CALIFORNIA COASTAL COMMISSION
CENTRAL COAST DISTRICT
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SANTA CRUZ, CA 95060
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W17a

Prepared January 11, 2021 for January 13, 2021 Hearing

To: Commissioners and Interested Persons

From: Susan Craig, Central Coast District Manager
Brian O'Neill, Coastal Planner

Subject: Additional hearing materials for W17a
Appeal Number A-3-SLO-20-0072 (Central Coast Blue Test Wells)

This package includes additional materials related to the above-referenced hearing item as follows:

Additional correspondence received in the time since the staff report was distributed

J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN
Specializing in Water Neutral Development

January 7, 2021

W17a
Appeal Filed: 12/2/2020 Action — Deadline: 2/9/2021 (2/12/2021 Actual)
Staff: Brian O'Neill - SC — Staff Report: 12/18/2020
Hearing Date: 1/13/2021 — Appeal Number: A-3-SLO-20-0072
STAFF REPORT SUBSTNATIAL ISSUE DETERMINATION ONLY
Applicant: City of Pismo Beach
Appellant: Jeff Edwards

Local Government Decision: San Luis Obispo County Coastal Development Permit Application number DRC2020-0050 approved by the San Luis Obispo County Board of Supervisors (on local appeal) on October 20, 2020.

Location: San Luis Obispo County Parks and Recreation Department's Coastal Dunes RV Park and Campground at 1001 Pacific Boulevard (APNs 061-111-017 and -018) in the unincorporated community of Oceano in San Luis Obispo County.

Project Description: Construction of two full-scale, permanent groundwater wells, a pipeline connection to an existing outfall, water tanks, a sound wall, an above-ground pipeline, and related development, all on a temporary basis to allow for monitoring and testing in support of a potential future project, known as "Central Coast Blue".

Appellant Recommendation: Find Substantial Issue

Dear Commissioners,

In response to the staff report prepared for the above referenced item, please consider the following:

Standing

As a resident San Luis Obispo County I am an aggrieved person appellant with a public interest in the subject application and the parent project, Central Coast Blue (CCB). My participation and opposition to the proposed project at the local level included correspondence and meetings/public hearings with the Oceano Community Services District, Oceano Advisory Council, San Luis Obispo County Planning Department Hearing and the San Luis Obispo County Board of Supervisors.

The proposed project is permanent, not temporary

While the project description indicates the wells in question are for testing purposes, it is important to note the City of Pismo Beach has made their intent clear that these wells will be permanent. The groundwater extraction well in question will be drilled to a depth of approximately 400 feet and developed with a 12-16 inch stainless steel casing and included with the total project cost of $750,000. It is unclear how much water will be pumped from the well and discharged to the ocean, eg. 17.5 acre feet to 185 acre feet.

LCP inconsistency-the Project is not allowed in the Recreation LUC

Staff indicates, "the proposed project *does not fit neatly* within the public utilities facilities use" column and further states, "while technically an LCP inconsistency" the report goes on to justify the inconsistency based on the County's illogical application of the proposed use definition relative to the Recreation land use category in question. As a result, in a footnote staff states, **"If the Applicant intends to permanently keep the wells as part of the larger CCB project, the County would need to reconcile the potential LCP inconsistency by re-designating a portion of the lot or amending the allowed uses in Table O."**

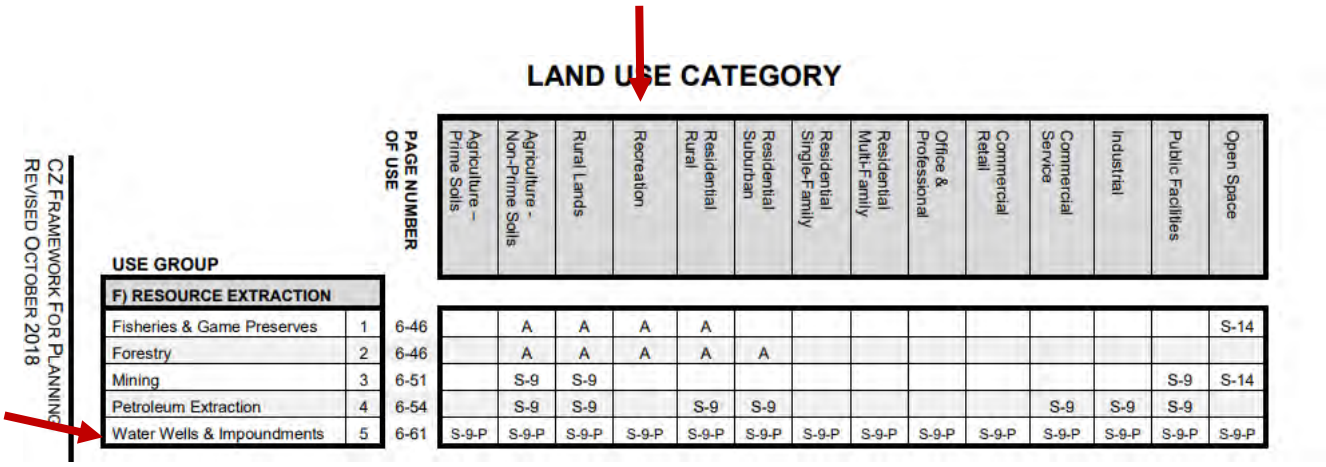
The proposal before you represents a clear prima facie case of LCP inconsistency because the proposed use is simply not allowed in the Recreation Land Use Category. The current proposal should have been rejected upon application to the County of San Luis Obispo because it is inconsistent with the current LCP. However, it appears a governmental accommodation was granted to the City of Pismo Beach by the County in accepting, processing and approving the project.

Your staff report, typically detailed and comprehensive, in the instant case, appears to have been hastily compiled in less than two weeks as a governmental courtesy to the City of Pismo Beach. The report fails, as did the County, to apply LCP provisions accurately to the proposed project. Furthermore, the staff report fails to conduct the type of analysis that would lead to a conclusion of LCP inconsistency and therefore would raise a Substantial Issue and jurisdiction over the project would be assumed by your Commission. Due to the likely adverse precedential effects of your Commission allowing the County decision to stand, the Commission must assume jurisdiction over the matter (First of four CCB groundwater wells in the Recreation Land Use Category).

The plain reading of the Use Group Definitions in Coastal Table O can result in no other interpretation of the proposed project, but that it is a Public Utility Facility and **NOT** a Water Well and Impoundment.

Water Wells and Impoundments [F5] Water extraction uses or structures for small scale domestic or agricultural use including wells, ponds, water tanks and distribution facilities. (page 46 of 46, Table O)

Excerpt from Table O, page 21 of 46



LAND USE CATEGORY

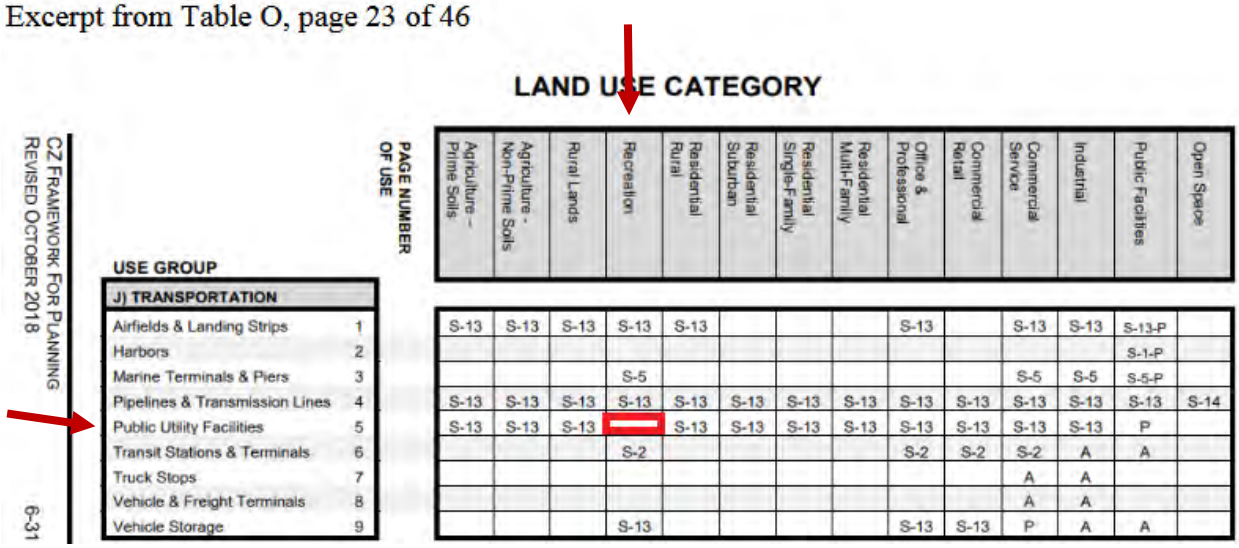
CZ FRAMEWORK FOR PLANNING REVISED OCTOBER 2018

USE GROUP		PAGE NUMBER OF USE	Agriculture – Prime Soils	Agriculture - Non-Prime Soils	Rural Lands	Recreation	Residential Rural	Residential Suburban	Residential Single-Family	Residential Multi-Family	Office & Professional	Commercial Retail	Commercial Service	Industrial	Public Facilities	Open Space
F) RESOURCE EXTRACTION																
Fisheries & Game Preserves	1	6-46		A	A	A	A									S-14
Forestry	2	6-46		A	A	A	A	A								
Mining	3	6-51		S-9	S-9										S-9	S-14
Petroleum Extraction	4	6-54		S-9	S-9		S-9	S-9					S-9	S-9	S-9	
Water Wells & Impoundments	5	6-61	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P	S-9-P

Alternatively, the appropriate use group for the subject proposal is Public Utility Facilities given the proposed project is a public water well, as shown below, however not applied accurately by the County:

Public Utility Facilities [J5] Fixed-base structures and facilities serving as junction points for transferring utility services from one transmission voltage to another or to local distribution and service voltages. These uses include any of the following facilities: electrical substations and switching stations; telephone switching facilities; natural gas regulating and distribution facilities; public water system wells, treatment plants and storage; and community wastewater treatment plants, settling ponds and disposal fields. Nothing in this definition is intended to require a land use permit where Government Code Section 53091 would exempt local agencies from permit requirements, except in the coastal zone where permitting requirements are as set forth in the Local Coastal Plan. These uses do not include those uses that are not directly and immediately used for the production, generation, storage, or transmission of water, wastewater or electrical power such as office or customer service centers (classified in "Offices"), or equipment and material storage yards (classified in Storage Yards and Sales Lots"). (page 41 of 46, Table "O")

Excerpt from Table O, page 23 of 46



LAND USE CATEGORY

CZ FRAMEWORK FOR PLANNING
REVISED OCTOBER 2018

PAGE NUMBER OF USE

USE GROUP		Agriculture - Prime Soils	Agriculture - Non-Prime Soils	Rural Lands	Recreation	Residential Rural	Residential Suburban	Residential Single-Family	Residential Multi-Family	Office & Professional	Commercial Retail	Commercial Service	Industrial	Public Facilities	Open Space
J) TRANSPORTATION															
Airfields & Landing Strips	1	S-13	S-13	S-13	S-13	S-13				S-13		S-13	S-13	S-13-P	
Harbors	2													S-1-P	
Marine Terminals & Piers	3				S-5							S-5	S-5	S-5-P	
Pipelines & Transmission Lines	4	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-14
Public Utility Facilities	5	S-13	S-13	S-13		S-13	S-13	S-13	S-13	S-13	S-13	S-13	S-13	P	
Transit Stations & Terminals	6				S-2					S-2	S-2	S-2	A	A	
Truck Stops	7											A	A		
Vehicle & Freight Terminals	8											A	A		
Vehicle Storage	9				S-13					S-13	S-13	P	A	A	

6-31

It is widely stipulated by the applicant, appellant and staff that the proposed project is not domestic, small or agricultural. However, Coastal staff justifies the use of Water Wells & Impoundments due to the "temporary" nature of the project, the small amount of water to be produced from the testing (17.5 acre feet) and the fact the land use category or use definition can be **changed later** to achieve LCP consistency. Clearly, this is not how regulatory agencies operate or how LCP consistency is found, by approving a project now and potentially establishing consistency at a future date.

Likewise, the City of Pismo Beach justifies the misapplication of the use definitions by stating that it is only two wells, they're accessory to the Visitors Serving function of the campground in question and almost laughably suggests that because the City of Pismo Beach is not regulated by the Public Utilities Commission it does not have to comply with the use definition of Public Utility Facilities.

Moreover, if by some wave of a magic wand, the proposed project could be found consistent with Coastal Table O; there is an existing Limitation on Use for the Recreation Land Use Category at the Coastal Dunes RV Park and Campground, location of the subject proposal. The limitation on use controls over any allowed uses in Table O if they are not expressly stated in the language of such limitation.

The proposed Project is precluded from Coastal Dunes RV Park & Campground

Ordinance No. 1215-Limitation on Use-Allowable uses in the area between Highway 1 and the railroad right-of-way are limited to recreational vehicle (RV) parks (Urban Destination Recreation Vehicle Park). Therefore, the proposed project is inconsistent with the County General Plan and the Local Coastal Plan. Coastal Staff, in their report, suggests since Ordinance 1215 was adopted in 1972 that pre-dates the Coastal Act and was therefore "never incorporated into the LCP, and thus is not part of the standard of review for this CDP application". This is a patently false assertion in that when the LCP was certified on

February 25, 1988 all of the ordinances of record were incorporated by reference in the newly certified plan. Therefore, the Limitation on Use is very much in play and does serve as a Standard of Review for the proposed project and as such precludes the proposed uses from the Recreation Land Use Category in the Coastal Dunes RV Park and Campground.

Coastal Act Public Recreational Access Policy inconsistencies

The Coastal Act requires public recreational access to be maximized and lower-cost facilities to be protected and provided as a way to maximize access for all segments of the population, including those unable to afford expensive accommodations and facilities. Overnight accommodations are a necessary part of providing public access and recreational opportunities for the many visitors that live further from the coast, including those from inland areas, such as the California Central Valley, where a coastal trip requires a lengthy car ride.In fact, many campers travel hundreds of miles to their destination so they may enjoy the coast without having to drive back to their home the same day. The issue of coastal access is not so much that visitors stay on or at the beach, but about the ability to spend time on the coast without the extended travel by having access to lower-cost accommodations. The County-approved project included no analysis of potential impacts upon the availability of lower-cost accommodations, let alone establishment of any mitigation measures. It is not enough to simply provide public recreational access to and along the coast, nor is it enough to simply protect public recreational access; rather such public recreational access must also be **MAXIMIZED.**

The staff report discounts potential impacts to public recreational access because of the limited duration of the proposed project being six months as conditioned by the county. The best case scenario for the proposed project, if the Commission finds No Substantial Issue and there is no legal challenge, construction could begin by mid-February. This timeline would suggest the project construction occurs between mid-February and mid-August of this year. This timeline would clearly impact the summer months and the displacement of available campsites could be significant given demand.

Moreover, staff has suggested that the project would coincide with the off-peak or shoulder season in February, March and April where demand is historically reduced. The problem with this assertion is that given the loss of 1,000 campsites at the ODSVRA and increased demand because of Covid-19 there is no visible “off-peak” season for the foreseeable future.

This is especially true in Oceano given its moderate climate with seventy-degree weather; camping demand is extremely high on weekdays and weekends because of its proximity to the beach. Options for camping are extremely limited. The Pismo Coast Village, a popular resort on Highway One does not allow tent camping (RV camping only). The County-approved project impacts to lower cost visitor-serving accommodations are significant. It is estimated; at minimum 40-camp sites at theOceano Dunes RV Park and Campground will be displaced during the project. The County-approved project lacks an adequate analysis of impacts to this class of visitors and as a result the proposed project is further inconsistent with the LCP.

Additionally, other campsites within the 230-space campground may be affected due to noise and construction activity, making them less desirable. Likewise, the affordable ($59.00 per night King bed) at the eighteen-room Oceano Inn, across the street from the project site, is also likely to experience impacts from the project, including noise, lighting and traffic, making it a less desirable place to stay, further reducing quality and affordable places to stay. Based upon the above discussion, theproposed project clearly fails to conform to Section 30213 of the Coastal Act as it relates to the protection of lower cost visitor-serving accommodations in the community of Oceano.

Proposed Project is inconsistent with LCP Noise Standards

The proposed project fails to conform with Section 23.06.040 of the San Luis Obispo County Coastal Zone Land Use Ordinance (CZLUO)Noise standards.

As staff suggests, the proposed project will be complaint with the exterior noise level standards for much of the six-month project construction and testing. However, the permanent, full-scale, water extraction well will require at least two weeks to be constructed. Construction requires non-stop twenty-four hours per day, seven days a week, continuous drilling for a minimum of two weeks. The exterior noise levels will exceed 65 dB maximum nighttime noise level standard, as shown below.

SAN LUIS OBISPO COUNTY CODE - TITLE 23, LAND USE ORDINANCE

Operational Standards 23.06.046

EXTERIOR NOISE LEVEL STANDARDS		
	Daytime (7 a.m. to 10 p.m.)	Nighttime1 (10 p.m. to 7 a.m.)
Hourly Equivalent Sound Level (L_{eq}, dB)	50	45
Maximum level, dB	70	65

Notes:
1. Applies only to uses that operate or are occupied during nighttime hours

Noise from the well drilling is expected to exceed 85 dB. The project proposes to deploy a 3-sided sound wall to attenuate the sound. However, even after attenuation, noise thresholds are likely to exceed the nighttime Maximum Nighttime Level of 65 dB. It is almost guaranteed nighttime operations will exceed the exterior noise levelstandards provided in the CZLUO and is therefore, further inconsistent with the LCP.

Proposed Project coincides with avian nesting season

While the City of Pismo Beach Categorical Exemption (CE) under CEQA discusses nesting

birds and mitigation measures, there are no County Conditions of Approval that require mitigation for potential impacts to Environmentally Sensitive Habitat Areas (ESHA) with respect to nesting bird species covered under the Migratory Bird Treaty Act. In fact, the proposed project construction is likely to be directly coincidental with the nesting season recognized by the California Department of Fish and Wildlife between February 1st and September 15th. Based upon pre-construction surveys, a minimum no disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no disturbance buffer around the nests of unlisted raptors shall be maintained until the breeding season has ended. The project CE offers substantially less disturbance buffers than is required. For example, the CE provides a 25-50 foot buffer for non-listed bird species and a 100-foot disturbance buffer for unlisted raptors. These disturbance buffers are clearly undersized and fail to protect ESHA and as a result render the proposed project LCP inconsistent.

Environmental Justice Considerations

The community of Oceano is a recognized Disadvantaged Community with a majority of its population being LatinX and twenty-percent of its residents falling under the poverty line. The elementary school students are 100% enrolled in the free and reduced meals program.

So far, CCB is largely a grant driven project of which Pismo Beach has secured a $2 million planning grant for water reclamation projects under a federal WaterSMART program. A second $2 million state Proposition 1 grant has also been awarded which will fully fund $750,000 for the subject proposal. The wealthy City of Pismo Beach has leveraged the DAC status of the community of Oceano, in part, to secure $4 million in total for the subject proposal and the parent project CCB. Meanwhile, the community of Oceano has no involvement in the subject application or the larger CCB and yet continues to be used to assist in securing grant funding with zero benefits to the very community that will likely experience the adverse effects from the subject proposal as well as CCB. This miscarriage is simply one more example of Pismo's pattern of taking advantage of a struggling community over many years.

What's good for the Goose is good for the Gander

Not in a million years, would a private sector applicant be afforded the accommodations extended to the City of Pismo Beach by the County of San Luis Obispo and seemingly, the Coastal Commission staff. It is up to your Commission to ensure that all parties, public and private, are treated equally and hold them to the same regulations and rules without exception. Favoring or accommodating another governmental agency is the wrong message to send to the regulated community and moreover, it's just bad business. Please hold the City of Pismo Beach and its proposed project accountable relative to the provisions of the LCP. It is an imperative that the public view the Commission as fair and equitable for all constituents. This is the Commission's obligation in connection with the conservation of all coastal resources.

The City of Pismo Beach will represent that the subject proposal is an essential component of a larger project; however needs special consideration because of the many benefits the project will offer to the region. What appears more accurate; it that the whole affair is a grant driven effort for a project that is high energy use, very expensive that will generate significant brine waste streams, all resulting in the production of a miniscule amount of water. This is a classic case of a solution looking for a problem.

Conclusion

The proposed project is not an allowable use in Coastal Table O. Also, there is a Limitation on Use that precludes the proposed project.

Four of the five permanent CCB groundwater wells are proposed in the Coastal Dunes RV Park and Campground which lies in the Recreation Land Use category. This is the reason why a decision to not find Substantial Issue would be highly precedential with long-term implications and a significant departure from LCP and Coastal Act consistency.

The proposed project is inconsistent with LCP Public Access provisions.

The proposed project does not conform to the public access and recreationpolicies of the Coastal Act because of the displacement of low-cost camping in a community already experiencing limited availability of lower cost visitor-serving accommodations. Coastal Act Section 30213 specifically requires lower cost visitor and recreational facilities be protected, encouraged and where feasible, provided. While the displacement of low-cost camping may be temporary, the County approval failed to include any analysis of the full extent of the potential impacts or consider appropriate mitigation measures. The proposed project fails to ensure maximum public access for members of the public with low or moderate incomes that wish to access and recreate at the coast.

