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# Cayucos Sustainable Water Project

## Final Environmental Impact Report Response to Comments Volume

SCH#2016041078

April 2017



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Prepared By:  
Firma Consultants, Inc.



Prepared for:  
Cayucos Sanitary District  
200 Ash Avenue  
Cayucos, CA 93430





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April 2017

**FINAL**  
**Environmental Impact**  
**Report -**  
**Response**  
**to Comments Volume**  
SCH # 2016041078

**Cayucos Sustainable**  
**Water Project**

**Cayucos Sanitary District**  
200 Ash Avenue  
Cayucos, California 93430

Prepared by:

***firma***

*Landscape Architecture*  
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## **A. Introduction**

### **1. Relationship of the Final EIR to the Draft EIR**

The Final EIR is comprised of the Draft EIR (DEIR) for the Cayucos Sustainable Water Project published January 2017 and this Response to Comments Volume. Pursuant to the *CEQA Guidelines* section 15088, the Lead Agency (Cayucos Sanitary District) must evaluate comments on environmental issues received from persons who reviewed the Draft EIR and prepare a written response. This volume includes all the comment letters received with responses to these comments in Section B following. The Office of Planning and Research State Clearinghouse date for the close of the 45-day comment period was March 29, 2017.

The written responses in the volume were transmitted to each commenter on April 10, 2017, ten days in advance of the hearing date of April 20 for CSD Board of Directors action to certify the EIR, as prescribed by CEQA.

Where the commenter's position is at variance with the Lead Agency's position set forth in the DEIR, consistent with CEQA, the responses to comments describe reasons why specific comments or suggestions were not accepted.

The CEQA Guidelines section 15088 states responses to comments may take the form of a revision to the draft EIR or may be a separate section in the Final EIR. This Final EIR includes all the pages of the DEIR that have been changed in response to comments received and further information available.

Pursuant to the *CEQA Guidelines* section 15097, Appendix B of the FEIR contains the Mitigation Monitoring Plan for the CSWP.

### **2. Summary of changes to the Draft EIR**

The CSD received six comment letters from the following entities:

- Northern Chumash Tribal Council
- County of San Luis Obispo Department of Planning and Building
- County of San Luis Obispo Department of Public Works
- County of San Luis Obispo Air Pollution Control District
- Caltrans
- The City of Morro Bay Community Development Department

In response to these comments, minor changes, clarifications and additions have been made to the DEIR as shown on the following pages. Deleted text has a strike through and added text is underlined.

Additional clarifying text has been added to DEIR section IV-L Land Use and Planning to detail consistency with the City of Morro Bay General Plan and Local Coastal Plan. More detail has been added to the discussion of the CEQA required "No Project" alternative.

A County Public Works Department requested mitigation measure TR-2 has been added to further ensure no significant impacts to the condition and safety of public roads during, and as a result of, construction identified in Impact TR-1. This added measure is not in response to a new impact.

Subsequent subsurface geotechnical investigations have determined that a segment of pipeline along Toro Creek Road may be feasibly directionally bored under Toro Creek and cultural resources present in that area. As a result, the Project has been changed to include directional boring for approximately 800 feet under Toro Creek and this resource. The change in the project avoids impacts to cultural resources and removes the need for a pipe bridge over Toro Creek. As a result, impacts to ESHA and visual resources in the Coastal Zone are also avoided. Boring under the creek is consistent with best mitigation practices identified in the Coastal Zone Land Use Ordinance section 23.07.174 to avoid impacts to surface waters.

Documentation of the feasibility of this Project change and mitigation strategy is contained in the Appendix A of this FEIR including a Technical Memo from GeoSolutions geotechnical engineers, a constructability letter from Filanc (the general contractor for the CSWP), and confirmation of no adverse effect on cultural resources from Applied Earthworks Archaeologists.

## **B. Comments and Responses**

The following pages include the comment letters received with each comment identified by a number, followed on the next page by responses to each numbered comment.



