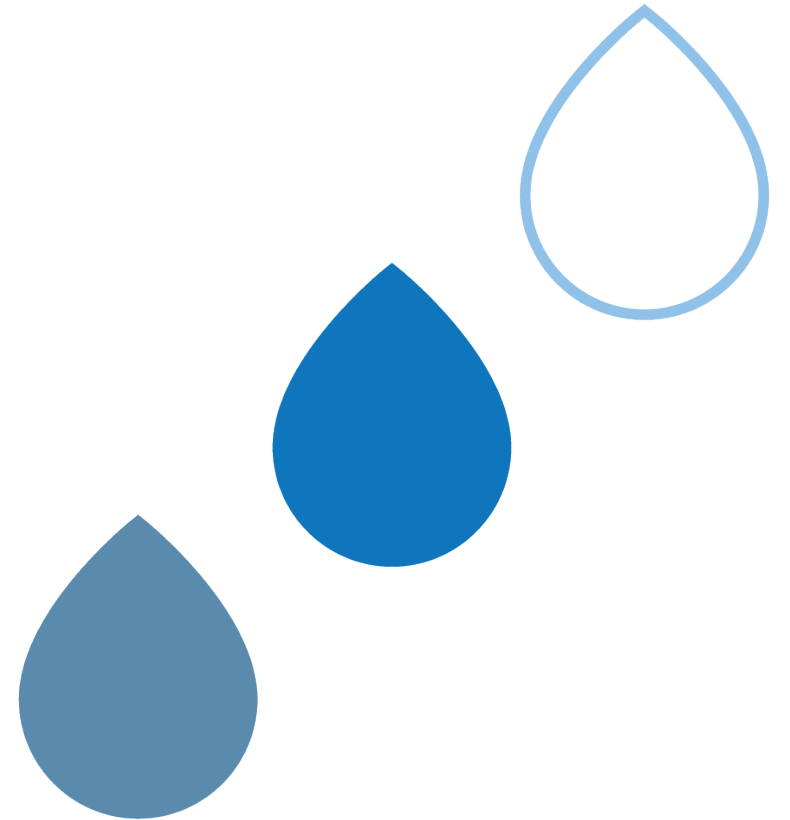
# Central Coast Blue EIR Scoping Meeting

January 22, 2020



# AGENDA

- Describe regulatory background
- Provide project overview
- Discuss scope of environmental impact report



# REGULATORY BACKGROUND





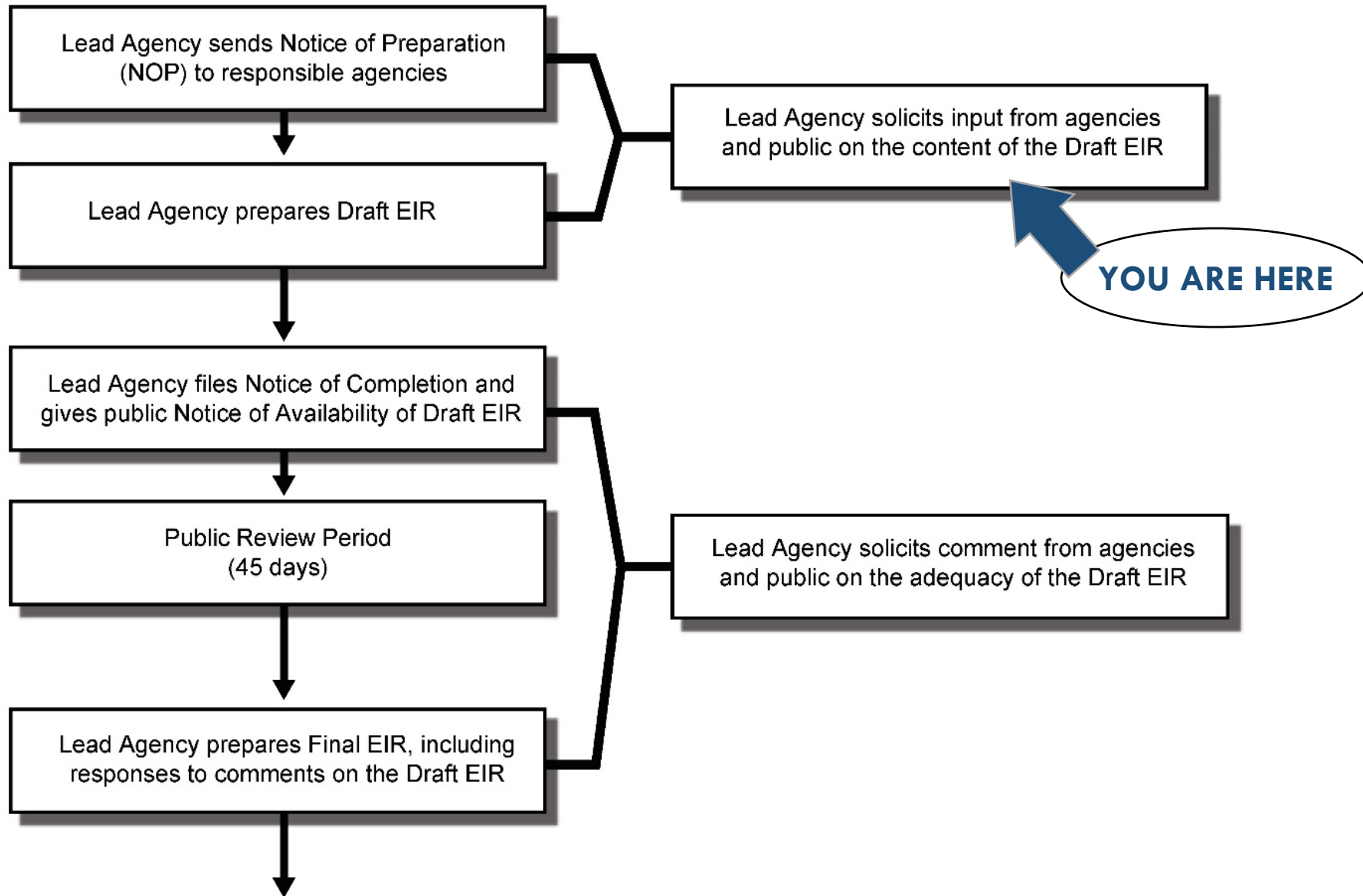
# PURPOSE OF THE SCOPING MEETING

- Inform the community & concerned agencies about the project and environmental review
- Get your input on scope of review
- Inform the community about future opportunities for input

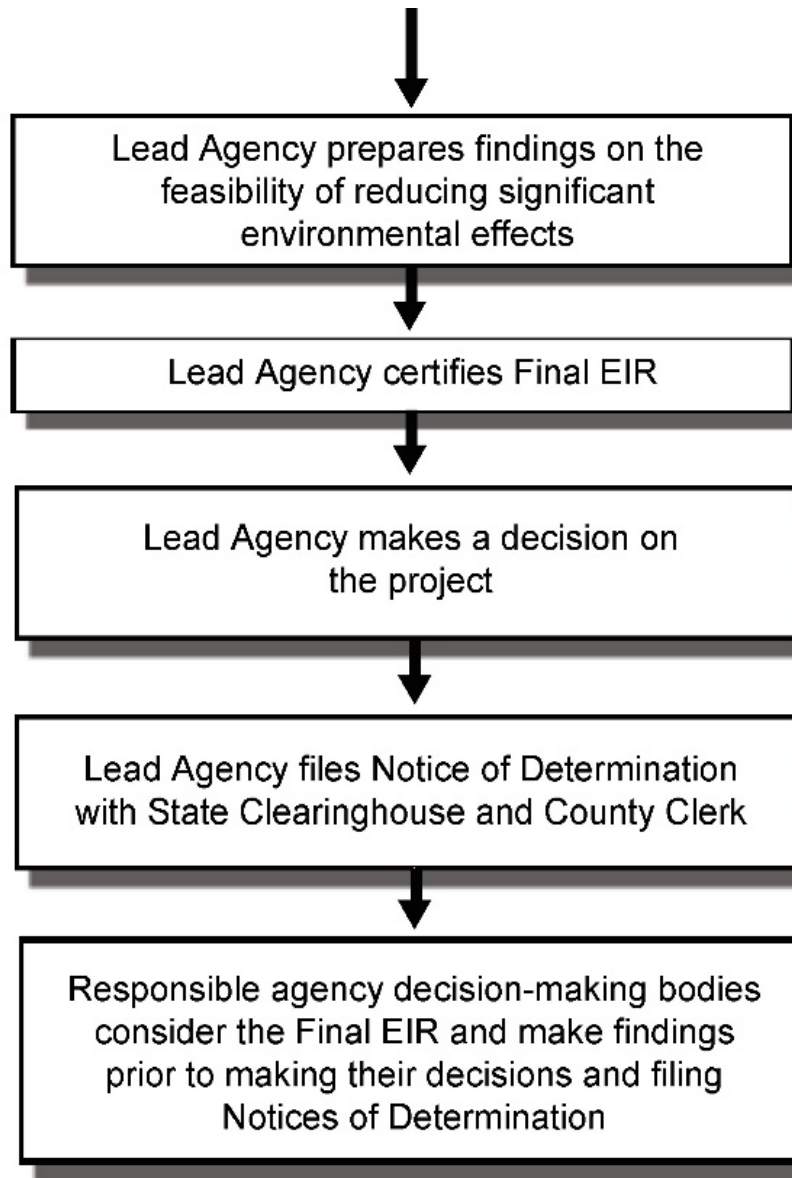
# PURPOSE OF CEQA

- Disclose the significant environmental effects of proposed projects
- Identify ways to avoid or reduce environmental impacts
- Consider feasible alternatives to proposed actions
- Enhance public participation in the planning process

# CEQA PROCESS

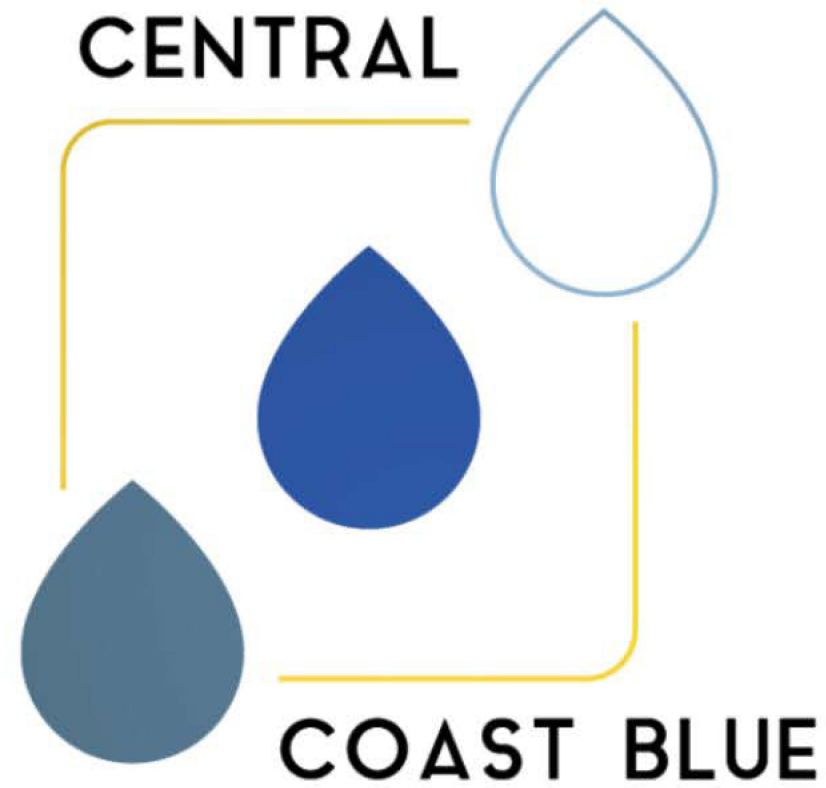


# CEQA PROCESS (CONT.)



# PROJECT OVERVIEW





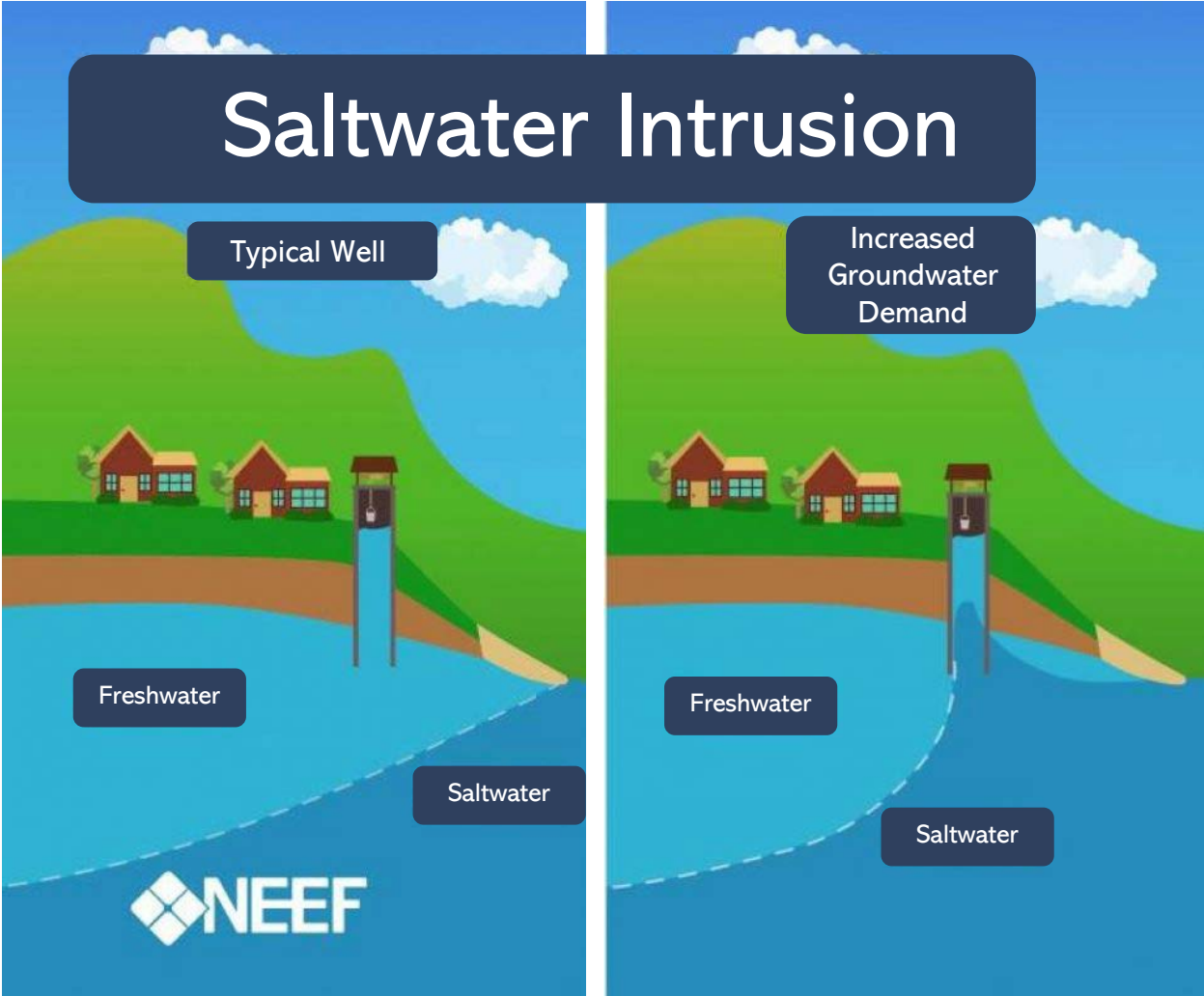
One Community. One Water. One Future.

# PROJECT BACKGROUND

State Water || Lake Lopez || Groundwater



# PROJECT BACKGROUND (CONT.)



Source: European Geosciences Union - <https://blogs.egu.eu/network/gfgd/2018/02/12/saltwater-intrusion-causes-impacts-and-mitigation/>

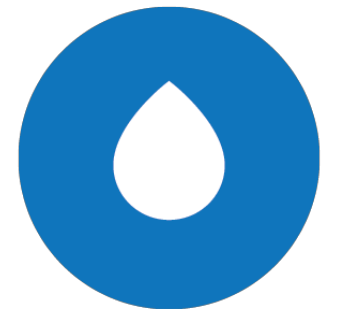


# PROJECT OVERVIEW

- Regional advanced purified water project including an advanced treatment facility, advanced purified water storage tank, an equalization tank, a pump station, distribution pipelines, injection wells, monitoring wells, and one new production well
- Multi-agency collaboration:
  - City of Pismo Beach
  - City of Grover Beach
  - City of Arroyo Grande
  - Oceano Community Services District
  - South San Luis Obispo County Sanitation District (SSLOCSD)