Miscellaneous LCP inconsistencies: The proposed project is inconsistent with LCP Nighttime Noise Standards, the Migratory Bird Treaty Act and ESHA setback standards and the proposed project fails to comply with CCC EJ policies for Oceano.

Finding Substantial Issue is necessary to protect Coastal Resources. I respectfully request that a Substantial Issue exists with respect to the grounds on which the appeal was filed. The County failed to adequately review the impacts of the proposed project and its conformance with the provisions of the Certified San Luis Obispo County LCP and with the Public Recreational Access policies of the Coastal Act necessitating the Commission asserting jurisdiction over the CDP application for the proposed project.

Please feel free to contact me with any questions you may have.

Respectfully,

Jeff Edwards

January 8, 2021

W17a
Appeal Filed: 12/2/2020 Action Deadline: 2/9/2021 (2/12/2021 Actual)
Staff: Brian O'Neill - SC Staff Report: 12/18/2020
Hearing Date: 1/13/2021
STAFF REPORT SUBSTNATIAL ISSUE DETERMINATION ONLY
Appeal Number: A-3-SLO-20-0072
Applicant: City of Pismo Beach
Appellant: Jeff Edwards

Dear Commissioners,

As a longtime community activist, I have followed this project and the parent project, Central Coast Blue, since its inception. I have participated in countless meetings and have read as many documents associated with the project as I have been able to find.

Appeal Hearing Actual

This appeal could easily have been heard in February. This would have given your staff more time to do a thorough report.

Land Use

The test well project is located in the Coastal Dunes RV Park and Campground, a coastal resource that retains special significance having Ordinance 1215 legally protecting its use as a low cost visitors serving destination before there was a Coastal Act or a Certified LCP. The Ordinance remains intact, as incorporated by reference into the LCP upon its certification in 1988.

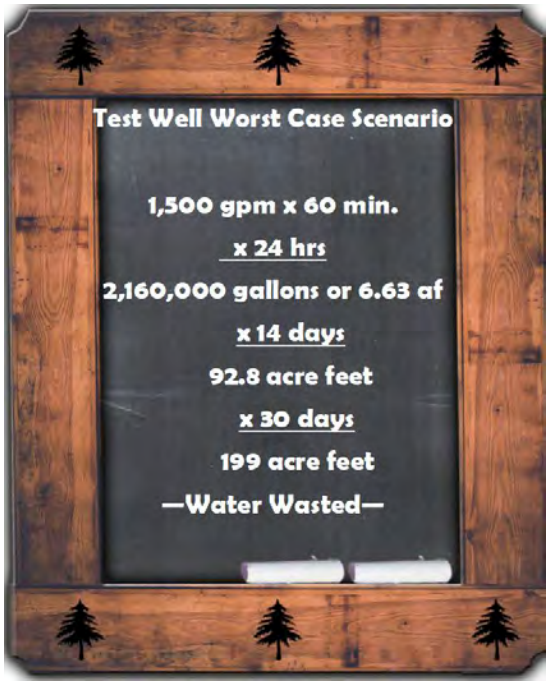
A Community Ill-informed

The test well project will be a great disturbance to the Community of Oceano that is largely Hispanic in its cultural make up. These people are hard working, disadvantaged and often marginalized when large public works projects are built in their neighborhoods. This project is no different, to date, I have seen no materials associated with public notices, agendas, studies, reports, workshops or any form of outreach printed in Spanish as to inform the LatinX community that this project may affect them or the environment they reside in.

Water Wasted to the Ocean

The documents associated with the project's water consumption in the environmental documents for the project are analyzed using a range of pumping rates from 100 to 1,500

gallons per minute. The applicant uses the best case scenario pumping numbers for the shortest duration and suggests just 17.4 acre feet of groundwater will be wasted through the ocean outfall connection, which leads to the Pacific Ocean. Contrarily, the appellant uses the projects worst case scenario of 1,500 gallons per minute for just one month of pumping, which comes to 186 acre feet.



(My math resulted in 199 acre feet; but who's counting?)

It is important to realize, if treated to drinking water standard, (best case scenario) could serve 104.4 or (worst case scenario) as many as 1,116 single-family homes for **one year** (6 homes per acre foot per year).

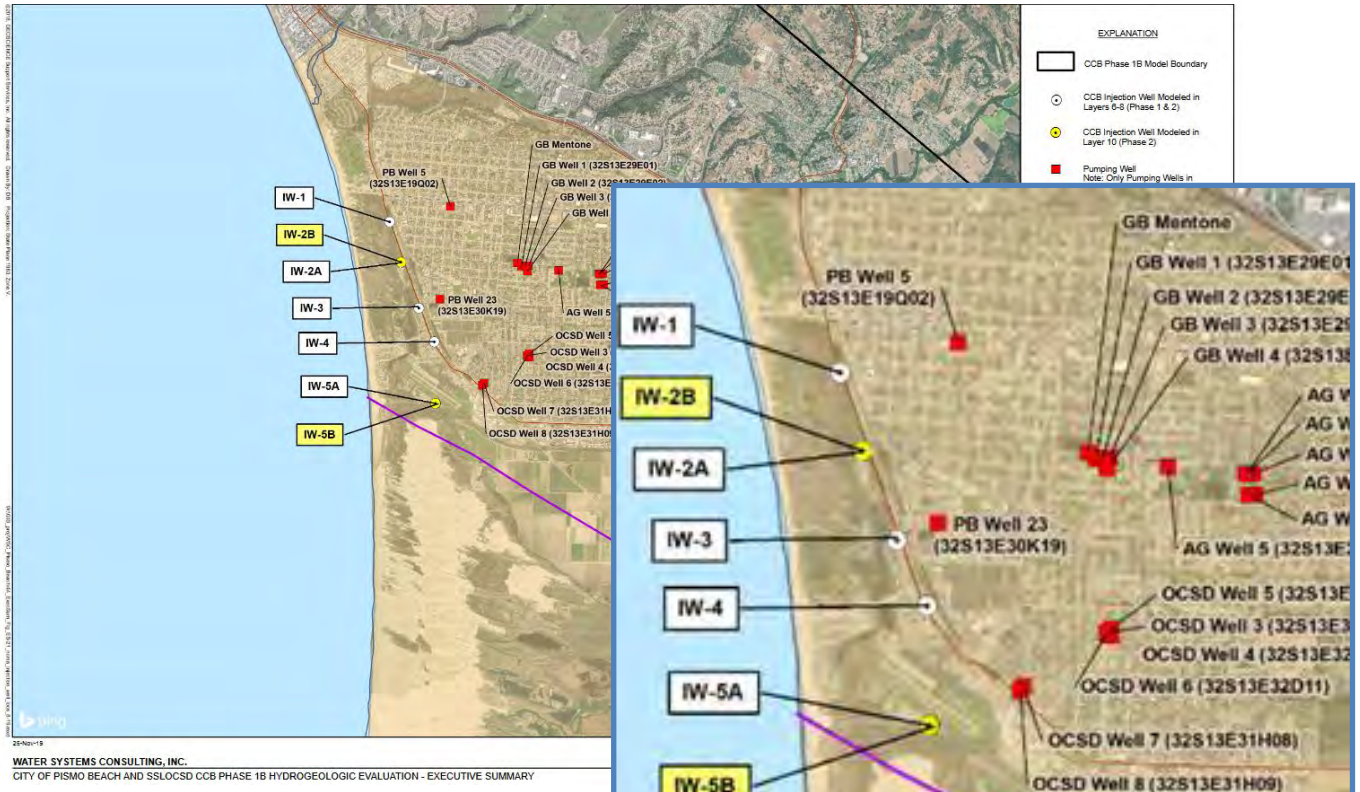
In correspondence provided by the Oceano Community Services District General Manager, he claims that the loss of water in the vicinity of the community supply wells will not adversely affect the District's water supply or ability to deliver water. The analysis he attached, performed by the contracted hydrologist, does speak to any potential impacts to the County's monitoring well located very near the test well site on Pier Avenue. While I am not a hydrologist, and would suggest that none of the Commissioners are either, it is not impossible that a cone of depression created by the new well(s) located in the campground, could affect this monitoring well and its readings during their use.

Seawater Intrusion

The applicant will represent that the test well project facilitates the larger, Central Coast Blue project that 'will provide for a sustainable water source for the region'. The applicant

will also assert that the CCB project (which Oceano is not a partner in) will benefit Oceano because "their supply wells are closest to the ocean." This is patently false.

Please see the exhibit created by the applicant below. Take note of the red dots depicting current supply wells. The two furthest west wells are supply wells for the City of Pismo Beach. They are located in the City of Grover Beach.

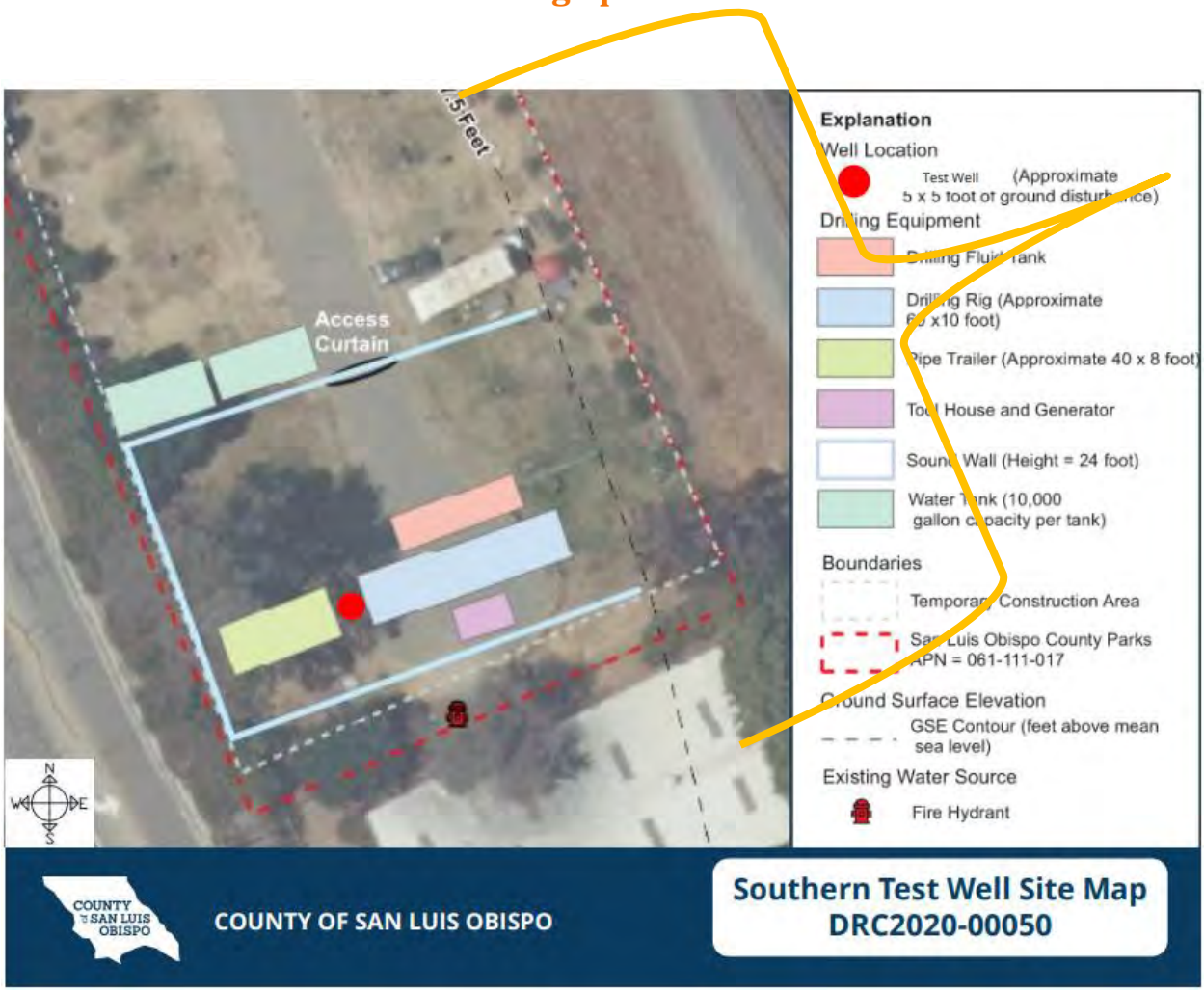


Noise

The mitigation the applicant provides is a sound wall. This 2 pound per square foot think wall is 24 feet tall, but it is only three-sided. The drilling operation is twenty-four hours a day/ seven days a week at 85 dB. As identified in the project materials, this sound wall is only proposed for **three sides** of the noisiest work area. The

open area, on the east side of the construction area, is **open** to the railroad tracks, tall eucalyptus trees (potential home to nesting raptors) and a small farm with homes within 200 feet of the project.

See graphic below; the sound wall is only on three (3) sides of the drilling operation.



Character Assignation

The City of Pismo Beach response the appellant's assertion that Seawater Intrusion in Oceano is a fiction includes an attack on Mr. Edwards's character, saying "the appellant is not an engineer, hydrologist, or other qualified professional to assert his claim, nor has he provided any scientific evidence to support his claim."

Mr. Edwards may not be an engineer or a hydrologist, but he is a qualified professional in his chosen field of real estate and land planning. He was in attendance at the meeting of the Oceano Community Services District Board members unanimously debunked the assertion that there was seawater intrusion in the above referenced monitoring well and wrote a strongly worded letter (attached) to the County Board of Supervisors at the time. The current Oceano CSD General Manager, along with representatives of Pismo Beach, are revising history from 2009 with their continued claims of seawater intrusion into that monitoring well. That well was promptly rehabilitated and has never seen evidence of seawater intrusion since.

Conclusion

This project is inconsistent with the LCP.

Sincerely,

Julie Tacker
P.O. Box 6070
Los Osos, CA 93412
805-235-8262

Oceano Community Services District

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

February 8, 2012

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

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

MARY LUCEY
Vice-President

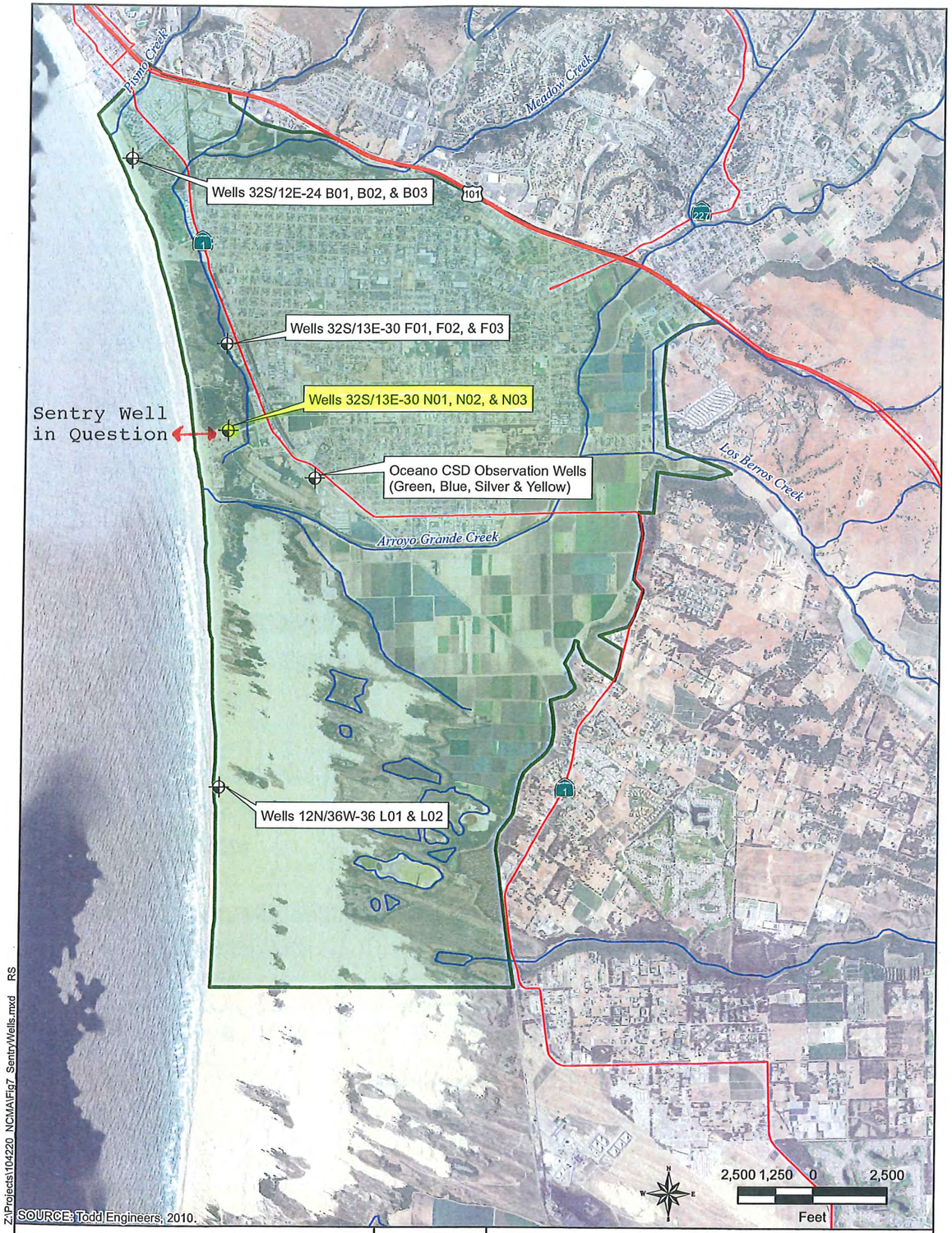
RICHARD SEARCY
Director

FELMA HURDLE
Director

LORI ANGELLO
Director

TOM GEASLEN
Interim General Manager

attachments



01-Mar-2011 Z:\Projects\104220_NCMA\Fig7_SentryWells.mxd RS

2010 Annual Monitoring Report
San Luis Obispo, California

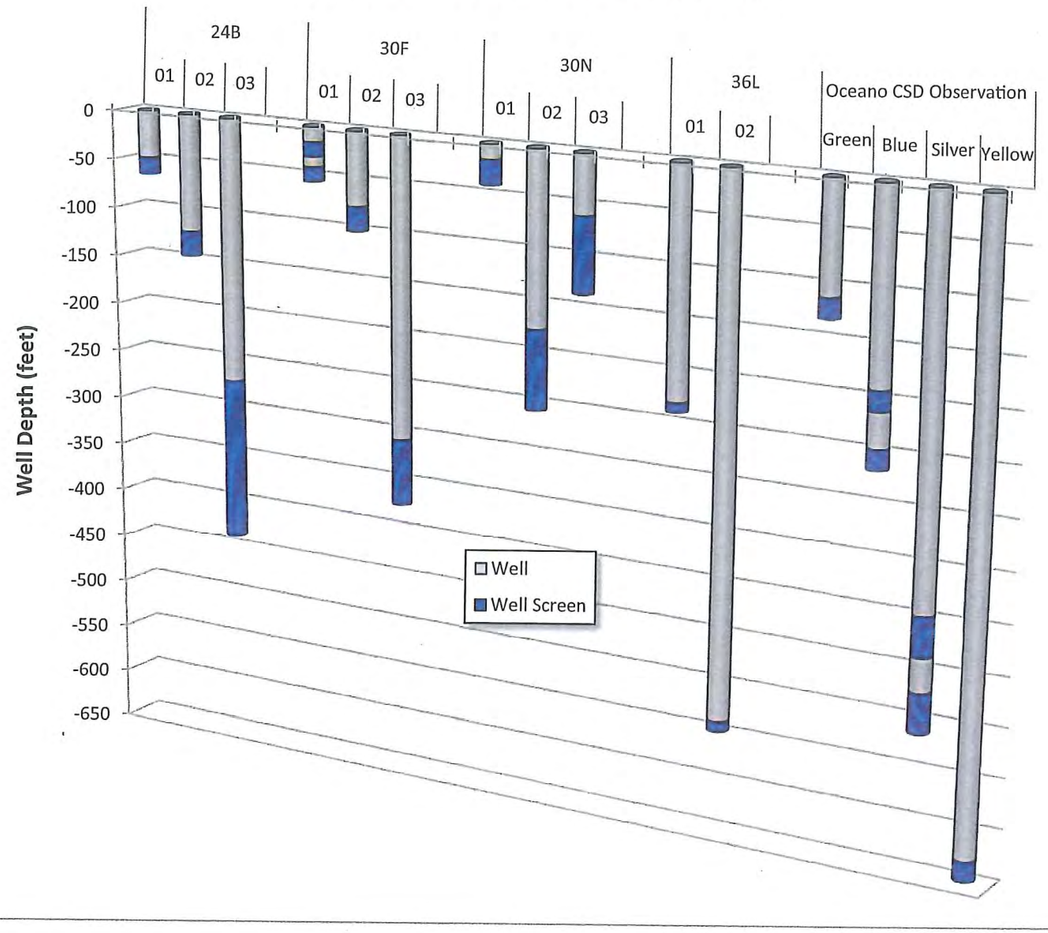
Northern Cities Management Area

GEI Consultants
Bookman-Edmonston Division

Location of Sentry Wells

APRIL 2011 FIGURE 7

Figure 8 - Depths of Sentry Wells



00-xxx-0000 Z:\GIS\Projects\...mxd XXX

	2010 ANNUAL MONITORING REPORT	GEI Consultants	DEPTHS OF SENTRY WELLS
	NORTHERN CITIES MANAGEMENT AREA		APRIL 2011 FIGURE 8