# Northern Chumash Tribal Council

*A Native American Corporation - NorthernChumash.org  
67 South Street, San Luis Obispo, CA 93401 805-801-0347*

Letter 1

Robert Enns, Board President  
Cayucos Sanitary District  
P. O. Box 333  
Cayucos, CA 93430

March 22, 2017

Re: CSWP

Dear Robert,

The Northern Chumash Tribal Council (NCTC) would like to thank you and the Cayucos Sanitary District (CSD) for reaching out to NCTC early in this project. It has always been our understanding that if a project starts out with transparency and all stake holders working together the outcome is always good. We also want to thank Rick Koon for his professionalism in working through our potential constraints, and coming up with great solutions for the management of California Native American Cultural Resources that are in CSWP footprint and/or near the project. 1.1

NCTC is in support of this project, we will send a letter to the Coastal Commission and the County Board of Supervisors.

Thank you again for reaching out to our community early in this project, NCTC gives our blessing for this project.

Fred Collins  
Tribal Administrator  
Northern Chumash Tribal Council

**ENVIRONMENTAL & LAND-USE CONSULTING  
EDUCATIONAL SERVICES TEACHING NATURE, NATIVE CULTURES &  
FARMING**

## Responses to Letter 1-Northern Chumash Tribal Council

- 1.1 The commenter supports the impact analysis, conclusions and mitigation measures in the EIR, no response needed.



March 24, 2017

Letter 2

Firma  
David Foote, ALSA  
187 Tank Farm Road  
San Luis Obispo, CA

Subject: Planning and Building Comments on the Cayucos SWP Draft EIR

Dear Mr. Foote,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Cayucos Sanitary District's (CSD's) Sustainable Water Project (project). 2.1

The Cayucos Sanitary District is the Lead Agency on the project as it is the primary public agency responsible for implementing the project. The County of San Luis Obispo is a Responsible Agency since it has land use authority in the unincorporated areas of the county and will be issuing permits for the project. The County anticipates using the CSD's EIR as the environmental determination for the required permits and will incorporate the recommended mitigation measures into the County's conditions of approval.

The Department of Planning and Building understands the project involves construction of conveyance infrastructure in the Coastal Zone and a water resource recovery facility (WRRF) in the Inland Area of the county. Development in the Coastal Zone will require a Development Plan / Coastal Development Permit and will be subject to the County's Local Coastal Plan, including Title 23 (Coastal Zone Land Use Ordinance), Coastal Plan Policies, and the Estero Area Plan. The WRRF component of the project will require a Conditional Use Permit and will be subject to Title 22 (Land Use Ordinance) and Adelaida planning area standards. All elements of the project will be reviewed for consistency with the County General Plan.

The Cayucos CSD submitted a combined Development Plan / Coastal Development Permit and Conditional Use Permit for the project on December 21, 2016. The Planning and Building Department reviewed this application and, on January 20, 2017, issued a letter requesting additional information. This information will be required before staff can process the application and bring it forward to a Planning Commission hearing.

Responses to Letter 2 – County of San Luis Obispo Department of Planning and Building

2.1 The comment describes the County role as the land use authority, no response is needed.

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We look forward to reviewing the Final EIR prior to its certification. If you need clarification or additional information regarding any of the information provided in this letter, please do not hesitate to contact me at [asingewald@co.slo.ca.us](mailto:asingewald@co.slo.ca.us) or (805) 781-5198.

Sincerely,



Airlin M. Singewald  
Senior Planner



March 23, 2017

Letter 3

Firma  
 David Foote, ALSA  
 187 Tank Farm Road  
 San Luis Obispo, CA 93401

Subject: Public Works Comments on the Cayucos Sustainable Water Project Draft Environmental Impact Report

Dear Mr. Foote,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Cayucos Sanitary District Sustainable Water Project (project). The County of San Luis Obispo Department of Public Works understands that the project includes two phases:

Phase 1 includes construction of a new Water Resource Recovery Facility (WRRF), a two-acre solar array, related conveyance pipelines, production of tertiary treated water for agricultural irrigation, and discharge of process water to the existing ocean outfall. This phase would also include participation and coordination in the decommissioning of the existing Morro Bay / Cayucos Wastewater Treatment Plant in Morro Bay.