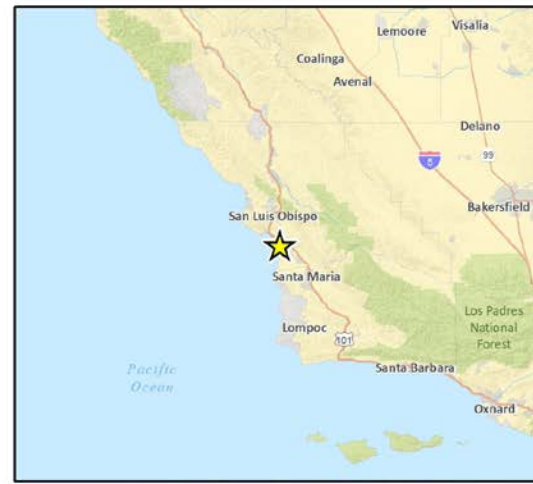
NCMA Agencies



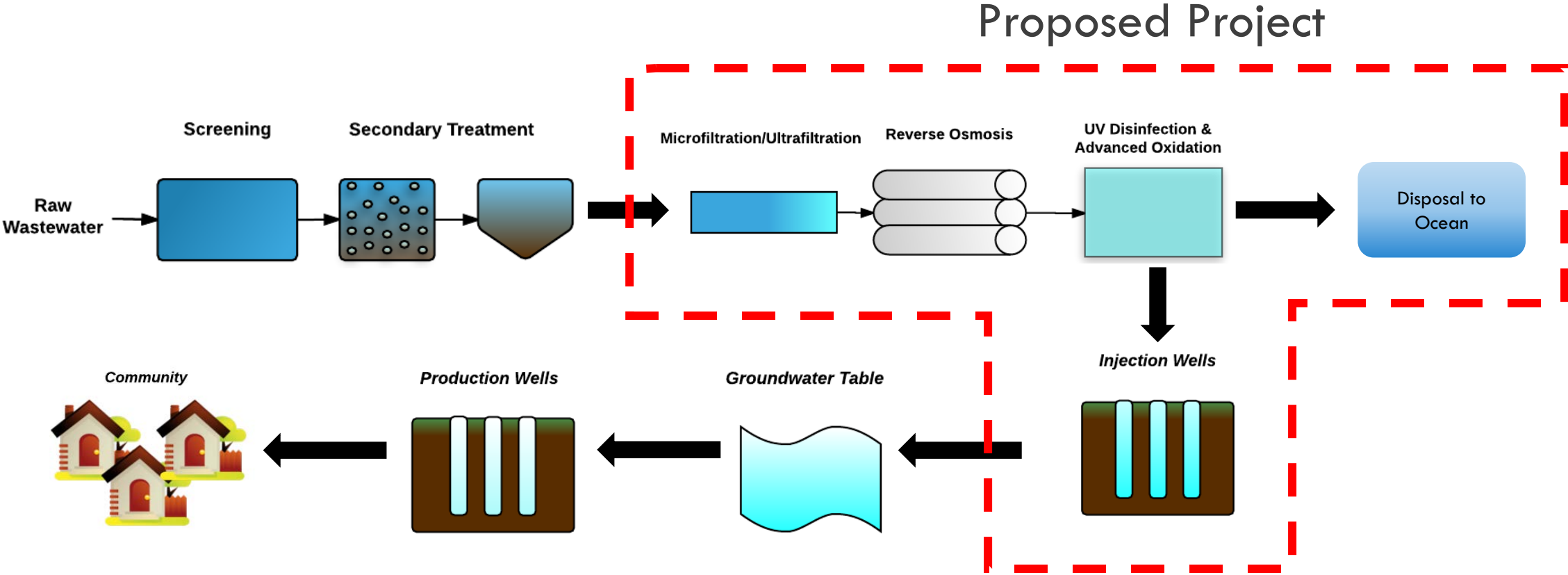
# REGIONAL PROJECT LOCATION



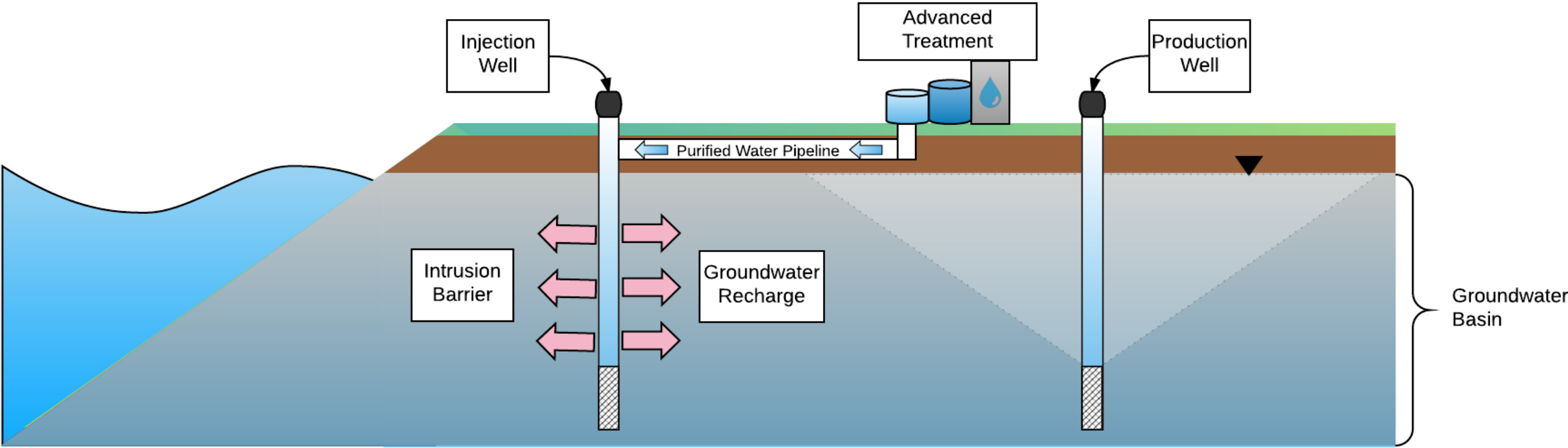
★ Project Location



# PROJECT COMPONENTS



# PROJECT COMPONENTS (CONT.)

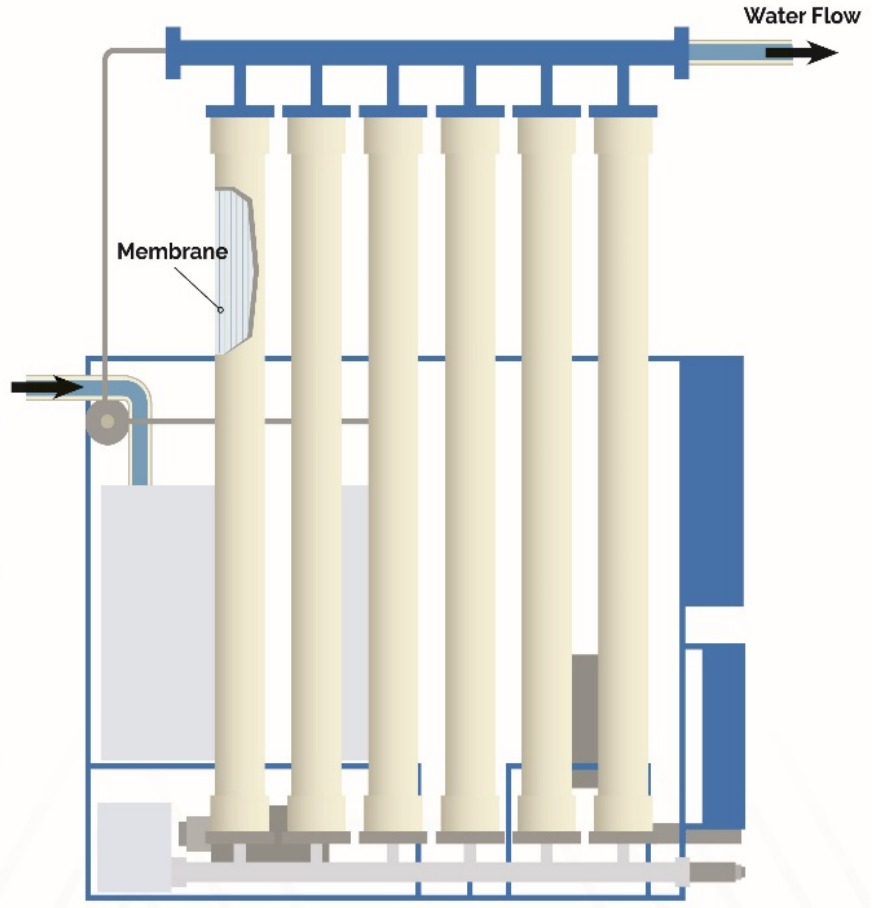
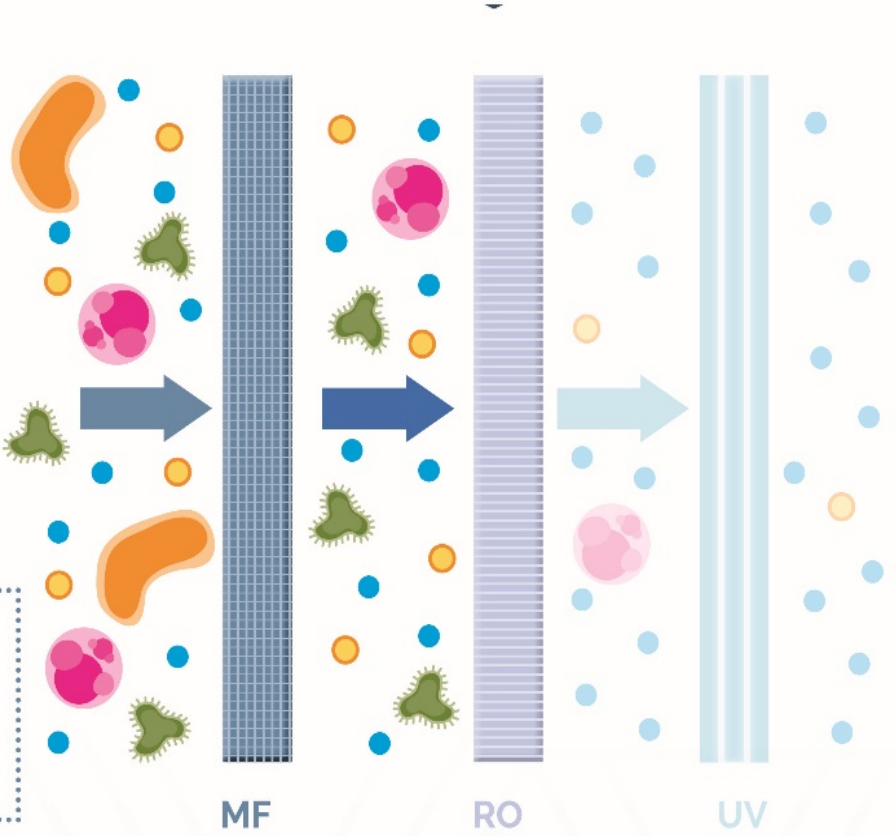
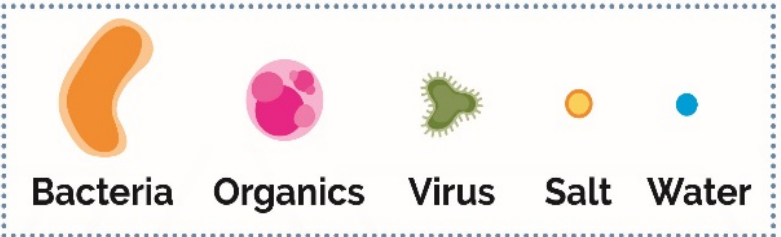


# ADVANCED TREATMENT FACILITY

- Location is yet to be determined – likely to be in Grover Beach
- Approximately two acres of land
- Will treat water from Pismo Beach and SSLOCSD Wastewater Treatment Plants
- Initial treatment capacity of 1.3 million gallons per day with final treatment capacity of 5.4 million gallons per day
- Includes staff support facilities (offices, restrooms, break room, etc.)
- Appurtenant structures:
  - Equalization basin
  - Advanced purified water storage tank
  - Pump station

The smallest size of bacteria is approximately 0.3 microns or equal to about 1/300<sup>th</sup> of a diameter of human hair.

The pore diameter of the MF membrane is 0.1 microns, which is smaller than bacteria.



Source: IDE Technologies.

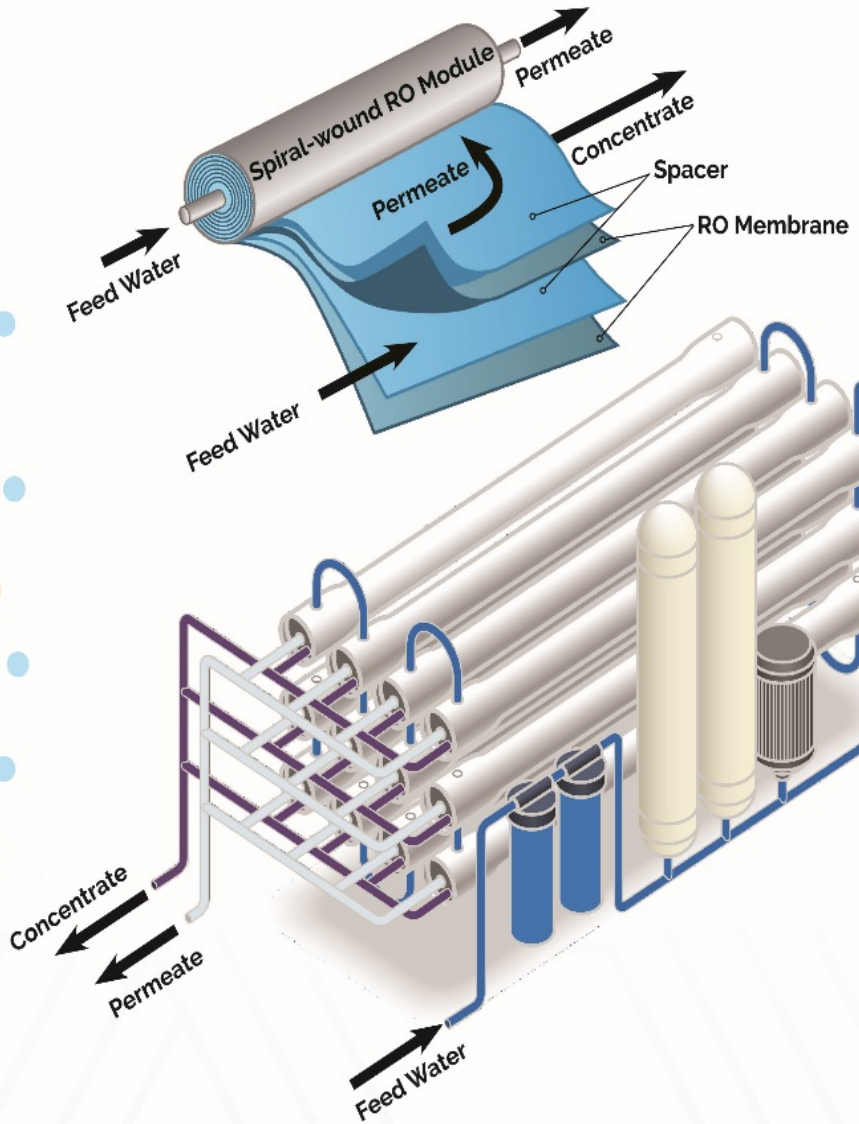
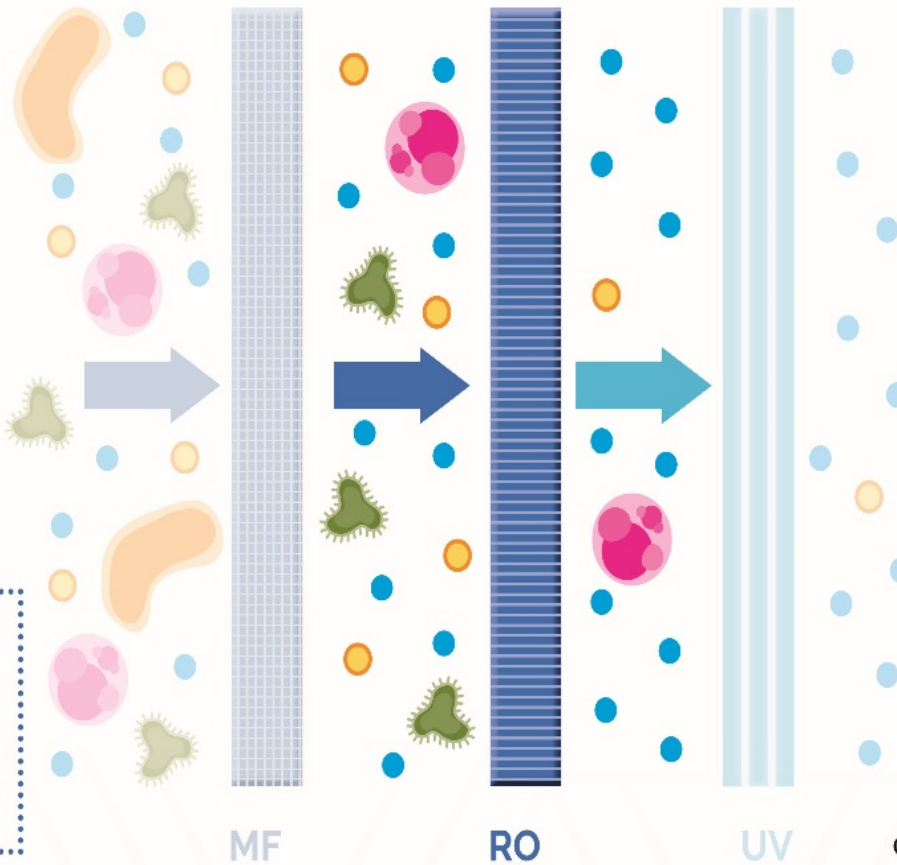
# MICROFILTRATION



A strand of silk from a spider web measures 3.0–8.0 microns.



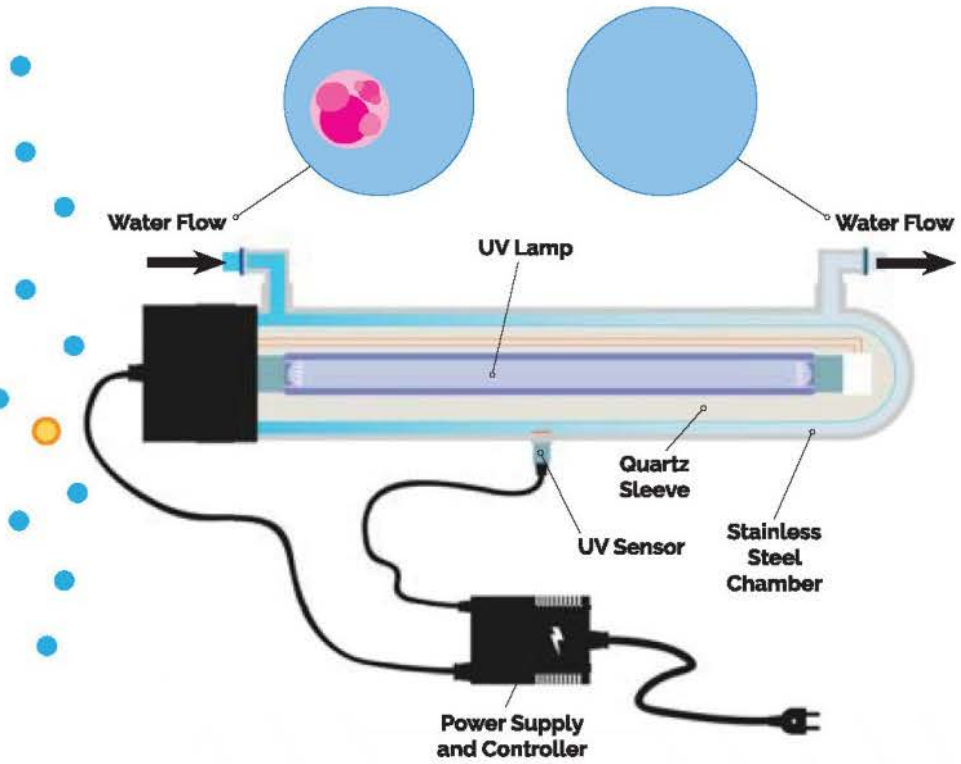
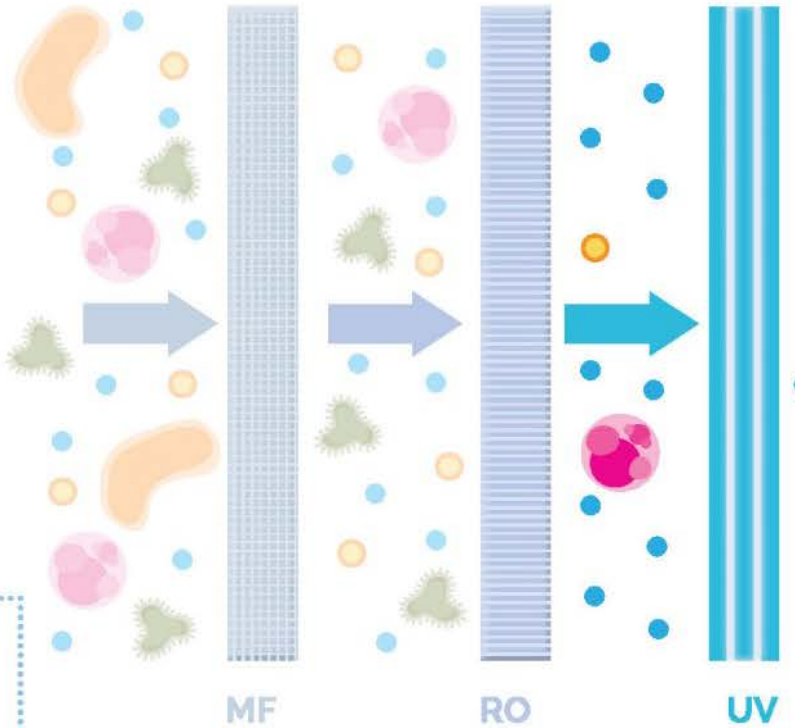
The diameter of a RO membrane pore ranges from 0.02–0.0001 microns.



Source: IDE Technologies.

# REVERSE OSMOSIS

Advanced oxidation uses UV light and electrodes to initiate a series of chemical reactions, which break down compounds in the water that may have passed through the MF/RO stages. This is an added measure to provide safe water.



Source: IDE Technologies

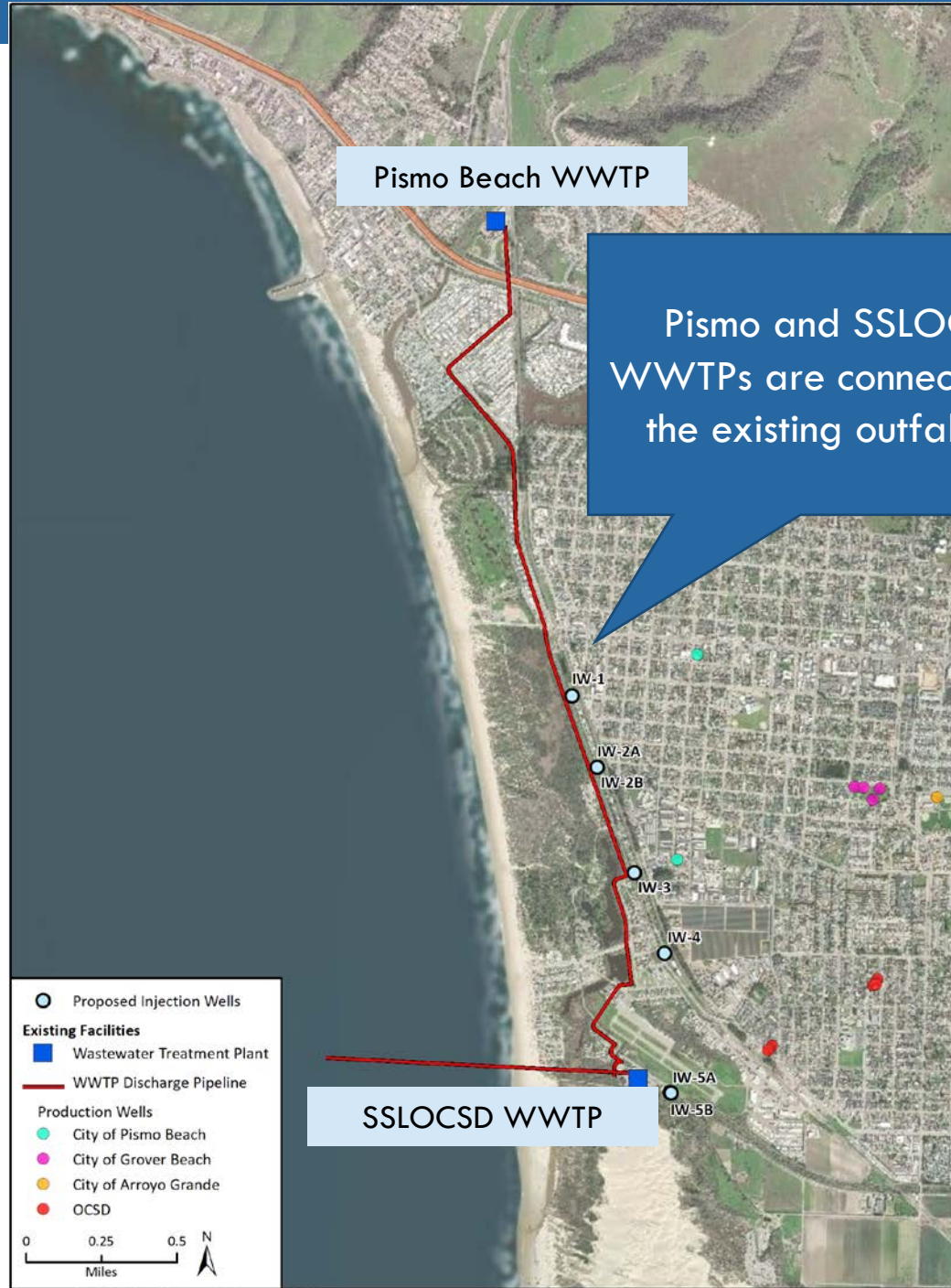
# ULTRAVIOLET/ADVANCED OXIDATION



# DISCHARGE OF REVERSE OSMOSIS CONCENTRATE

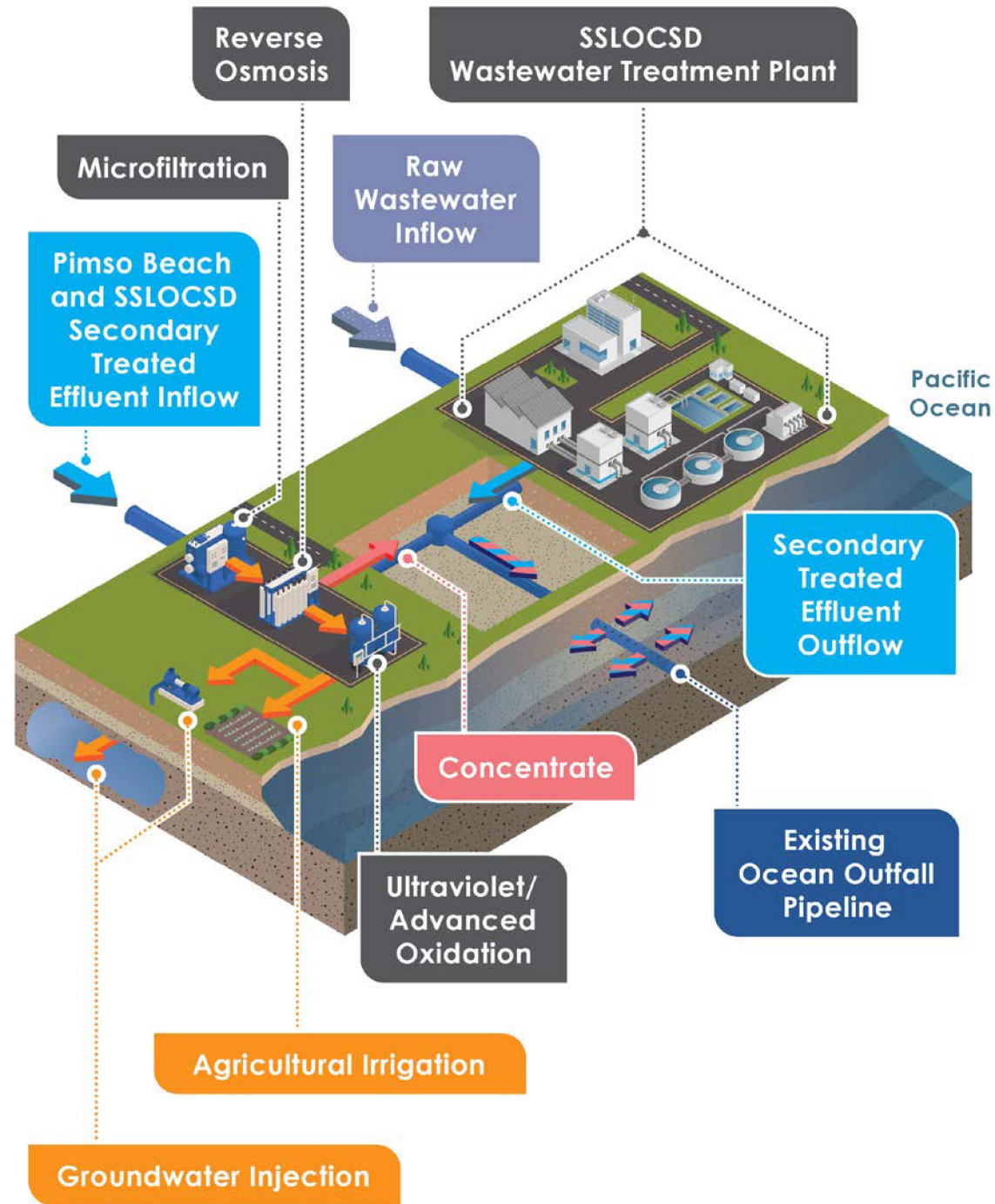
- Reverse osmosis process produces a waste water stream (concentrate) in addition to the purified water
- Concentrate will be discharged via existing Pismo Beach/SSLOCSO ocean outfall
- Must be compliant with City of Pismo Beach and SSLOCSO National Pollutant Discharge Elimination System (NPDES) permit requirements





Imagery provided by Microsoft Bing and its licensors © 2019.