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
32S/13E-30N03	Screened from 60-135'	1/24/2011	6.68	8.75	570	76	48
		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	50	60
		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
Confirmation Sample Collected from Pump Discharge at End of Purge:		2/25/2010	1.72	11.78	1,010	74	76.9
Confirmation Sample Collected by Standard Method (Bailer):		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 Elavated 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)	Bromide (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-30N03	Screened from 60-135' - 2-inch diameter	15.43																										
	Wellhead renovation in 6/2010 added to the TOC elevation	1.90	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	900	<0.1	0.0224	45
	Pad elevation NAVD 88	13.53	10/21/2010	10.76	4.67	550	69	59	3.3	65	31	133	130	15	<1.0	<0.1	0.1	NA	<0.005	1.1	133	<10	<10	656	<0.1	0.0159	63
	TOC elevation prior to renovation (Approximate)	13.5	7/27/2010	9.53	5.90	528	72	55.1	3.41	68.7	31.0	139	130	15.0	< 0.50	0.0672	0.14	0.11	< 0.00500	1.3	139	< 1.0	< 1.0	860	<0.100	0.0181	55
			4/27/2010	6.14	7.36	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
			1/26/2010	5.68	7.82	606	110	75.0	4.51	77.8	34.3	126	130	14	1.4	0.0654	0.15	< 0.10	0.0130	1.3	126	< 1.0	< 1.0	990	0.653	0.0118	85
			10/20/2009	6.56	6.94	806	160	93.3	25.5	92.3	41.5	162	150	9.7	2.2	0.107	0.26	< 0.10	0.245	1.4	162	< 1.0	< 1.0	1,200	0.344	0.0078	129
			8/20/2009	7.50	6.00	1,070	190	151	61.6	112	44.2	130	130	16	3.4	NA	0.20	< 0.10	0.151	1.6	130	< 1.0	< 1.0	1,700	1.93	0.0084	119
			5/12/2009	6.33	7.17	602	97	63.4	3.96	72.9	32.2	122	120	NA	NA	NA	0.22	NA	24	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
			6/7/1976	NA	NA	705	90	54	2.9	99	43	189	168	112.5	NA	0.08	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			1/21/1966	NA	NA	604	57	54	3	132	59	410	250	1	NA	0.08	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
32S/13E-30N02	Screened from 175-255' - 2-inch diameter	15.43																										
	Wellhead renovation in 6/2010 added to the TOC elevation	1.90	1/24/2011	3.67	11.76	1,050	50	60	6.4	120	49	190	490	0.24	<1.0	0.17	0.17	<0.10	0.064	<0.1	190	<2.0	<2.0	1,380	0.12	NA	NA
	Pad elevation NAVD 88	13.53	10/21/2010	10.42	5.01	1,040	48	52	3.5	100	45	181	460	0.15	<1.0	<0.1	<0.1	NA	<0.005	<0.3	181	<10	<10	1,377	<0.1	NA	NA
	TOC elevation prior to renovation (Approximate)	13.5	7/27/2010	10.02	5.41	777	57	67.6	7.31	141	58.5	190	470	0.3	3.5	0.138	< 0.10	0.11	0.102	0.28	190	< 1.0	< 1.0	1,300	3.43	0.0049	204
			4/27/2010	5.26	8.27	600	93	71.9	12.50	103	46.3	159	300	7.0	3.2	0.123	0.13	0.11	0.0776	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	59.1	195	490	0.16	< 0.50	0.15	0.15	< 0.10	0.0093	0.16	195	< 1.0	< 1.0	1,300	3.50	0.0033	300
	Confirmation Sample Collected from Pump Discharge at End of Purge		2/25/2010	1.72	11.78	1,010	74	78.9	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
	Confirmation Sample Collected by Standard Method (Bailer)		1/25/2010	3.72	9.78	970	50	74.2	4.77	152	62.2	195	510	0.14	< 0.50	0.129	0.11	< 0.10	< 0.00500	0.16	195	< 1.0	< 1.0	1,300	< 0.100	0.0032	313
Readings in Question			10/20/2009	7.38	6.12	2,080	690	274	151	239	101.0	220	490	< 0.10	7.0	0.201	0.16	0.87	0.398	2.0	220	< 1.0	< 1.0	2,800	5.50	0.0029	343
			8/20/2009	11.94	1.56	1,350	500	199	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	0.178	0.56	176	< 1.0	< 1.0	1,800	5.24	0.0033	304
			3/27/1993	NA	NA	1,050	50	71	5.5	145	60	243	516	0.9	NA	0.23	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
			1/21/1966	NA	NA	1,059	54	71	5	148	63	232	483	0	NA	0.12	0.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
12N/06W-36L01	Screened from 227-237' - 2-inch diameter	26.29																										
	Wellhead renovation in 6/2010 added to the TOC elevation	2.31	1/24/2011	17.61	8.68	890	41	55	5.1	93	36	160	400	0.50	<1.0	0.20	0.15	<0.10	<0.005	<0.1	180	<2.0	<2.0	1,200	<0.1	NA	NA
	Pad elevation NAVD 88	23.98	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	182	<10	<10	1,213	<0.1	NA	NA
	TOC elevation prior to renovation (Approximate)	24.0	7/27/2010	21.18	5.11	707	35	64.2	3.70	127	47.4	162	420	0.40	< 0.50	0.158	< 0.10	< 0.10	< 0.00500	0.11	182	< 1.0	< 1.0	1,100	< 0.100	0.0031	327
			4/26/2010	15.84	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	17.72	6.28	856	38	72.0	4.64	131	48.2	192	420	0.49	0.84	0.150	0.12	< 0.10	0.0694	0.13	192	< 1.0	< 1.0	1,100	1.68	0.0034	292
			8/20/2009	19.16	4.84	890	39	78.0	4.21	138	48.1	184	390	0.49	0.56	NA	< 0.10	< 0.10	0.185	0.14	184	< 1.0	< 1.0	1,200	2.03	0.0030	279
			5/11/2009	17.68	6.32	832	63	83.8	4.83	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
			3/26/1998	NA	NA	892	35	69	4.8	124	47	233	409	2	NA	0.24	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
			6/8/1976	NA	NA	936	35	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
12N/06W-36L02	Screened from 535-545' - 2-inch diameter	26.29																										
	Wellhead renovation in 6/2010 added to the TOC elevation	2.31	1/24/2011	9.37	16.92	800	120	95	7.6	75	30	300	190	<0.05	2.3	0.39	0.16	1.31	0.13	0.53	300	<2.0	<2.0	1,270	1.40	0.0044	226
	Pad elevation NAVD 88	23.98	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	<10	<10	1,293	0.12	0.0045	222
	TOC elevation prior to renovation (Approximate)	24.0	7/27/2010	20.53	5.76	737	110	121	7.81	91.1	39.9	268	190	< 0.10	< 0.50	0.427	0.10	0.77	0.160	0.60	268	< 1.0	< 1.0	1,200	0.845	0.0073	138
			4/26/2010	9.24	14.76	720	100	116	6.68	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	81.6	23.0	172	200	< 0.10	3.2	0.268	0.33	57	0.128	0.61	172	< 1.0	< 1.0	940	0.355	0.0062	162
			8/20/2009	19.15	4.85	785	100	131	6.66	89.8	36.6	290	190	< 0.10	3.8	NA	0.15	0.27	0.307	0.75	290	< 1.0	< 1.0	1,200	0.830	0.0073	133
			5/11/2009	14.35	9.62	775	120	132	7.24	84	39.7	294	180	NA	NA	NA	0.18	NA	0.406	0.78	294	< 1.0	< 1.0	1,300	0.958	0.0065	154
			3/26/1998	NA	NA	772	127	130	8.7	85	36	390	148	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	30.86																										
	Casing relative to concrete pad	-4.14	1/24/2011	106.59	-71.96	310	98	22	8.1	34	9.2	19.0	53	<0.05	<1.0	<0.1	0.2	4.42	0.4	0.63	19.0	<2.0	<2.0	480	10	0.0064	156
	Pad elevation above MSL, approximate	35.0	10/28/2010	NA	NA	290	81	26	9.3	64	11	160.0	68	<0.1	<1.0	<0.1	0.2	NA	0.85	0.36	160.0	<10	<10	520	38	0.0044	225
			10/21/2010	112.71	-81.85	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
	All elevations relative to MSL		7/26/2010	95.61	-64.79	438	85	34.3	1.93	61.7	30.4	30.0	210	< 0.10	< 0.50	0.0435	0.53	0.22	1.48	0.32	30.0	< 1.0	< 1.0	690	36	0.0038	266
			4/26/2010	63.90	-33.04	560	83	47.7	5.7	86.1	48.3	62	310	< 0.10	0.84	< 0.02	< 0.1	0.56	2.54	0.31	62.0	< 1.0	< 1.0	880	233	0.0037	268
			1/27/2010	43.71	-12.85	460	130	45.0	25.4	682	124	112	100	0.56	NA	< 0.0200	0.21	0.25	32.4	0.49	112.0	< 1.0	< 1.0	760	4,360	0.0038	265
			10/20/2009	29.20	1.66	362	92	39.6	2.92	19.2	45.1	76.8	110	< 0.10	< 0.50	0.0697	< 0.10	< 0.10	0.242	0.39	80.0	3.2	< 1.0	590	11.4	0.0042	236
			8/18/2009	24.55	6.31	420	160	48.4	3.37	49.9	20.4	17.6	54	< 0.10	1.1	NA	< 0.10	0.25	1.76	0.68	17.6	< 1.0	< 1.0	600	242	0.0043	235
			5/16/1983	15.80	15.06	665	35	40	NA	85	65	360	90	<4	NA	NA	0.2	NA	0.01	NA	360	ND	ND	950	0.10	NA	NA
Oceano MW-Blue	Screened from 190-210' and 245-265' - 3-inch diameter	30.91																										
	Casing relative to concrete pad	-4.09	1/24/2011	24.87	9.76	680	110	60	17	64	22	5.0	330	<0.05	<1.0	<0.1	0.22	0.96	0.16	0.31	11.2	6.2	<2.0	1,040	10.0	0.0028	355
	Pad elevation above MSL, approximate	35.0	10/21/2010	30.11	0.80	770	100	68	12	68	31	14.0	390	<0.1	<1.0	<0.1	0.28	NA	0.054	<0.3	14.0	<10	<10	1,163	2.2	NA	NA
			7/26/2010	24.74	6.17	783	130	80.1	8.58	142	42.0	2.8	450	< 0.10	< 0.50	< 0.0200	0.26	0.31	3.97	0.8	2.8	< 1.0	< 1.0	1,200	593	0.0059	169
	All elevations relative to MSL		4/26/2010	18.52	12.39	1,130	160	70.2	6.48	208	50.7	8.4	530	< 0.10	0.56	< 0.02	0.23	0.54	3.10	1.0	8.4	< 1.0	< 1.0	1,600	383	0.0061	165
			1/27/2010	22.06	8.85	1,740	430	55.6	4.68	282	43.0	< 1.0	680	< 0.10	< 0.50	0.0819	0.14	0.41	9.41	2.0	< 1.0	< 1.0	< 1.0	2,300	170	0.0047	215
			10/20/2009	27.50	3.41	2,250	1,000	19.5	2.40	487	22.5	5.0	410	< 0.10	0.93	0.0532	0.13	< 0.10	13.1	4.5	5.0	< 1.0	< 1.0	3,100	236	0.0015	222
			8/19/2009	24.65	6.26	322	150	93.2	16.7	23.9	12.1	3.0	4.0	< 0.10	1.3	NA	0.19	0.5	0.7	0.74	23.0	20.0	< 1.0	640	153	0.0049	203
			5/16/1983	13.30	17.61	840	80	90	NA	100	50	250	160.0	<4	NA	ND	0.2	NA	0.14	NA	250.0	ND	ND	1,200	0.10	NA	NA
Oceano MW-Silver	Screened from 395-435' and 470-510' - 3-inch diameter	30.85																										
	Casing relative to concrete pad	-4.15	1/24/2011	22.02	12.61	440	92	90	9.2	3.4	27	90	140	<0.05	<1.0	0.25	0.11	0.94	0.041	0.35	110	20	<2.0	810	2.2	0.0038	263
	Pad elevation above MSL, approximate	35.0	10/21/2010	29.11	1.74	460	90	110	15	6.8	32	94	140	<0.1	<1.0	0.2	0.1	NA	0.1	0.38	124	30	<10	868	3.5	0.0042	237
			7/26/2010	24.24	6.61	478	83	109	5.94	52.9	30.4	122.0	94	< 0.10	<0.50	0.255	< 0.10	0.41	0.477	0.56	130.0	8.0	< 1.0	720	61.0	0.0067	148
	All elevations relative to MSL		4/26/2010	19.04	11.81	452	83	83	7.42	29.3	34.5	72.0	190	< 0.1	0.56	0.134	< 0.10	0.65	0.702	0.4	86.0	14.0	< 1.0	810	71.0	0.0048	208
			1/27/2010	21.05	9.8	495	71	92.2	10.6	22.9	39.1	13.0	230	<0.10	< 0.50	0.323	< 0.10	0.20	0.604	0.29	51.0	33.0	< 1.0	780	54.4	0.0041	245
			10/20/2009	27.52	3.33	564	71	80.8	8.63	33.2	49.8	49.6	310	<0.10	< 0.50	0.148	< 0.10	< 0.10	0.337	0.32	54.0	14.4	< 1.0	850	20.0	0.0045	222
			8/19/2009	29.34	1.51	522	160	148	71.6	95.2	8.42	30.0	3.5	<0.10	1.7	NA	0.24	0.52	2.35	0.76	170	140	< 1.0	1,000	278	0.0042	237
			5/16/1983	13.50	17.35	630	40	40	NA	90	50	330	80	<4	NA	NA	0.1	NA	0.02	NA	330	ND	ND	900	0.05	NA	NA
Oceano MW-Yellow	Screened from 625-645' - 3-inch diameter	30.89																										
	Casing relative to concrete pad	-4.11	1/24/2011	22.01	12.62	430	83	73	6	6.3	31	160	100	<0.05	<1.0	0.22	0.11	0.66	0.078	0.28	160	<2.0	<2.0	780	0.49	0.0034	296
	Pad elevation above MSL, approximate	35.0	10/21/2010	28.22	2.67	410	87	100	3.9	6.0	33	148	100	<0.1	<1.0	0.14	<0.1	NA	0.087	<0.3	148	<10	<10	796	0.66	NA	NA
			7/26/2010	25.50	5.39	446	94	93.0	8.81	10.2	32.0	38.4	120	< 0.10	< 0.50	0.142	< 0.10	0.32	0.196	0.48	56.0	17.6	< 1.0	700	22.4	0.0051	196
	All elevations relative to MSL		4/26/2010	19.17	11.72	416	96	87.6	9.86	14.8	37.1	46.0	150	< 0.1	0.63	0.132	< 0.10	0.39	0.579	0.44	58.0	12.0	< 1.0	780	56.2	0.0046	218
			1/27/2010	20.58	10.31	498	89	79.6	10.2	15.6	38.0	31.0	180	< 0.10	0.56	0.132	< 0.10	0.19	0.283	0.38	51.0	20.0	< 1.0	810	23.6	0.0043	234
			10/20/2009	25.80	5.09	446	100	97.1	12.8	16.4	37.9	26.6	180	< 0.10	0.56	0.168	0.15	< 0.10	0.18	0.42	42.6	16.0	< 1.0	760	18.9	0.0042	238
			8/19/2009	31.04	-0.15	426	160	101	18.9	93.2	29.1	64.4	36	< 0.10	0.93	NA	0.16	0.31	0.49	0.60	54.4	20	< 1.0	790	682	0.0038	267
			5/16/1983	14.30	16.59	770	60	70	NA	90	70	330	120	9	NA	NA	0.1	NA	0.02	NA	330	ND	ND	1,100	0.24	NA	NA

Des. by: CNT
Ckd. by: MKR 08.09.11

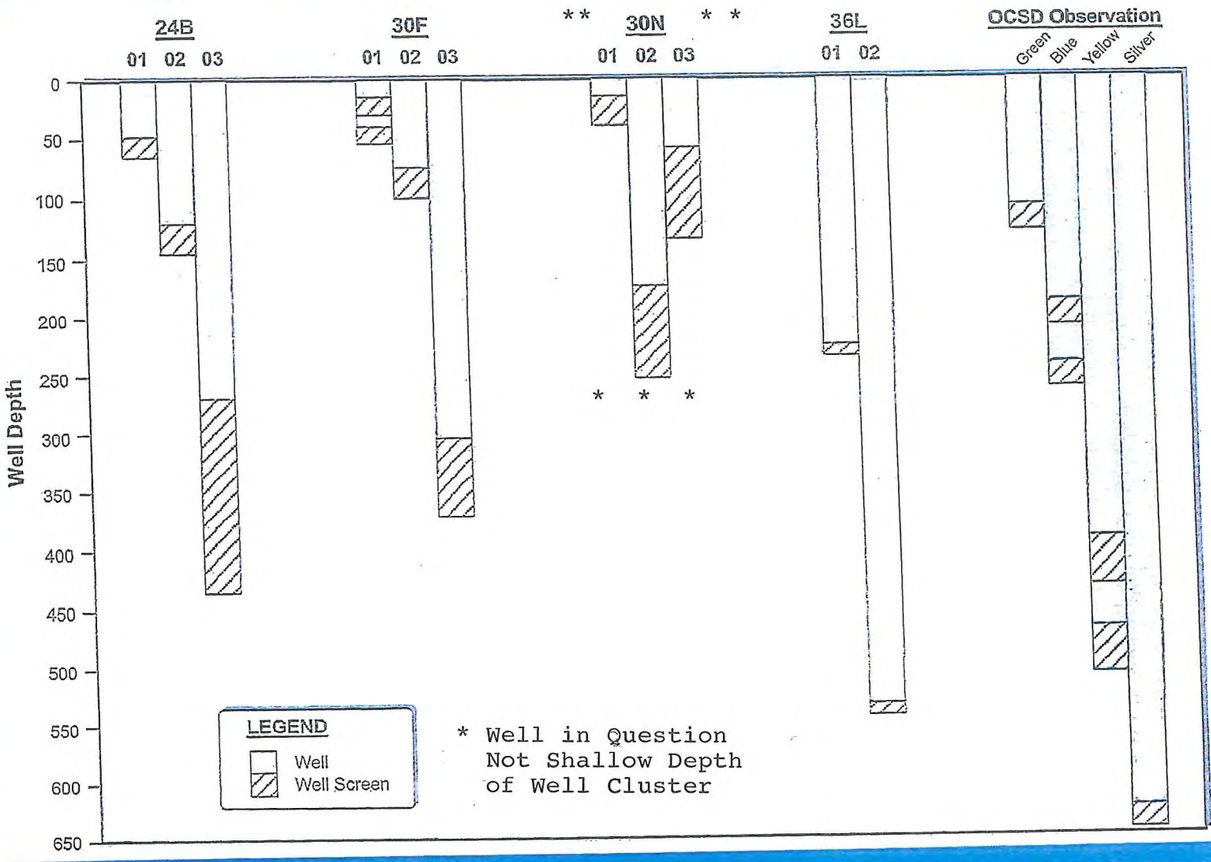
Oceano Community Services District
1655 Front Street, P. O. Box 599, Oceano, CA 93445 (805) 481-6730 FAX (805) 481-6836

Previous Photos

of

Sentry Well

Depth of Sentry Wells



Sentry Wells NO1, 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


Master

CALIFORNIA COASTAL COMMISSION
CENTRAL COAST DISTRICT
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877
WEB: WWW.COASTAL.CA.GOV

W17a

A-3-SLO-20-0072 (CENTRAL COAST BLUE TEST WELLS)
JANUARY 13, 2021 HEARING
CORRESPONDENCE

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

December 11, 2020

California Coastal Commission
ATTN: Brian O'Neill
725 Front Street, #300
Santa Cruz, CA 95060
Via Electronic Delivery: Brian.O'Neill@coastal.ca.gov

Subject: RESPONSE TO APPEAL OF DRC2020-00050 BY SAN LUIS OBISPO COUNTY BOARD OF SUPERVISORS TO THE CALIFORNIA COASTAL COMMISSION; PROJECT LOCATION – 1001 PACIFIC BOULEVARD, OCEANO, SAN LUIS OBISPO COUNTY, CA 93445

Dear Mr. O'Neill:

As you are aware, the City of Pismo Beach is the lead agency for Central Coast Blue, a regional groundwater sustainability project. Central Coast Blue is envisioned to be a two-phase project, with Phase 1 purifying the effluent from the City of Pismo Beach's wastewater treatment plant and injecting it into the groundwater basin. This will provide two benefits: 1) providing a supplemental source of developed water which can be pumped for municipal use, and 2) providing a saltwater intrusion barrier. In addition, to being a new highly drought-resistant supply of potable water for the Five Cities Region of San Luis Obispo County, Central Coast Blue will also reduce the amount of wastewater currently being discharged into the ocean.