Phase 2 is the construction of a conveyance pipeline for recycled water to the CSA 10 Surface Water Treatment Facility.

Our Utilities, Development Services, and Environmental Divisions have reviewed the NOP and offer the following comments:

No.	DEIR Ref.	Comment
1.	p. I-6	Planning and Building would also process the Public Lot application as well as the Conditional Use Permit
2.	p. I-19 & II-32 TR-1 & p. IVG-12	Montecito Road fronting the alternative project site is a County maintained gravel road, the addition of project trips both during construction and during operation would result in additional road maintenance costs to the County. We recommend a mitigation that requires Montecito Road to be vacated and removed from the County road maintenance system, or requires the project owner to enter into an agreement with the County to provide ongoing maintenance of Montecito Road between the project site and Old Creek Road.

3.1

3.2

Response to Letter 3 – County of San Luis Obispo Department of Public Works

3.1 Comment noted.

3.2 Should the Proposed Project go forward on the Alternative site on Montecito Road, this measure would be a Condition of Approval by the land use authority, San Luis Obispo County.

3.3

No.	DEIR Ref.	Comment
3.	p. I-21 & II-32 TR-1 & p. IVG-12 & pgs. IVG-12, 13	<p>To mitigate construction traffic damage to County maintained roads a condition requiring the project owner to enter into an agreement with the County to maintain the roads during construction, and to repair the roadways to pre-construction conditions or better prior to project final is recommended.</p> <p>MM TR-2 (recommended):</p> <ol style="list-style-type: none"><li>1. <b>Prior to commencing any work</b>, the Applicant shall submit for review and approval by the County Department of Public Works, and other affected agencies as requested, a Road Restoration Plan (RRP) to maintain public roads during construction, and to repair the roadways to pre-construction conditions or better prior to project final. At a minimum, the RRP should address the following:<ol style="list-style-type: none"><li>a. A video or photo log of the proposed construction route roads to establish baseline ("before construction") conditions of the pavement and adjacent shoulders.</li><li>b. Identify the current Pavement Condition Index (PCI) of the construction route roadways.</li><li>c. Identify a procedure for addressing public complaints in a timely manner on public roads due to construction related traffic operations.</li><li>d. Identify a procedure for timely response to repair damage to public roads during construction including, but not limited to, pothole repairs, edge of pavement repairs, and shoulder repairs.</li><li>e. Identify a procedure to restore public roads to a condition equal to or better than pre-construction conditions prior to project final.</li></ol></li><li>2. <b>Prior to final inspection</b>, the Applicant's licensed civil engineer must meet with the County Department of Public Works, and other affected agencies as requested, to review the baseline road conditions and field identify sections of the public right-of-way that may have been damaged by the project work forces. The project owner shall establish a schedule to complete the repairs or compensate the respective agency for repairs in accordance with the Roadway Repair Agreement.</li></ol>
4.	n/a	<p>To mitigate construction traffic operational and safety constraints on public roads a condition requiring a licensed civil engineer to evaluate the construction routes and provide recommendations as needed to minimize impacts.</p>

3.4

3.3 On page IVG-12 the DEIR does not identify a significant impact upon the pavement based on the County's pavement inventory ranking, therefore no mitigation is identified. The CSD would anticipate that the suggested measure will be a Condition of Approval of the CSD's Conditional Use Permit and Coastal Development Permit for the Project.

3.4 Mitigation Measure TR-1 has been modified to include the language set forth in this comment as additional mitigation for a Class II impact on traffic during construction.