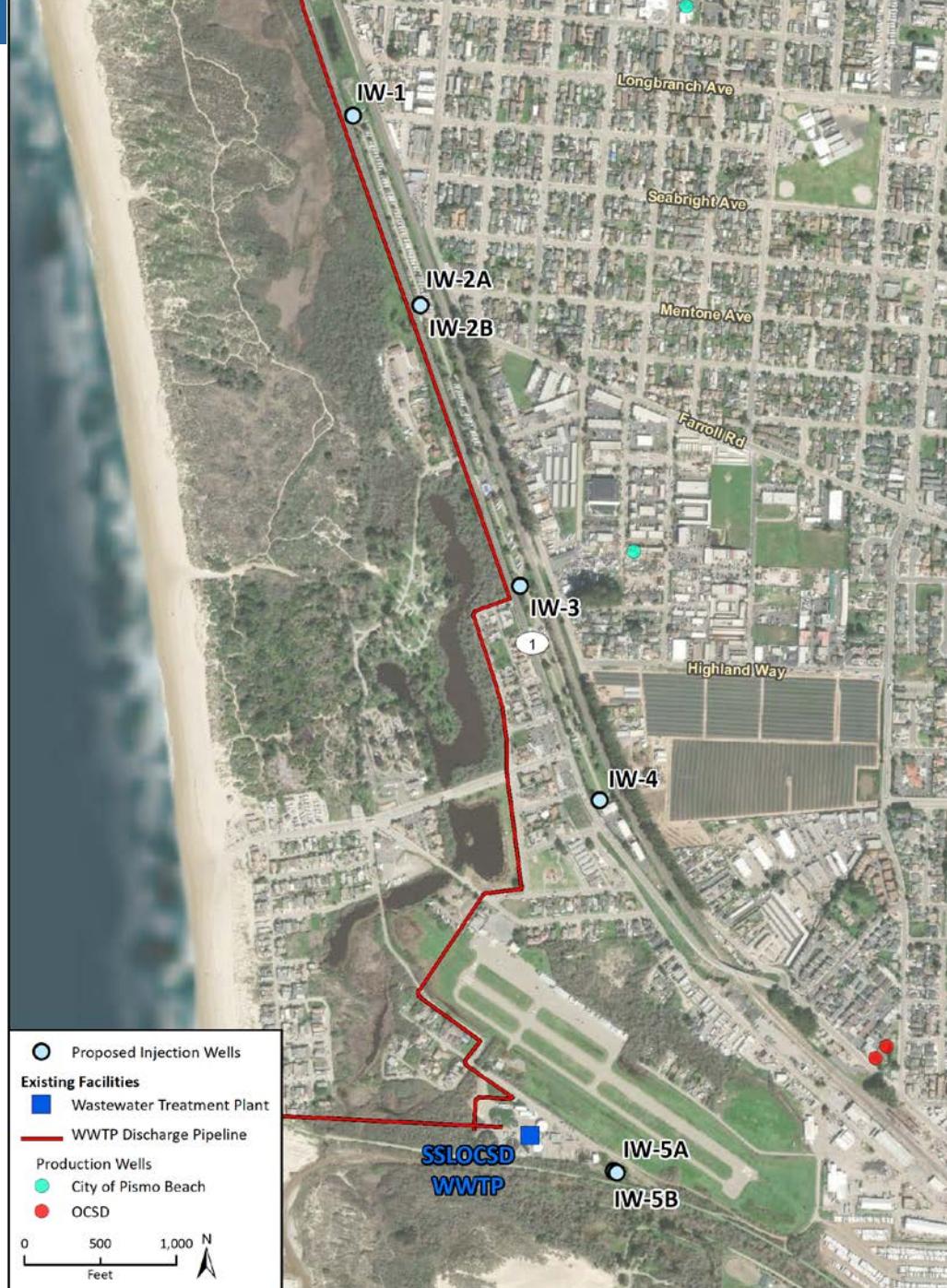
Fig. 3 Project Components Conceptual Location - 20190121



# INJECTION AND MONITORING WELLS

- Seven injection wells
  - 12 inches in diameter
  - 200 to 600 feet in depth
- Each injection well would have up to 2 monitoring wells
- Footprints:
  - Up to 3,000 square feet per injection well (conservative assumption of footprint)
  - 25 square feet per monitoring well
- Heights:
  - 6 feet for injection wells
  - Flush-mounted for monitoring wells

# INJECTION WELL LOCATIONS



Five wells in Coastal Dunes  
RV Park and Campground

Two wells at SSLOCSD  
Wastewater Treatment Plant  
property

# PIPELINES

- Connections between:
  - The existing ocean outfall pipeline and the advanced treatment facility
  - The advanced treatment facility and the injection wells
- Approximately 6 to 24 inches in diameter
- Exact locations are yet to be determined – primarily in existing rights-of-way
- Will likely require drilling under the Union Pacific Railroad track

# NEW PRODUCTION WELL

- Location is yet to be determined – likely to be in Grover Beach
- Intended to optimize groundwater pumping
- Will be owned by City of Pismo Beach
- 14 inches diameter
- 300 to 600 feet in depth
- Up to 3,000 square feet at surface (conservative assumption of footprint)

# INCREASED GROUNDWATER PUMPING

	Acre-Feet per Year
2018 Levels	764
Total Adjudicated Amount for Urban Uses*	4,330
Net Increase	<b>3,566</b>

*\*Note: There will be no increase in the groundwater allocations for any of the NCMA agencies.*



# AGRICULTURAL IRRIGATION

- Potentially a supplemental (not primary) use of advanced purified water
- Will require pipelines between the advanced treatment facility and agricultural lands to the south of Oceano
- Exact locations are yet to be determined

# CONSTRUCTION PHASING

- Phase I:
  - Five injection wells (IW-1, -2a, -3, -4, and -5a)
  - Water distribution pipelines
  - Advanced treatment facility with initial capacity to treat flows from Pismo Beach Wastewater Treatment Plant
- Phase II
  - Two injection wells (IW-2b and -5b)
  - Expansion upgrades to the advanced treatment facility with full capacity to treat additional flows from SSLOCSD Wastewater Treatment Plant

# REGULATIONS FOR RECYCLED WATER

- California Code of Regulations Title 22, Division 4, Chapters 1-3
  - Regulations on use of recycled water for a range of purposes, including groundwater replenishment/indirect potable reuse and agricultural irrigation
  - Requires at least two months of travel time between injection wells and drinking water wells to allow for monitoring and response if needed



A woman wearing a backpack and a child are crouching by a stream. A dog is also present, and the woman is reaching towards the water. The scene is set in a natural, wooded area. The image has a blue tint and is overlaid with text and water drop icons.

# SCOPE OF THE ENVIRONMENTAL IMPACT REPORT



# EIR APPROACH

- Hybrid Project/Program EIR
- Project-level for Components with Known Locations:
  - Injection wells
  - Discharge via ocean outfall
- Program-level for Components with Unknown Locations:
  - Monitoring wells
  - Water distribution pipelines
  - Advanced treatment facility and appurtenant structures
  - New production well
  - Agricultural irrigation pipelines

# ISSUES TO BE ANALYZED IN THE EIR

- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Environmental Justice
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Noise
- Transportation
- Cumulative Impacts
- Growth-Inducing Impacts

# ALTERNATIVES

- **Alternative 1:** No Project Alternative (required by CEQA)
- **Alternative 2:** Locating Advanced Treatment Facility at SSLOCSD  
Wastewater Treatment Plant
- Others?

# PROJECTED EIR SCHEDULE

- February 4, 2020 - Last day to submit comments on EIR scope
- Spring 2020 – Release of Draft EIR for public comment and two public hearings on the Draft EIR
- Summer/Fall 2020 – Preparation and certification of Final EIR



# WE WELCOME YOUR COMMENTS!

Please provide comments on the following:

- The scope, focus, and content of the EIR
- Mitigation measures to avoid or reduce environmental effects
- Alternatives to avoid or reduce environmental effects

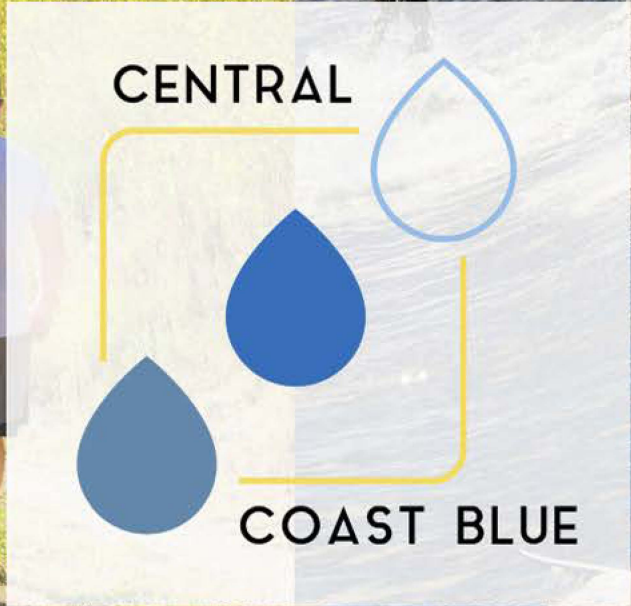
In order to provide everyone an opportunity to speak, please limit your comments to 3 minutes.

**Please also submit a written comment for the record.**

For more information, visit <http://centralcoastblue.com/>

Thank you for participating!









City of Pismo Beach  
Public Works Department  
760 Mattie Road  
Pismo Beach, California 93449  
T: (805) 773-4658

[www.pismo-beach.org](http://www.pismo-beach.org)

## Revised Notice of Preparation

**TO:** Responsible Agencies & Interested Parties

**SUBJECT:** REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

**NOTICE IS HEREBY GIVEN** that the City of Pismo Beach will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project, if applicable. The City is issuing this Revised Notice of Preparation to notify public agencies and the public regarding the determination of locations for the proposed Advanced Treatment Facility (ATF) complex, distribution pipelines, and monitoring wells, which were previously unknown, and to request input regarding the scope and content of the Draft EIR in light of these modifications of the project.

The public review and comment period for this revised Notice of Preparation begins Monday, April 13, 2020 and ends Thursday, May 28, 2020 at 5:00 p.m. A detailed revised project description with revised location maps is available online at <https://centralcoastblue.com/recent-updates>. No Initial Study is attached because the lead agency has already determined that an EIR is clearly required for the project and is therefore not required to prepare an Initial Study per CEQA Guidelines Section 15063(a).

Written comments may be submitted to City of Pismo Beach, Attn: Matthew Downing, 760 Mattie Road, Pismo Beach, California 93449. In addition, because the project is of regional and areawide significance, a scoping meeting will be held by the City of Pismo Beach on Thursday, May 7, 2020 at 6:00 p.m. via video conference. This videoconference will be held in accordance with the provisions of Executive Order N-29-20, which authorizes local legislative bodies to hold public meetings via teleconferencing and to make public meetings accessible telephonically or otherwise electronically to all members of the public seeking to observe and to address the local legislative body during the period in which state or local public health officials have imposed or recommended social distancing measures. Executive Order N-29-20 also waives all requirements in the Brown Act requiring the physical presence of personnel of the legislative body or of the public as a condition of participation in or quorum for a public meeting during the period in which state or local public health officials have imposed or recommended social distancing measures. To access the video conference, visit <https://global.gotomeeting.com/join/571841381> or call (646) 749-3112 with access code 571-841-381 on Thursday, May 7, 2020 at 6:00 p.m.

**Project Title:** Central Coast Blue Project

**State Clearinghouse #:** 2019120560

**Project Location:**

The project would be located on several properties in the city of Grover Beach and portions of unincorporated San Luis Obispo County, including the community of Oceano. A specific map of the project components with known locations can be viewed online at <https://centralcoastblue.com/recent-updates>. Additional project components will be located at yet to be determined locations within the city of Grover Beach in San Luis Obispo County and portions of unincorporated San Luis Obispo County.

**Project Sponsors:** City of Pismo Beach, Public Works Department  
760 Mattie Road, Pismo Beach, CA 93449  
South San Luis Obispo County Sanitation District  
1600 Aloha Place, Oceano, CA 93445

**Brief Project Description:**

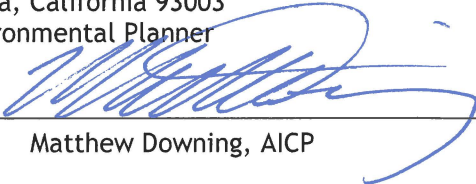
The proposed project is a regional advanced purified water project intended to enhance supply reliability by reducing the Santa Maria Groundwater Basin's (SMGB) vulnerability to drought and seawater intrusion. The project would involve injection of advanced purified water into the SMGB via a series of injection wells installed at various locations to create a seawater intrusion barrier. Water for the project would be sourced from two of the region's wastewater treatment facilities - the Pismo Beach Wastewater Treatment Plant (WWTP) and the South San Luis Obispo County Sanitation District (SSLOCS) WWTP. Prior to injection to the SMGB, water would be treated to an advanced level of purification at a proposed ATF constructed at Assessor's Parcel Number 060-543-016 in Grover Beach. The proposed ATF would treat a combination of flows from the Pismo Beach WWTP and flows from the SSLOCS WWTP for injection in the SMGB and/or for agricultural irrigation. In addition to the ATF, project components include an advanced purified water storage tank, an equalization basin, a pump station, distribution pipelines, injection wells, monitoring wells, one new production well, and potential agricultural irrigation pipelines. The project would alter the pumping regime of existing, operational production wells in the project area and would include construction of one new production well to optimize groundwater production in the area. Potential environmental effects include, but are not necessarily limited to, impacts related to air quality, biological resources, cultural and tribal cultural resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use, noise, and transportation.

**Consulting firm retained to prepare draft EIR:**

**Firm Name:** Rincon Consultants, Inc.  
**Address:** 180 N. Ashwood Avenue, Ventura, California 93003  
**Contact:** Annaliese Miller, Associate Environmental Planner

**Date:** April 8, 2020

**Signature:**



Matthew Downing, AICP

**Title:** Planning Manager, City of Pismo Beach

**Phone:** (805) 773-7044

# Project Description

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## 1. Project Title

Central Coast Blue

## 2. Lead Agency Name and Address

City of Pismo Beach  
Community Development Department, Planning Division  
760 Mattie Road  
Pismo Beach, California 93449

## 3. Contact Person and Phone Number

Matthew Downing, AICP, Planning Manager  
(805) 773-7044

## 4. Background and Project Overview

The cities of Pismo Beach, Grover Beach, and Arroyo Grande and the Oceano Community Services District (OCS D) obtain water from a combination of three sources: the California State Water Project, Lopez Reservoir, and local groundwater. Each of these sources is highly variable, with supply fluctuations on the order of thousands of acre-feet per year over the past decade (City of Pismo Beach 2016). The primary source of groundwater for these agencies is the Northern Cities Management Area (NCMA) of the Santa Maria Groundwater Basin (SMGB). The cities of Pismo Beach, Grover Beach, and Arroyo Grande and OCS D (collectively referred to as the NCMA agencies) manage groundwater extraction in their portion of the basin to protect long-term sustainable use and to prevent seawater intrusion.

Historically, elevated freshwater levels along the coastline and natural outflow to the ocean have prevented seawater from intruding into the groundwater basin. However, groundwater elevations along the coastline have dropped due to changing climatic conditions, including more frequent periods of extended drought resulting in reduced inflow into the groundwater basin and increased demands on groundwater supplies resulting in a higher rate of groundwater extraction. These lower levels reduce the flow of freshwater out toward the ocean, which reduces the effectiveness of groundwater as a barrier to seawater, and in 2009, water quality constituents consistent with seawater intrusion were detected in the NCMA monitoring wells. If conditions worsen, seawater will draw toward the freshwater zone of the aquifer, contaminating it with elevated salt concentrations.

Central Coast Blue (herein referred to as the “proposed project” or “project”) is a regional advanced purified water project intended to enhance supply reliability by reducing the SMGB’s vulnerability to drought and seawater intrusion. The project is a multi-agency collaboration between the City of Pismo Beach, the South San Luis Obispo County Sanitation District (SSLOCS D), and other NCMA agencies. The project would involve injection of advanced purified water into the SMGB via a series of injection wells, installed at various locations in the SMGB, to develop a seawater intrusion barrier.

Water for the project would be sourced from two of the region's wastewater treatment facilities - the Pismo Beach Wastewater Treatment Plant (WWTP) and the SSLOCSD WWTP. Prior to injection to the SMGB, water would be treated to an advanced level of purification at a proposed Advanced Treatment Facility (ATF) complex, which would include an ATF, equalization basin, advanced purified water storage tank, and pump station. The proposed ATF would treat a combination of flows from the Pismo Beach WWTP and the SSLOCSD WWTP for injection in the SMGB and/or for agricultural irrigation. The blend of source water treated at the ATF would depend on the amount of water available from each WWTP, the water quality characteristics of each of the water flows, the production capacity of the ATF, and the demand for advanced purified and/or irrigation water. The amount of water from each WWTP treated at the ATF would be adjusted periodically based on operational needs.

This EIR analyzes the majority of project components, including the injection wells, monitoring wells, water distribution pipelines, and ATF complex at a more detailed, project-specific level because they would be constructed in the near-term and the construction details, locations, and component specifications are generally well-known at this time. However, because the location, engineering, and/or construction details are not known for some project components at this time, this analysis evaluates the environmental impacts of those components at a programmatic level. Once details are known, these project components will be examined in light of this EIR to determine what, if any, additional CEQA documentation needs to be prepared. Project components are described in detail in Section 2.8, *Description of Project*.

## **Project Objectives**

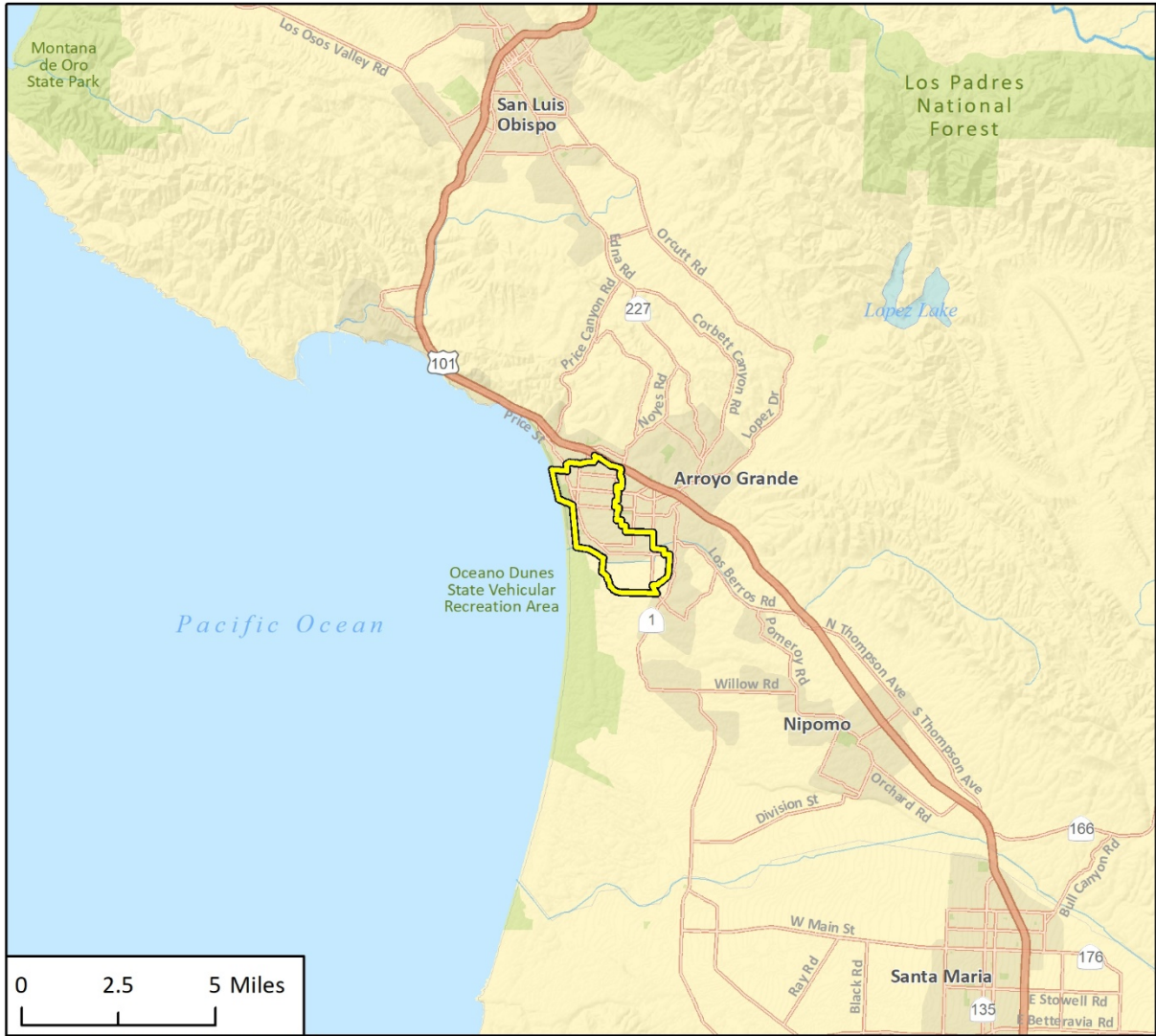
The objectives for the proposed Central Coast Blue project are as follows:

1. Produce advanced purified water of a quality that can safely be used to augment groundwater supply while maintaining or improving existing groundwater quality
2. Create a sustainable, drought-resistant, local water supply and improve water supply reliability for southern San Luis Obispo County
3. Provide a new source of recharge to the SMGB to protect the basin from degradation via seawater intrusion
4. Reduce wastewater discharges to the ocean and maximize utilization of local water supplies
5. Facilitate continued water resources collaboration in the NCMA

## **5. Project Location**

The project area is in the city of Grover Beach and portions of unincorporated San Luis Obispo County, including the community of Oceano, which is a census-designated place. Figure 1 shows the regional location of the project area, which is approximately 8.5 miles south of the city of San Luis Obispo. The project area is regionally accessible from U.S. Highway 101 and locally accessible from California State Route (SR) 1. Figure 2 shows the boundaries of the NCMA agencies overlain on an aerial view of the project area and the known locations of project components. The project area extends from West Grand Avenue in Grover Beach in the north to unincorporated San Luis Obispo County, including Oceano, in the south. The total project area measures approximately 3.5 miles north to south to allow for appropriate spacing of the proposed injection wells.

Figure 1 Regional Location



 Project Area

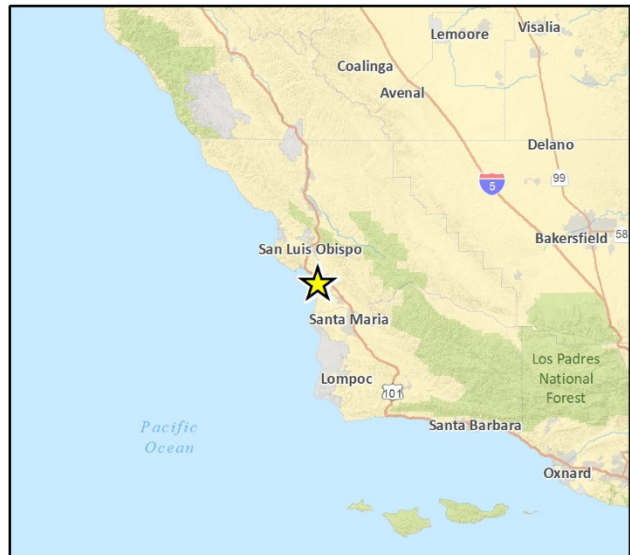
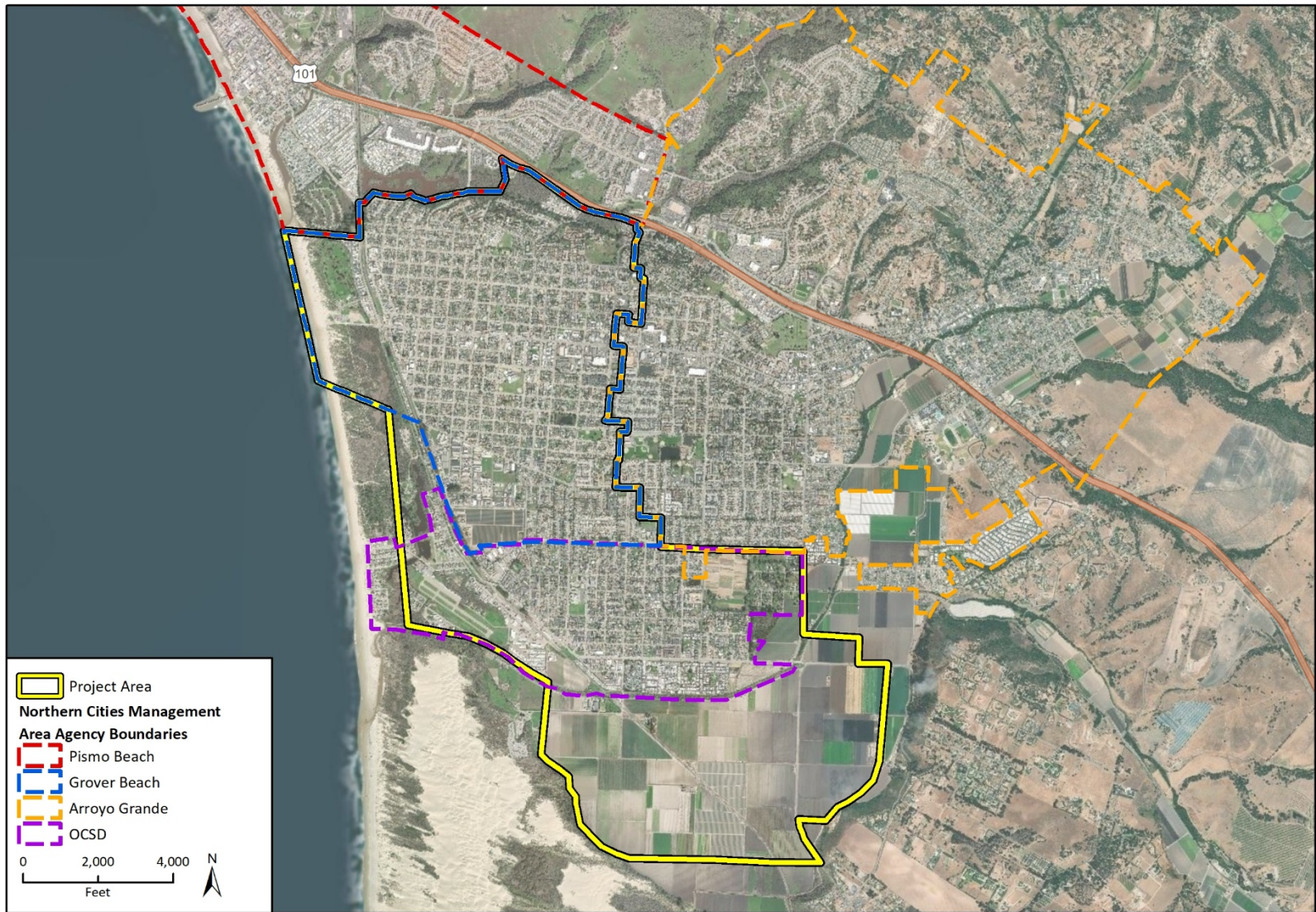


Fig 2-1 Regional Location



Figure 2 Boundaries of NCMA Agencies



Imagery provided by Microsoft Bing and its licensors © 2020.  
Additional data provided by South San Luis Obispo County Sanitation District 2016

Fig 2-2. NCMA Boundaries

Table 1 and Figure 3 present the known locations of project components. All of the project components would be located within one mile of the coast with the exception of the existing production wells that would be used for the proposed project, the one new production well likely to be located in Grover Beach, and the agricultural irrigation pipelines and associated irrigated lands. The new production well would be owned and operated by the City of Pismo Beach and likely would be located in Grover Beach on land leased or acquired by the City of Pismo Beach. Potential agricultural irrigation pipelines would likely be located within public rights-of-way, as feasible. These pipelines would also traverse Arroyo Grande Creek and extend through agricultural lands south of Oceano, where they would terminate at the agricultural properties to be irrigated.