Related to Central Coast Blue, but maintained as a separate project, is this Test Injection Well project, which the San Luis Obispo County Board of Supervisors (the "County") approved on October 20, 2020, as was appealed to the Coastal Commission on December 1, 2020. Below are the responses from the City of Pismo Beach regarding the perceived issues identified in the appeal and information that establishes that these appeal points are either inaccurate or not substantial issues.

Substantial Issue Determination
Section 30625(b)(2) of the Coastal Act requires a de novo hearing of the appealed project unless the Coastal Commission determines that no substantial issue exists with respect to the grounds on which the appeal has been filed pursuant to Section 30603(a) of the Coastal Act. The term "substantial issue" is not defined in the Coastal Act or its implementing regulations. Section 13115(b) of the Commission's regulations simply indicates that the Commission will hear an appeal unless it "finds that the

appeal raises no significant question." In previous decisions on appeals, the Commission has considered the following factors:

1. The degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act;
2. The extent and scope of the development as approved or denied by the local government;
3. The significance of the coastal resources affected by the decision;
4. The precedential value of the local government's decision for future interpretations of its Local Coastal Plan (LCP); and,
5. Whether the appeal raises local issues, or those of regional or statewide significance.

The following discussion provides an explanation of why a substantial issue does not exist regarding the Test Injection Well project.

1. *The degree of factual and legal support for the local government's decision that the development is consistent or inconsistent with the relevant provisions of the Coastal Act*

   As discussed in Response to Appeal Contention 1 below, the proposed use was categorized based on the limited scope and duration of the project, the definition of "Public Utility" as being regulated by the California Public Utilities Commission, as well as the ability for the San Luis Obispo County Board of Supervisors' ability to clarify ambiguities. As a result, it is appropriate to classify the project as "Water Wells and Impoundments," which is a consistent use with the project site's land use designation under the County's LCP. In addition, as discussed in Response to Appeal Contention 5, there is adequate evidence that the Test Injection Well project would not result in significant impacts to public access given that 1) construction activities would occur primarily during the non-peak season at which time the specific portion of the Coastal Dunes RV Park and Campground where the project site is located is normally closed to the public and 2) the project would not permanently preclude the use of any existing campsites upon completion of short-term project construction and testing activities. Therefore, there is sufficient factual and legal support for the County's decision that the Test Injection Well project is consistent with the relevant provisions of the Coastal Act.

2. *The extent and scope of the development as approved or denied by the local government*

   The Test Injection Well project construction period is conditioned by the County to be limited to 6 months and its permanent facilities includes one groundwater well (approximately four square feet at the surface), one monitoring well (approximately one square foot at the surface), and an underground outfall

connection pipeline (approximately two square feet valve box at the surface). In addition, as discussed under Response to Appeal Contention 4, only approximately 17.4 AF of water would be extracted through the duration of the construction and data gathering phases, which is a small fraction of the City's typical annual excess allocation of 400 AF under the existing Adjudication Agreement for the Santa Maria Groundwater Basin. Therefore, the project is relatively small in extent and scope.

3. *The significance of the coastal resources affected by the decision*

   As discussed in the Environmental Impact Analysis prepared to support the City's Categorical Exemption determination under CEQA and explained in the Responses to Appeal Contentions below, no significant coastal resources, including marine and land habitat, areas of significant recreational value, highly scenic areas, archaeological sites, significant visitor destination areas, coastal housing or recreational opportunities for low- and moderate-income persons, or coastal public access, would be significantly adversely affected by the Test Injection Well project.

4. *The precedential value of the local government's decision for future interpretations of its LCP*

   As discussed in Response to Appeal Contention 1, the proposed use was categorized based on the limited scope and duration of the project, the definition of "Public Utility" as being regulated by the California Public Utilities Commission, as well as the ability for the San Luis Obispo County Board of Supervisors' ability to clarify ambiguities. As a result, it is appropriate to classify the project as "Water Wells and Impoundments," which is a consistent use with the project site's land use designation under the County's LCP. Therefore, the County's decision does not establish precedent for future interpretations of its LCP.

5. *Whether the appeal raises local issues, or those of regional or statewide significance*

   The Test Injection Well project is intended to provide necessary data to inform the larger Central Coast Blue project, which is an initiative being pursued by the Northern Cities Management Area agencies as part of proactive sustainable groundwater management. As discussed under Response to Appeal Contention 4, the Test Injection Well project does not pose short-term threats to OCSD's water supply and does not propose any confiscation of groundwater entitlements. Although the Test Injection Well project is intended to provide data to inform the larger Central Coast Blue project, which will provide regional benefits to sustainable groundwater management, the Test

> Injection Well project in itself does not raise any issues of regional or statewide significance

Appeal Contention 1

Coastal Table "O" provides definitions of proposed uses in specific use groups. The proposed project is mischaracterized as a use that falls within the definition of Water Wells and Impoundments [F5]. Water Wells and Impoundments are defined in Table "O" as, "Water extraction uses or structures for small scale domestic or agricultural use including wells, ponds, water tanks and distribution facilities." More precisely, the proposed project falls within an entirely different use group, and definition for Public Utility Facilities [J5]. Public Utility Facilities is defined in Table "O" as these uses include any of the following facilities:…; public water system wells. The proposed project lies within the Recreation Land Use category and Public Utility Facilities are not an allowed use in the Recreation Land Use category in Coastal Table "O" of the LCP. Clearly, the City of Pismo Beach is not proposing small-scale domestic or agricultural use for water extractions. Please see the attached Addendum to October 13, 2020 CCB Appeal letter, dated October 16, 2020 for greater detail.

Response to Appeal Contention 1

The appellant contends that the County incorrectly characterized the project as a "Water Wells and Impoundments" use instead of a "Public Utility Facility," citing the general land use definitions contained in the County's Coastal Zone Framework for Planning Excerpts. The document itself states that:

> "This section describes the 13 land use categories in detail, including their purpose and intended character. The criteria listed for each land use category are the basis for determining actual locations where the categories should be applied."

Title 23 of the San Luis Obispo County Coastal Zone Land Use Ordinance contains the implementing rules for the County's Coastal Zone. The County defined the Test Injection Well project as "Water Wells and Impoundments" for several reasons. The first is that the Test Injection Well project proposes two wells: one for test extraction and one for monitoring. The second reason it is appropriately defined is that Section 23.11.030 of the Coastal Zone Land Use Ordinance defines a "Public Utility" as a being regulated by the California Public Utility Commission. As the Test Injection Well project is not proposing a public water system well, and is in fact conditioned to be limited to temporary extraction and monitoring for a 6-month term in accordance with Condition 3 and Condition 5, respectively, of the County's approval, the use category of "Water Wells and Impoundments" is the most closely relating use category. Lastly, the proposed project is accessory to and will not preclude the use of the site for the primary purpose of visitor serving recreation accommodations. Therefore, it is

appropriate to classify the project as "Water Wells and Impoundments," which is a consistent use with the project site's land use designation under the County's LCP.

Appeal Contention 2

Recreation Land Use Standards. Limitation on use "allowable uses in the area between HWY 1 and railroad right-of-way are limited to recreational vehicle (RV) parks in accordance with Ordinance 1215" (attached). The project is proposed to be located within the County owned Coastal Dunes RV Park & Campground. The subject property lies within the area referenced in Ordinance 1215 and is therefore limited to urban destination recreational vehicle park ONLY. Consequently, even if the proposed project were allowable under Coastal Table "O", it could not proceed because of the limitation on use provided in Ordinance 1215 and is, therefore, inconsistent with the LCP.

Response to Appeal Contention 2

Ordinance 1215 was adopted by the County on March 6, 1972, prior to implementation of the Coastal Act. In order to comply with the requirements of the Coastal Act, an LCP is required for the County to exercise local approval authority over the project site. It is the City's understanding that Ordinance 1215 was not incorporated into the County's LCP, and therefore any restriction previously placed on this area through ordinance is no longer applicable.

Nevertheless, if determined that Ordinance 1215 is applicable, the project will not prohibit or change the use of the Coastal Dunes RV Park & Campground, and the project is limited in time (conditioned to no more than 6 months) and size (with a permanent footprint of 7 square feet over three locations) such that the intent of the Ordinance is met. Also, the Ordinance does indicate that the uses are "to be administered by the Subdivision Review Board and any conflict brought to the Commission for determination." While time has passed since the Ordinance was adopted, the original appeal of the Planning Department Hearing Officer's approval was denied by the Board of Supervisors. Acting in the capacity of the appeal arbiter, the Board effectively settled the conflict by approving the permit.

Appeal Contention 3

The proposed project fails to conform with Section 23.06.040 of the San Luis Obispo County Coastal Zone Land Use Ordinance (CZLUO) Noise standards.

EXTERIOR NOISE LEVEL STANDARDS		
	Daytime (7 a.m. to 10 p.m.)	Nighttime1 (10 p.m. to 7 a.m.)
Hourly Equivalent Sound Level (L_{eq}, dB)	50	45
Maximum level, dB	70	65

Notes:

1. Applies only to uses that operate or are occupied during nighttime hours

The proposed project includes well drilling that requires 24/7 construction until each well is complete. It is anticipated well construction will require a minimum of two-weeks per well. Noise from the well drilling is expected to exceed 85 dBA. The project proposes to deploy sound walls to attenuate the sound. However, even after attenuation, noise thresholds are to exceed the nighttime Hourly Equivalent Sound Level of 45 dBA. It is likely nighttime operations will exceed the exterior noise level standards provided in the CZLUO and is therefore further inconsistent with the LCP.

Response to Appeal Contention 3
Section 23.06.042 of the San Luis Obispo County Coastal Zone Land Use Ordinance provides for exceptions for construction related activity conducted during daytime hours. Specifically, Section 23.06.042 states:

> **23.06.042 - Exceptions to Noise Standards**
> "The standards of Sections 23.06.044-050 are not applicable to noise from the following sources:
>
> **d.** Noise sources associated with construction, provided such activities do not take place before seven a.m. or after nine p.m. any day except Saturday or Sunday, or before eight a.m. or after five p.m. on Saturday or Sunday;"

The project includes installation of a temporary 24-foot-tall sound barrier during construction and well testing activities to be constructed of material with a minimum weight of two pounds per square foot and a minimum Sound Transmission Class (STC) rating of 29. This barrier will break the line-of-sight between heavy-duty equipment and nearby sensitive receivers (i.e., Oceano Inn to the west, residences to the west and south, and campsites to the north). As demonstrated in the Environmental Impact Analysis prepared to support the City's Categorical Exemption determination under CEQA, with use of the temporary sound barrier, noise generated during 24-hour drilling and well testing activities would not exceed the County's daytime exterior noise standards of 50 dBA L_{eq} and 70 dBA L_{max} or the nighttime exterior noise standards of 45 dBA L_{eq} and 65 dBA L_{max} at campsites to the north, Oceano Inn, and nearby residences located further away. In addition, the 24-hour well drilling and testing phases of the proposed project would be temporary and short-term, lasting approximately 14 days total.

Lastly, additional claims that "it is likely nighttime operations will exceed the exterior noise level standards provided in the CZLUO," are not supported by applicable evidence and are therefore without merit.

Appeal Contention 4
The proposed project includes groundwater extractions from injection well IW-4 for an indeterminate amount of time. It fails to conform to Coastal Watersheds Policy 1, Preservation of Groundwater Basins. While the parent project CCB intends to inject

water into the basin, the proposed project is intending to extract water. However, the location of the proposed project, particularly IW-4 is in very close proximity to the primary production well (Well No. 8) for the community of Oceano. Please see the attached Figure 7-1 from the CCB DEIR which reflects the location of the proposed project and the other four injection wells in relation to Services District (OCSD) wells, shown as red dots. Based upon the project description in the Categorical Exemption, groundwater extractions are expected up to 1,500 gallons per minute. In just two–weeks, the project will have extracted and discharged to the ocean some 92.8 acre-feet. If the pumping continues for one-month, the total amount of groundwater wasted to the ocean will approach 185 acre-feet. For context, the entire community of Oceano, including approximately 7,600 residents uses about 55 acre-feet per month from all sources. Most recently, the OCSD pumped 147 acre feet in a one-year period, for comparison. Moreover, the Disadvantaged Community (DAC) of Oceano, possesses a 900 acre-foot groundwater entitlement (as adjudicated for the Santa Maria Groundwater Basin (SMGB), shown in Figure 4.8-3 attached). The Oceano Community Services District (OCSD) has reduced pumping to approximately sixteen percent (16%) or 147 acre-feet annually. Therefore, in just one-month, the proposed project may pump, with no beneficial use, over one hundred percent (100%+) of Oceano's most recent groundwater extractions indicated in the Northern Cities Management Area 2019 Annual Monitoring Report. The OCSD primary groundwater extraction well, Well No. 8, is located less than one-half mile from IW-4, the key component of the proposed project. The proposed project may impact OCSD's Well No. 8, given its close proximity. Well No. 8 was the OCSD's only groundwater well in production during the 2019 reporting period.

The long-term integrity of the groundwater basins within the Coastal Zone shall be protected. The proposed project could have a significant adverse impact on the groundwater basin, notwithstanding the projects limited duration. These short-term impacts to the groundwater basin and Oceano's groundwater entitlement are significant; however, the potential long-term impacts from the parent project, Central Coast Blue (CCB), may have longer-lasting adverse effects upon the entire DAC of Oceano with Environmental Justice (EJ) implications. The County-approved project included no analysis of the potential short or long-term impacts nor did it include any mitigation or compensation to the OCSD for potential impacts to Well No. 8 and/or their adjudicated groundwater entitlement.

While the City of Pismo Beach considers the current efforts a regional collaboration, with a Memorandum of Agreement (MOA) with only the cities of Arroyo Grande and Grover Beach. The MOA has numerous "opt-out clauses". In fact, the OCSD has declared they are not participating in the project at all. The dilemma facing the City of Pismo Beach is the concern that, non-participating agencies be PROHIBITED from pumping groundwater that may include CCB treated water injected into the groundwater basin. As a result, the City of Pismo Beach has made it clear that the OCSD may be limited to recent groundwater extractions of just 147 acre-feet. This could have the effect of confiscating over 700 acre-feet of groundwater entitlement for the DAC community. This alone, smacks of Environmental Injustice given that the

communities most valuable asset is their 900 acre-foot groundwater entitlement. In fact, the County-approved project has completely failed to consider or analyze any EJ factors thus failing to conform to Section 30604(h) of the California Public Resources Code. "When acting on a Coastal Development Permit, the issuing agency, or the commission on appeal, may consider Environmental Justice, or the equitable distribution of environmental benefits throughout the state."

Ironically, the impetus for the subject proposal and the parent project, CCB, relates to representations that seawater intrusion (SWI) is impacting the groundwater basin in the area. This is patently false. The fiction of SWI surfaced in 2009 and involves the Northern Cities Management Area (NCMA) members. The members are the cities of Pismo Beach, Arroyo Grande and Grover Beach plus OCSD who is often the "odd man out". The community of Oceano, through the OCSD, has a diversified water portfolio, including State Project Water, Lopez Lake and groundwater entitlements. Currently, the OCSD is using approximately one-third of their combined entitlements. By way of background, the SMGB was adjudicated in 2008. The City of Pismo Beach's premise for CCB is the incursion of seawater into the groundwater basin. In fact, the City of Pismo Beach presents a revisionist view of local water history. They assert the County of San Luis Obispo constructed the Lopez Dam in 1969 because of seawater intrusion in Oceano. More accurately, the County built Lopez Dam fundamentally as a flood control project to protect the downstream properties and farms from flooding. A letter dated February 8, 2012 from the OCSD Board of Directors to the then, Board of Supervisors, refutes erroneous assertions regarding the historical presence of seawater intrusion. The letter speaks to data collected in 2009 and states, "The Oceano groundwater supply is not threatened with seawater intrusion." The OCSD's primary groundwater drinking supply Well No. 8 is in close proximity to two proposed CCB injection wells including the proposed CCB (IW-4).

Response to Appeal Contention 4

This appeal point attempts to conflate the Test Injection Well project with the larger Central Coast Blue project, which is not currently being considered for approval. The Test Injection Well Project has been kept separate from the parent project due to the independent utility associated with the data collection that will result from the Test Injection Well project. The utility of the information that would be gained through the Test Injection Well project is independent of any potential future development because subsurface conditions are not currently well-known, and while the results of this exploration may inform future development actions such as the Central Coast Blue project, the Test Injection Well project would not predispose decision makers to choose one alternative over another. This point is attempting to confuse the issue instead of keeping the Test Injection Well project and Central Coast Blue project separate.

The pumping information asserted by the appellant is additionally flawed. As stated in the Categorical Exemption documentation for the Test Injection Well project, the Test Injection Well project is anticipated to pump approximately 300,000 gallons (0.9 acre-

feet [AF]) of water during construction of the monitoring well, approximately 3,500,000 gallons (10.8 AF) of water during construction of the groundwater well, and approximately 1,900,000 gallons (5.7 AF) during well testing activities for a total one-time extraction of 17.4 AF of water through the duration of the construction and data gathering phases. For context, the Santa Maria Groundwater Basin is an adjudicated basin, and extractions are subject to the adjudication. The City of Pismo Beach alone has an allocation under the adjudication of 700 AF per year (AFY). Typically, the City of Pismo Beach extracts about 300 AFY, leaving 400 AF that could be extracted for this project, if only considering Pismo Beach's allocation. Furthermore, the total municipal extraction allowed under the adjudication is 4,330 AFY, and in 2019, the combined Northern Cities Management Area extraction was 684 AF. In addition, the OSCD General Manager has indicated that this project will not adversely impact the District's water supply or ability to deliver water in the short or long term.

For informational purposes, since the Test Injection Well is a separate project, the parent project, Central Coast Blue, will provide long term protection from saltwater intrusion to all users of the Santa Maria Groundwater Basin. The appellant disputes the widely-documented and scientifically-proven indications of potential saltwater intrusion into the basin in 2009; however, the appellant is not an engineer, hydrogeologist or other qualified professional to assert his claim, nor has he provided any scientific evidence supporting his claim.

Appeal Contention 5

The Coastal Act requires public recreational access to be maximized and lower-cost facilities to be protected and provided as a way to maximize access for all segments of the population, including those unable to afford expensive accommodations and facilities. Overnight accommodations are a necessary part of providing public access and recreational opportunities for the many visitors that live further from the coast, including those from inland areas, such as the California Central Valley, where a coastal trip requires a lengthy car ride. In fact, many campers travel hundreds of miles to their destination so they may enjoy the coast without having to drive back to their home the same day. The issue of coastal access is not so much that visitors stay on or at the beach, but about being able to spend time on the coast without the extended travel by having access to lower-cost accommodations. The County-approved project included no analysis of potential impacts upon the availability of lower-cost accommodations. It is not enough to simply provide public recreational access to and along the coast, nor is it enough to simply protect public recreational access; rather such public recreational access must also be MAXIMIZED.

Lower cost visitor-serving accommodations are presently in high demand across the county and their availability locally is in short supply presently. The County-approved project lacks an adequate analysis of impacts to this class of visitors. It is common knowledge, that the lowest cost camping at the nearby Oceano Dunes State Vehicular Riding Area (ODSVRA) is closed indefinitely. When the ODSVRA does reopen for camping, it will be limited to just 500 of the 1,000 campsites. Camping during Covid-

19 is in high demand, as this is one of the few activities where social distancing is easier and safer. Moreover, given its moderate climate with seventy-degree weather, camping demand is extremely high in Oceano because of its proximity to the beach. Options for camping are extremely limited. The Pismo Coast Village, a popular resort on Highway One does not allow tent camping (RV camping only). The County-approved project impacts to lower cost visitor-serving accommodations are significant. It is estimated; approximately 40-camp sites at the Oceano Dunes RV Park and Campground will be displaced during the project.

Additionally, other campsites within the 230-space campground may be affected due to noise and construction activity, making them less desirable. Likewise, the affordable ($59.00 per night King bed) at the eighteen-room Oceano Inn, across the street from the project site, is also likely to experience impacts from the project, including noise, lighting and traffic, making it a less desirable place to stay, further reducing quality and affordable places to stay. Based upon the above discussion, the proposed project clearly fails to conform to Section 30213 of the Coastal Act as it relates to the protection of lower cost visitor-serving accommodations in the community of Oceano.

Response to Appeal Contention 5

The thirty-seven (37) campsites that would be physically impacted by construction are closed annually by the County from mid-September until March and therefore are unavailable for recreational camping during this time period each year Construction of the Test Well Project is scheduled to occur from January through May, which was determined in consultation with County Parks to avoid construction during peak reservation demand during the summer. As a result, minimal impacts to coastal access or lower cost visitor-serving accommodations will occur as a result of construction and testing activities associated with the Test Injection Well project. Following construction of the wells, the affected campsites will again be available for use, as the permanent footprints(one-square-foot monitoring well surface footprint in a traffic-rated flush-mount vault within an existing roadway in the park, four-square-foot groundwater well surface footprint, and the two-square-foot surface footprint for the underground outfall connection pipeline in a park parking spot) do not impact the ability for campers to use the campsites. Therefore, no long-term impacts to the campground will result from the Test Injection Well project. Additional assertions are made that other visitor serving uses will be impacted by the project; however, no technical information is provided to draw this conclusion. In reality, construction-related impacts associated with noise will be for a limited duration during the non-peak travel season. As discussed under Response to Appeal Contention 3, construction noise impacts to Oceano Inn and other nearby campsites would not occur given that the project includes installation of a temporary sound barrier for the duration of construction and testing activities, which would reduce noise levels to achieve compliance with the County's noise standards. The additional assertions that the

project will result in increased lighting and traffic are not substantiated and should be dismissed.