No.	DEIR Ref.	Comment
		<p>MM TR-3 (recommended):</p> <ol style="list-style-type: none"> <li>1. <b>Prior to commencing any work</b>, the Applicant shall submit for review and approval by the Department of Public Works, and other affected agencies, a letter report prepared by a licensed civil engineer that identifies roadway operational and safety constraints along the construction route, and recommendations to mitigate identified impacts. At a minimum, the report should address the following:               <ol style="list-style-type: none"> <li>a. Roadway operational constraints including pavement widening to prevent off tracking of construction vehicles, slope setbacks, vegetation trimming, etc.</li> <li>b. Roadway safety constraints including intersection sight distance, construction signage, etc.</li> </ol> </li> </ol> <p>The Applicant must secure an encroachment permit from the respective agency to construct improvements in accordance the encroachment permit conditions. All improvements must be completed prior to commencement of project-related construction activities.</p>
5.	Page I-16	<p>The Phase 2 pipeline to CSA 10 is proposed to cross Old Creek on the existing footbridge. There are already 2 water lines (CSA 10 raw water line and CSA 10A distribution main) on this bridge, so whether the bridge can accommodate an additional line should be considered. If not, an alternative crossing should be considered in the EIR.</p>
6.	Page I-16	<p>At this time, the CSA 10 water treatment plant is not able to accept and treat the effluent from the Project for direct potable reuse.</p>

3.5

3.6

We look forward to review of the Final EIR prior to its certification. If you need clarification or additional information regarding any of the information provided above, please do not hesitate to contact me at [kballantyne@co.slo.ca.us](mailto:kballantyne@co.slo.ca.us) or at (805) 788-2765.

Sincerely,



Kate Ballantyne  
Environmental Division Manager

File: CF 450.20.03

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3.5 In the event the final design of this pipeline crossing is a pipe bridge instead of hanging the pipe on the existing Old Creek bridge, the EIR identifies the regulatory setting within the Coastal Zone for ESHA and creeks on pages IV-C4-6, consistency with CZLUO policy on page IV-C26, and impacts and mitigation on IV-C27-28. Cultural Resources and Visual Resource regulatory issues and impacts and mitigation are addressed for a pipe bridge in sections IV-E and IV-F.

3.6 The EIR text on page I-16 acknowledges that the future transmission of recycled water to CSA 10 is contingent on regulatory changes and the decisions of the water purveyors to accept the water.



Air Pollution Control District  
San Luis Obispo County

Letter 4

March 27, 2017

Firma  
David Foote, ASLA  
187 Tank Farm Road  
San Luis Obispo, CA 93401

SUBJECT: APCD Comments Regarding the Cayucos Sustainable Water Project Draft Environmental Impact Report

Dear Mr. Foote:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Cayucos Sustainable Water Project Draft Environmental Impact Report (DEIR).

The proposed project is the construction of a Water Resource Recovery Facility to serve the community of Cayucos. The Project consists of two phases; Phase 1 includes construction of a new Water Resource Recovery Facility, related conveyance pipelines, production of tertiary treated water for agricultural irrigation, and discharge of process water to the existing ocean outfall. This phase would also include participation and coordination in the decommissioning of the existing Morro Bay / Cayucos Wastewater Treatment Plant in Morro Bay. Phase 2 is the construction of a conveyance pipeline for recycled water to the CSA 10 Surface Water Treatment Facility.

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

The second paragraph on page IV-I11 of the DEIR states, "Tier 3 diesel particulate filters will be used on excavators, graders, dozers, and tractors/loaders/backhoes." It is unclear from this statement whether the proposal is to utilize equipment outfitted with Tier 3 engines or with Level 3 particulate filters, and how many, or what percentage, of the equipment would be so outfitted. This proposal to use cleaner-than-required equipment is commendable, and the APCD encourages efforts to reduce emissions; however, neither Tier 3 engines nor Level 3 particulate filters would be required on this project to meet the APCD emissions thresholds. As illustrated in Table IV-I2 and in the *CalEEMod* emissions modeling report provided in the Technical Appendix to the DEIR, this project will be below APCD thresholds for criteria pollutants and DPM, with or without the Tier 3 or Level 3 mitigation measures.

4.1

## Responses to Letter 4- San Luis Obispo County Air Pollution Control District

4.1 Comment noted; no change to the EIR is required because the effect of the Project related to DPM is identified as less than significant.

*Cayucos Sustainable Water Project DEIR*  
*March 27, 2017*  
*Page 2 of 2*

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 805-781-5912.