**Table 1 Known Locations of Project Components**

Project Component	APN	Address/Description	Existing Use
ATF Complex and MW-3D/3E	060-543-016	980 Huber Street (between Huber Street and Barca Street approximately 120 feet north of Calvin Court), Grover Beach <sup>1</sup>	An approximately 1.5-acre parcel that contains several unpaved storage yards separated with chain link fencing that are used for the storage of automobiles, trucks, recreational vehicles, storage containers, boats, trailers and miscellaneous equipment storage. Northwestern portion of the parcel occupied by American Roof Removal/American Roofing Co.
IW-1	060-267-001	West of the western terminus of Manhattan Avenue, Grover Beach	Coastal Dunes RV Park and Campground
IW-2A, IW-2B, and MW-2A/2B/2C	060-323-004	West of South 4th Street between Trouville Avenue and Farroll Road, Grover Beach	Coastal Dunes RV Park and Campground
IW-3	061-111-018	Northeast of intersection of SR 1 and Coolidge Drive, Oceano	Coastal Dunes RV Park and Campground
IW-4	061-111-017	East of SR 1 between Truman Drive and Pershing Drive, Oceano	Coastal Dunes RV Park and Campground
IW-5A, IW-5B, and MW-5A/5B/5C	061-093-047	1600 Aloha Place, Oceano	SSLOCSD WWTP
MW-1A/1B	060-193-022	Northeast corner of Longbranch Avenue and South 6th Street, Grover Beach	Undeveloped land
MW-1C/1D	Public right-of-way of Manhattan Avenue	Manhattan Avenue right-of-way west of South 4th Street, Grover Beach	Paved roadway
MW-2D/2E/2F	Public right-of-way of South 5 <sup>th</sup> Street	South 5 <sup>th</sup> Street right-of-way between Mentone Avenue and Farroll Road, Grover Beach	Paved roadway
MW-3A/3B	Public right-of-way of South 4 <sup>th</sup> Street	South 4th Street right-of-way between Leoni Drive and Calvin Court, Grover Beach	Paved roadway

City of Pismo Beach  
**Central Coast Blue Project**

Project Component	APN	Address/Description	Existing Use
MW-4A/4B	061-111-017	East of the eastern terminus of Pier Avenue, Oceano	Coastal Dunes RV Park and Campground
MW-4C/4D	060-591-018	West of the western terminus of The Pike, Grover Beach	Stormwater detention basin
MW-5D/5E/5F	062-271-006	1650 Front Street, Oceano	Oceano Depot
Water Distribution Pipelines	Public rights-of-way of Barca Street, South 4 <sup>th</sup> Street, Calvin Court, SR 1, Coolidge Drive, Norswing Drive, Pershing Drive, and Mendel Drive	Barca Street, South 4 <sup>th</sup> Street, Calvin Court, SR 1, Coolidge Drive, Norswing Drive, Pershing Drive, and Mendel Drive in Oceano and Grover Beach	Paved roadways
	061-093-047	1600 Aloha Place, Oceano	SSLOCSD WWTP
	061-093-044	561 Air Park Drive, Oceano	Oceano County Airport
	061-111-017 and -018	East of intersection of SR 1 and Coolidge Drive, Oceano	Coastal Dunes RV Park and Campground
	061-111-019, -021 and -022	East of intersection of SR 1 and Coolidge Drive, Oceano	Union Pacific Railroad track

APN = Assessor's Parcel Number; ATF = advanced treatment facility; IW = injection well; MW = monitoring well; SSLOCSD = South San Luis Obispo County Sanitation District; WWTP = wastewater treatment plant

<sup>1</sup> A sign on one of the gates that provides access to this parcel identifies the site address as 980 Huber Street.

**Figure 3 Project Components with Known Locations**



Fig. 3-3 Project Components Concept Locations

## 6. Project Sponsors' Name and Address

City of Pismo Beach  
 Public Works Department  
 760 Mattie Road  
 Pismo Beach, California 93449

South San Luis Obispo County Sanitation District  
 1600 Aloha Place  
 Oceano, California 93445

## 7. General Plan and Zoning Designations

Table 2 summarizes the General Plan and zoning designations for project components with known locations. See Figure 4 and Figure 5 for maps of General Plan land use and zoning designations, respectively.

**Table 2 General Plan and Zoning Designations for Project Components with Known Locations**

Project Component	General Plan Land Use Designation	Zoning Designation <sup>1</sup>	Combining Designation <sup>2</sup>
ATF Complex and MW-3D/3E	Industrial	Industrial	Coastal Zone
IW-1	Visitor Serving – Mixed-Use	Coastal Visitor Serving	Coastal Zone Flood Hazard Area
IW-2A and IW-2B	Recreation	N/A	Coastal Zone Airport Review Area
IW-3, IW-4, MW-2A/2B/2C, MW-4A/4B	Recreation	N/A	Coastal Zone Archaeologically Sensitive Area Airport Review Area
IW-5A, IW-5B, and MW-5A/5B/5C	Public Facilities	N/A	Coastal Zone Archaeologically Sensitive Area Wetland Airport Review Area Flood Hazard Area
MW-1A/1B	Public right-of-way	Public right-of-way	N/A
MW-1C/1D	High Density Residential	High Density Residential	None
MW-2D/2E/2F	Public right-of-way	Public right-of-way	N/A
MW-3A/3B	Public right-of-way	Public right-of-way	N/A
MW-4C/4D	Public/quasi-public	Urban Reserve	None
MW-5D/5E/5F	Recreation	N/A	Coastal Zone Airport Review Area

Project Component	General Plan Land Use Designation	Zoning Designation <sup>1</sup>	Combining Designation <sup>2</sup>
Water Distribution Pipelines	Public Facilities, Recreation, Industrial, public rights-of-way	Industrial, public rights-of-way	Coastal Zone Archaeologically Sensitive Area Coastal Zone Creek or Stream Wetland Airport Review Area Flood Hazard Area

ATF = advanced treatment facility; IW = injection well; MW = monitoring well; SSLOCSO = South San Luis Obispo County Sanitation District; WWTP = wastewater treatment plant; N/A = Not applicable

<sup>1</sup> The County of San Luis Obispo does not assign zoning designations to parcels in unincorporated San Luis Obispo County.

<sup>2</sup> Combining designations are assigned by the County of San Luis Obispo.

Sources: City of Grover Beach 2014 and 2018; County of San Luis Obispo 2020

**Figure 4 General Plan Land Use Designations of Project Components with Known Locations**

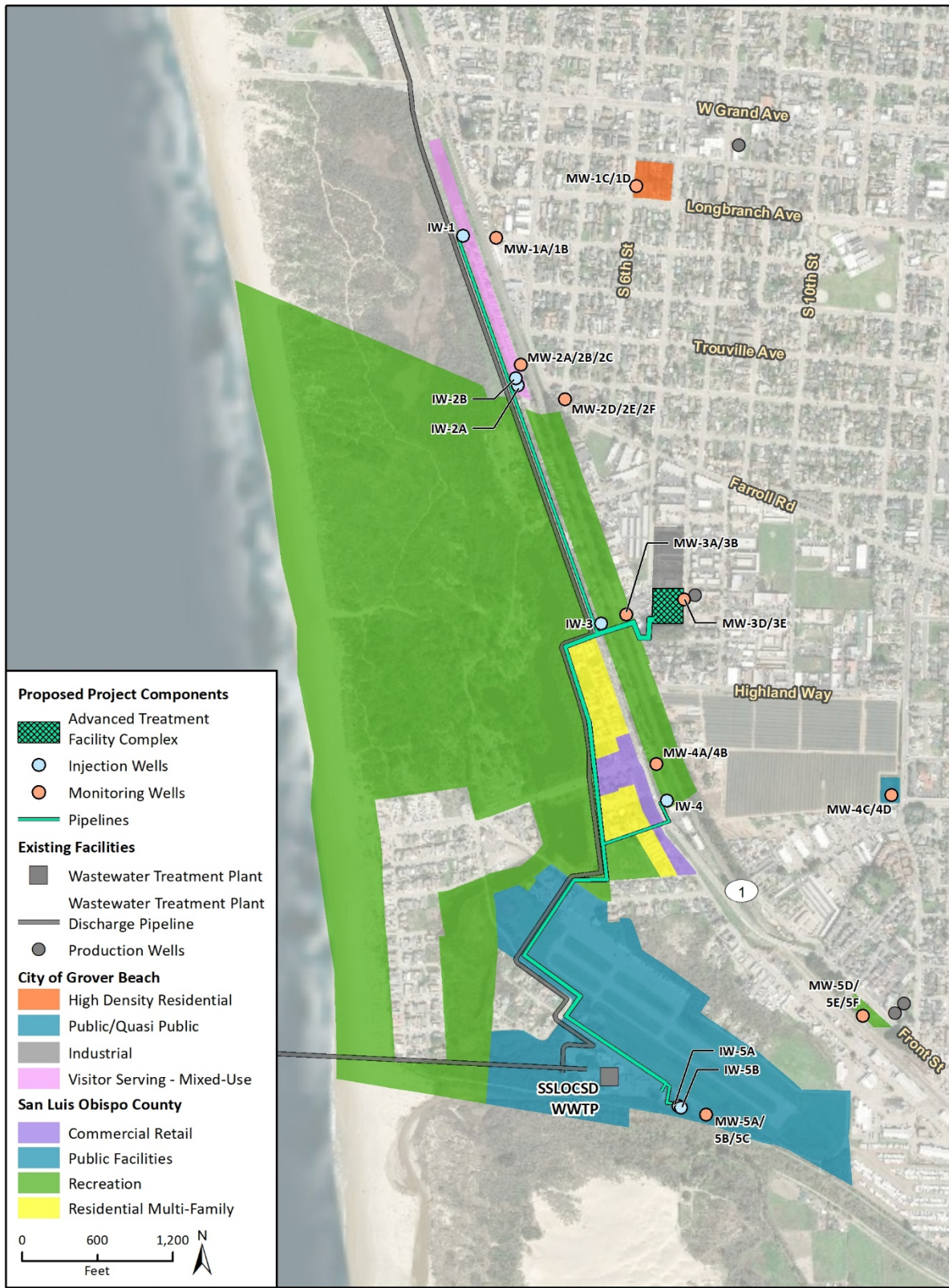
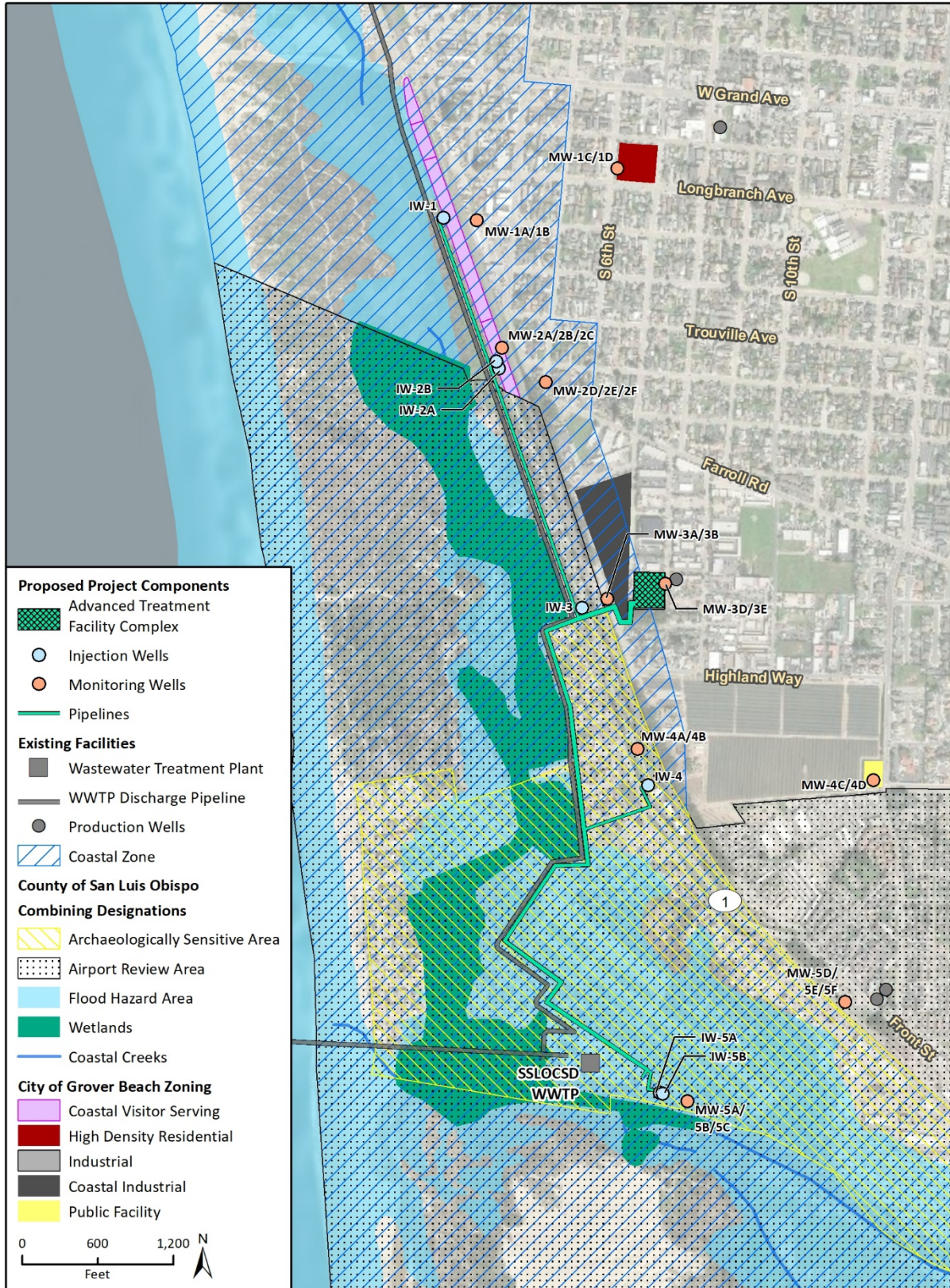


Fig 2-4 Land Use

**Figure 5 Zoning Designations of Project Components with Known Locations**





## 8. Description of Project

The proposed project consists of an ATF complex (including an equalization basin, an advanced purified water storage tank, and a pump station), water distribution pipelines, injection wells, monitoring wells, one new production well, and potential agricultural irrigation pipelines. The project would also include groundwater injection via the proposed injection wells and increased groundwater pumping from existing production wells. Each of these project components is described below.

### **Advanced Treatment Facility Complex**

The ATF complex would include an ATF, an equalization basin, an advanced purified water storage tank, and a pump station, which would all be constructed on the same parcel (Assessor's Parcel Number 060-543-016).

#### *Advanced Treatment Facility*

The ATF would treat flows from the Pismo Beach WWTP and the SSLOCSD WWTP. The proportion of the ATF source water that each of these flows comprises would be determined based on the operational needs of the project and the need for supplemental water for the participating agencies, among other factors. The ATF would be designed to initially receive and treat up to 1.3 million gallons per day (mgd) of secondary treated influent flows from the Pismo Beach WWTP with a final influent capacity of 5.4 mgd for flows from both the Pismo Beach and SSLOCSD WWTPs. The ATF could initially produce up to 1.0 mgd of advanced purified water with a final production capacity of 3.9 mgd.<sup>1</sup> The Pismo Beach WWTP currently treats an average of 0.9 million gallons per day (mgd) of wastewater to a secondary treatment level. The existing treatment process starts with a bar screen to remove debris. After the bar screen, the water flows through oxidation ditches. The oxidation ditches operate under anoxic and aerobic conditions to remove nitrogen/ammonia from the water. Next, the water flows to a clarifier, where solids are settled out. At this point, the water has been treated to a non-potable level and can be disinfected in the chlorine contact basins and conveyed to the SSLOCSD WWTP where it is discharged to the ocean through the existing ocean outfall, which is shared with SSLOCSD.

The existing treatment process at the SSLOCSD WWTP is slightly different than the process described above for the Pismo Beach WWTP. The SSLOCSD WWTP currently treats approximately 2.4 mgd of wastewater to a secondary level. Similar to the process at the Pismo Beach WWTP, the first step of treatment is a bar screen that physically separates solids and large debris from the flow. After the bar screen, the water is sent to the grit removal stage to remove sand, silt and grit. Then, the wastewater flows to the primary clarifier, which uses gravity to separate solid compounds out of the water. Next, the wastewater flowing out of the primary clarifier goes to the fixed film reactor. The fixed film reactor is a large circular basin filled with a network of plastic media. Microorganisms grow on the plastic media. As the wastewater runs through the media, the microorganisms consume the dissolved organic matter in the water as their food supply. After the water leaves the fixed film reactor, it then goes to the secondary clarifier. The secondary clarifier performs the same process as the primary clarifier, using gravity to separate out any remaining solids or new solids that may have formed during the fixed film reactor stage of treatment. At this point, the water has been

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<sup>1</sup> The difference between influent and production flows from the ATF are a result of the water losses that occur over the course of several steps of treatment processes, which are described in detail below.

treated to a non-potable level and can be disinfected in the chlorine contact chambers before being discharged to the ocean through the existing ocean outfall.

Advanced treatment would add several additional treatment steps to further purify water from the Pismo Beach WWTP and SSLOCSD WWTP. Additional treatment steps include microfiltration/ultrafiltration (MF/UF), reverse osmosis (RO), and ultraviolet (UV) disinfection with advanced oxidation. The first step in the advanced treatment process is MF/UF, which filters the wastewater that has already undergone secondary treatment through a physical membrane barrier with very small pores to remove turbidity, particles, and microorganisms. These pores range in size depending on the level of filtration; MF typically has a pore diameter of 0.1 micrometer ( $\mu\text{m}$ ) and UF typically has a pore diameter of 0.01  $\mu\text{m}$ . For comparison, 0.1  $\mu\text{m}$  is 1/600th the diameter of a human hair. In comparison, the smallest size of bacteria is approximately 0.3  $\mu\text{m}$ , which is 1/300th the diameter of a human hair. MF/UF removes very small particles and prepares the water for the next step of RO. The MF/UF membranes are permeable and retain suspended particulates, including bacteria, protozoa, and some organics and viruses, thereby removing these constituents from the water. The MF/UF membranes are designed to adapt to water quality conditions and flow with automatic adjustments to the filter system, which saves energy, chemical use, and manpower. Figure 6 provides an illustrated example of the MF process. The UF process is similar to that of the MF process; however, more organics and viruses are removed in the UF process due to the smaller pore size.

From the MF component, the water travels downstream to the RO component. RO removes dissolved solids, organic contaminants, sugars, salts, and sub-micron particles and pathogens, including viruses, bacteria, and protozoa, from the water. It also uses a physical membrane barrier with pore sizes that range from 0.02  $\mu\text{m}$  to 0.0001  $\mu\text{m}$  depending on the membranes used. Figure 7 provides an illustrated example of the RO process. Unlike MF/UF, RO produces a clean water stream (permeate) and a wastewater stream (concentrate). This means that not all the water is recovered from this process as permeate water. A percentage of the water becomes concentrate (typically about 10 to 30 percent), which contains a higher concentration of the dissolved particles than were in the source water flow. This concentrate will ultimately be discharged to the ocean through the existing ocean outfall that currently receives all the flow from the Pismo Beach and SSLOCSD WWTPs. While the concentrate stream is more concentrated than typical drinking water, it is still much less salty than ocean water or concentrate from ocean desalination facilities. As discussed in the *RO Concentrate Sampling Plan Results* prepared by Carrollo Engineers (2018), the large majority of constituents present in RO concentrate produced using treated wastewater from the City's WWTP will not cause exceedances of the City of Pismo Beach's National Pollutant Discharge Elimination System permit effluent concentration limits (Appendix B). Although testing determined that Total Residual Chlorine concentrations exceed the effluent concentration limits, this issue is present in both the RO source water and RO concentrate and is therefore a result of the secondary treatment process at the Pismo Beach WWTP, not the proposed advanced treatment process. Nevertheless, the ATF would include a process to neutralize the chlorine, which would resolve the exceedance of Total Residual Chlorine concentrations. Testing of RO concentrate produced using the treated wastewater from the SSLOCSD WWTP has not been performed because the advanced treatment pilot plant was located at the Pismo Beach WWTP and the SSLOCSD WWTP effluent water quality is expected to change with implementation of the planned SSLOCSD WWTP Redundancy Project.

After the dissolved solids have been removed, the water that passed through the RO membranes is of very high quality and is ready for the UV disinfection/advanced oxidation treatment process. The

UV disinfection component provides additional treatment by oxidizing trace chemical pollutants that may have passed through the MF and RO stages. Advanced oxidation uses UV light and oxidation chemicals to initiate a series of chemical reactions that break down compounds in the water that cannot be broken down by biological treatment or removed using the membranes. Figure 8 provides an illustrated example of the UV/advanced oxidation treatment process.

In addition to the advanced treatment components described above, the ATF would include staff support facilities that may include office space, a locker room, restrooms, file storage, a break room and kitchen, chemical storage and feed facilities, and an emergency power generator. The ATF would occupy approximately 0.85 acre, and the support facilities would occupy approximately 0.14 acre.

### *Equalization Basin, Storage Tank, and Pump Station*

The project would involve construction of an equalization storage basin as part of the ATF complex, providing greater capacity and operational flexibility to the ATF. The 1.1 million gallons of storage is required to store the secondary treated effluent from the Pismo Beach and SSLOCSDD WWTPs prior to advanced purification in the ATF, allowing operations staff to address fluctuations in flow from the WWTPs without impacting the flow rate to the ATF. The equalization basin would occupy approximately 7,500 square feet of area.

Following advanced purification in the ATF, water would travel to the proposed 538,632-gallon advanced purified water storage tank and then to the proposed pump station, where advanced purified water would be pumped to the injection wells. The advanced purified water storage tank would provide operational flexibility and help to maintain a consistent flow in the advanced purified water pump station. The storage tank would be located below ground adjacent to the ATF as part of the ATF complex. The pump station would be housed in a rectangular, cast-in-place concrete building to limit noise and corrosion due to weather. The pump station would occupy approximately 0.03 acre and would be located above the storage tank and adjacent to the ATF as part of the ATF complex. A conceptual drawing of the overall treatment process that would be used is shown in Figure 9.