Appeal Contention 6

The County-approved project failed to adequately express a need or purpose for the project. The applicant states the proposed project would be a preliminary investigation of the physical and technological constraints and opportunities in the project area. The project would expand the knowledge of subsurface conditions in the area. It is unclear if the proposed project is necessary; please see a copy of Section 8. References from the NCMA 2019 Annual Monitoring Report (attached) with over fifty references to various studies , monitoring reports and other documentation prepared by both the public and private sector, making the subject groundwater basin one of the most studied on the Central Coast. It is highly likely the information sought from the proposed project is already contained in the numerous groundwater basin analyses.

Response to Appeal Contention 6

While the area has been extensively investigated, adequate information does not exist from the numerous previous studies that appropriately addresses the specific data needs in the specific planned locations to better inform the larger Central Coast Blue project. Injection well capacity assumptions have significant cost impacts for the larger Central Coast Blue project, including the number of injection wells needed, their locations, and the extensive conveyance infrastructure required to deliver purified water. The Test Injection Well project will reduce uncertainty associated with the capacity assumption and improve cost understanding of the larger Central Coast Blue project. Similar projects have had to add injection wells and conveyance infrastructure after operations started, resulting in increased costs and reduced supply, due to incorrect injection capacity assumptions. In addition, the Test Injection Well project is 100% funded by a grant from the State of California, State Water Resources Control Board, due to the importance of the up-front investigative work.

Summary

Based on the above information, we respectfully request that the Commission find that no substantial issue exists and that the approval by the San Luis Obispo County Board of Supervisors was carried out properly, which will allow this critical project to move forward expeditiously, meet specific funding deadlines, and further reduce the temporary impact to the RV park.

Sincerely,

Benjamin A. Fine, PE
Director of Public Work/ City Engineer

Matthew Downing

Matthew J. Downing, AICP
Director of Community Development

Attachment:

1. Pismo Beach Notice of Exemption And Land Use Permit Application for Central Coast Blue Test Injection Well Staff Report, April 7, 2020

cc: City Manager
City Attorney

PISMO BEACH COUNCIL AGENDA REPORT

Agenda Item #9.H

SUBJECT/TITLE:
NOTICE OF EXEMPTION AND LAND USE PERMIT APPLICATION FOR CENTRAL COAST BLUE TEST INJECTION WELL

RECOMMENDATION:

1. Adopt a **Resolution** certifying a Notice of Exemption for the Central Coast Blue Test Injection Well project;
2. Authorize staff to submit a land use permit application to San Luis Obispo County for the project.

EXECUTIVE SUMMARY:

Staff recommends that the City Council certify a Notice of Exemption (California Environmental Quality Act environmental document) for the construction and testing of a full-scale groundwater well, a nested monitoring and a connection to the existing City of Pismo Beach ocean outfall pipeline as part of the planning, engineering, and design process for Central Coast Blue. An Environmental Categorical Class 6 Exemption for information collection will be considered; the Notice of Exemption and its supporting Categorical Exemption memorandum and environmental impact analysis are attached as **Attachment 1.A** and **2**. Additionally, staff recommends that the Council authorize submittal of the related land use permit application to San Luis Obispo County.

BACKGROUND:

The Central Coast Blue (CCB) Test Injection Well is part of the planning, engineering, and design process for the larger CCB project. The purpose of the Test Injection Well is to provide the City of Pismo Beach and the CCB stakeholders with information regarding the feasibility and design options for the proposed CCB project, which involves advanced treatment of secondary effluent from the Pismo Beach and South San Luis Obispo County Sanitation District Wastewater Treatment Plants and injection of the purified water to create a seawater intrusion barrier.

The Test Injection Well project is a preliminary investigation of groundwater basin hydrogeology and will expand the knowledge of subsurface conditions in the area. This information may be used to modify the design of CCB or determine its feasibility. The utility of the information gained through the proposed project is independent of any potential future development because subsurface conditions are not currently well-known, and while the results of this groundwater well exploration may inform future development actions, the proposed project will not predispose decision makers to choose one alternative over another when considering CCB.

Project Description:

Project Location

The project site consists of approximately 500 square feet of land (including a 100-square-foot site for the proposed groundwater well, a 100-square foot site for the proposed nested monitoring well, and an approximately 300-square foot site for the proposed outfall connection). The project site is located at 1001 Pacific Boulevard (also known as State Route 1) in the community of Oceano in unincorporated San Luis Obispo County. The site is located on Assessor's Parcel Number 061-111-017 and -018. The project site is located within the Coastal Dunes RV Park and Campground, which is owned and operated by the County of San Luis Obispo (County), and the right-of-way of SR 1. See **Attachment 3** for vicinity maps of the project site.

Project Components

The proposed groundwater well will be constructed of a stainless steel casing, be approximately 12 inches in diameter, reach a depth of approximately 400 feet and require approximately 100 square feet of ground disturbance. The groundwater well will have aboveground components, such as piping, that will be approximately three feet in height with a welded cap after testing is complete.

The proposed nested monitoring well will include two PVC (plastic) well casings approximately three inches in diameter and will extend to depths of 200 and 400 feet. The nested monitoring well would require approximately 100 square feet of ground disturbance and will be located within a traffic-rated flush-mount vault that does not include aboveground component.

The proposed outfall connection pipeline will be approximately 8 inches in diameter and constructed of ductile iron pipe. The pipeline will require approximately 300 square feet of ground disturbance and be located underground, terminating within a traffic-rated flush-mount vault that will not include aboveground components. A temporary aboveground pipeline will connect the well locations to the outfall connection point within the vault and will only be present during project construction and well testing activities. See **Attachment 3** for the site plan of the test injection well and monitoring well and **Attachment 5** for project plans.

Project Construction

Construction activities will occur over the course of approximately six months during the off-peak season of the Coastal Dunes RV Park and Campground (i.e., mid-September through mid-March) from 7:00 a.m. to 7:00 p.m. on Mondays through Fridays and from 8:00 a.m. to 5:00 p.m. on Saturdays and Sundays with the exception of approximately 14 days of well drilling activities that would occur for 24 hours per day, Monday through Sunday, which is standard practice for groundwater well drilling.

Project construction will require groundwater pumping during well development, which is standard practice for groundwater well drilling. Water will be disposed of through City's ocean outfall via the proposed connection to the City's existing outfall pipeline or by

transport via tanker trucks and discharge to the Mentone Drainage Basin Park in Grover Beach. The City of Grover Beach's Public Works Director has indicated that temporary groundwater disposal at the Mentone Drainage Basin Park will be allowed.

Well Testing Activities

Upon completion of construction, a series of well pumping tests will occur at the groundwater well for information and data collection purposes. Well pump tests will produce approximately 1,900,000 gallons (5.7 acre-feet) of groundwater, and pumped groundwater will be discharged to temporary storage tanks for release via the outfall connection point.

Project Design Features: Avoidance and Minimization Measures

The project will include the following avoidance and minimization measures as part of the project design, which are detailed in **Attachment 4**. These measures include pre-construction nesting bird surveys, use of temporary sound barriers during construction and well testing activities, implementation of a traffic control plan, execution of a Workers' Environmental Awareness Program training on archaeological sensitivity for construction workers, and archaeological and Native American monitoring during construction activities.

Land Use:

The project site is located in unincorporated San Luis Obispo County and is subject to the land use permitting authority of the County. As such, while the City will be the lead agency for environmental review purposes, the County's land use approval will ultimately be required for the project to continue. The County has indicated that the project will require a minor land use permit and would be subject to requirements provided in San Luis Obispo County Code (SLOCC) Section 8.40 (Construction, Repair, Modification and Destruction of Wells), and staff seeks Council authorization for the submittal of the land use permit application. At this time, staff has submitted materials to the County for preliminary review. Construction of the outfall connection would also require an Encroachment Permit from Caltrans. At this time, staff has submitted application materials to Caltrans, which are pending approval.

Recreation

Project construction and well testing activities will temporarily restrict the use of approximately 40 campsites within the Coastal Dunes RV Park and Campground during the off-peak season (i.e., mid-September through mid-March). All the campsites will be restored to pre-construction condition upon completion except for the area of the capped groundwater well that extends above the surface in a hiker/biker site. Staff has been engaged in active coordination and collaboration with County Parks regarding use of this portion of the campground. On February 27, 2020, County Parks Commission approved the City's requested Land Use Consent for CCB Test Injection Well project. Final approval is pending a consent agenda item at an upcoming San Luis Obispo County Board of Supervisors.

Archaeologically Sensitive Area

An Extended Phase I (XPI)/Phase II archaeological investigation of the project site was conducted in January 2020, during which a Native American monitor from the San Luis Obispo Chumash Council was present, to identify the presence or absence of prehistoric archaeological sites within the project footprint and to evaluate any identified deposits for cultural significance. The XPI/Phase II investigation did not identify any significant cultural deposits within the project site. These reports are considered confidential and are not attached to this report to preserve archaeological resources. Furthermore, in accordance with the recommendations of the XPI/Phase II report, the City would implement AMM 4 and AMM 5, which include conducting a worker's environmental awareness program and archaeological and Native American monitoring, to avoid impacts in the event that unanticipated archaeological deposits are encountered during project construction.

Environmental Review:

In accordance with the Guidelines for Implementation of the California Environmental Quality Act (CEQA), a Categorical Exemption has been prepared for the proposed project in accordance with Section 15306 (Class 6) of the State CEQA Guidelines, exempting information collection projects, which consist of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded. The Notice of Exemption and its supporting Categorical Exemption memorandum and environmental impact analysis have been included as **Attachments 1.A and 2**.

The groundwater well, monitoring well, and outfall connection that are part of the project may be left in place to become part of the larger groundwater well injection network envisioned by the CCB project, should the CCB project be approved by the City. However, prior to the decision-making process on the CCB project, environmental documentation pursuant to CEQA would need to be prepared for the whole of the CCB project.

Conclusion and Recommendation:

Staff recommends that the Council adopt a Resolution (**Attachment 1**) certifying the CEQA Notice of Exemption for the Test Injection Well project, and authorize staff to proceed with submitting a land use permit application to San Luis Obispo County for the project.

FISCAL IMPACT:

There is no fiscal impact from this action.

ALTERNATIVES:

1. Decline certification of the Notice of Exemption and do not authorize staff to move forward.
2. Provide alternative direction to staff.

ATTACHMENTS:

1. Resolution
   1.A. Exhibit A to Resolution: Notice of Exemption
2. Categorical Exemption Memorandum
3. Vicinity Maps and Site Plan
4. Avoidance and Minimization Measures
5. Plans

Submitted by: **Meeting Date:** April 7, 2020

Benjamin A. Fine, P.E., Director of Public Works/City Engineer

City Manager Approval:

RESOLUTION NO. R-2020-XXX

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PISMO BEACH, CALIFORNIA CERTIFYING A NOTICE OF EXEMPTION FOR THE CENTRAL COAST BLUE TEST INJECTION WELL PROJECT

WHEREAS, the Central Coast Blue (CCB) Test Injection Well is part of the planning, engineering, and design process for the larger CCB project; the purpose of the Test Injection Well is to provide the City of Pismo Beach and stakeholders with information regarding the feasibility and design options for the proposed CCB project, which involves advanced treatment of secondary effluent from the Pismo Beach and South San Luis Obispo County Sanitation District Wastewater Treatment Plants and injection of the purified water to create a seawater intrusion barrier; and

WHEREAS, in accordance with the Guidelines for Implementation of the California Environmental Quality Act (CEQA), a Categorical Exemption has been prepared for the proposed project in accordance with Section 15306 (Class 6) of the State CEQA Guidelines, exempting information collection projects, which consist of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Pismo Beach hereby certifies the CEQA Notice of Exemption (**Exhibit A**) prepared for the Central Coast Blue Test Injection Well project.

UPON MOTION OF Council Member , seconded by Council Member , the foregoing resolution was adopted by the City Council of the City of Pismo Beach this 7th day of April 2020, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:
RECUSED:

Approved: **Attest:**

_____ **_____**
Ed Waage, Mayor **Erica Inderlied, City Clerk**

Notice of Exemption

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk
County of: San Luis Obispo
1055 Monterey Street
San Luis Obispo, CA 93408

From: (Public Agency): City of Pismo Beach
760 Mattie Road
Pismo Beach, CA 93349
(Address)

Project Title: Central Coast Blue Test Groundwater Well Project

Project Applicant: City of Pismo Beach

Project Location - Specific:
1001 Pacific Boulevard (APN 061-111-017 and -018) in Oceano, California

Project Location - City: unincorporated Oceano Project Location - County: San Luis Obispo

Description of Nature, Purpose and Beneficiaries of Project:
The purpose of the project is to investigate subsurface hydrogeologic conditions. The project would construct a test groundwater well, a nested monitoring well with two casings, and a connection to the City's existing ocean outfall pipeline.

Name of Public Agency Approving Project: City of Pismo Beach

Name of Person or Agency Carrying Out Project: City of Pismo Beach

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☒ Categorical Exemption. State type and section number: Class 6 (15306)
- ☐ Statutory Exemptions. State code number: _____

Reasons why project is exempt:
The purpose of the project is to collect data on subsurface conditions in the project area to inform decision-making on the feasibility of the Central Coast Blue Project. The proposed project would not predispose decision-makers to choose one alternative of the Central Coast Blue Project over another. The project would be part of a study leading to an action which a public agency has not yet approved, adopted, or funded.

Lead Agency
Contact Person: Benjamin Fine Area Code/Telephone/Extension: 805-773-7037

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ☐ Yes ☐ No

Signature: _____ Date: _____ Title: _____

☒ Signed by Lead Agency ☐ Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

Rincon Consultants, Inc.
180 North Ashwood Avenue
Ventura, California 93003

805 644 4455 OFFICE

info@rinconconsultants.com
www.rinconconsultants.com

February 6, 2020
Project No: 19-07175

Ben Fine
Public Works Director
City of Pismo Beach
760 Mattie Road
Pismo Beach, California 93349

Subject: Central Coast Blue Test Injection Well Project CEQA Categorical Exemption

Dear Mr. Fine:

This memorandum provides an analysis to support the determination by the lead agency that the proposed Central Coast Blue Test Injection Well Project is exempt from the California Environmental Quality Act (CEQA) pursuant to Sections 15306 of Title 14 of the California Code of Regulations.

Project Location

The project site consists of approximately 500 square feet of land (including a 100-square foot site for the proposed groundwater well, a 100-square foot site for the proposed nested monitoring well, and an approximately 300-square foot site for the proposed outfall connection). The project site is located at 1001 Pacific Boulevard (also known as State Route [SR] 1) in the community of Oceano in unincorporated San Luis Obispo County. The site is located on Assessor's Parcel Number 061-111-017 and -018 and is located within the California Coastal Zone. The project site is designated Recreation in the County of San Luis Obispo General Plan with overlying combining designations of "Archaeologically Sensitive Area" and "Airport Review Area."

The project site is located within the Coastal Dunes RV Park and Campground, which is owned and operated by the County of San Luis Obispo, and the right-of-way of SR 1. The project site encompasses the portion of the facility from Pier Avenue to the southernmost park boundary as well as a 6 foot by 36 foot trench partially within the Coastal Dunes RV Park and Campground and partially within the California Department of Transportation (Caltrans) right-of-way along the northbound lane of SR 1 between Coolidge Drive and the entrance to the Pismo State Beach park administration facilities. The Coastal Dunes RV Park and Campground contains 230 green grass campsites, including pull-thru and back-in campsites for recreational vehicles and trailers and hiker/biker campsites. The project site currently contains RV/trailer sites, hiker/biker campsites, a paved access roadway terminating in a cul-de-sac, ruderal vegetation, and iceplant mat. See Figure 1 for a map of the project site location in a regional context and Figure 2 for a map of the project site location within the Coastal Dunes RV Park and Campground.

The project site is immediately surrounded by industrial warehouse uses to the south; Union Pacific Railroad tracks to the east; commercial development, vacant land, Oceano Lagoon and Pismo State Beach to the west across SR 1; and the remainder of the Coastal Dunes RV Park and Campground to the north. Agricultural land is located east of the project site across the railroad tracks, and single-family residential uses are located approximately 200 feet to the west. SR 1 provides access to the project site.

Figure 1 Regional Location

Figure 2 Project Site Location

Imagery provided by ESRI and its licensors © 2020.

Project Description

The Central Coast Blue Test Injection Well Project (herein referred to as "project" or "proposed project") would include the design, construction, and testing of a full-scale groundwater well and a nested monitoring well as well as a connection to the existing City of Pismo Beach's ocean outfall pipeline. Figure 3 shows the project site plan.

Purpose of the Project

The purpose of the project is to provide the City of Pismo Beach and the Central Coast Blue (CCB) stakeholders with information regarding the feasibility and design options for the proposed CCB project, which involves advanced treatment of secondary effluent from the Pismo Beach and South San Luis Obispo County Sanitation District Wastewater Treatment Plants and injection of the purified water to create a seawater intrusion barrier. The proposed project would be a preliminary investigation of the physical and technological constraints and opportunities in the project area. The proposed project would expand the knowledge of subsurface conditions in the area. This information may be used to modify the design of the CCB project or determine its feasibility. The utility of the information gained through the proposed project is independent of any potential future development because subsurface conditions are not currently well-known, and while the results of this groundwater well exploration may inform future development actions, the proposed project would not predispose decision makers to choose one alternative over another when considering the CCB project.

Project Components

The proposed groundwater well would be approximately 12 inches in diameter and would reach a depth of approximately 400 feet. The groundwater well would be constructed of 316L stainless steel casing and would require approximately 100 square feet of ground disturbance. The groundwater well would have aboveground components, such as piping, that would be approximately three feet in height with a welded cap after testing is complete.

The proposed nested monitoring well would include two well casings approximately three inches in diameter and constructed of polyvinyl chloride (PVC). One casing would reach a maximum depth of approximately 200 feet, and the other casing would reach a maximum depth of approximately 400 feet. The nested monitoring well would require approximately 100 square feet of ground disturbance and would be located within a traffic-rated flush-mount vault that would not include aboveground components.

The proposed outfall connection pipeline would be approximately 8 inches in diameter and would be constructed of ductile iron pipe. The pipeline would require approximately 300 square feet of ground disturbance and would be located underground, terminating within a traffic-rated flush mount vault that would not include aboveground components. A temporary aboveground pipeline would connect the well locations to the outfall connection point within the vault and would only be present during project construction and well testing activities.

Figure 3 **Test Injection Well and Monitoring Well Site Plan**

Project Construction

Construction activities would occur over the course of approximately six months during the off-peak season of the Coastal Dunes RV Park and Campground (i.e., mid-September through mid-March). Construction is anticipated to begin in 2020 and would include the following phases:

- Outfall Connection Construction and Monitoring Well Site Preparation (2 weeks)
- Monitoring Well Drilling/Development (8 weeks)
- Groundwater Well Site Preparation (2 weeks)
- Groundwater Well Drilling/Development/Testing (12 weeks)
- Site Restoration (2 weeks)

Construction activities would occur from 7:00 a.m. to 7:00 p.m. on Mondays through Fridays and from 8:00 a.m. to 5:00 p.m. on Saturdays and Sundays with the exception of approximately 14 days during which well drilling activities would occur for 24 hours per day, Monday through Sunday. Temporary lighting would be required during 24-hour drilling and testing activities and would consist of several lights adhered to the mast of the drill rig that would be pointed downward and two portable lights that would be placed around the working area. Both wells would be installed using the reverse circulation rotary drilling method. Installation of the outfall connection pipeline would require trenching up to a depth of approximately 10 feet.

The temporary construction footprint for the groundwater well would be approximately 30,000 square feet, and the temporary construction footprint for the monitoring well would be approximately 30,000 square feet. Construction equipment would include a drilling rig, a gradall forklift, diesel-powered generators, a compressor, and a backhoe. Additional construction components would include a pipe trailer, up to 15 21,000-gallon water storage tanks, a tool trailer for supply storage, a mud tank, diesel-engine powered vertical turbine pump, 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 79 cubic yards of soil would be excavated and exported during well drilling activities.[1] An average of one delivery truck trip and one soil haul truck trip would be made to and from the project site per day.