Sincerely,



Vince Kirkhuff  
Air Quality Specialist

VJK/ihs

cc: Mr. Rick Koon, Cayucos Sanitary District

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**DEPARTMENT OF TRANSPORTATION**

50 HIGUERA STREET  
SAN LUIS OBISPO, CA 93401-5415  
PHONE (805) 549-3111



*Serious Drought.  
Serious drought.  
Help save water!*

Letter 5

March 27, 2017

Rick Koon  
Cayucos Sanitary District  
PO Box 333  
Cayucos, CA 93430

05-SLO-1-30.14  
SCH#2016041078

COMMENTS THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CAYUCOS  
SUSTAINABLE WATER PROJECT

Dear Mr. Koon:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report (DEIR) for the proposed Cayucos Sustainable Water Project (CSWP) as it relates to State Route 1 and State Route 41.

The DEIR identifies that “The CSWP includes infrastructure, pipelines and appurtenances for influent, effluent, recycled water and processed discharge water within public rights of way including but not limited to Toro Creek Road, State Route 1, Ocean Blvd. Main Street in Morro Bay, and Atascadero Road/Highway 41 in Morro Bay (Map I-2), totaling 1.62 acres of disturbance over approximately 14,113 linear feet of pipeline.” In anticipation of encroachment into Caltrans right of way for State Routes 1 and 41, we offer the following detailed comments regarding Caltrans encroachment permit requirements:

Installation of any pipeline within the State’s right of way will require an encroachment permit and an exception to Caltrans encroachment permit utility policy that would have to be approved by Caltrans Headquarters Division of Design. If approved, any pipeline permitted to be located within the State’s right of way will likely require encasement for the entire length. It would also be required to have a two foot vertical clearance if crossing any existing Caltrans culverts. A slurry backfill will be required for any pipelines proposed to be located under existing Caltrans pipeline and existing highway bridges would be unavailable for pipe attachment. Any construction in the State’s right of way may also require upgrading certain highway features such as pavement, signal facilities, curb ramps, and trees.

5.1

Please note that the conditions of approval and the requirements for the encroachment permit are issued at the sole discretion of the Permits Office and nothing in this letter shall be implied as a comprehensive list of requirements nor shall limit future conditions and requirements. For more information regarding the encroachment permit process, please visit the District 5 Encroachment Permit Website at: <http://www.dot.ca.gov/dist05/permit/index.htm>. The Caltrans *Encroachment Permit Manual* with details regarding our engineering and environmental standards can be accessed at: <http://www.dot.ca.gov/trafficops/ep/manual.html>.

## Responses to Letter 5- Caltrans

5.1 The comment addresses encroachment permit requirements and likely conditions of permit approval that may be applied. The requirements outlined do not change the impacts identified in the EIR or require new or different mitigation.

Mr. Koon  
03/27/2017  
Page 2

Thank you for the opportunity to review and comment on this project. We appreciate the opportunity to provide input on this project as it relates to State Routes 1 and 41. Please feel welcome to contact me at [Melissa.streder@dot.ca.gov](mailto:Melissa.streder@dot.ca.gov) or 805-549-3800 if you have any questions regarding the comments provided.

Sincerely,



Melissa Streder  
Planning and Development Review  
Caltrans District 5

cc. Cindy Utter



**CITY OF MORRO BAY**  
COMMUNITY DEVELOPMENT DEPARTMENT  
955 Shasta Avenue  
Morro Bay, CA 93442

Letter 6

March 27, 2017

David Foote, firma

Re: Response to NOA on DEIR for Cayucos Sustainable Water Project

Dear David,

I want to first thank you for meeting with John Rickenbach and myself last Friday March 24, 2017 to discuss our concerns/questions. As discussed, we have reviewed the DEIR for the Cayucos Sustainable Water Project and have developed the following comments in response to the document:

1. Page I-1. The EIR correctly notes the City of Morro Bay as a Responsible Agency. However, its responsibilities go beyond the pipelines in the City limits. The City is also co-owner of the existing outfall, which will be used as part of this project, and should be considered part of the overall project description, with impacts related to the tie-in and its continued shared use pursuant to a renewed permit from the RWQCB considered in the document. In addition, the City will have permitting authority over the decommissioning of the existing WWTP and reuse of that site, which is located in the City. The existing WWTP is co-owned by the City and CSD, and its decommissioning needs to be considered as part of the proposed project, since it is not only reasonably foreseeable, but an integral part of both the CSD's and City's efforts to relocate wastewater treatment functions away from its current location pursuant to direction by the Coastal Commission. Impacts related to the continued use of the outfall and WWTP decommissioning need to be considered throughout the document, because under CEQA the whole of a project must be considered, and not just the aspects for which an agency is seeking permits in the short-term. These actions are being considered in the Draft EIR currently being prepared by the City of Morro Bay for its own Water Reclamation Facility. The two documents need to have a consistent and comprehensive approach, so that future actions related to the use of the outfall or decommissioning of the existing WWTP are fully addressed under CEQA. 6.1
2. Page I-7. The project would ultimately need coordination with City of Morro Bay on decommissioning the existing WWTP. This should be added to the list of subsequent discretionary actions. 6.2
3. Page I-9. Map would be more clear if it showed all project components on the Map I-2 and renamed as such, including the boundaries of the treatment facility itself (as shown on Map I-1). 6.3
4. Page I-18. Any modifications to existing conveyance pipeline infrastructure must be identified as part of the project, as must decommissioning of the existing WWTP. Impacts related to these facilities must be identified. See previous comment to that effect. 6.4

## Responses to Letter 6- City of Morro Bay Community Development Department

6.1 The CSD and EIR used the following logic to determine that decommissioning was not necessarily a foreseeable action at the time of the CSWP Notice of Preparation and that in the event that decommissioning was ripe for action and CEQA review, the City of Morro Bay would conduct CEQA for that action:

The EIR and Initial Study relied upon the City's WWTF decommissioning report prepared by Black and Veatch dated August 28, 2015, where under section 3.1 the City of Morro Bay is identified as the lead agency responsible for the CEQA document on the decommissioning project as follows: "The City of Morro Bay will be the Lead Agency under the requirements of the CEQA and will prepare an EIR for the overall Morro Bay WRF project. The decommissioning and repurposing/cleanup of the existing WWTP is one component of the Morro Bay WRF project."

Further, the Draft Water Reclamation Facility Master Plan (November 2016) section 10.5.3 identifies the permitting of the decommissioning project as being supported by the City's EIR.

It is understood the City is preparing an EIR for their new facility and that consistent information regarding common project issues in the CSWP EIR and the City EIR is desirable. However, at the time of the CSWP Notice of Preparation in April 2016, which serves as the environmental baseline condition for the CSWP EIR, the August 2015 Black and Veatch decommissioning report was the most current information available to the CSD related to the City's plans for the WWTF. At that time, there was uncertainty on the City's path to a new facility and the many variables and frequent changes along this path are well documented.

By reducing the flows to the WWTF, the CSWP project would make the existing WWTF compliant with the Clean Water Act and the Regional Water Control Board settlement agreement, resulting in the possibility of the City staying at that location for the foreseeable future. Given these uncertainties and the preliminary nature of City plans at the time of the CSWP NOP, the CSD believes it was correct in not including the decommissioning as part of the Proposed Project.

Last, and perhaps most importantly, it is unclear how two parallel and redundant analyses in the respective EIRs, with the possibilities of differing conclusions, is helpful to either party.

6.2 For the reasons detailed above, the decommissioning is not considered part of this Proposed Project and listing the decommissioning as a discretionary action covered in the EIR is not appropriate.

6.3 The requested information is depicted elsewhere in the EIR, for example on Map IV- A3.

6.4 The detailed description of the proposed pipelines is on page I-16 of the EIR. The impacts to these pipelines, including those in Morro Bay, are discussed in the respective EIR sections. For example, pertinent sections in Morro Bay include Traffic, Noise, Geology, and Cultural Resources.