## **Water Distribution Pipelines**

Water distribution pipelines would be installed along the alignments shown in Figure 3. These pipelines would accomplish four purposes: 1) convey secondary treated effluent from the Pismo Beach WWTP from the existing ocean outfall pipeline to the proposed ATF; 2) convey secondary treated effluent from the SSLOCSDD WWTP to the proposed ATF; 3) convey advanced purified water from the proposed ATF to the injection wells; and 4) convey concentrate from the proposed ATF to the existing ocean outfall pipeline. The pipelines would range in size from approximately 6 to 24 inches.

## **Groundwater Injection and Monitoring Wells**

Seven injection wells would be installed at five locations throughout the NCMA, which are shown in Figure 3. The injection wells would be located generally within one-half mile of the coast and would each require approximately 3,000 square feet of land.<sup>2</sup> Each injection well would be approximately 12 inches in diameter and would be constructed of 316L stainless steel casing. Each injection well

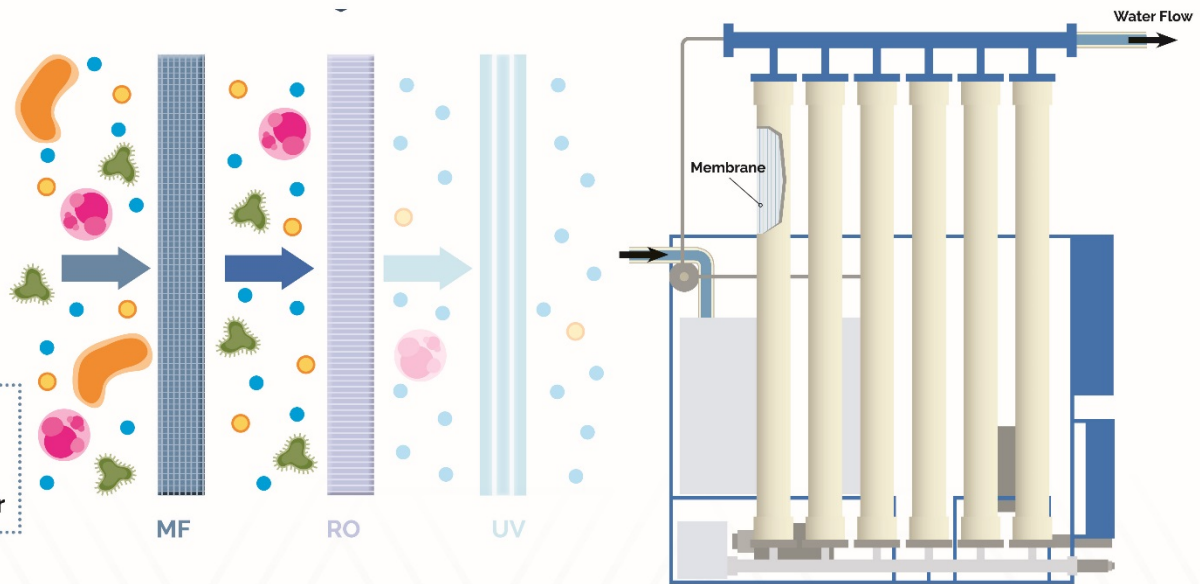
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<sup>2</sup> This is a conservative assumption of the footprint of each injection well.

Figure 6 Conceptual Microfiltration Process Detail

The smallest size of bacteria is approximately 0.3 microns or equal to about 1/300<sup>th</sup> of a diameter of human hair.

The pore diameter of the MF membrane is 0.1 microns, which is smaller than bacteria.



Source: IDE Technologies.

Figure 7 Conceptual Reverse Osmosis Process Detail

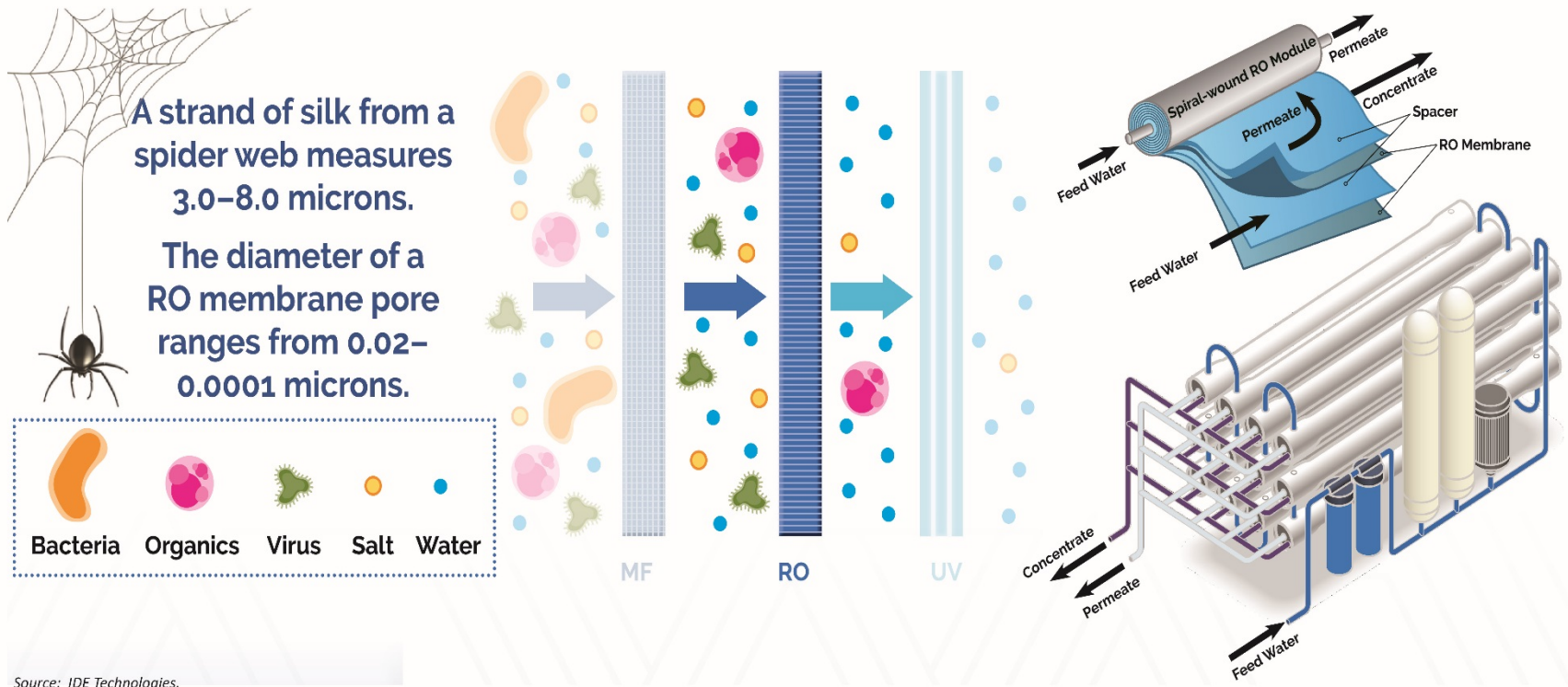


Figure 8 Conceptual Ultraviolet/Advanced Oxidation Process Detail

Advanced oxidation uses UV light and electrodes to initiate a series of chemical reactions, which break down compounds in the water that may have passed through the MF/RO stages. This is an added measure to provide safe water.



Source: IDE Technologies

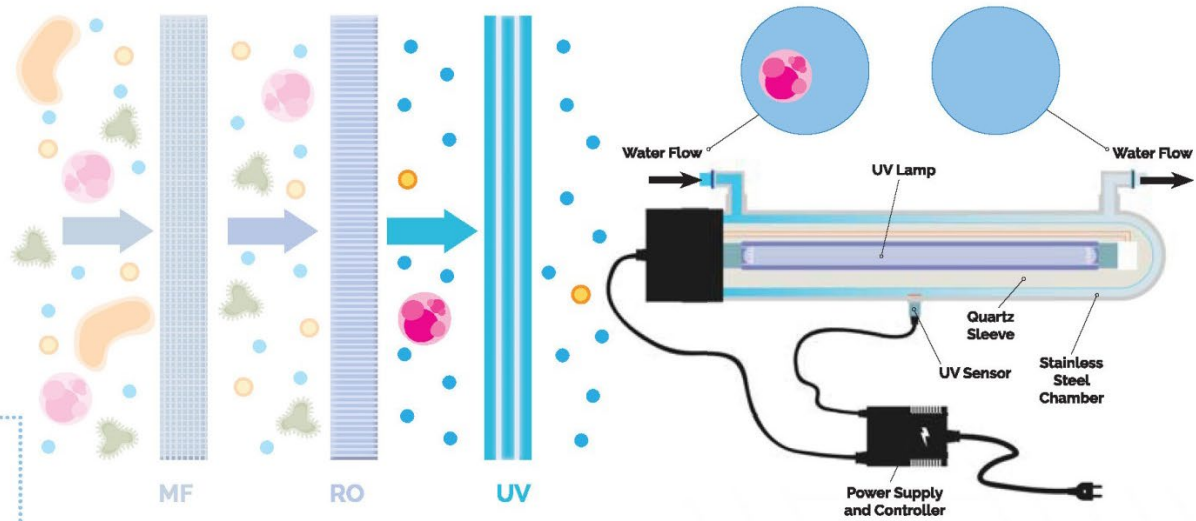
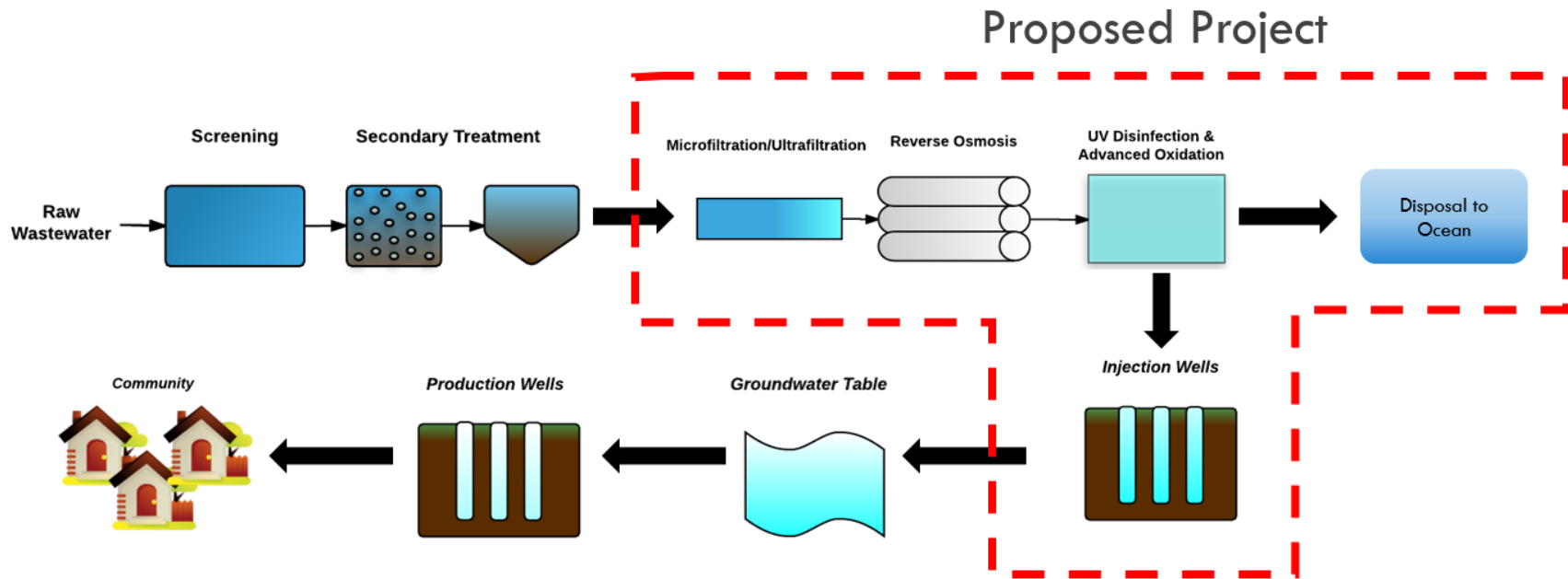


Figure 9 Conceptual Advanced Treatment Process



would be capable of injecting approximately 800 acre-feet per year (AFY). The advanced purified water would be injected at a depth of approximately 200 to 600 feet below ground surface. The injection well network would be accompanied by a network of nested monitoring wells at ten locations throughout the project area. Nested monitoring wells would each include two to three well casings constructed of polyvinyl chloride that would extend to varying depths up to 400 feet. Each monitoring well would have a surface footprint of approximately 25 square feet and would be equipped to measure and monitor water level and water quality. Injection wells would include aboveground piping and infrastructure such as electrical panels, control panels, and storage facilities that would be approximately six feet in height. Monitoring wells would be flush-mounted or encased in a protective casing that extends several feet above ground.

Injection well IW-4 and monitoring well MW-4A/4B will be initially constructed as test wells to conduct a preliminary investigation of the physical and technological constraints and opportunities in the project area. The purpose of this investigation is to gather data and information that may be used to modify the engineering design of the proposed project. As such, these wells were determined by the City of Pismo Beach to be categorically exempt from CEQA under CEQA Guidelines Section 15306, which exempts projects that are classified as basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. Therefore, construction of IW-4 and MW-4A/4B and the testing activities conducted via these wells were covered under previous environmental review and are not evaluated in this analysis. However, the long-term operational impacts of IW-4 and MW-4A/4B are addressed in this EIR.

## Production Wells

Several existing production wells would be available for extraction of the injected advanced purified water. The project would involve increased pumping at these wells but would not involve modification of these existing production wells or any associated ground disturbance. Figure 3 shows the existing production wells that are anticipated to be used. In 2018, the NCMA agencies pumped approximately 764 AFY from the SMGB, which was approximately 18 percent of their total allocation for urban groundwater uses of 4,330 AFY (NCMA 2018). Under full buildout (both Phase I and Phase II) of the proposed project, the NCMA agencies would potentially increase groundwater pumping up to their full allocation for urban uses of 4,330 AFY, which would be a net increase of approximately 3,566 AFY. While the project would lead to increased groundwater pumping over recent rates, groundwater pumping will still be below historical (i.e., 2009) levels.

One new production well would be constructed to optimize the system, but the precise location of that new well has not been determined at this time. The new production well likely would be located in Grover Beach, likely on land leased or acquired by the City of Pismo Beach, and would require approximately 3,000 square feet of land.<sup>3</sup> The characteristics of the new production well, which would be approximately 14 inches in diameter and 300 to 600 feet in depth, would be similar to those of the City's existing production wells. The new production well would include aboveground components typical of production wells, including piping, control systems, a sunshade, storage facilities, a pump and motor, and security fencing/walls. The well pump would be submersible and would therefore not generate substantial noise.

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<sup>3</sup> This is a conservative assumption of the footprint of the production well.



## Agricultural Irrigation

A portion of the advanced purified water may be used for agricultural irrigation. Potential agricultural irrigation areas include agricultural lands located generally south of Oceano. If agricultural irrigation is included in the proposed project, additional distribution pipelines would be constructed to carry advanced purified water from the ATF complex to the irrigated lands.

## Construction Activities

Project construction would occur in two main phases. Phase I would include construction of five injection wells (IW-1, IW-2A, IW-3, IW-4, and IW-5A), the water distribution pipelines, and the ATF complex with its initial capacity (1.0 mgd of produced water) designed to treat flows from the Pismo Beach WWTP. Phase II would include construction of the remaining two injection wells (IW-2B and IW-5B), installation of approximately 40 feet of additional water distribution pipelines to connect these injection wells to the water distribution pipelines constructed under Phase I, construction of the agricultural irrigation pipelines, and expansion upgrades to the ATF complex to accommodate flows from the SSLOCSO WWTP (3.9 mgd of produced water). Construction of the project components with known locations is anticipated to last approximately 24 months. During the construction period, portions of the project area would be closed to public access.

Construction of the project components is not expected to result in removal of large numbers of mature trees. Also, the project would include planting trees for accenting, screening, or other purposes as space allows, with a preference for native trees.

### *Injection, Monitoring, and Production Wells*

Construction activities would occur from 7:00 a.m. to 7:00 p.m., Monday through Friday with the exception of a three-week period for each well during which well drilling activities would occur for 24 hours per day, Monday through Sunday. Temporary lighting would be required during 24-hour drilling activities and would consist of several lights adhered to the mast of the drill rigs that would be pointed downward and portable lights that would be placed around the working areas.

Construction equipment would include a drilling rig, a gradall forklift, four diesel-powered generators, a compressor, and a backhoe. Additional construction components would include a pipe trailer, water storage tanks, a tool trailer for supply storage, a mud tank, and a roll-off bin. Construction equipment would be up to 50 feet in height. Approximately seven construction workers would be on the project site at any given time. Wells would be drilled up to a depth of approximately 600 feet. Approximately 553 cubic yards of soil would be excavated and exported during well drilling activities.<sup>4</sup>

Project construction would require groundwater pumping activities during well development at a rate of approximately 100 to 300 gallons per minute (gpm) for the monitoring wells and 100 to 1,500 gpm for the injection wells. Well development would produce approximately 300,000 gallons (0.9 acre-feet) of water per monitoring well and approximately 3,500,000 gallons (10.8 acre-feet) of water per groundwater well. Groundwater produced during well development would be disposed of via connections to the existing Pismo WWTP ocean outfall pipeline that runs below SR 1.

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<sup>4</sup> Assumes a swell factor of 1.5.

### *Water Distribution Pipelines*

Construction methods for the proposed pipelines would predominantly involve open trenching, with augur boring or horizontal directional drilling methods used as needed. Trenches would be excavated to approximately six feet in depth and would be backfilled after pipeline installation.

### *ATF Complex*

To accommodate the ATF complex, the existing pavement and fencing at the location of the ATF complex would be removed. In addition, the location of the ATF complex would likely need to be graded to provide a level base for the ATF and appurtenant structures, to provide site access, and to provide appropriate stormwater drainage. It is assumed a moderate amount of existing soil would be excavated and exported and a moderate amount of clean engineered fill or another suitable substrate would be imported to provide geotechnical stability for the ATF complex. Soil export would also be required to accommodate the underground advanced purified water storage tank. Excavation depth is not anticipated to exceed 20 feet.

### **Site Access**

Site access at the ATF complex would be provided via an entrance gate or gates through the ATF complex fencing. Construction of the project components, including the water distribution pipelines and the injection and monitoring wells, would result in temporary access restrictions along public roadways throughout the project area.

### **Operation and Maintenance**

The proposed project would require approximately 15 employees, including operators, electricians, mechanics, and administrative staff, that would work at the ATF complex. Operation and maintenance of the injection, monitoring, and production wells would require weekly visits for inspections, monitoring of pressures, cleaning out well casings, removing microbial build-up, and backflushing. Operation and maintenance of the pipelines would require inspections of pipeline and exercising valves every six months. Chemical deliveries to the ATF complex would occur approximately eight times per month.

Construction of IW-2A, IW-2B, IW-3, and IW-4 could preclude use of up to two campsites per injection well in the Coastal Dunes RV Park and Campground. To compensate for this impact, the City would negotiate a cost agreement with the County of San Luis Obispo Parks and Recreation Department to offset lost revenue from these campsites.

## **9. Surrounding Land Uses and Setting**

Table 3 summarizes the surrounding land uses for each of the project components with known locations.

**Table 3 Surrounding Land Uses for Project Components with Known Locations**

<b>Project Component</b>	<b>Direction</b>	<b>Land Use</b>
ATF Complex and MW-3D/3E	North	Industrial
	East	Industrial
	South	Undeveloped land with a eucalyptus tree grove (zoned Coastal Low-Density Residential)
	West	Industrial
Water Distribution Pipelines	North	Pismo State Beach/Oceano Lagoon, Oceano County Airport, Coastal Dunes RV Park and Campground, Industrial
	East	Residential, Oceano Park, Oceano County Airport, undeveloped land with a eucalyptus tree grove (zoned Coastal Low-Density Residential)
	South	Residential, SSLOCSO WWTP
	West	Pismo State Beach/Oceano Lagoon, Oceano Memorial Campground, Oceano County Airport, Residential, SSLOCSO WWTP, Industrial, Coastal Dunes RV Park and Campground
IW-1, IW-2A, IW-2B, IW-3, IW-4, MW-2A/2B/2C, and MW-4A/4B	North	Undeveloped land (zoned Coastal Visitor Serving), Coastal Dunes RV Park and Campground
	East	Union Pacific Railroad track, South 4 <sup>th</sup> Street, Residential, Industrial
	South	Industrial and Coastal Dunes RV Park and Campground
	West	Pismo State Beach/Oceano Lagoon
IW-5A and IW-5B and MW-5A/5B/5C	North	SSLOCSO WWTP and Oceano County Airport
	East	Oceano County Airport and Arroyo Grande Creek
	South	Arroyo Grande Creek
	West	SSLOCSO WWTP
MW-1A/1B	North	Industrial
	East	Industrial, Manhattan Avenue
	South	Industrial
	West	Union Pacific Railroad track, Coastal Dunes RV Park and Campground
MW-1C/1D	North	Residential
	East	Residential
	South	Longbranch Avenue, Residential
	West	South 6 <sup>th</sup> Street, Residential
MW-2D/2E/3F	North	South 5 <sup>th</sup> Street
	East	Residential
	South	South 5 <sup>th</sup> Street
	West	Residential
MW-3A/3B	North	South 4 <sup>th</sup> Street
	East	Industrial
	South	South 4 <sup>th</sup> Street
	West	Union Pacific Railroad track, Coastal Dunes RV Park and Campground

Project Component	Direction	Land Use
MW-4C/4D	North	Agricultural
	East	South 13 <sup>th</sup> Street, church
	South	Industrial
	West	Agricultural
MW-5D/5E/5F	North	Oceano Depot
	East	Parking lot, undeveloped land
	South	Union Pacific Railroad track, industrial
	West	Union Pacific Railroad track, industrial

ATF = advanced treatment facility; IW = injection well; MW = monitoring well; SSLOCSD = South San Luis Obispo County Sanitation District; WWTP = wastewater treatment plant

## 10. Other Public Agencies Whose Approval is Required

Other agencies whose approval is potentially required include the United States Bureau of Reclamation, the United States Army Corps of Engineers (USACE), the United States Environmental Protection Agency, the Federal Aviation Administration, the California Department of Fish and Wildlife (CDFW), the State Lands Commission, the California Coastal Commission, the California Department of Parks and Recreation, the State Water Resources Control Board (SWRCB) Division of Funding Assistance and the Division of Drinking Water, the California Department of Water Resources, the Central Coast Regional Water Quality Control Board, the California Department of Transportation (Caltrans), SSLOCSD, the County of San Luis Obispo, the City of Arroyo Grande, the City of Grover Beach, and OCSD.

Several partner agencies, potentially including the City of Pismo Beach, SSLOCSD, the County of San Luis Obispo, the City of Arroyo Grande, and the City of Grover Beach, may form a Joint Powers Authority (JPA) at a future time. Should a JPA be formed for the purposes of project funding, management, and operation, that JPA likely would serve as a CEQA Responsible Agency for the proposed project.

## 11. References

- Carollo Engineers. 2018. Appendix B of Technical Memorandum 3 RO Concentrate Sampling Plan Results. November 2018.
- Grover Beach, City of. 2014. "General Plan Land Use Element Map." Last modified: October 2014. [http://www.grover.org/DocumentCenter/View/2751/LUE-Map-after-CoastalComm-approval-includes-Tract3038\\_Oct2014?bidId=](http://www.grover.org/DocumentCenter/View/2751/LUE-Map-after-CoastalComm-approval-includes-Tract3038_Oct2014?bidId=) (accessed March 2020).
- \_\_\_\_\_. 2018. "Official Zoning Map." Last modified: January 3, 2018. [https://www.grover.org/DocumentCenter/View/2749/ZoningMap-11x17-after-CoastalCommissionApproval-includesTract3038\\_Oct2014?bidId=](https://www.grover.org/DocumentCenter/View/2749/ZoningMap-11x17-after-CoastalCommissionApproval-includesTract3038_Oct2014?bidId=) (accessed March 2020).
- Northern Cities Management Area (NCMA) Technical Group. 2018. Northern Cities Management Area 2017 Annual Monitoring Report. April 22, 2018. Available online at: <https://www.pismo beach.org/DocumentCenter/View/42377/NCMA-2017-Annual-Monitoring-Report?bidId=>

City of Pismo Beach  
**Central Coast Blue Project**

Pismo Beach, City of. 2016. 2015 Urban Water Management Plan for the City of Pismo Beach. June 29, 2016. Available online at: <https://pismo-beach.org/DocumentCenter/View/47720/Pismo-Beach-2015-UWMP-?bidId=>

San Luis Obispo, County of. 2020. "Land Use View." <https://gis.slocounty.ca.gov/sites/luvview.htm> (accessed March 2020).