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 well and 100 to 1,500 gpm for the groundwater well. Well development would produce approximately 300,000 gallons (0.9 acre-feet) of water from the monitoring well and approximately 3,500,000 gallons (10.8 acre-feet) of water from the groundwater well, which would be discharged to temporary on-site water tanks for storage prior to disposal. Water would be disposed of via one or both of the following methods:

- Discharge to the City of Pismo Beach's ocean outfall via a proposed connection to the outfall pipeline between Coolidge Drive and the main entrance to the Coastal Dunes RV Park and Campground (see Figure 2). This method would be the primary/preferred option of groundwater disposal. Approximately 40 feet of the connection pipeline would be installed underground in the California Department of Transportation (Caltrans) right-of-way (ROW), extending from the outfall connection point along SR 1 to the eastern side of the fenceline of the campground. At this point, the pipeline would rise into a buried vault. Construction of the outfall connection would require an Encroachment

[1] Assumes a swell factor of 1.5

Permit from Caltrans. Groundwater would be conveyed from the well locations to the outfall connection point via a temporary aboveground pipeline that would proceed along the western edge of the campground. Groundwater disposal would be permitted under the existing National Pollutant Discharge Elimination System (NPDES) permit for the City of Pismo Beach Wastewater Treatment Facility. The City of Pismo Beach would require the contractor to reduce turbidity (from mud and sand in the produced groundwater) to less than 100 nephelometric turbidity units (NTU) and dechlorinate the groundwater (as needed) prior to discharge to meet the NPDES permit requirements. To reduce turbidity, the project contractor would use a series of baffled storage tanks to settle out mud and sand and/or filter the water prior to discharge.

- Transport via 4,000-gallon tanker trucks and discharge to the Mentone Drainage Basin Park located between 14th Street, Mentone Avenue, 16th Street, and Trouville Avenue in Grover Beach. This method would be a secondary, alternative option that would only be utilized to dispose of groundwater produced during monitoring well development if there are delays in obtaining the Caltrans Encroachment Permit for construction of the outfall connection. Approximately 72 tanker truck trips over the course of six days would be required to dispose of approximately 288,000 gallons of produced groundwater. The Mentone Drainage Basin Park is owned by the City of Grover Beach, and groundwater disposal would be permitted under the Statewide General Waste Discharge Requirements (WDRs) for Discharges to Land with a Low Threat to Water Quality. The City of Grover Beach would require the contractor to reduce turbidity (from for mud and sand in the produced groundwater) to less than 100 NTU and dechlorinate the groundwater (as needed) prior to discharge to meet the WDRs. To reduce turbidity, the project contractor would use a series of baffled storage tanks to settle out mud and sand and/or filter the water prior to discharge. An energy dissipator would be used during the process of discharging water from tanker trucks into the basin. If the Mentone Drainage Basin Park is at full capacity due to recent rainfall events, the City of Grover Beach would require the City's contractor to delay groundwater disposal until adequate capacity is available.[2] In this case, produced groundwater would be stored in the temporary on-site storage tanks.

In addition, stormwater best management practices would be implemented during well construction activities in accordance with County of San Luis Obispo requirements, including preparation of an Erosion and Sediment Control Plan. [3]

Project construction would temporarily restrict the use of up to 40 campsites within the Coastal Dunes RV Park and Campground. All the campsites would be restored to pre-construction condition upon completion except for the portion of the capped groundwater well that would extend above the surface in a hiker/biker site.

Well Testing Activities and Well Closure

Upon completion of construction, a series of well pumping tests would occur at the groundwater well. Well pump tests would produce approximately 1,900,000 gallons (5.7 acre-feet) of groundwater, and pumped groundwater would be discharged to temporary storage tanks for release via the outfall connection point.

[2] Ray, Gregory A. 2019. Public Works Director / City Engineer, City of Grover Beach Public Works Department. Personal communication via email regarding groundwater disposal at Mentone Drainage Basin Park with Rob Morrow, Water Systems Consulting, Inc. October 25, 2019.
[3] San Luis Obispo, County of. 2017. "Stormwater Management during Construction." Last modified: April 3, 2017. https://www.slocounty.ca.gov/Departments/Planning-Building/Stormwater/Services/Stormwater-Management-During-Construction.aspx (accessed August 2019).

The well tests would be performed using a diesel-engine powered vertical turbine pump. Approximately four personnel would be on site during well testing activities, which would occur over the course of two to six days. Well testing activities would occur primarily during daytime hours (7:00 a.m. to 7:00 p.m. Mondays through Fridays and 8:00 a.m. to 5:00 p.m. Saturdays and Sundays) over the course of a six-day period. However, the constant rate test may require up to 24 hours of constant equipment use for the duration of one day. As with project construction activities, up to 40 campsites within the Coastal Dunes RV Park and Campground would be unavailable for use during well testing. At the end of well testing activities, closure of the well may occur in accordance with State and County requirements for well destruction and would require the use of a development rig, a cement truck, and a backhoe.

The groundwater well, monitoring well, and outfall connection that are part of the proposed project may be left in place to become part of the larger groundwater well injection network envisioned by the CCB project, should the CCB project be approved by the stakeholders. However, prior to the decision making process on the CCB project, environmental documentation pursuant to CEQA would need to be prepared for the whole of the CCB project. At that time, the environmental impacts of leaving the proposed groundwater well, monitoring well, and outfall connection in place would be evaluated. Therefore, this analysis focuses only on the environmental impacts of the project as a temporary groundwater well, monitoring well, and outfall connection.

Project Design Features: Avoidance and Minimization Measures

AMM 1 Nesting Birds

If construction occurs within the bird breeding season (February 1 through August 31), then no more than one week prior to initiation of ground disturbance and/or vegetation removal, a nesting bird and raptor pre-construction survey will be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer, where practicable.

Pre-construction nesting bird and raptor surveys will be conducted during the time of day when birds are active and will be of sufficient duration to reliably conclude presence/absence of nesting birds and raptors on site and within the designated vicinity. A report of the nesting bird and raptor survey results, if applicable, will be submitted to the City of Pismo Beach prior to ground and/or vegetation disturbance activities.

If nests are found, their locations will be flagged. An appropriate avoidance buffer, ranging in size from 25 to 50 feet for song birds and up to 100 feet for raptors depending upon the species and the proposed work activity, will be determined and demarcated by a qualified biologist with suitable flagging. Active nests will be monitored at a minimum of once per week until it has been determined the nest is no longer being used by either the young or adults. No ground disturbance will occur within this buffer until the qualified biologist confirms the breeding/nesting is complete, and all the young have fledged. If project activities must occur within the buffer, they will be conducted at the discretion of the qualified biologist. If no nesting birds are observed during pre-construction surveys, no further actions are necessary. If a bird initiates a nest while construction activities, such as ground disturbance or well installation, are ongoing, it is unlikely that this bird would be substantially disturbed by those same activities.

AMM 2 Sound Barrier

During project construction and well testing activities the project contractor will install a sound barrier of sufficient height and length to break the line-of-sight between heavy-duty equipment and nearby sensitive receivers (i.e., Oceano Inn to the west, residences to the west and south, and campsites to the north). The sound barrier will be constructed of material with a minimum weight of two pounds per square foot and a minimum Sound Transmission Class (STC) rating of 29. The barrier will enclose all heavy-duty equipment and will be at least 100 feet in length along the northern and southern sides and at least 50 feet in length along the western side. The barrier will be 24 feet in height and will be continuous with no gaps or holes between panels or the ground with the exception of an opening for equipment access. The opening in the barrier for equipment access would have sound curtains for noise control when equipment is not using the access point. Sound blankets on individual pieces of construction equipment may also be used in place of a temporary sound barrier. The sound blankets will meet a STC rating of 32 and will be of sufficient length to overlap each other and the ground surface.

AMM 3 Traffic Control Plan

The project contractor will prepare and implement a traffic control plan that specifies how traffic will be safely and efficiently redirected during work within the Caltrans ROW. Traffic control measures in the event of a lane closure will be included, and priority access will be given to emergency vehicles. The traffic control plan will also include requirements to notify local emergency response providers, including Five Cities Fire Authority, the San Luis Obispo County Sheriff Department, ambulance services, and paramedic services at least one week prior to the start of work within the Caltrans ROW if a lane closure is required.

AMM 4 Worker's Environmental Awareness Program

A qualified archaeologist will be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training will be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology.[4] Archaeological sensitivity training will include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

AMM 5 Archaeological and Native American Monitoring

During initial ground disturbance for the project, a qualified archaeologist and a locally affiliated Native American monitor should monitor construction activities within the project site. Initial ground disturbance is defined as disturbance within previously undisturbed native soils. If, during initial ground disturbance, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources (e.g., excavations are within previously disturbed, non-native soils, or within soil formation not expected to yield cultural resources deposits), the qualified archaeologist may recommend that monitoring be reduced or eliminated. Consistent with City of Pismo Beach General Plan and Local Coastal Program Policy CO-6, if cultural resources are encountered during ground-disturbing activities, whether or not a monitor is present, work in the immediate area must halt and an archaeologist meeting

[4] National Parks Service. 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Washington, DC. https://www.nps.gov/history/local-law/arch_stnds_0.htm (accessed January 2020).

the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If the discovery proves to be eligible for listing in the CRHR, additional work such as data recovery excavation and Native American consultation may be warranted to avoid or minimize impacts/adverse effects.

Exemption Analysis

Suitability of Use of Categorical Exemption

The project qualifies for a Categorical Exemption (CE) under the California Environmental Quality Act (CEQA). Public Resources Code Section 21084 requires the *State CEQA Guidelines* to include a list of classes of projects that have been determined not to have a significant effect on the environment and that are, therefore, exempt from CEQA (see Chapter 19 Sections 15301 through 15333 of the *State CEQA Guidelines*). Categorically Exempt projects under CEQA fall into several distinct categories; Class 6 applies to the project.

Section 15306 – Information Collection: Class 6 projects consist of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded.

> The proposed project would be a preliminary investigation of the physical and technological constraints and opportunities, such as subsurface conditions, in the project area. The purpose of this investigation is to gather data and information that may be used to modify the design of a potential future injection well network and seawater intrusion barrier or reveal the infeasibility of that network. The utility of the information that would be gained through this proposed project is independent of any potential future development because subsurface conditions are not currently well-known and while the results of this test injection well exploration may inform future development actions, the proposed project would not predispose decision makers to choose one alternative over another. As such, the project would be part of a study leading to an action which a public agency (i.e., the City of Pismo Beach) has not yet approved, adopted, or funded. Furthermore, as discussed in detail in the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis, the proposed project would not result in a serious or major disturbance to an environmental resource. Therefore, the Class 6 exemption is applicable.

Discussion of CEQA Guidelines 15300.2 Exceptions

Projects that are consistent with the categorical exemptions identified in *CEQA Guidelines* sections 15301 through 15333 are not automatically exempt from CEQA review. Section 15300.2 (Exceptions) of the *State CEQA Guidelines* outlines the cases in which projects that would normally be exempt from CEQA review would not be exempt. These exceptions are as follows:

a. **Location**. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b. **Cumulative Impact**. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c. **Significant Effect**. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d. **Scenic Highways**. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e. **Hazardous Waste Sites**. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f. **Historical Resources**. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The following sections address each one of the potential exceptions and demonstrate that none apply to the proposed project.

15300.2(a) **Location**. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

As stated in the *Biological Resources* section of the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis, the project site does not contain suitable habitat for any special-status species, sensitive plant communities, or potentially jurisdictional drainage features. It is not expected to serve as a migratory wildlife corridor and is not located within the jurisdiction of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or state habitat conservation plan. Therefore, construction and operation of the proposed project would not impact an environmental resource of critical concern. In addition, as stated below in the discussion of Exception 15300.2(e) Hazardous Waste Sites, the project site is not listed as containing or being contaminated by hazardous materials. Therefore, construction and operation of the proposed project would not impact an environmental resource of hazardous concern. Therefore, this exception to a CE does not apply to the proposed project. See also the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis, specifically the *Biological Resources* and *Hazards and Hazardous Materials* sections for further information.

15300.2(b) **Cumulative Impact**. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

As discussed in the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis, the project would not result in significant environmental impacts. The project may provide information that ultimately leads to implementation of the larger CCB project; however, the environmental impacts of the

CCB injection well network would be analyzed in a separate CEQA document. In addition, due to the temporary and short-term nature of project construction and well testing activities, the potential for cumulative impacts to occur is low. Furthermore, there are no major reasonably foreseeable future projects within the geographic scope that would result in significant cumulative impacts in combination with the proposed project. Therefore, no significant cumulative impacts would result from successive projects in the same place over time. This exception to a CE does not apply to the proposed project.

15300.2(c) **Significant Effect**. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The circumstances of the proposed project, which would result in the construction of a groundwater well, a monitoring well, and an outfall connection, are not considered unusual because: (1) The project site currently operates as a campground and is therefore a highly disturbed location with limited environmental resources; (2) Although the project site has a combining designation of Archaeologically Sensitive Area, the Extended Phase I archaeological investigation performed for the project, during which a Native American monitor from the San Luis Obispo Chumash Council was present, did not identify any significant cultural resource deposits that would be adversely impacted by the project; (3) Installation of a test injection well and monitoring well is a typical activity for performing investigations of subsurface conditions; and (4) Drilling activities associated with project construction would be typical of those associated with well installation. Furthermore, as discussed in the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis, the proposed project would not have a significant effect on the environment due to unusual circumstances. Therefore, this exception to a CE does not apply to the proposed project.

15300.2(d) **Scenic Highways**. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

According to the California Department of Transportation, the segment of SR 1 that fronts the project site is a designated State scenic highway.[5] The project site is located on the east side of SR 1, away from the Pacific Ocean. Views of the project site from SR 1 consist of mature low-lying vegetation and trees in the foreground, chain link and plastic fencing in the middle ground, and a maintained campground in the background. Upon completion, the aboveground components of the project would be momentarily visible by vehicles travelling past the project site from SR 1. In addition, the project would not damage scenic resources such as trees, historic buildings, or rock outcroppings and would not block scenic views of the ocean or foothills. Therefore, this exception to a CE does not apply to the proposed project.

15300.2(e) **Hazardous Waste Sites**. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

According to a search of the Department of Toxic Substances Control (DTSC) EnviroStor database and the State Water Resources Control Board GeoTracker database conducted in July 2019, the project site is not

[5] California Department of Transportation (Caltrans). 2018. "Scenic Highways" Last modified: August 2, 2018. http://www.dot.ca.gov/design/lap/livability/scenic-highways/ (accessed September 2018).

on or within 0.25 mile of any hazardous waste sites.[6, 7] Therefore, this exception to a CE does not apply to the proposed project. Refer also to the *Hazards and Hazardous Materials* section of the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis.

15300.2(f) **Historical Resources**. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The project site is a maintained campground operated by the County of San Luis Obispo. As discussed in the *Cultural Resources* section of the Central Coast Blue Test Injection Well Project – Environmental Impact Analysis, no historical resources are located on the project site. Therefore, this exception to a CE does not apply to the proposed project.

Determination

Based on this analysis, the proposed project meets the qualifications of the Class 6 (15306. Information Collection) categorical exemption and as provided in Article 19 and is exempt from CEQA pursuant to the State CEQA Guidelines Section 15312.

Sincerely,
Rincon Consultants, Inc.

Annaliese Miller
Associate Environmental Planner

Jennifer Haddow, PhD
Principal Environmental Scientist

[6] Department of Toxic Substances Control (DTSC). 2019. EnviroStor Database. https://www.envirostor.dtsc.ca.gov/public/ (accessed July 2019).
[7] State Water Resources Control Board (SWRCB). 2019. Geotracker Database. https://geotracker.waterboards.ca.gov/ (accessed July 2019).

Figure 1 Regional Location

Imagery provided by Esri and its licensors © 2019.

Project Location

N

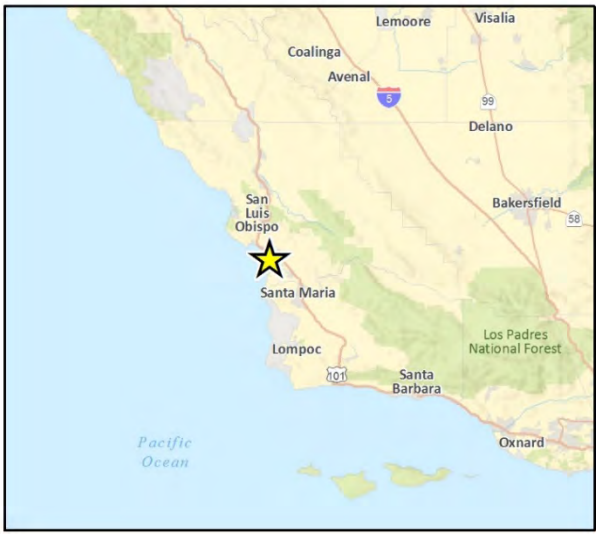


Figure 2 Project Site Location

Figure 3 Test Injection Well and Monitoring Well Site Plan

Central Coast Blue Test Injection Well Avoidance and Minimization Measures

AMM 1 Nesting Birds

If construction occurs within the bird breeding season (February 1 through August 31), then no more than one week prior to initiation of ground disturbance and/or vegetation removal, a nesting bird and raptor pre-construction survey will be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer, where practicable.

Pre-construction nesting bird and raptor surveys will be conducted during the time of day when birds are active and will be of sufficient duration to reliably conclude presence/absence of nesting birds and raptors on site and within the designated vicinity. A report of the nesting bird and raptor survey results, if applicable, will be submitted to the City of Pismo Beach prior to ground and/or vegetation disturbance activities.

If nests are found, their locations will be flagged. An appropriate avoidance buffer, ranging in size from 25 to 50 feet for song birds and up to 100 feet for raptors depending upon the species and the proposed work activity, will be determined and demarcated by a qualified biologist with suitable flagging. Active nests will be monitored at a minimum of once per week until it has been determined the nest is no longer being used by either the young or adults. No ground disturbance will occur within this buffer until the qualified biologist confirms the breeding/nesting is complete, and all the young have fledged. If project activities must occur within the buffer, they will be conducted at the discretion of the qualified biologist. If no nesting birds are observed during pre-construction surveys, no further actions are necessary. If a bird initiates a nest while construction activities, such as ground disturbance or well installation, are ongoing, it is unlikely that this bird would be substantially disturbed by those same activities.

AMM 2 Sound Barrier

During project construction and well testing activities the project contractor will install a sound barrier of sufficient height and length to break the line-of-sight between heavy-duty equipment and nearby sensitive receivers (i.e., Oceano Inn to the west, residences to the west and south, and campsites to the north). The sound barrier will be constructed of material with a minimum weight of two pounds per square foot and a minimum Sound Transmission Class (STC) rating of 29. The barrier will enclose all heavy-duty equipment and will be at least 100 feet in length along the northern and southern sides and at least 50 feet in length along the western side. The barrier will be 24 feet in height and will be continuous with no gaps or holes between panels or the ground with the exception of an opening for equipment access. The opening in the barrier for equipment access would have sound curtains for noise control when equipment is not using the access point. Sound blankets on individual pieces of construction equipment may also be used in place of a temporary sound barrier. The sound blankets will meet a STC rating of 32 and will be of sufficient length to overlap each other and the ground surface.

AMM 3 Traffic Control Plan

The project contractor will prepare and implement a traffic control plan that specifies how traffic will be safely and efficiently redirected during work within the Caltrans ROW. Traffic control measures in the event of a lane closure will be included, and priority access will be given to emergency vehicles. The traffic control plan will also include requirements to notify local emergency response providers, including Five Cities Fire Authority, the San Luis Obispo County Sheriff Department, ambulance services, and paramedic services at least one week prior to the start of work within the Caltrans ROW if a lane closure is required.

AMM 4 Worker's Environmental Awareness Program

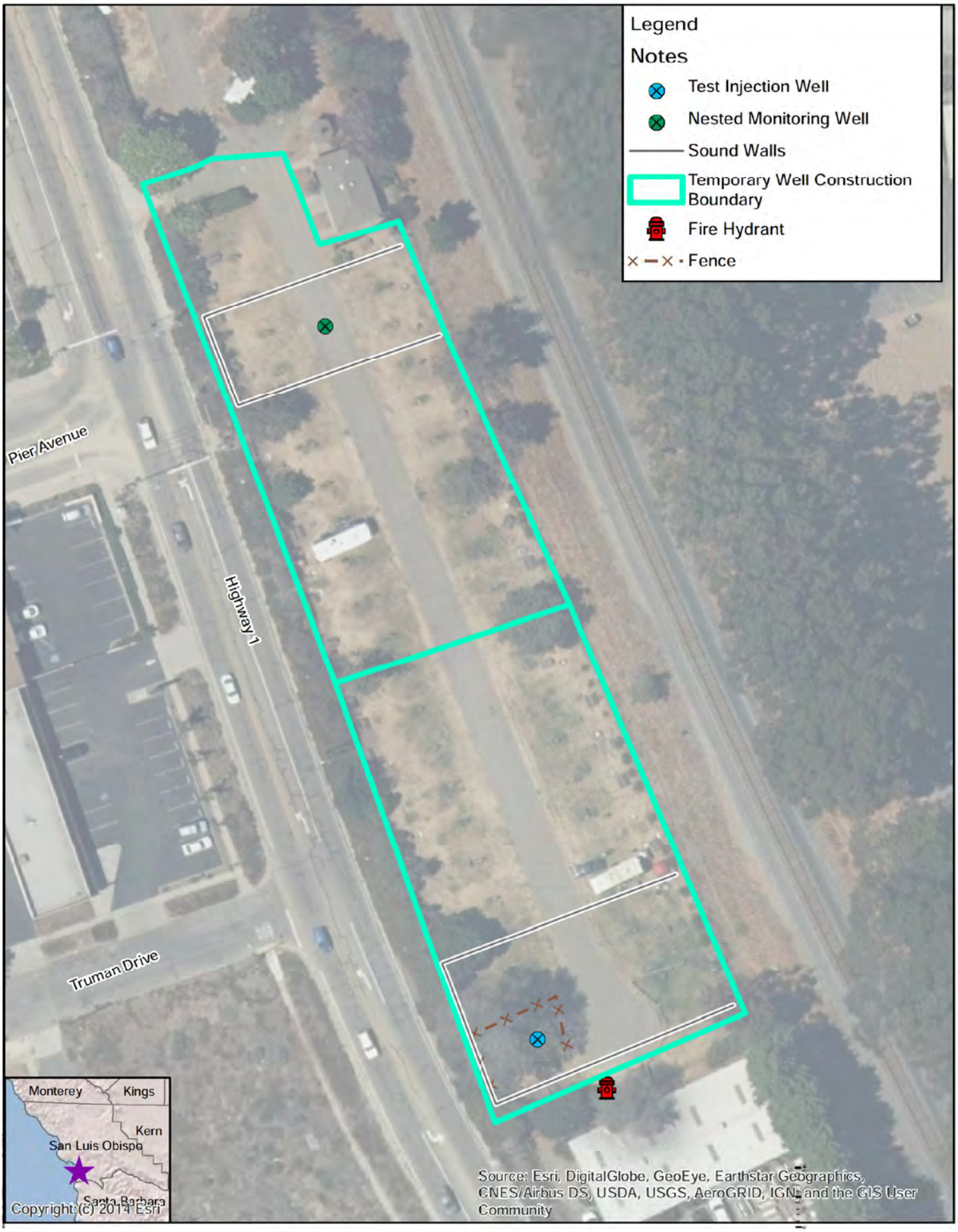
A qualified archaeologist will be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training will be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology.[1] Archaeological sensitivity training will include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

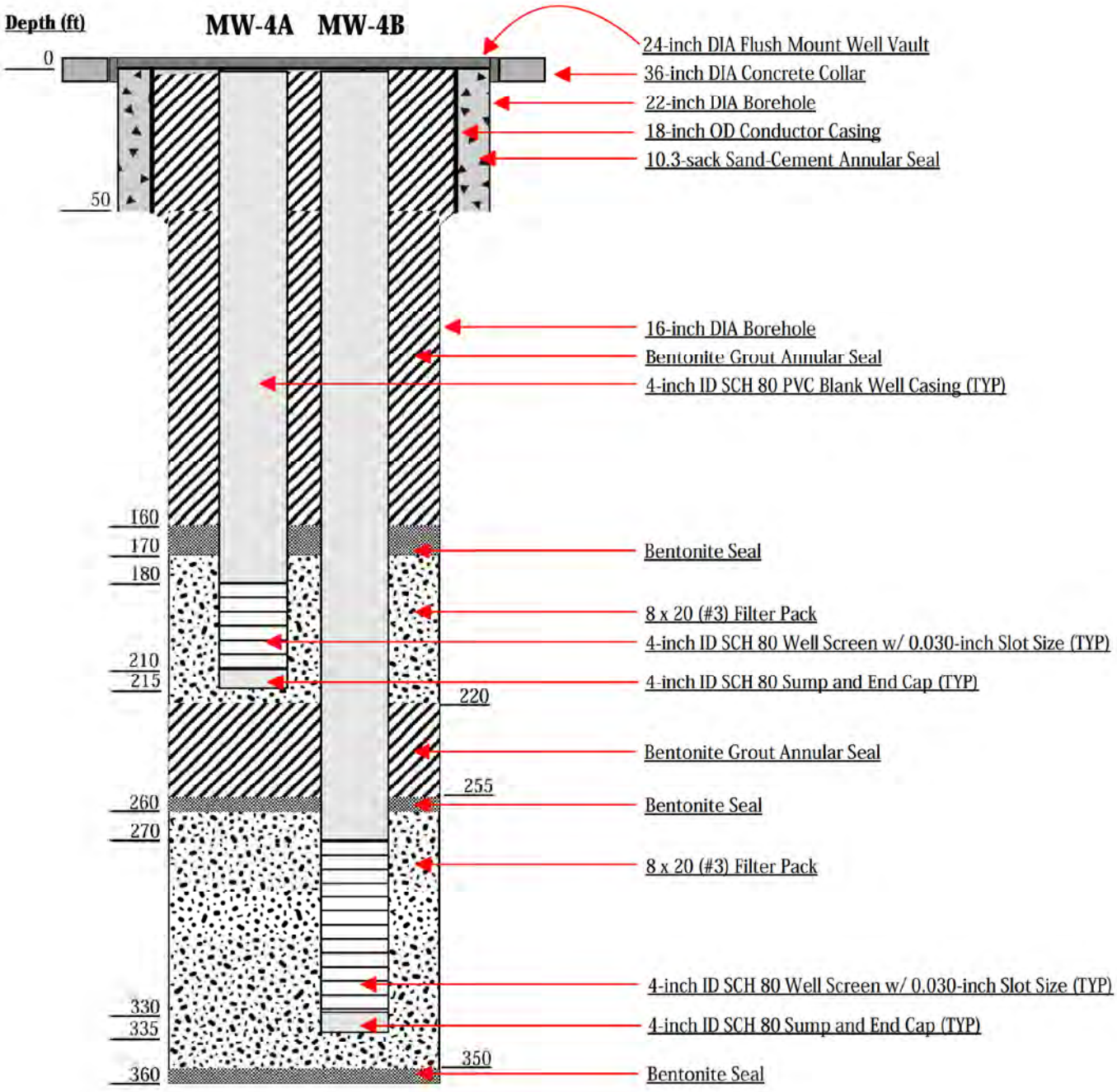
AMM 5 Archaeological and Native American Monitoring

During initial ground disturbance for the project, a qualified archaeologist and a locally affiliated Native American monitor should monitor construction activities within the project site. Initial ground disturbance is defined as disturbance within previously undisturbed native soils. If, during initial ground disturbance, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources (e.g., excavations are within previously disturbed, non-native soils, or within soil formation not expected to yield cultural resources deposits), the qualified archaeologist may recommend that monitoring be reduced or eliminated. Consistent with City of Pismo Beach General Plan and Local Coastal Program Policy CO-6, if cultural resources are encountered during ground-disturbing activities, whether or not a monitor is present, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If the discovery proves to be eligible for listing in the California Register of Historical Resources, additional work such as data recovery excavation and Native American consultation may be warranted to avoid or minimize impacts/adverse effects.

[1] National Parks Service. 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Washington, DC. https://www.nps.gov/history/local-law/arch_stnds_0.htm (accessed January 2020).


Legend
Test Injection Well
Nested Monitoring Well
Temporary Well Construction Boundary
Outfall Connection Project Area
Ocean Outfall Pipeline
Highway 1
Pier Avenue
Monterey
Fresno
Kings
Kern
San Luis Obispo
Santa Barbara
Copyright (c) 2014 Esri
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Prepared by:
WSC
N
References:
1. Coordinate System: NAD 1983
Notes:
Prepared for:


Legend
Notes
Test Injection Well
Nested Monitoring Well
Sound Walls
Temporary Well Construction Boundary
Fire Hydrant
Fence
Pier Avenue
Highway 1
Truman Drive
Monterey
Kings
Kern
San Luis Obispo
Santa Barbara
Copyright (c) 2014 Esri
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Prepared by:
WSC
N
References:
1. Coordinate System: NAD 1983
Notes:
Prepared for:



DRAFT

Not Drawn To Scale

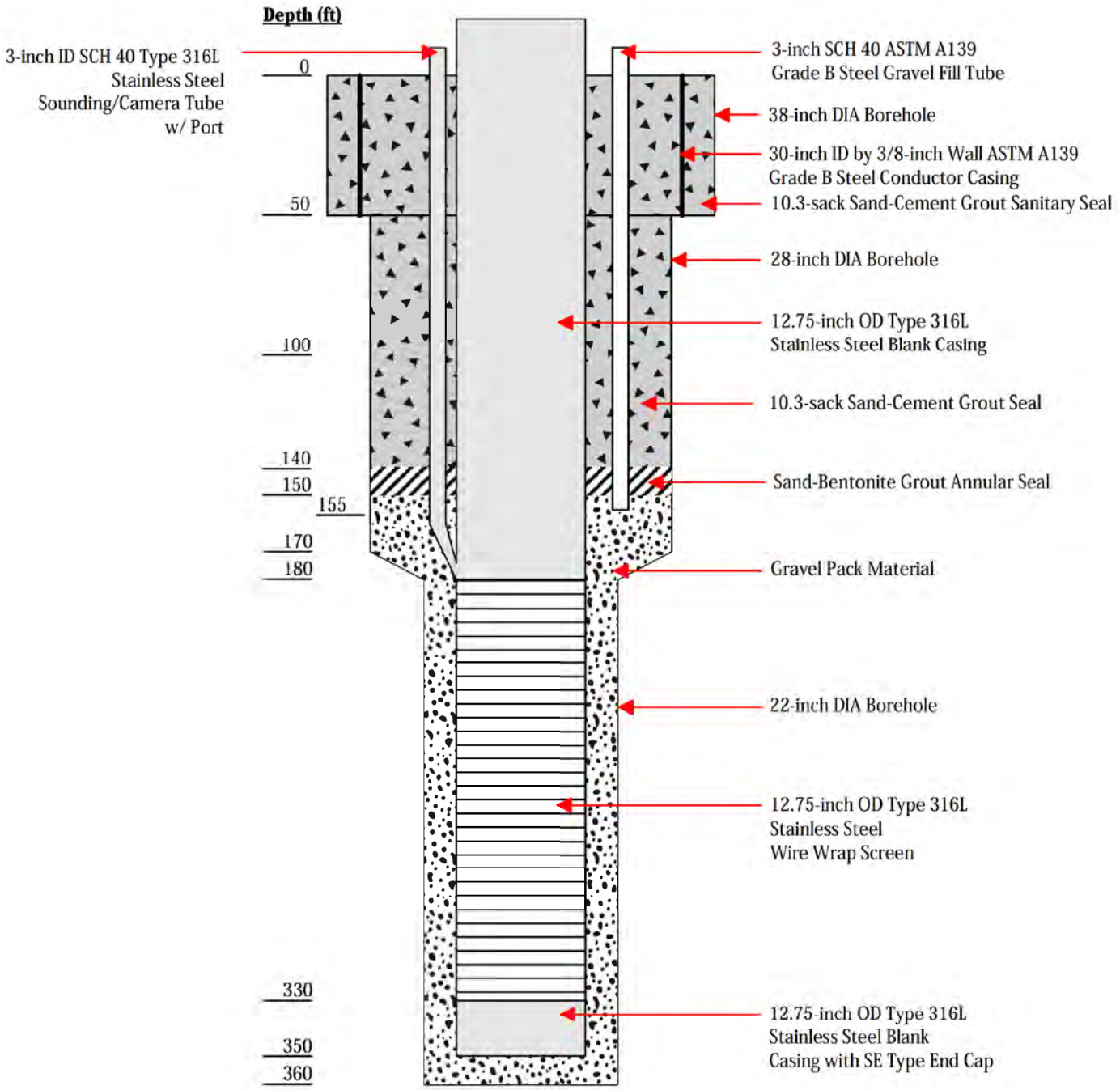
Prepared by:
WSC
Water Systems Consulting, Inc.
File Name:

Author:
10/28/2019

Notes
1. Final depth of borehole, well casings, filter pack size and interval, and well casing screen size will be determined based on results of pilot borehole drilling.
2. DIA = diameter; SCH = schedule; OD = outside diameter; ID = inside diameter; TYP = typical

Prepared for:
City of Pismo Beach

Preliminary Well Construction Design for MW-4A & -4B
Central Coast Blue - Regional Groundwater Study Program
Figure 4



Not Drawn To Scale

Prepared by:
WSC
Water Systems Consulting, Inc.
File Name:

Author:
10/28/2019

Notes
1. Final depth of borehole, well casings, gravel pack size and interval, and well casing screen size will be determined based on results of pilot borehole drilling.
2. DIA = diameter; SCH = schedule; OD = outside diameter; ID = inside diameter; TYP = typical

Prepared for:
City of Pismo Beach

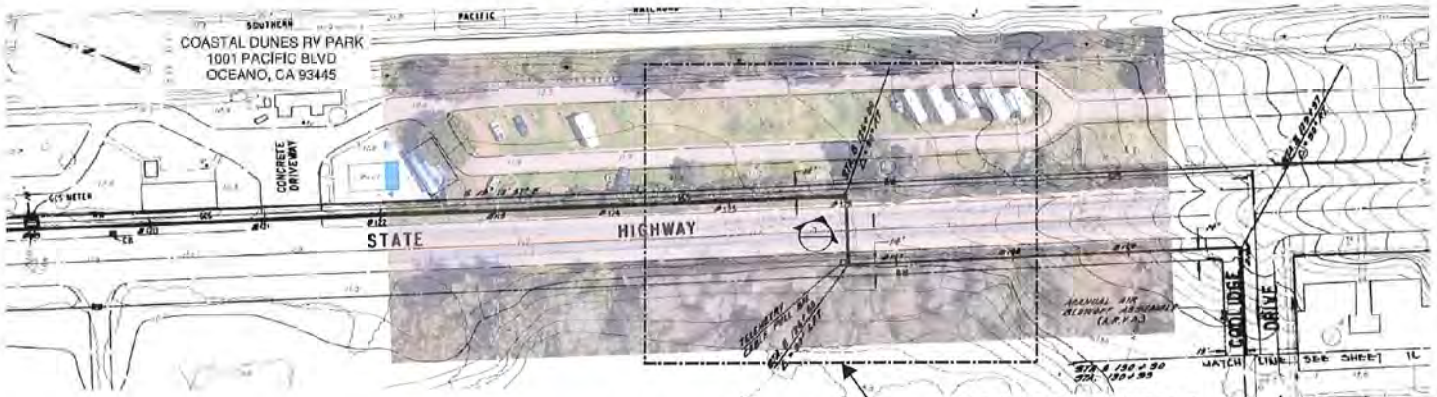
Preliminary Well Construction Design for IW-4
Central Coast Blue - Regional Groundwater Study Program
Figure 5

OUTFALL PIPING CONNECTION PLANS

CITY OF PISMO BEACH
JANUARY 2020

PIPE ABBREVIATION SCHEDULE

ACP	ASPHALT CEMENT PIPE
DIP	DUCTILE IRON PIPE
VCP	VITRIFIED CLAY PIPE



LOCATION MAP

SEE ENLARGED PLANS FOR PIPING IMPROVEMENTS

SHEET INDEX:

SHEET NO.	DRAWING NO.	DESCRIPTION
1	T-1	TITLE SHEET, LOCATION MAP AND SHEET INDEX
2	C-1	PLAN - OPTION A
3	C-2	PLAN - OPTION B
4	D-1	TYPICAL SECTION
5	D-2	SITE DETAILS

** NOTE: DRAWING BACKGROUNDS ARE BASED ON RECORD DRAWINGS. ACCURACY AND SCALES TO BE FIELD VERIFIED.

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CALL TOLL FREE 1-800-422-4133
TWO WORKING DAYS BEFORE YOU DIG

REV	DATE	BY	DESCRIPTION

DESIGNED: RGN & KNT
DRAWN: RGN & KNT
CHECKED:
SCALE:

PREPARED BY: Robb & Nash PE(Ret.) 76971 DATE 2/4/20

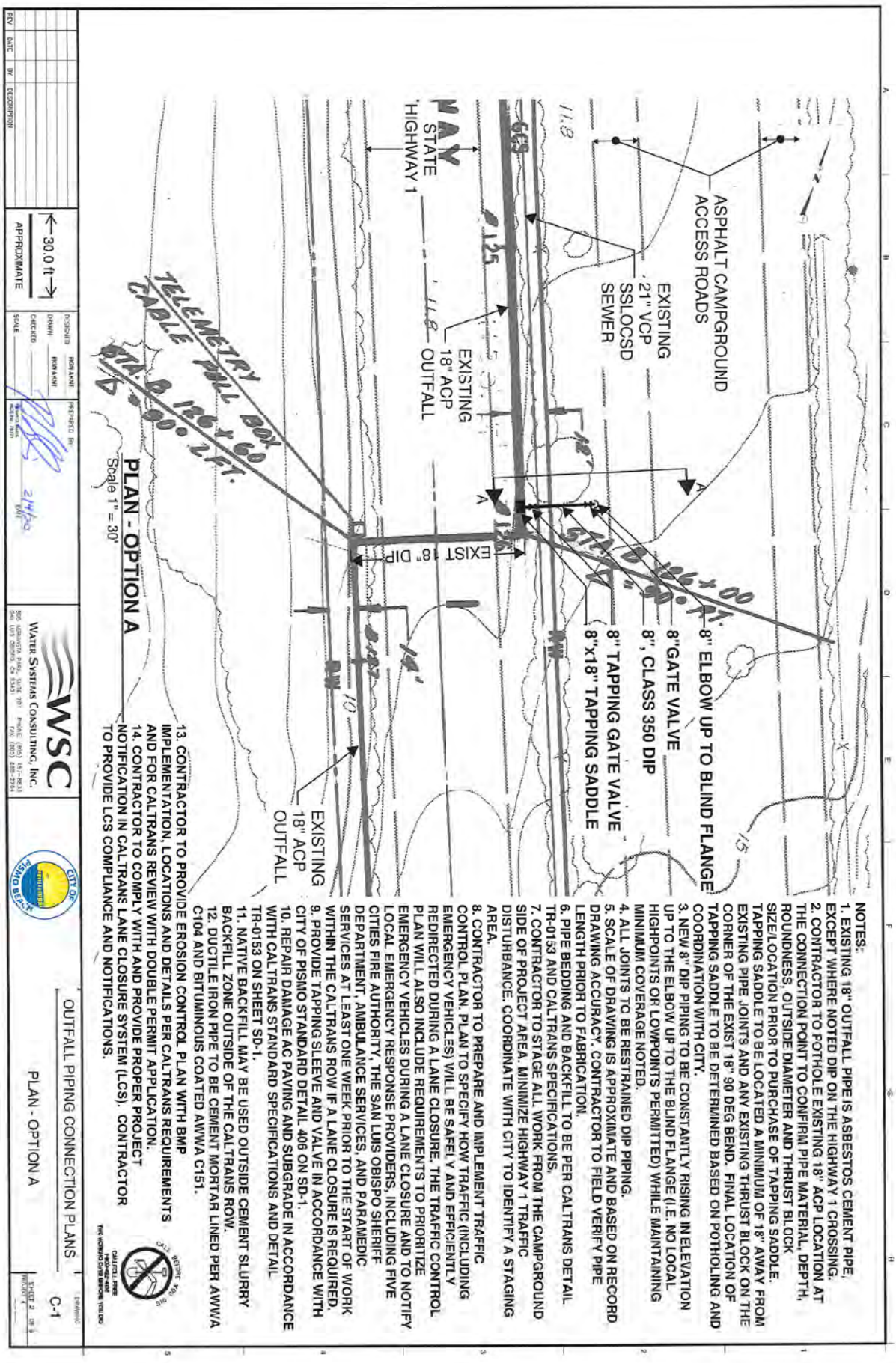
WSC
WATER SYSTEMS CONSULTING, INC.
835 ARCHASTA PARK, SUITE 201 SAN LUIS OBISPO, CA 93401
PHONE: (805) 457-9833 FAX: (805) 888-2764

OUTFALL PIPING CONNECTION PLANS

TITLE SHEET, LOCATION MAP AND SHEET INDEX

DRAWING: T-1

SHEET 1 OF 5
PROJECT #



NOTES:
1. EXISTING 18" OUTFALL PIPE IS ASBESTOS CEMENT PIPE, EXCEPT WHERE NOTED DIP ON THE HIGHWAY 1 CROSSING.
2. CONTRACTOR TO POTHOLE EXISTING 18" ACP LOCATION AT THE CONNECTION POINT TO CONFIRM PIPE MATERIAL, DEPTH, ROUNDNESS, OUTSIDE DIAMETER AND THRUST BLOCK SIZE/LOCATION PRIOR TO PURCHASE OF TAPPING SADDLE. TAPPING SADDLE TO BE LOCATED A MINIMUM OF 18" AWAY FROM EXISTING PIPE JOINTS AND ANY EXISTING THRUST BLOCK ON THE CORNER OF THE EXIST 18" 90 DEG BEND. FINAL LOCATION OF TAPPING SADDLE TO BE DETERMINED BASED ON POTHOLING AND COORDINATION WITH CITY.
3. NEW 8" DIP PIPING TO BE CONSTANTLY RISING IN ELEVATION UP TO THE ELBOW UP TO THE BLIND FLANGE (I.E. NO LOCAL HIGHPOINTS OR LOWPOINTS PERMITTED) WHILE MAINTAINING MINIMUM COVERAGE NOTED.
4. ALL JOINTS TO BE RESTRAINED DIP PIPING.
5. SCALE OF DRAWING IS APPROXIMATE AND BASED ON RECORD DRAWING ACCURACY. CONTRACTOR TO FIELD VERIFY PIPE LENGTH PRIOR TO FABRICATION.
6. PIPE BEDDING AND BACKFILL TO BE PER CALTRANS DETAIL TR-0153 AND CALTRANS SPECIFICATIONS.
7. CONTRACTOR TO STAGE ALL WORK FROM THE CAMPGROUND SIDE OF PROJECT AREA. MINIMIZE HIGHWAY 1 TRAFFIC DISTURBANCE. COORDINATE WITH CITY TO IDENTIFY A STAGING AREA.
8. CONTRACTOR TO PREPARE AND IMPLEMENT TRAFFIC CONTROL PLAN. PLAN TO SPECIFY HOW TRAFFIC (INCLUDING EMERGENCY VEHICLES) WILL BE SAFELY AND EFFICIENTLY REDIRECTED DURING A LANE CLOSURE. THE TRAFFIC CONTROL PLAN WILL ALSO INCLUDE REQUIREMENTS TO PRIORITIZE EMERGENCY VEHICLES DURING A LANE CLOSURE AND TO NOTIFY LOCAL EMERGENCY RESPONSE PROVIDERS, INCLUDING FIVE CITIES FIRE AUTHORITY, THE SAN LUIS OBISPO SHERIFF DEPARTMENT, AMBULANCE SERVICES, AND PARAMEDIC SERVICES AT LEAST ONE WEEK PRIOR TO THE START OF WORK WITHIN THE CALTRANS ROW IF A LANE CLOSURE IS REQUIRED.
9. PROVIDE TAPPING SLEEVE AND VALVE IN ACCORDANCE WITH CITY OF PISMO STANDARD DETAIL 406 ON SD-1.
10. REPAIR DAMAGE AC PAVING AND SUBGRADE IN ACCORDANCE WITH CALTRANS STANDARD SPECIFICATIONS AND DETAIL TR-0153 ON SHEET SD-1.
11. NATIVE BACKFILL MAY BE USED OUTSIDE CEMENT SLURRY BACKFILL ZONE OUTSIDE OF THE CALTRANS ROW.
12. DUCTILE IRON PIPE TO BE CEMENT MORTAR LINED PER AWWA C104 AND BITUMINOUS COATED AWWA C151.
13. CONTRACTOR TO PROVIDE EROSION CONTROL PLAN WITH BMP IMPLEMENTATION, LOCATIONS AND DETAILS PER CALTRANS REQUIREMENTS AND FOR CALTRANS REVIEW WITH DOUBLE PERMIT APPLICATION.
14. CONTRACTOR TO COMPLY WITH AND PROVIDE PROPER PROJECT NOTIFICATION IN CALTRANS LANE CLOSURE SYSTEM (LCS). CONTRACTOR TO PROVIDE LCS COMPLIANCE AND NOTIFICATIONS.