NATIVE AMERICAN HERITAGE COMMISSION  
CITY OF PISMO BEACH

APR 21 2020

COMMUNITY DEVELOPMENT  
DEPARTMENT

April 13, 2020

Matthew Downing  
City of Pismo Beach  
760 Mattie Road  
Pismo Beach, CA 93449

**Re: 2019120560, Central Coast Blue Project, San Luis Obispo County**

Dear Mr. Downing:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

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**Merri Lopez-Keifer**  
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PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

COMMISSIONER  
**Marshall McKay**  
Wintun

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

COMMISSIONER  
**Joseph Myers**  
Pomo

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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)



## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Nancy.Gonzalez-Lopez@nahc.ca.gov](mailto:Nancy.Gonzalez-Lopez@nahc.ca.gov).

Sincerely,



Nancy Gonzalez-Lopez  
Staff Services Analyst

cc: State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**

CALTRANS DISTRICT 5  
50 HIGUERA STREET  
SAN LUIS OBISPO, CA 93401-5415  
PHONE (805) 549-3101  
FAX (805) 549-3329  
TTY 711  
www.dot.ca.gov/dist05/



*Making Conservation  
a California Way of Life.*

May 26, 2020

SLO Hwy 1  
SCH# 2019120560

Matthew Downing, Planning Manager  
City of Pismo Beach  
760 Mattie Road  
Pismo Beach, CA 93449

COMMENTS FOR THE NOTICE OF PREPARATION (NOP) FOR THE CENTRAL COAST  
BLUE PROJECT

Dear Mr. Downing:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the NOP for the Central Coast Blue Project. The proposed project is a regional advanced purified water project intended to enhance supply reliability by reducing the Santa Maria Groundwater Basin's (SMGB) vulnerability to drought and seawater intrusion. The project would involve injection of advanced purified water into the SMGB via a series of injection wells installed at various locations to create a seawater intrusion barrier. Caltrans has reviewed the above project and offers the following comments at this time:

- Caltrans has cross culverts located at PM 13.74 and PM 13.88 on Hwy 1. It appears the proposed outfall pipeline that connects to the Advanced Treatment Facility will parallel Hwy 1 and possibly intersect the Caltrans culverts. For utility crossings, Caltrans requires 2-foot minimum clearance.
- Plans will need to clearly show where the project components will enter Caltrans ROW.
- All work in State right of way will need to conform to the guidance found in the Caltrans Project Development Procedures Manual Chapter 17 and the Caltrans Encroachment Permits Manual.
- Any work within, over, or under the State's ROW, including but not limited to landscaping, landscape maintenance, and utility work, will require an

Mr. Matthew Downing  
May 26, 2020  
Page 2

encroachment permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/caltrans-near-me/district-5/district-5-programs/d5-encroachment-permits>.

Caltrans requests to be included in any future public noticing regarding this project to allow us to prepare for and participate in the public process.

We look forward to continued coordination on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 549-3432 or [Jenna.Schudson@dot.ca.gov](mailto:Jenna.Schudson@dot.ca.gov).

Sincerely,



Jenna Schudson  
Development Review Coordinator  
District 5, LD-IGR South Branch

Attachments:

- Encroachment Permit Application Check List





May 15, 2020

City of Pismo Beach, Attn: Matthew Downing  
760 Mattie Road  
Pismo Beach, CA 93449

**Subject: Central Coast Blue Project**

Dear Mr. Downing:

These comments are submitted on behalf of the California Department of Parks and Recreation (State Parks), Oceano Dunes District, regarding the scoping meeting and Revised Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Central Coast Blue Project (herein referred to as the project) issued by the City of Pismo Beach. State Parks appreciates the opportunity to contribute to the scoping for this project.

Oceano Dunes District lies within the Guadalupe-Nipomo Dunes Complex, the largest coastal dune landscape along the west coast of North America. This complex contains some of the rarest wildlife habitats and species on the continent and a diverse assemblage of wetlands, lagoons, and creeks. State Parks manages these lands for public use and enjoyment while preserving the extraordinary biological diversity unique to this landscape.

**1. EIR Must Identify Impacts to Environmentally Sensitive Habitat Types and Promote Conservation of Habitat Values Impacted by the Project During Both Construction and Long Term Operation**

State Parks owns and manages portions of Arroyo Grande Creek and Meadow Creek which are immediately adjacent to some of the proposed project's injection wells, monitoring wells, and production wells. While we agree that the project would be beneficial in reducing the Santa Maria Groundwater Basin's (SMGB) vulnerability to drought and seawater intrusion, State Parks is concerned that the construction, development, and future operations of the wells may impact the environmentally sensitive habitat areas within Meadow Creek and Arroyo Grande Creek. This could occur through direct impacts like removal of aquatic habitat and associated upland species and through longer term impacts to surface water availability in the vicinity.

Phase I of the project would include construction of water distribution pipelines and five injection wells including IW-1, IW-2A, IW-3, and IW-4 which are immediately adjacent to the State Park managed portion of Meadow Creek (Figure 3 in NOP). IW-5A is immediately adjacent to the section of Arroyo Grande Creek which State Parks also owns and manages. Phase II of the project would include construction of the remaining two injection wells; IW-2B is adjacent to Meadow Creek and IW-5B is upstream of

Arroyo Grande Creek, both areas under State Park's management. Phase II would also include installation of approximately 40 feet of water distribution pipelines to connect these injection wells to the water distribution pipelines. Construction of the project components is anticipated to last approximately 24 months. During the construction period, portions of the project area would be closed to public access and use potentially impacting ongoing State Park operations, public access, and/or habitat functionality in and near construction zones.

At the time of writing this comment letter, the closure locations, engineering, and/or construction details are not known for many of the project components for Phase I and Phase II. State Parks has concerns regarding the project's close proximity to our sensitive wetland areas and impacts related to the biology and hydrology of Meadow Creek and Arroyo Grande Creek. The permanent and temporary impacts to riparian and wetland vegetation during the construction and future operations of the project may have a substantial impact on riparian plant communities and habitat for the State and federally-listed species that occur within State Parks (federally-threatened California red-legged frog (*Rana draytonii*), threatened South-Central California Coast steelhead (*Oncorhynchus mykiss*), and federally-endangered tidewater goby (*Eucyclogobius newberryi*). The section of Arroyo Grande creek owned by State Parks has already been impacted severely by urban development, levee construction, channelization, and agricultural activities.

We are aware that the project may require permits or other approvals from the California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and the California Coastal Commission. Some of the relevant codes may include California Fish and Game Code 1600 – 1616, and California Coastal Act Sections 30106 (Development) and 30107.5 (Environmentally Sensitive Habitat Areas). All impacts from project activities to the riparian and wetland habitats for fish and wildlife in lower Arroyo Grande Creek and Meadow Creek should be fully analyzed, avoided, and minimized or mitigated, if necessary.

## **2. EIR must Address Long-Term Hydrological Impacts to Meadow and Arroyo Grande Creek**

State Parks has concerns that existing groundwater management and extraction practices have been unduly impacting the hydrology of Meadow Creek and Arroyo Grande Creek and their associated wetlands and riparian areas. These areas are home to several listed species (mentioned above) as well as many plants and wildlife which depend upon these habitats for their continued survival. The EIR must ensure that hydrological impacts (water quality and flow rates) are considered for Meadow Creek and Arroyo Grande Creek. Conversely, the project also has the potential to benefit these areas and resources, through provision of alternative irrigation water and the injection wells' potential benefits to groundwater levels, as we discuss further below.

The project appears designed to increase the pumping regime of existing, operational production wells in the project area. Based on State Parks' experience with changes in hydrology in Arroyo Grande Creek caused by the adjacent developed properties, agricultural activities, and the Lopez Dam, State Parks believes this project could create potentially significant impacts from substantial alteration of the existing drainage pattern

of the creek. Over the past 10 years, State Parks has recorded a number of adverse hydrological conditions in Arroyo Grande Creek and we suspect these impacts are related to shallow groundwater use and the connection between groundwater availability and surface flow. The existing groundwater uses in the vicinity of the project and the adjacent Cienega Valley likely contribute to the drying of lower Arroyo Grande Creek and its lagoon. In the past this has resulted in direct impacts to federally listed fish and amphibian species.

Since this project is a multi-agency collaboration of the Northern Cities Management Area (NCMA), and addresses groundwater supply and impacts, the EIR should acknowledge the recurring cone of depression previously documented by NCMA which is adjacent to the State Parks' reach of Arroyo Grande Creek, and assert NCMA's groundwater monitoring authority to the agricultural/irrigator beneficiaries of this project.

The project scoping meeting that occurred on May 7, 2020, reported the injection wells and greater project would be designed to dispose of 1.3 million gallons per day (Mgd) effluent (1.3Mg is about 4 acre-feet [af]). The presentation also stated that this project would enable local agencies to increase their pumping from the groundwater basin to their adjudicated maximum allocation of 3,566 af/year, up from a "typical" volume like the 780 af pumped from production wells last year. Thus, it appears that the project intends to inject 1,450 af/year through the new injection wells, but pump 2,786 af/year more through the NCMA entities' production wells (including 1 new production well to be drilled as part of the project).

Any new groundwater pumping must be sustainable and should not exacerbate the already documented groundwater impacts noted above. Extracting a lower volume than the volume injected could provide benefits to address the significant existing groundwater issues in the Basin (like perennial Cienega Valley cone of depression), many of which impact State Park resources (surface water yield to Arroyo Grande Creek).

State Parks is also concerned that the location of some project wells may overlap and/or be impacted by the San Luis Obispo County Flood Control & Water Conservation District (FCWCD) proposed Meadow Creek Lagoon mitigation/restoration project footprint. An alternative to be considered for the County's prospective lagoon restoration project may include removal of up to 1,000' of the levee, and flood control flap-gates, currently separating Meadow Creek from Arroyo Grande Lagoon.

### **3. Additional Project Objective and Benefits**

Five project objectives were given on page 2 of the NOP. State Park's is requesting that a 6<sup>th</sup> objective be considered: Remediate existing surface water impacts of groundwater extraction occurring in the Cienega Valley. In addition to addressing concerns about seawater intrusion and water supply, it should be recognized that this project has the potential to address if not solve other local groundwater issues and resource impacts, and the EIR's alternatives analysis should include evaluation of some alternatives that address those well-documented problems (e.g. NCMA Annual Reports). At the very least, a project alternative should be evaluated which provides benefits to groundwater resources beyond a narrow objective of deterring seawater intrusion. As these injection, monitoring, and production wells are new project features




that will likely increase production, please consider modern Sustainable Groundwater Management Act (SGMA) principles -- no "undesirable effect to surface waters" should occur as part of the "increased production" at this location. Injection volume, both gross and net, should be maximized at IW-5A and IW-5B. The proposed "increase" in groundwater production should be substantially less than the injected volume. Since one of the project purposes will be to provide irrigation water, this project should also include a program to coordinate with regional irrigators to measure, monitor, and report all Cienega Valley water production; not just delivered yield from this project, but also all pumping from every well in NCMA's service area. This would represent coordinated management of groundwater resources that are part of this project and encourage coordination among extractors through "conjunctive use."

## **Conclusion**

Thank you for the opportunity to submit scoping comments for this project. We look forward to working with the City of Pismo Beach and other project partners and stakeholders to ensure that the environmental review fulfills the requirements of State and federal law and to ensure that Arroyo Grande Creek and Meadow Creek and the species that inhabit these areas will not be impacted.

Please do not hesitate to contact State Parks with any questions at the number listed below. We look forward to reviewing the EIR document once it is made available for public review.

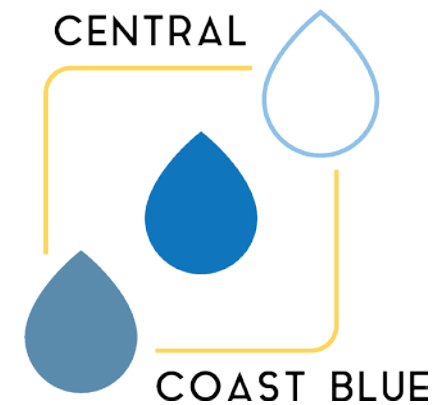
Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Pearce', with a long horizontal stroke extending to the right.

Kevin Pearce, Superintendent  
California State Parks, Oceano Dunes District  
Oceano Dunes SVRA • Pismo State Beach  
340 James Way, Suite 270  
Pismo Beach, CA 93449  
805-773-7170  
Kevin.pearce@parks.ca.gov

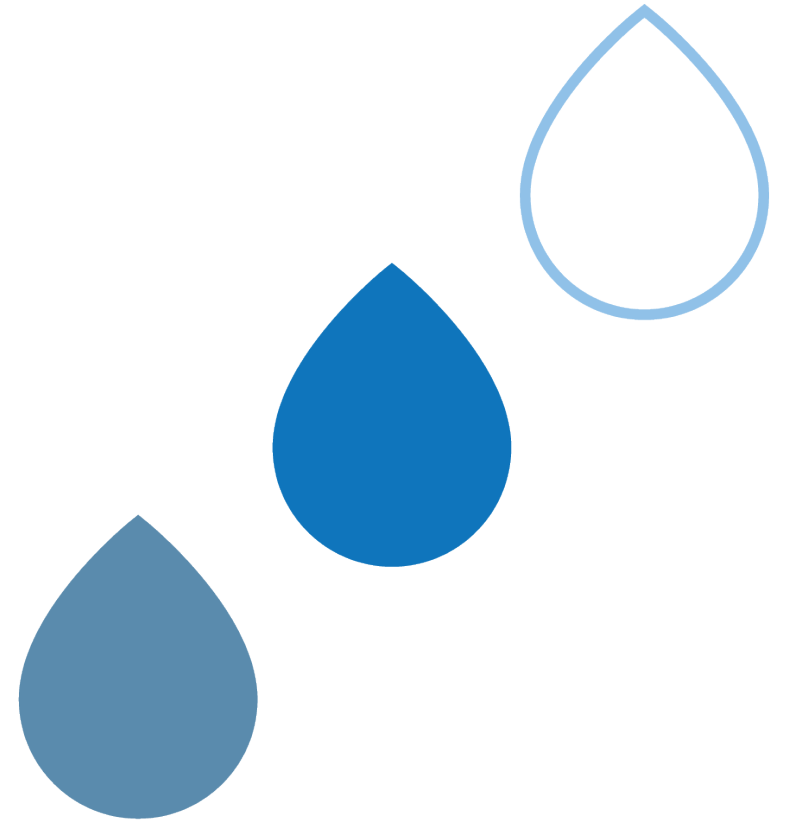
# Central Coast Blue EIR Scoping Meeting #2

May 7, 2020



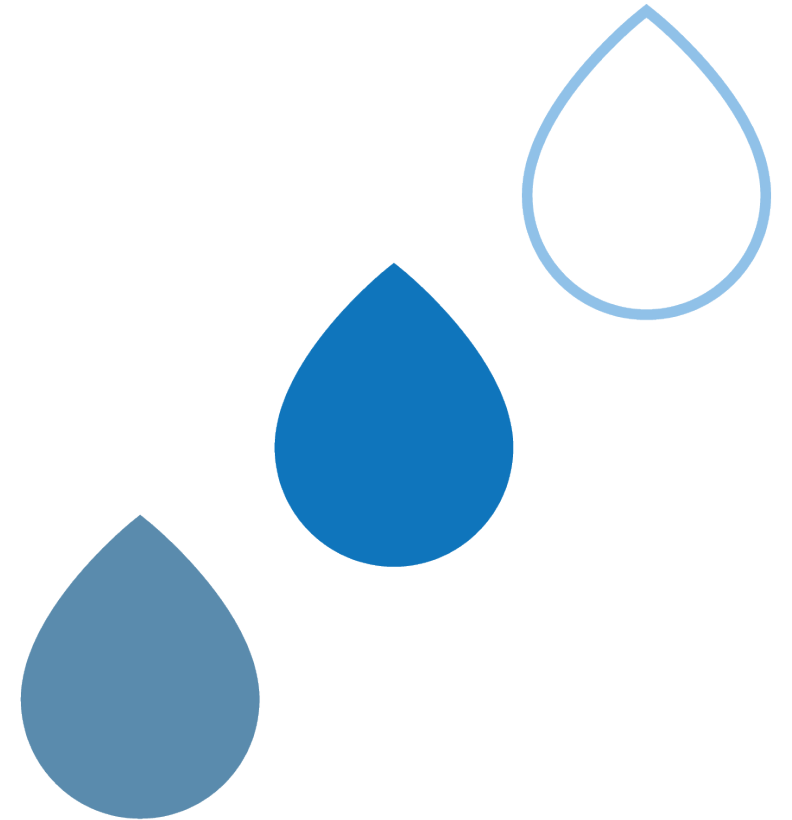
# AGENDA

- Describe regulatory background
- Provide project overview
- Discuss scope of environmental impact report



# GROUND RULES

- Participant audio will be muted during meeting
- Online attendees can submit questions/comments using chat function
- Call-in attendees will be unmuted after the presentation to submit verbal comments, if desired
- Meeting is being recorded and will be posted online
- Chat is also being recorded



# REGULATORY BACKGROUND



# PURPOSE OF THE SCOPING MEETING

- Inform the community & concerned agencies about the project and environmental review
- Get your input on scope of review
- Inform the community about future opportunities for input

# WHY A SECOND SCOPING MEETING?

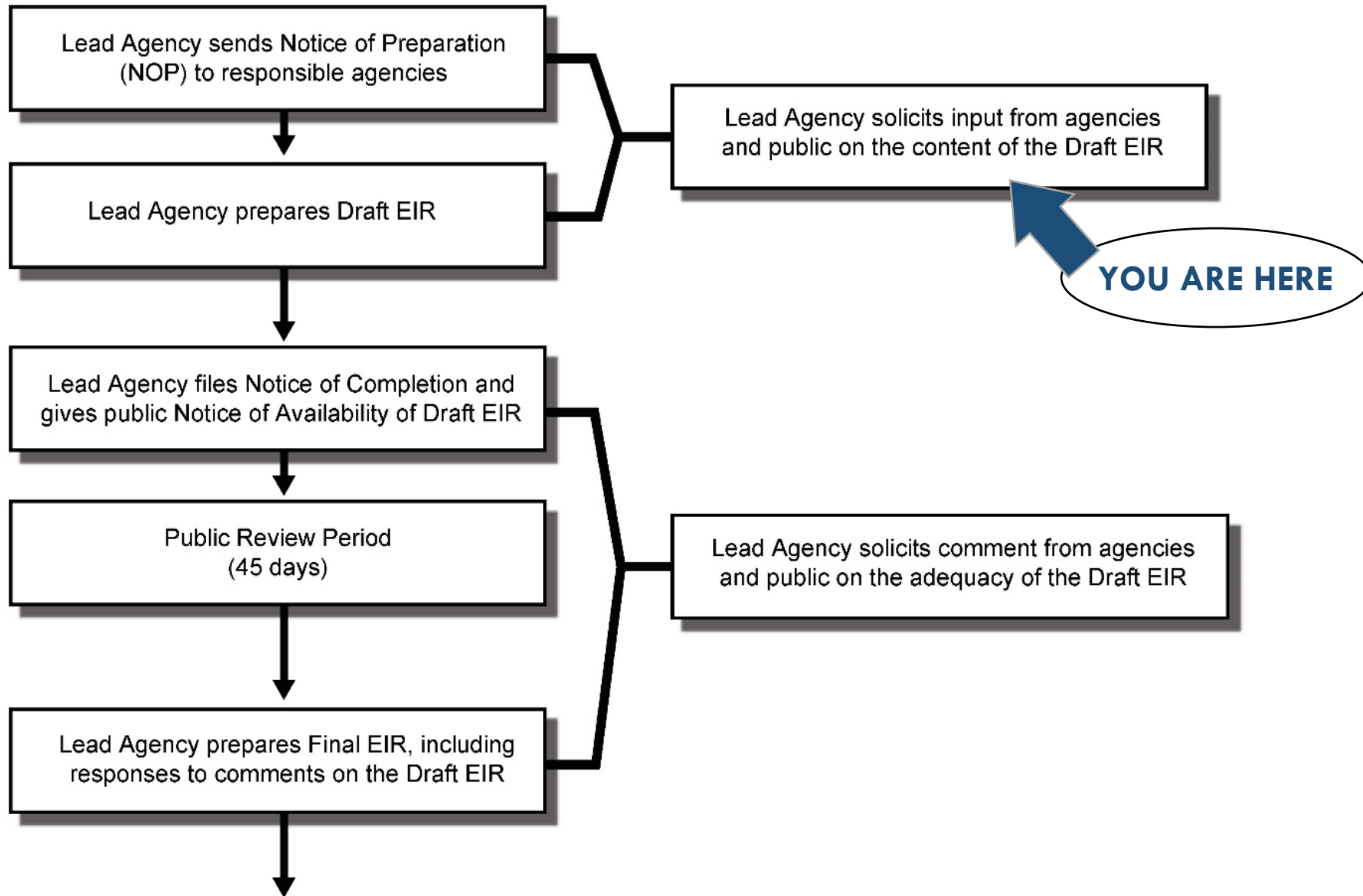
- To solicit input on and inform the community of the locations of the ATF complex and water distribution pipelines, which were selected after the first scoping meeting was held
- All comments received during first scoping period will be included in the EIR
  - No need to submit the same comments twice

# PURPOSE OF CEQA

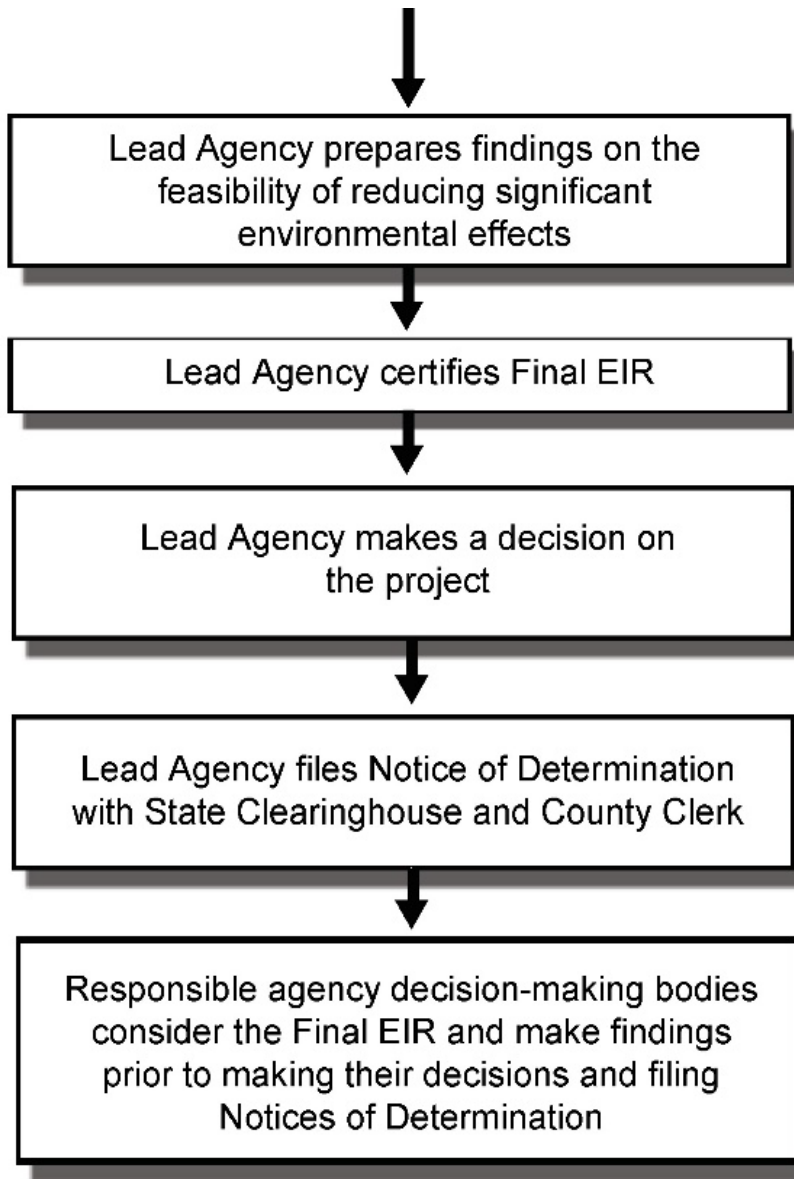
- Disclose the significant environmental effects of proposed projects
- Identify ways to avoid or reduce environmental impacts
- Consider feasible alternatives to proposed actions
- Enhance public participation in the planning process



# CEQA PROCESS



# CEQA PROCESS (CONT.)

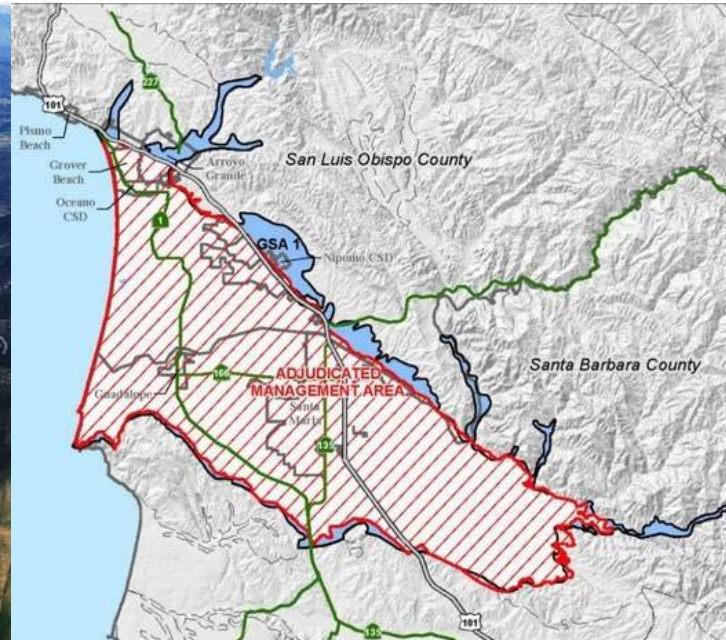


# PROJECT OVERVIEW

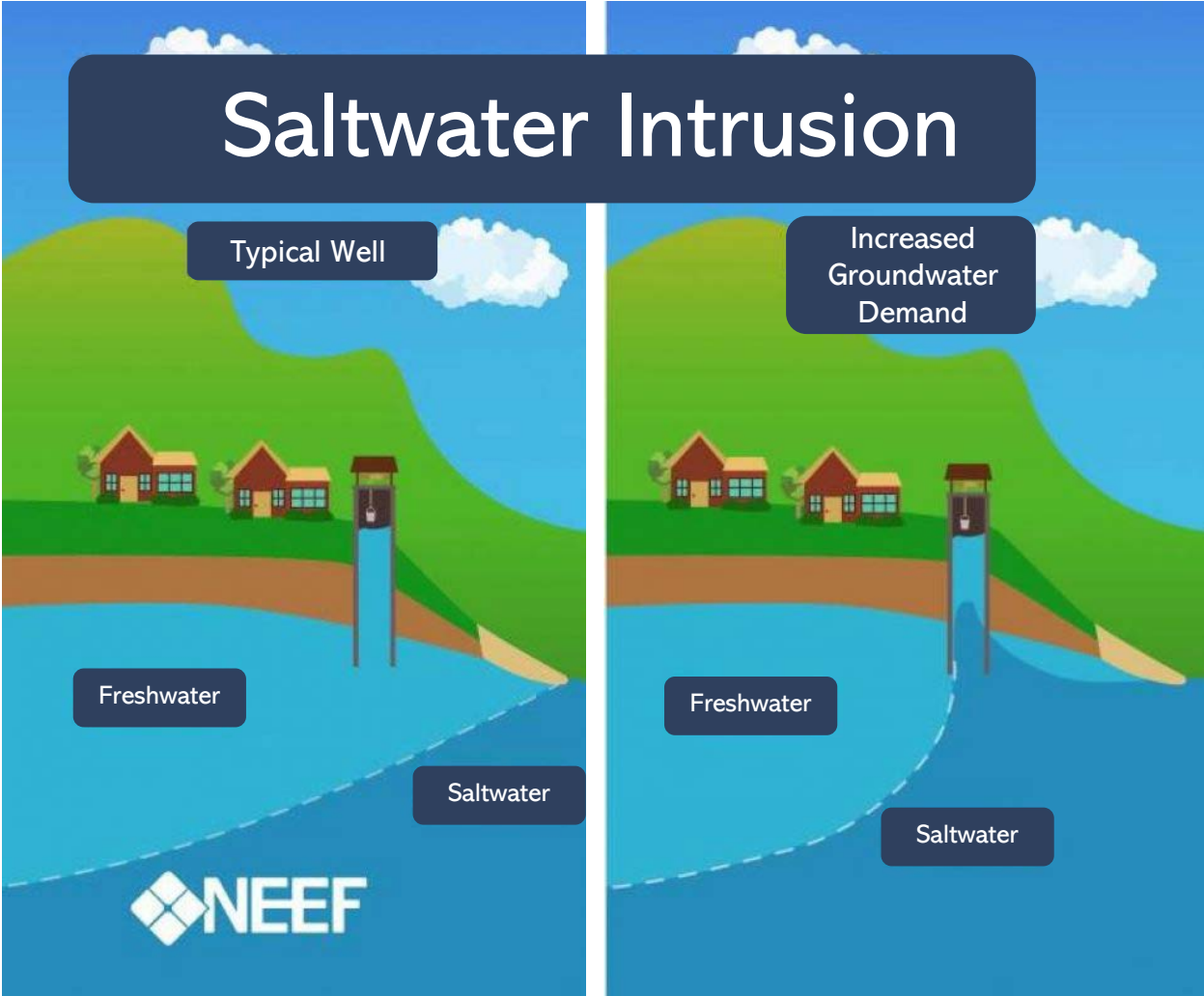


# PROJECT BACKGROUND

State Water || Lake Lopez || Groundwater



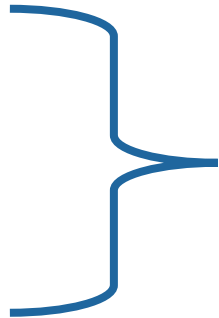
# PROJECT BACKGROUND (CONT.)



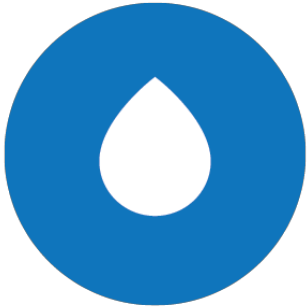
Source: European Geosciences Union - <https://blogs.egu.eu/network/gfgd/2018/02/12/saltwater-intrusion-causes-impacts-and-mitigation/>

# PROJECT OVERVIEW

- Regional advanced purified water project including an advanced treatment facility complex (ATF; including an advanced purified water storage tank, an equalization basin, a pump station), pipelines, injection wells, monitoring wells, and one new production well
- Multi-agency collaboration:
  - City of Pismo Beach
  - City of Grover Beach
  - City of Arroyo Grande
  - Oceano Community Services District
  - South San Luis Obispo County Sanitation District (SSLOCSD)



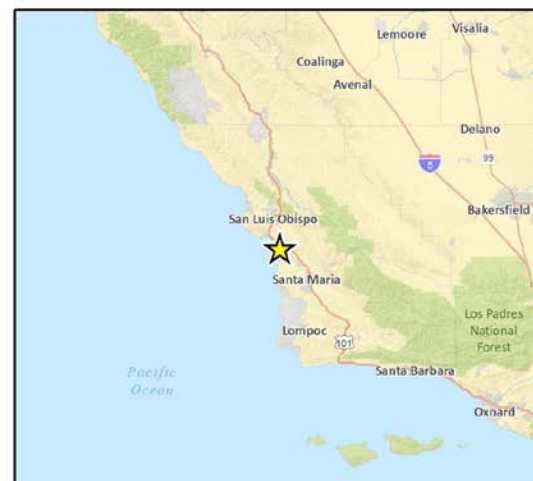
NCMA Agencies



# REGIONAL PROJECT LOCATION

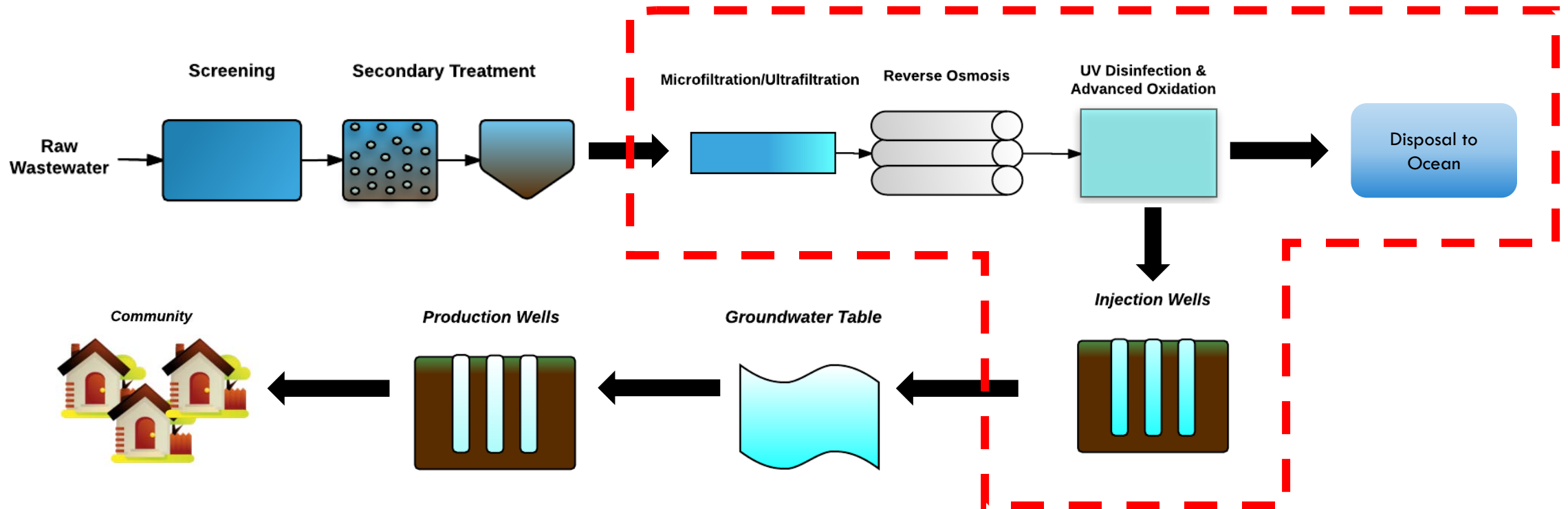


★ Project Location



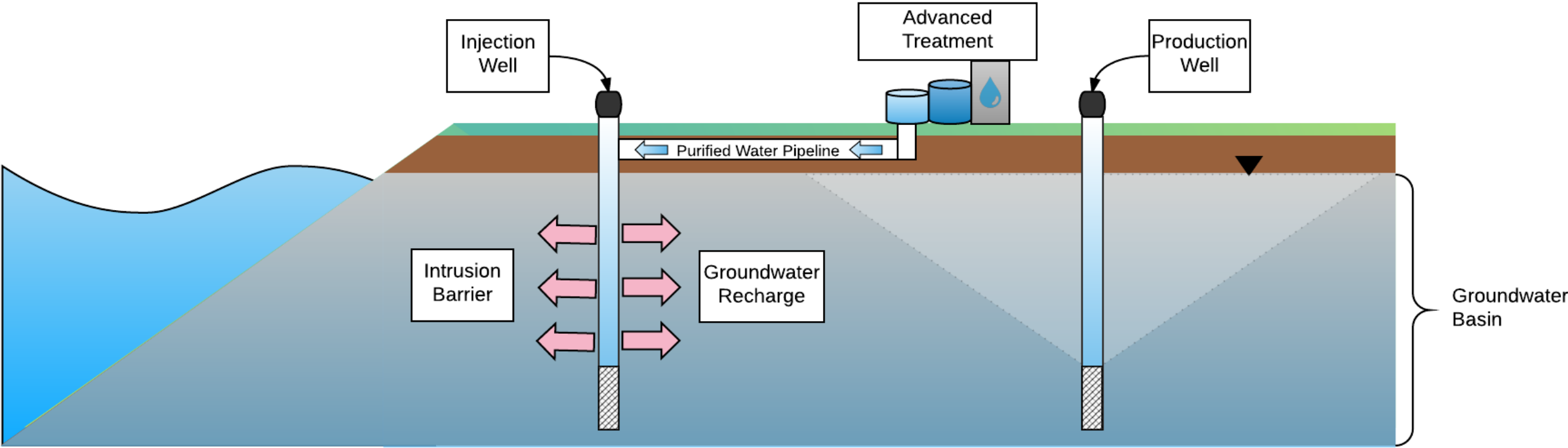
# PROJECT COMPONENTS

## Proposed Project





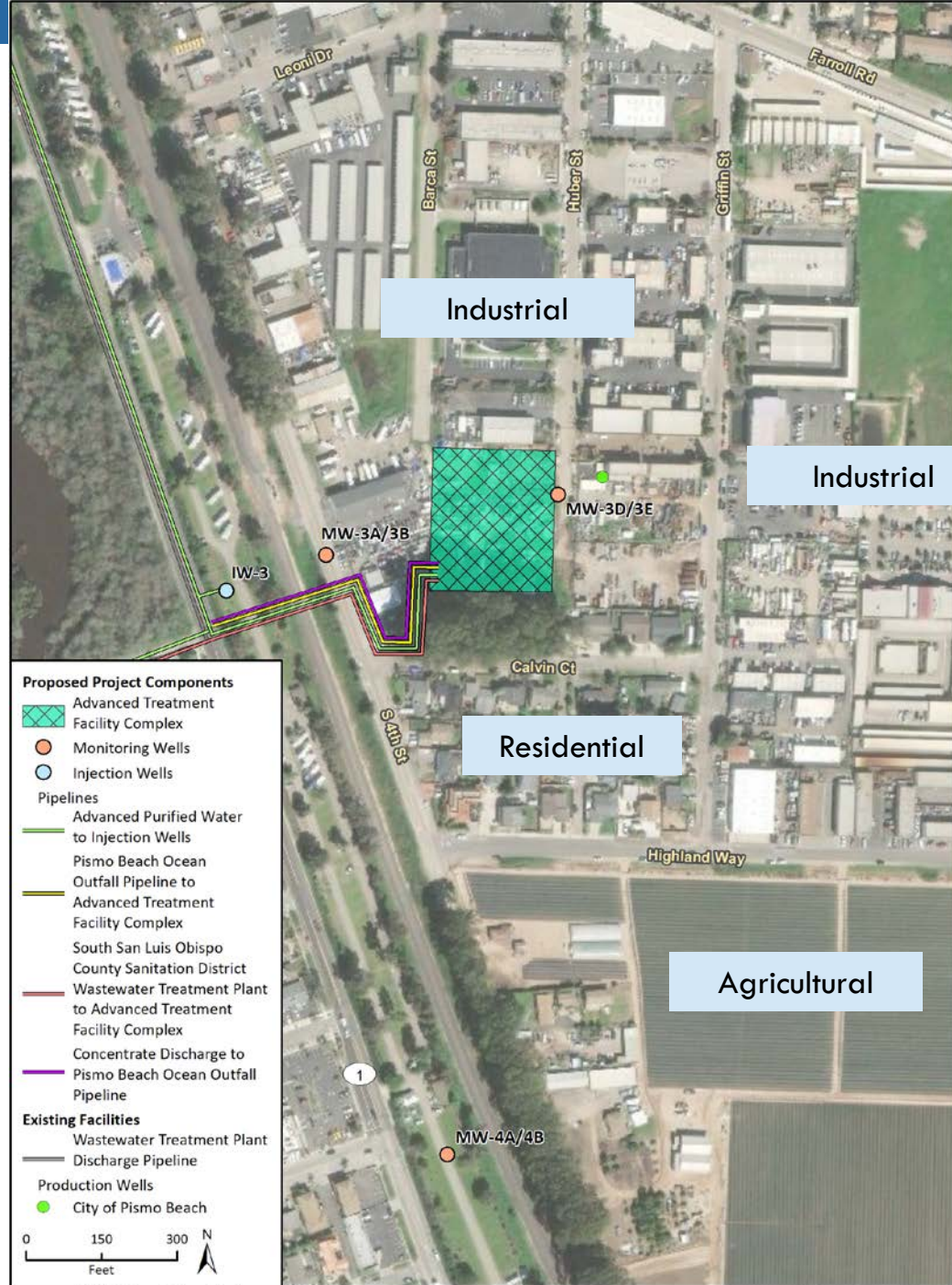
# PROJECT COMPONENTS (CONT.)



# ADVANCED TREATMENT FACILITY COMPLEX

- Proposed site: 980 Huber Street, Grover Beach(APN 060-543-016)
- Approximately 1.5 acres of land
- Existing use: several unpaved storage yards for vehicles, equipment, and containers
- Will treat water from Pismo Beach and SSLOCSD Wastewater Treatment Plants
- Initial treatment capacity of 1.3 million gallons per day (Phase I) with final treatment capacity of 5.4 million gallons per day (Phase II)
- Includes staff support facilities (offices, restrooms, break room, etc.)
- Appurtenant structures:
  - Equalization basin
  - Advanced purified water storage tank
  - Pump station

# ATF COMPLEX LOCATION



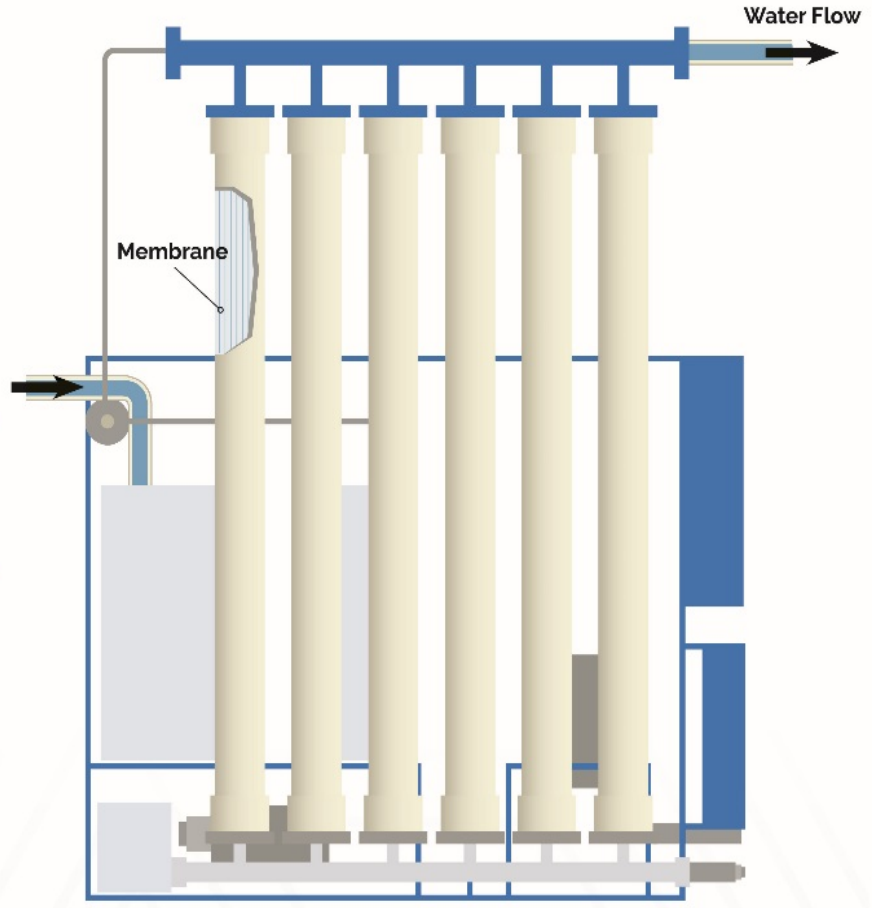
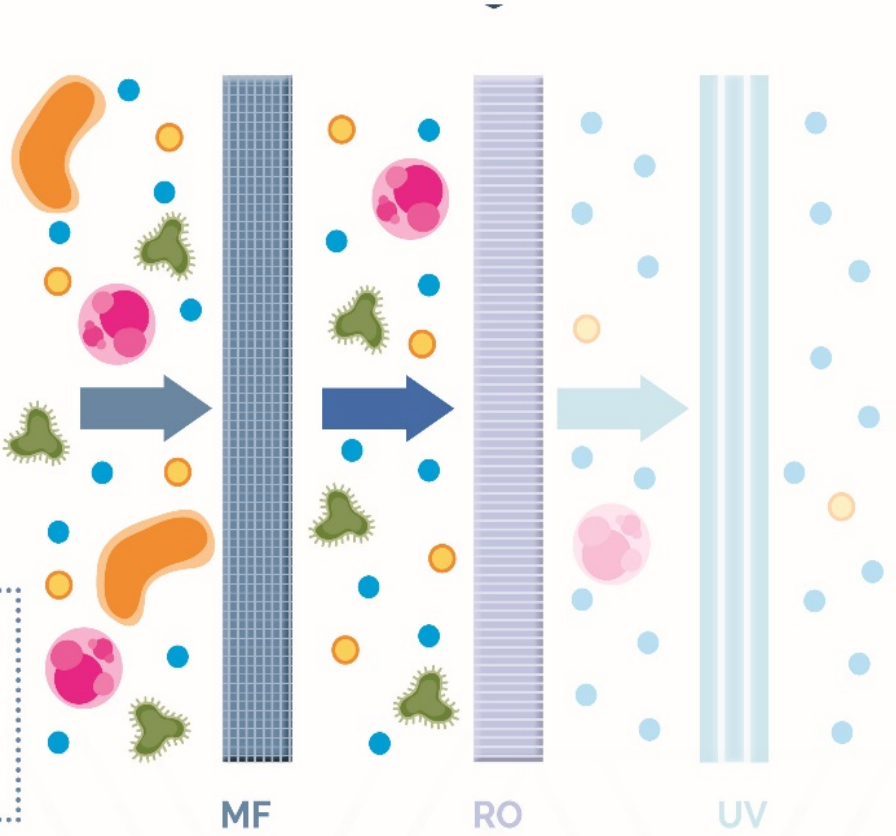
Imagery provided by Microsoft Bing and its licensors © 2020.

Fig. 2-3 Project Components Zoom A1

Current Land Use

The smallest size of bacteria is approximately 0.3 microns or equal to about 1/300<sup>th</sup> of a diameter of human hair.

The pore diameter of the MF membrane is 0.1 microns, which is smaller than bacteria.



Source: IDE Technologies.