APPROXIMATE 30.0 ft

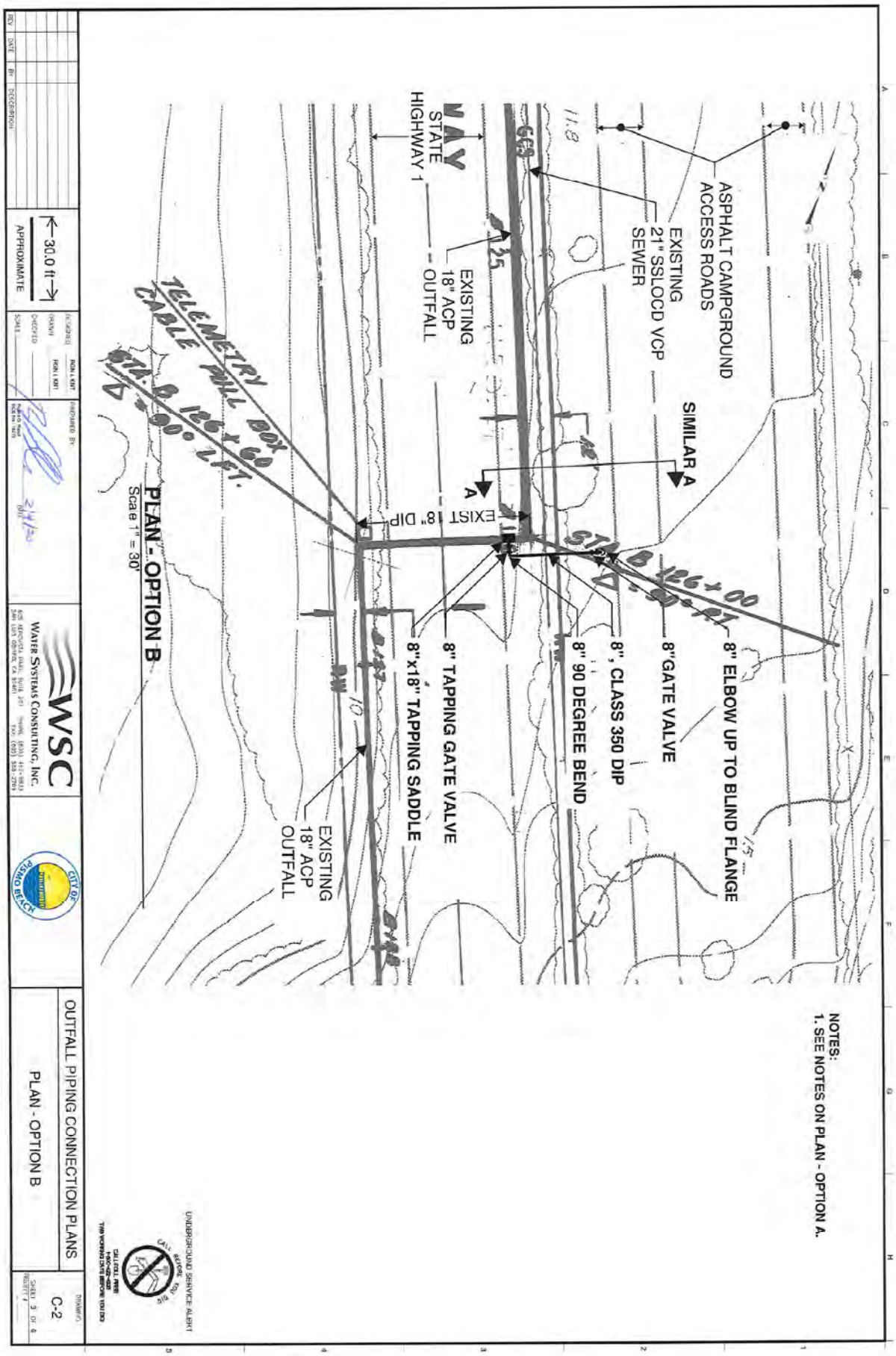
REV	DATE	BY	DESCRIPTION

DESIGNED RON KINT
DRAWN PREPARED BY
CHECKED
SCALE

WSC
WATER SYSTEMS CONSULTING, INC.
905 MONTEREY PARK, SUITE 201
PISMO BEACH, CA 93449
PHONE (805) 457-9633
FAX (805) 489-7214

CITY OF PISMO BEACH

OUTFALL PIPING CONNECTION PLANS
PLAN - OPTION A
C-1


NOTES:
1. SEE NOTES ON PLAN - OPTION A.
ASPHALT CAMPGROUND ACCESS ROADS
EXISTING 21" SSLOCD VCP SEWER
SIMILAR A
8" ELBOW UP TO BLIND FLANGE
8"GATE VALVE
8", CLASS 350 DIP
8" 90 DEGREE BEND
8" TAPPING GATE VALVE
8"x18" TAPPING SADDLE
EXISTING 18" ACP OUTFALL
HIGHWAY 1
EXISTING 18" ACP OUTFALL
EXIST 18" DIP
TELEMETRY CABLE
PULL BOX 16"x 60"
PLAN - OPTION B
Scale 1" = 30'
30.0 ft
APPROXIMATE
WATER SYSTEMS CONSULTING, INC.
OUTFALL PIPING CONNECTION PLANS
PLAN - OPTION B
C-2

SECTION A-A

Scale: NTS

NOTES:

1. ALL JOINTS TO BE RESTRAINED. BELOW GRADE PROVIDE RESTRAINED MECHANICAL JOINTS, ABOVE GRADE PROVIDE FLANGES, UNO.
2. VERTICAL PIPE OFFSET MAY BE ACHIEVED WITHOUT FITTINGS AT THE CONTRACTORS PREFERENCE. PIPE JOINTS MAY BE DEFLECTED UP TO 75% OF THE MANUFACTURERS ALLOWABLE DEFLECTION.
3. INSTALL VAULT AND LID PER MANUFACTURERS RECOMMENDATIONS. BASE OF VAULT TO BE OPEN TO 3/4" CRUSHED ROCK BEDDING. TOP OF CRUSHED ROCK BEDDING TO BE 6" BELOW BLIND FLANGE.
4. PROVIDE VALVE AND VALVE BOX PER CITY OF PISMO BEACH STANDARD DETAIL SD-407.

WSC
WATER SYSTEMS CONSULTING, INC.

OUTFALL PIPING CONNECTION PLANS

TYPICAL SECTION

D-1

PHOTO 1 - HWY 1 LOOKING AT COASTAL DUNES RV PARK & CAMPGROUND

Not to Scale

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811
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REV	DATE	BY	DESCRIPTION

DESIGNED: RDM & ENT
DRAWN: RDM & ENT
CHECKED:
SCALE:

PREPARED BY:
Robert D. Mora
RCE No. 76011
2/4/20
DATE

WSC
WATER SYSTEMS CONSULTING, INC.
8375 ARNOSIA PKWY, SUITE 201
SAN LUIS OBISPO, CA 93401
PHONE (805) 457-9933
FAX (805) 456-2201

CITY OF PISMO BEACH

OUTFALL PIPING CONNECTION PLANS

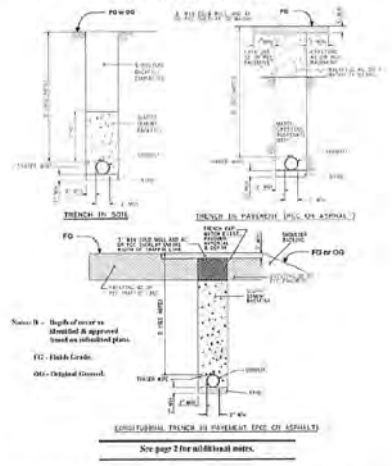
SITE DETAILS

DRAWING
D-2

SHEET 5 OF 6
PERMIT

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
ENCROACHMENT PERMIT TRENCH DETAIL

TYPICAL TRENCH DETAIL (NOT TO SCALE)



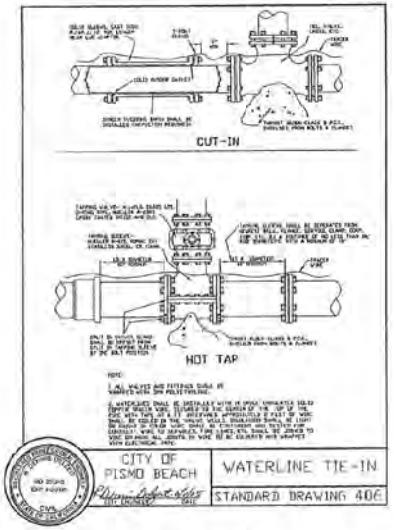
See page 2 for additional notes.

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
ENCROACHMENT PERMIT TRENCH DETAIL

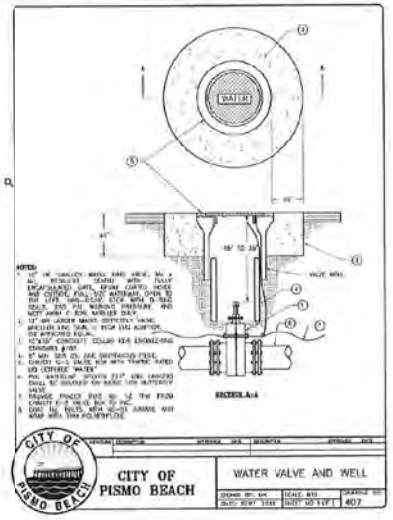
- All work must be authorized by the encroachment permit, and/or as directed by the State's representative.
- A tracer wire must be placed on top of the conduit unless specified not to.
- Clearance between the trench wall and encroachment work less than 6 inches in width shall be a minimum of 2 inches. Clearance between the trench wall and encroachment work greater than 6 inches width shall be a minimum of 6 inches.
- When the trench width is less than 2' the backfill for subgrade must consist of either slurry cement or Controlled Low Strength Material (CLSM).
- When trench width is greater than 2' compacted aggregate base may be used for backfill.
- Structure backfill must conform to Section 19-3.02C of the Standard Specifications.
- For trench located under unimproved surface, structure backfill can use the original soil. Soil must be compacted by mechanical means. Ponding, jetting or flooding are not allowed. Slurry cement backfill is optional at the discretion of the Caltrans District.
- Slurry cement backfill must conform to Section 19-3.02F of the Standard Specifications.
- Aggregate base shall conform to Section 26 of the Standard Specifications.
- CLSM must conform to Section 19-3.02G of the Standard Specifications. When CLSM is utilized the mix design and test results must be submitted to the State's representative. See Appendix H of the Encroachment Permits Manual for additional information.
- Cold planed surface and overlay shall be to the nearest lane line for the entire length of the trench/disturbed area, and/or as directed by the State's representative.
- A paving notch ("T" Cut) shall be cold planed in exist asphalt concrete to a minimum width of 1.0' beyond each side of the trench and to a depth of 2" for the final layer of HMA.
- HMA or PCC to replace pavement section shall match existing pavement depth, unless directed otherwise by the State's representative.
- Hot mix asphalt must conform to Section 39 of the Standard Specifications.
- A tack coat of asphaltic emulsion conforming to Section 39-2.01C (3) (f) shall be applied.
- When the trench is within 4' of curb and gutter, additional cold planing may be required at the discretion of the State's representative.
- Pavement markings and/or striping removed or damaged during construction must be replaced as directed by the State's representative.
- Other trench related details are shown in Chapter 6 of the Encroachment Permits Manual as well as the Trenching and Shoring Manual. Both publications can be found on the State of California, Department of Transportation's website.

CALTRANS TRENCH DETAIL TR-0153 - PG 1.
Not to Scale

CALTRANS TRENCH DETAIL TR-0153 PG. 2
Not to Scale



WATERLINE TIE-IN SD-406
Not to Scale



WATER VALVE AND WELL DETAIL SD-407
Not to Scale

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TWO WORKING DAYS BEFORE YOU DIG

REV	DATE	BY	DESCRIPTION

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PREPARED BY: 2/4/20 DATE

WSC
WATER SYSTEMS CONSULTING, INC.
840 MORRO BAY, SUITE 201 PHONE (805) 457-8833
SAN LUIS OBISPO, CA 93401 FAX (805) 388-3764

CITY OF PISMO BEACH

OUTFALL PIPING CONNECTION PLANS
STANDARD DETAILS

DRAWING SD-1
SHEET 6 OF 6
PROJECT #

Oceano Community Services District

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

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

www.oceanocsd.org

December 17, 2020

California Coastal Commission
Attn: Brian O'Neill
725 Front St., #300
Santa Cruz, CA 95060
Via email: Brian.O'Neill@coastal.ca.gov

Subject: Comments on Appeal of DRC2020-00050 by San Luis Obispo County Board of Supervisors to the California Coastal Commission; Project Location – 1001 Pacific Blvd., Oceano, San Luis Obispo County, CA 93445

Dear Mr. O'Neill,

We are aware that the subject Test Injection Well Project approved by the San Luis Obispo County Board of Supervisors on October 20, 2020 was appealed to the Coastal Commission on December 1, 2020. We are providing comments below related to statements made by the appellant in Appeal Contention 4 as they relate to the Oceano Community Services District (OCSD).

The appellant states that "the OCSD has declared they are not participating in the project at all". This statement is untrue. On January 11, 2017 and again on February 13, 2019, the OCSD Board voted unanimously to support inter-agency regional project development efforts for Central Coast Blue with the South San Luis Obispo County Sanitation District and the cities of Arroyo Grande, Grover Beach and Pismo Beach. These project development efforts would naturally include the subject Test Injection Well Project. In addition, on December 9, 2020, the OCSD Board considered ways to participate in Central Coast Blue and direction to staff on drafting an operating agreement for future consideration. This discussion was continued to the December 23, 2020 meeting and any action taken should be known at the time for hearing this appeal.

The appellant further states, "The County-approved project included no analysis of the potential short or long-term impacts nor did it include any mitigation or compensation to the OCSD for potential impacts to Well No. 8 and/or their adjudicated groundwater entitlement". There is no impact to the OCSD

groundwater entitlement as any groundwater extractions related to the Test Injection Well Project would come from the groundwater entitlement of the City of Pismo Beach. The appellant also makes inaccurate statements relating to the magnitude of groundwater extractions and the potential impacts to OCSD Well 8 from the extractions. The attached letter from Cleath-Harris Geologists, Inc. addresses those statements in further detail.

Based on a review of the appeal and information provided by Cleath-Harris Geologists, Inc. as well as the City of Pismo Beach, the OCSD continues to have no operational concerns with the subject Test Injection Well Project. Thank you for your consideration of these comments.

Sincerely,

Will Clemens
General Manager

Attachment: 121620 Letter from Cleath-Harris Geologists, Inc.

Cc: Matt Downing, AICP, Community Development Director, City of Pismo Beach

Cleath-Harris Geologists, Inc.
75 Zaca Lane, Suite 110
San Luis Obispo, CA 93401
(805) 543-1413

CHG

December 16, 2020

Will Clemens
General Manager
Oceano Community Service District
P. O. Box 599
Oceano, CA 93475

Subject: Response to Appeal Contention 4 related to the Coastal Development Permit for the Central Coast Blue Test Injection Well.

Dear Mr. Clemens,

As requested, Cleath-Harris Geologists (CHG) has prepared a response to portions of Appeal Contention 4 submitted by Mr. Jeff Edwards (Appellant) in regards to the Coastal Development Permit application for the Central Coast Blue Test Injection Well project. Our responses below follow excerpts from the Appeal.

Appeal Contention 4 – Magnitude of Groundwater Extractions

The Appellant has made several claims regarding the potential magnitude of groundwater extractions at injection well IW-4 during the project:

> *Based upon the project description in the Categorical Exemption, groundwater extractions are expected up to 1,500 gallons per minute. In just two–weeks, the project will have extracted and discharged to the ocean some 92.8 acre-feet. If the pumping continues for one-month, the total amount of groundwater wasted to the ocean will approach 185 acre-feet. For context, the entire community of Oceano, including approximately 7,600 residents uses about 55 acre-feet per month from all sources. Most recently, the OCSD pumped 147 acre feet in a one-year period, for comparison. Moreover, the Disadvantaged Community (DAC) of Oceano, possesses a 900 acre-foot groundwater entitlement (as adjudicated for the Santa Maria Groundwater Basin (SMGB), shown in Figure 4.8-3 attached). The Oceano Community Services District (OCSD) has reduced pumping to approximately sixteen percent (16%) or 147 acre-feet annually. Therefore, in just one-month, the proposed project may pump, with no beneficial use, over one hundred percent (100%+) of Oceano's most recent groundwater extractions indicated in the Northern Cities Management Area 2019 Annual Monitoring Report.* (Appeal Contention 4)

Response – Magnitude of Groundwater Extractions:

The anticipated volume of groundwater to be extracted from injection well IW-4 during the project is not accurately represented in Appeal Contention 4. The following paragraphs from the Central Coast Blue Test Injection Well Project Environmental Impacts Analysis (Rincon Consultants, February 6, 2020) describe the anticipated extraction volumes:

> *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 well and 100 to 1,500 gpm for the groundwater well. Well development would produce approximately 300,000 gallons* ***(0.9 acre-feet)*** *of water from the monitoring well and approximately 3,500,000 gallons* ***(10.8 acre-feet)*** *of water from the groundwater well, which would be discharged to temporary on-site water tanks for storage prior to disposal.* (Environmental Impacts Analysis, Page 6)
>
> *Upon completion of construction, a series of well pumping tests would occur at the groundwater well. Well pump tests would produce approximately 1,900,000 gallons* ***(5.7 acre-feet)*** *of groundwater, and pumped groundwater would be discharged to temporary storage tanks for release via the outfall connection point.* (Environmental Impacts Analysis, Page 7)

The total volume of groundwater extractions for development and testing for the project is estimated to be less than 18 acre-feet. Pumping rates between 100 gpm and 1,500 gpm represent the overall range of capacities for the test pumps. The Appellant has taken the maximum capacity of the injection well test pump and assumed continuous operation for up to a month, resulting in an extraction volume that is an order of magnitude greater than estimated for the project. Actual pumping rates and durations will be much less than assumed by the Appellant, as indicated by the total estimated extraction volumes reported above.

Appeal Contention 4 – Potential Impacts to OCSD Well 8

The Appellant is concerned that the project may impact the groundwater production capacity of Oceano Community Services District (OCSD) Well 8:

> *The OCSD primary groundwater extraction well, Well No. 8, is located less than one-half mile from IW-4, the key component of the proposed project. The proposed project may impact OCSD's Well No. 8, given its close proximity. Well No. 8 was the OCSD's only groundwater well in production during the 2019 reporting period.* (Appeal Contention 4)

Response – Potential Impacts to OCSD Well 8:

Well 8 is approximately 2,500 feet southeast of the proposed injection well IW-4, which is not in close proximity with respect to interference between pumping wells. Groundwater extractions during development and testing at injection well IW-4 will not significantly impact water levels at Well 8 or the ability of OCSD to provide municipal water deliveries.

Respectfully submitted,
CLEATH-HARRIS GEOLOGISTS

Spencer J. Harris, HG 633
Senior Hydrogeologist