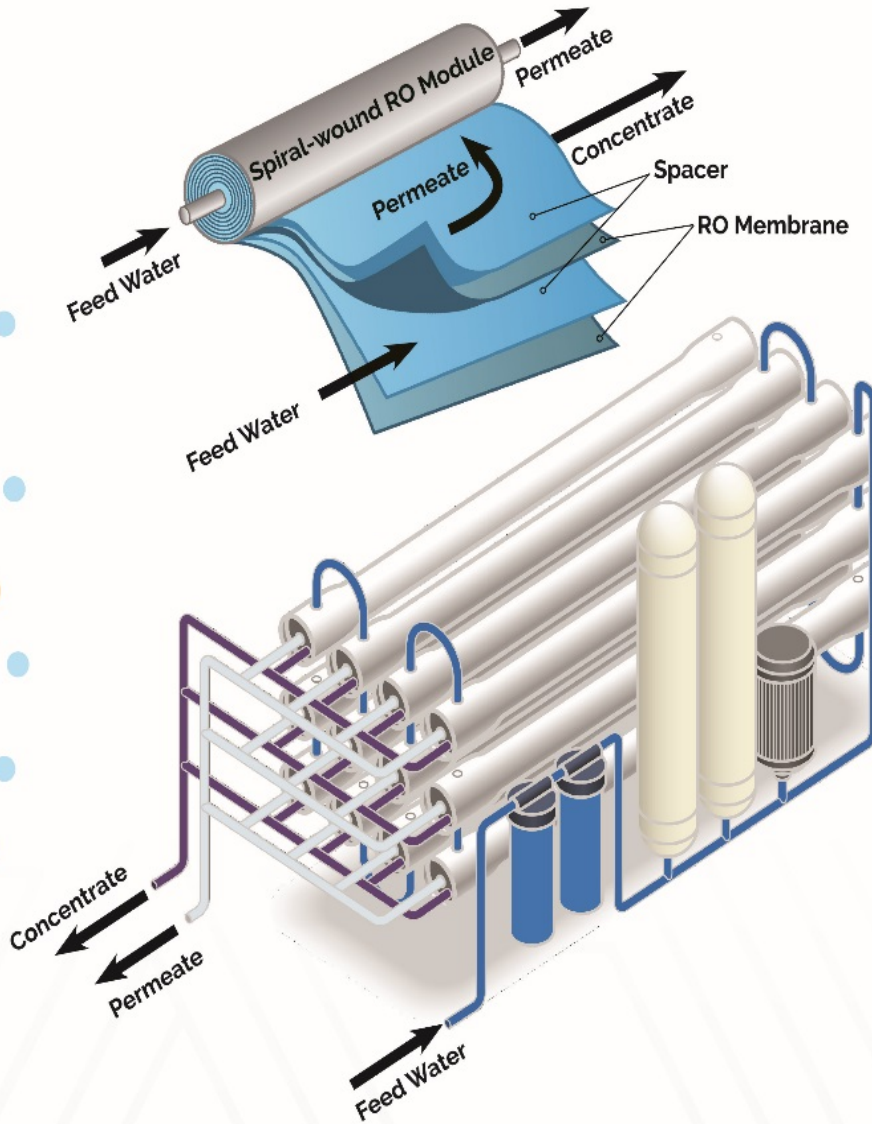
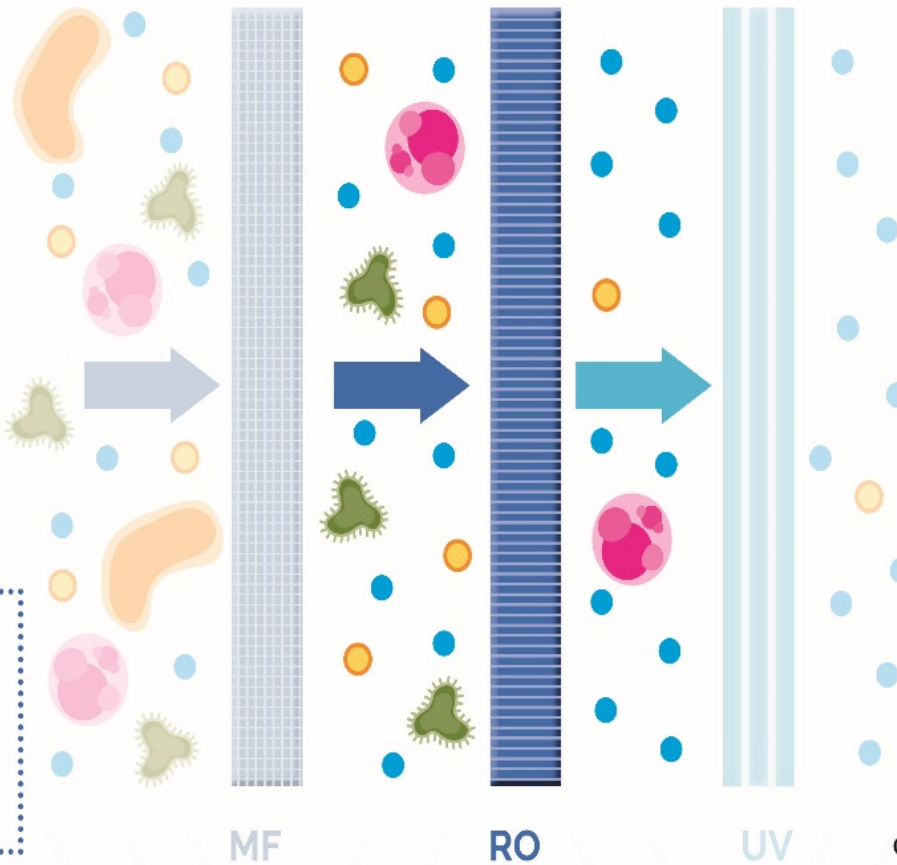
# MICROFILTRATION



A strand of silk from a spider web measures 3.0–8.0 microns.



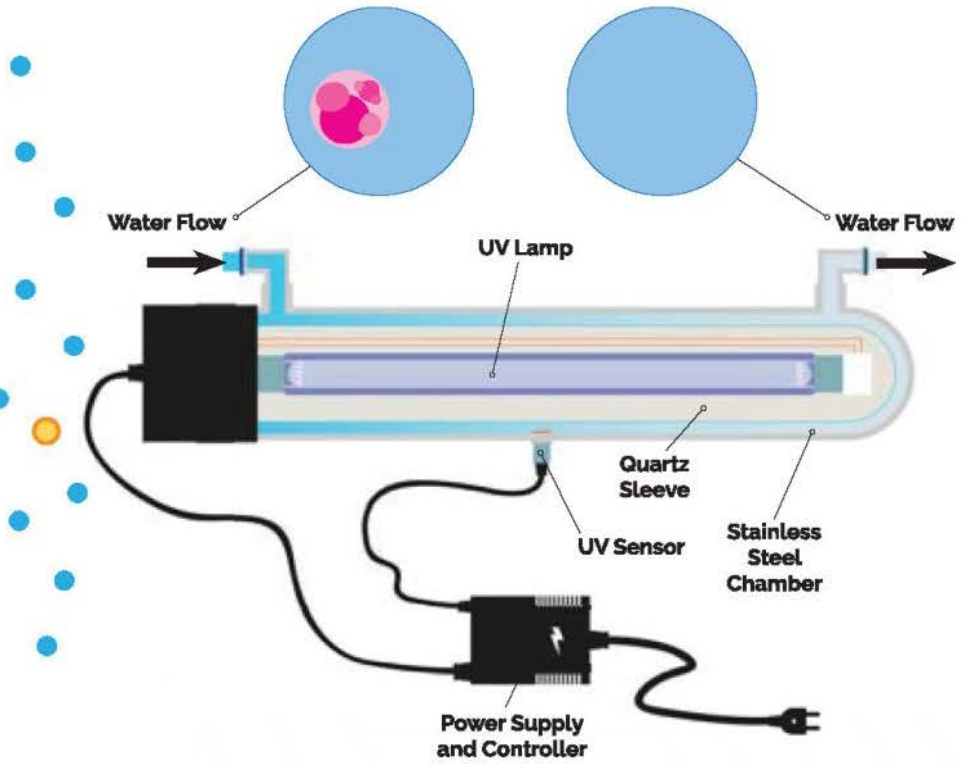
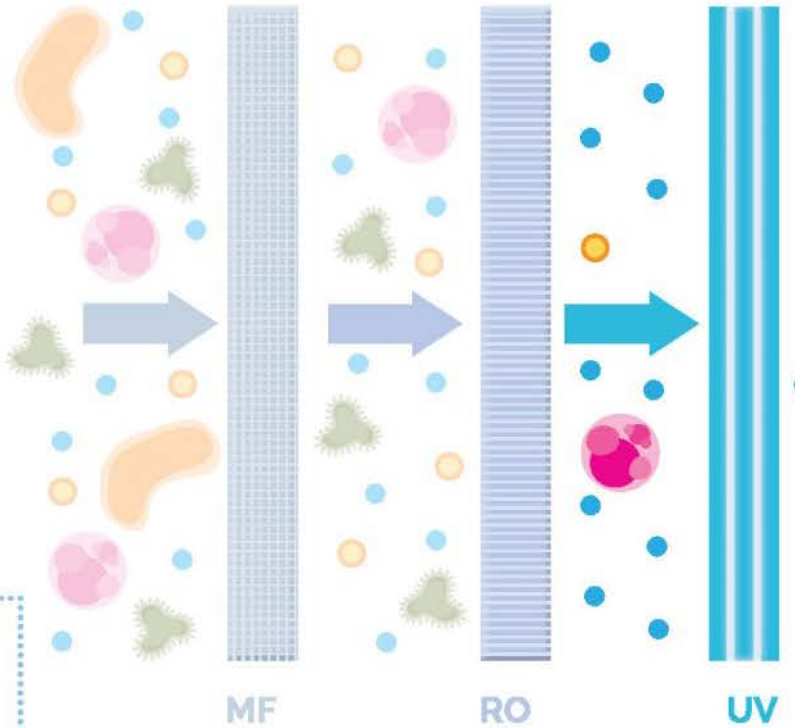
The diameter of a RO membrane pore ranges from 0.02–0.0001 microns.



Source: IDE Technologies.

# REVERSE OSMOSIS

Advanced oxidation uses UV light and electrodes to initiate a series of chemical reactions, which break down compounds in the water that may have passed through the MF/RO stages. This is an added measure to provide safe water.



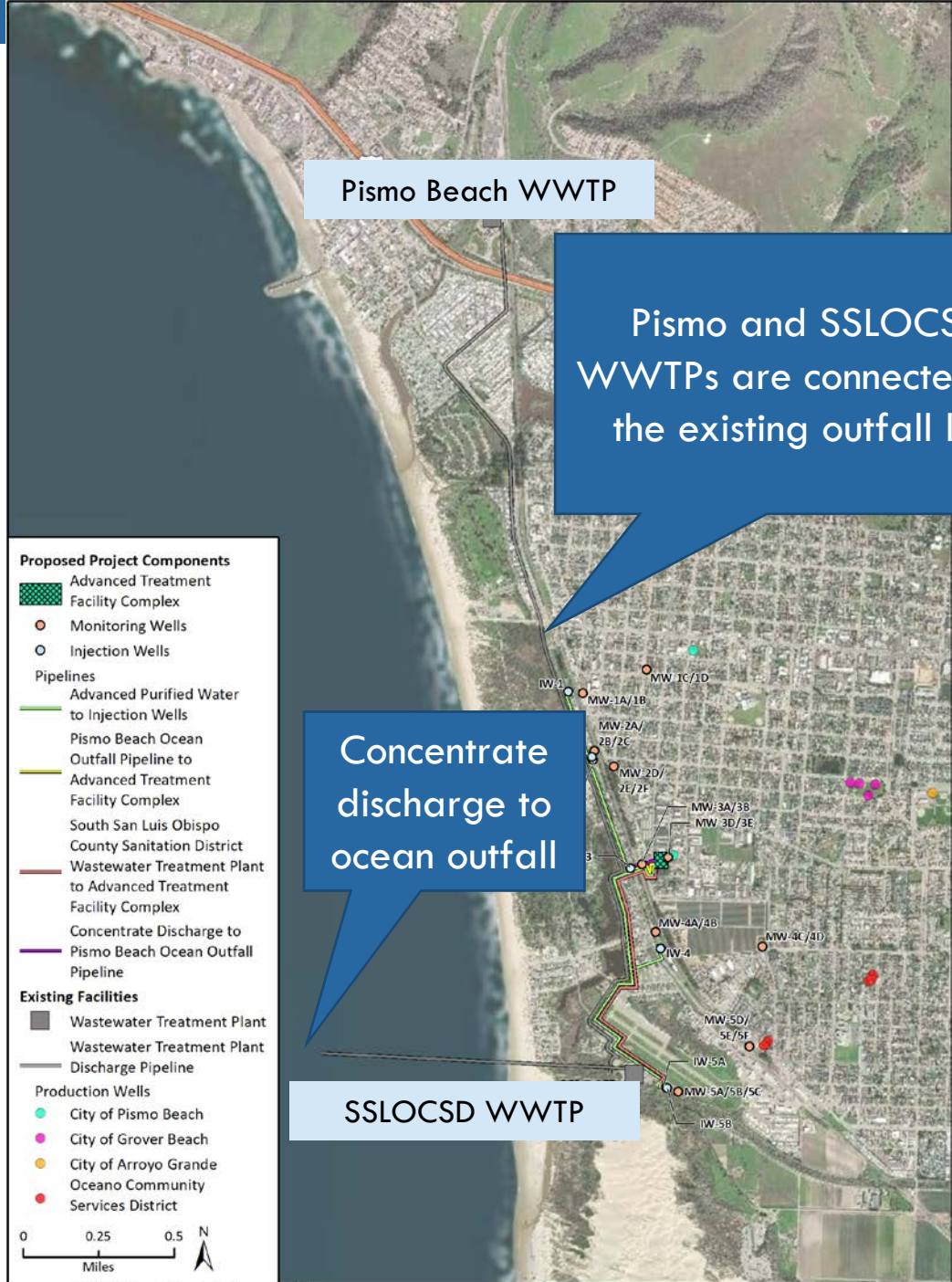
Source: IDE Technologies

# ULTRAVIOLET/ADVANCED OXIDATION

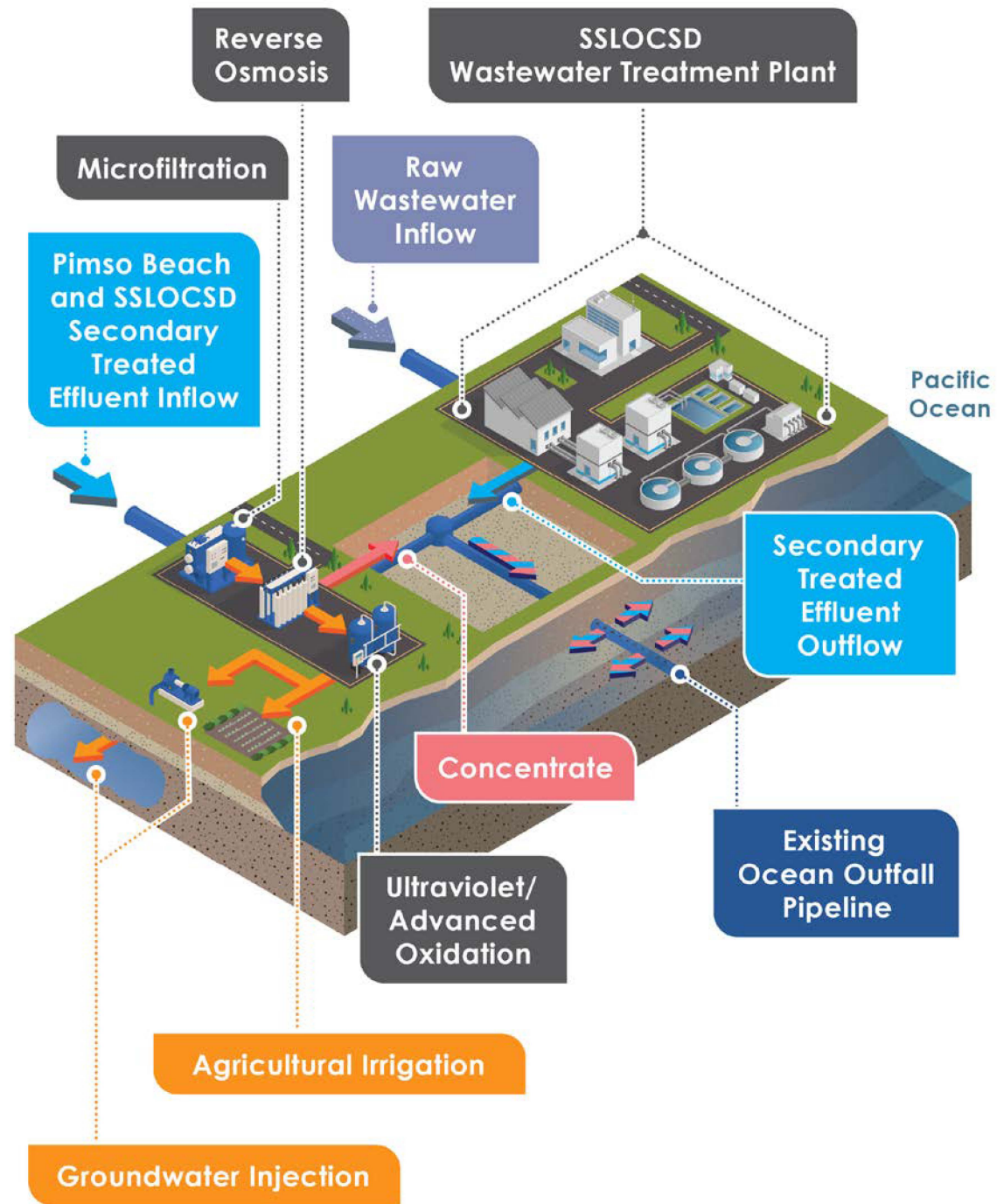
# DISCHARGE OF REVERSE OSMOSIS CONCENTRATE

- Reverse osmosis process produces a waste water stream (concentrate) in addition to the purified water
- Concentrate will be discharged via existing Pismo Beach/SSLOCSO WWTPs ocean outfall pipeline
- Must be compliant with City of Pismo Beach and SSLOCSO National Pollutant Discharge Elimination System (NPDES) permit requirements









# INJECTION AND MONITORING WELLS

- Seven injection wells
  - 12 inches in diameter
  - 200 to 600 feet in depth
- Ten monitoring wells
- Footprints:
  - Up to 3,000 square feet per injection well (conservative assumption of footprint)
  - 25 square feet per monitoring well
- Heights:
  - 6 feet for injection wells
  - Flush-mounted for monitoring wells

# PIPELINES

- Four sets:
  1. Convey secondary treated effluent from the existing Pismo Beach WWTP discharge pipeline to the ATF complex
  2. Convey secondary treated effluent from the SSLOCSD WWTP to the ATF complex
  3. Convey advanced purified water from the ATF complex to the injection wells
  4. Convey concentrate from the ATF complex to the existing WWTP discharge pipeline
- Approximately 6 to 24 inches in diameter
- Primarily in existing rights-of-way
- Will require drilling under the Union Pacific Railroad track
- Will require work within the Oceano County Airport

# WELL AND PIPELINE LOCATIONS



Five injection wells in Coastal Dunes RV Park and Campground

Two injection wells at SSLOCSD Wastewater Treatment Plant property

# NEW PRODUCTION WELL

- Location is yet to be determined – likely to be in Grover Beach
- Intended to optimize groundwater pumping
- Will be owned by City of Pismo Beach
- 14 inches diameter
- 300 to 600 feet in depth
- Up to 3,000 square feet at surface (conservative assumption of footprint)

# INCREASED GROUNDWATER PUMPING

	Acre-Feet per Year
2018 Levels	764
Total Adjudicated Amount for Urban Uses*	4,330
Net Increase	<b>3,566</b>

*\*Note: There will be no increase in the groundwater allocations for any of the NCMA agencies.*

# AGRICULTURAL IRRIGATION

- Potentially a supplemental (not primary) use of advanced purified water
- Will require pipelines between the ATF complex and agricultural lands to the south of Oceano
- Exact locations are yet to be determined

# CONSTRUCTION PHASING

- Phase I:
  - Five injection wells (IW-1, IW-2A, IW-3, IW-4, and IW-5A)
  - Ten monitoring wells
  - Water distribution pipelines
  - ATF complex with initial capacity to treat flows from Pismo Beach Wastewater Treatment Plant
- Phase II
  - Two injection wells (IW-2B and IW-5B)
  - Expansion upgrades to the ATF complex with full capacity to treat additional flows from SSLOCSD Wastewater Treatment Plant
  - Potentially agricultural irrigation pipelines



# REGULATIONS FOR RECYCLED WATER

- California Code of Regulations Title 22, Division 4, Chapters 1-3
  - Regulations on use of recycled water for a range of purposes, including groundwater replenishment/indirect potable reuse and agricultural irrigation
  - Requires at least two months of travel time between injection wells and drinking water wells to allow for monitoring and response if needed



A woman wearing a backpack and a child are crouching by a stream. A dog is also present, and the woman is reaching towards the water. The scene is overlaid with a blue tint. In the bottom left corner, there are three white water drop icons of increasing size.

# SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

# EIR APPROACH

- Hybrid Project/Program EIR
- Project-level for Components with Known Locations:
  - Injection and monitoring wells
  - Water distribution pipelines
  - Advanced treatment facility complex
  - Discharge via ocean outfall
- Program-level for Components with Unknown Locations:
  - New production well
  - Agricultural irrigation pipelines

# ISSUES TO BE ANALYZED IN THE EIR

- Air Quality
- Biological Resources
- Cultural and Tribal Cultural Resources
- Energy
- Environmental Justice
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology/Water Quality
- Land Use and Planning
- Noise
- Transportation
- Cumulative Impacts
- Growth-Inducing Impacts

# ALTERNATIVES

- **Alternative 1:** No Project Alternative (required by CEQA)
- **Alternative 2:** No Agricultural Irrigation Pipelines
- **Alternative 3:** Locating Advanced Treatment Facility Complex at SSLOCSD Wastewater Treatment Plant
- **Alternative 4:** Modified Locations of Injection and Monitoring Wells
- **Alternative 5:** Increased State Water Project Allocation
- **Alternative 6:** Increased Storage of Lopez Reservoir
- Others?

# PROJECTED EIR SCHEDULE

- May 28, 2020 - Last day to submit comments on EIR scope
- Summer 2020 – Release of Draft EIR for public comment and two public hearings on the Draft EIR
- Fall/Winter 2020 – Preparation and certification of Final EIR

# WE WELCOME YOUR COMMENTS!

Please provide comments on the following:

- The scope, focus, and content of the EIR
- Mitigation measures to avoid or reduce environmental effects
- Alternatives to avoid or reduce environmental effects

For more information, visit <http://centralcoastblue.com/>

Thank you for participating!



# ADDITIONAL DISCUSSION GUIDELINES

- **Reminder:** meeting and chat are being recorded
- Questions/comments will only be received via chat for online attendees
- Questions/comments from chat will be read aloud in the order they were received
- Call-in attendees will then be unmuted to see if they have verbal comments to share (3 minutes per person)

**You can also submit a written comment via letter or email.**

*Matthew Downing*

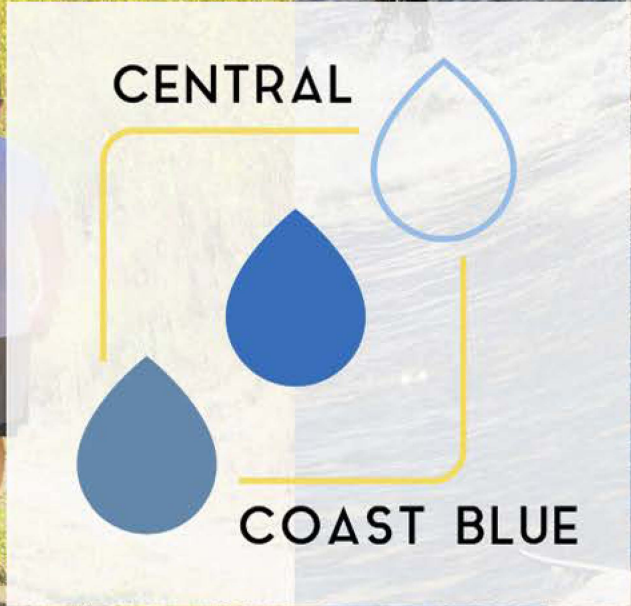
*760 Mattie Road*

*Pismo Beach, CA 93449*

*[mdowning@pismobeach.org](mailto:mdowning@pismobeach.org)*







# Central Coast Blue Second Scoping Meeting Attendee List and Chat Log (5/7/2020)

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## Attendee List

- Jeff Winklepleck – City of Pismo Beach Community Development Director
- Matt Downing – City of Pismo Beach Planning Manager
- Daniel Heimerl – Water Systems Consulting
- Annaliese Miller – Rincon Consultants
- Amanda Antonelli – Rincon Consultants
- Jennifer Haddow – Rincon Consultants
- Kate Shea – County of San Luis Obispo Department of Planning and Building
- Emi Sugiyama – County of San Luis Obispo Department of Planning and Building
- Stephanie Little – California State Parks
- Doug Rischbieter – California State Parks
- Cynthia Replogle – member of public<sup>1</sup>
- Brad Snook – Surfrider Foundation
- Kira Smith – State Water Resources Control Board Groundwater Grant Unit

## Transcript of Chat Log

**Cynthia Replogle & Brad Snook (to Everyone):** 6:34 PM: I'll comment please

**Cynthia Replogle & Brad Snook (to Everyone):** 6:35 PM: it's too long to type

**Doug Rischbieter (to Organizer(s) Only):** 6:44 PM: Will the unspecified dimensions and quantities of the prospective irrigation water be under the "Programmatic" part of your EIR?

**Doug Rischbieter (to Organizer(s) Only):** 6:45 PM: It was a question!

**Kate Shea (to Everyone):** 6:45 PM: Please provide updated project description in the recent NOP posted in CEQA.net with the SCH

**Doug Rischbieter (to Organizer(s) Only):** 6:46 PM: Thanks!

**Little, Stephanie@Parks (to Organizer(s) Only):** 6:46 PM: nothing from me

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<sup>1</sup> Cynthia Replogle indicated that she was submitting comments as a member of the public and Oceano resident, not as a director of the Oceano Community Services District.