5. Page I-20. Decommissioning is part of the whole of the project, and its conceptual impacts must be considered in the Draft EIR. Even if the timing isn't clear, the fact that it must happen in conjunction with the project is known (it's a driving consideration in Coastal Commission's CDP denial of the existing WWTP upgrade in January 2013), and the impacts can be analyzed. See previous comments to that effect. 6.5
6. Page II-1. Agricultural Resources is listed twice. Please clarify. 6.6
7. Page II-6. There needs to be a different approach to the No Project Alternative evaluated in the Draft EIR that assesses what would occur if there was truly no project undertaken; i.e., remaining at the current WWTP site, and assuming that the City would remain there too. Although the DEIR dismisses this as a non-starter because of the CCC's 2013 denial of the CDP at the current site, the EIR needs to evaluate this option to comply with CEQA Guidelines Section 15126.6.e., even if it does not intend to pursue this option, because it provides the background context for better understanding the relative impacts of the proposed project. The true "no project-no build" scenario would likely avoid some environmental impacts, but introduce not only a variety of policy consistency issues, but could have important impacts related to safety, flood hazard, and risk of upset. This is an important analysis to include to allow a meaningful comparison of possible actions, particularly for the benefit of the Coastal Commission, RWQCB, and the general public, especially those living near the WWTP site, or the City of Morro Bay in general, who has land use permitting authority over that site. The current version of the "No Project Alternative" in the Draft EIR is more appropriately considered as another project alternative, rather than the CEQA-required No Project Alternative. 6.7
8. Page II-6. Note that the City of Morro Bay's preferred site is now called the "South Bay Boulevard site", not the "Tri-W site". Please change this reference throughout the document. 6.8
9. Page II-7. The Alternative Outfall Location must be approved by the Coastal Commission as a prerequisite of determining feasibility. Has the Draft EIR evaluated this from a policy consistency perspective, or other perspectives related to marine biology, cultural resources, or public safety? 6.9
10. Page II-7. It appears that the Alternative Outfall Location is potentially environmentally superior based on the analysis of that option on this page, particularly the third paragraph of that analysis. Why is it not identified as such? 6.10
11. Page II-38. The discussion under Impact EJ-2 is cut off, and does not continue on Page II-39. Please correct. 6.11
12. Page II-40. The beneficial impact shown for Impact AQ-7 can only be realized following the decommissioning of the existing WWTP, but this feature of the project is not analyzed in the Draft EIR. If, for example, the CSD is operating a new WRRF prior to the City of Morro Bay's new similar facility comes online, there would be emissions from both the new WRRF and the existing WWTP simultaneously. In that case, there is no beneficial impact. This is one good example why the existing WWTP decommissioning should be evaluated as part of this Draft EIR. 6.12

- 6.5 See response 6.1
- 6.6 The listing of Agricultural Resources twice is a typographical error.
- 6.7 See additional discussion of this No Project scenario in the FEIR on pages V10-V12.
- 6.8 See the revised project site name on pages V10-V12 and page V20.
- 6.9 The Alternative outfall is in original jurisdiction of the Coastal Zone and would be permitted by the Coastal Commission. For the purposes of a general alternative discussion and not for detailed study in anticipation of a specific design and permit application, the DEIR identified several key topics for comparison with the existing outfall only.
- 6.10 As described in response 6.9 above because the policy consistency and other topics germane to Coastal Commission approval of this Alternative were not discussed, the DEIR did not identify the alternative outfall as superior to the existing outfall.
- 6.11 This print error is corrected in the FEIR Summary of Impact and Mitigation Measures Table.
- 6.12 The DEIR air quality analysis quantified the portion of energy attributable to the CSD wastewater flow processing at the WWTF. The resulting energy at the WWTF without the CSD wastewater combined with the energy demand at the proposed WRRF is a net energy benefit because the WRRF is more efficient. Therefore the benefit is present even if the WWTF is not decommissioned.

13. Page III-9. Would a new outfall be subject to a County CDP, or would this aspect of the project be processed directly through the Coastal Commission? Please clarify. 6.13
14. Page II-10. There is no discussion of City of Morro Bay policies, and yet aspects of the project could not be brought online without regulatory approval of the City. This discussion should be added to the EIR, including a consistency analysis with relevant policies. This would include any pipeline modifications or maintenance needed for the portions of the pipelines that are within the City, the continued use of the existing outfall, and the decommissioning of the existing WWTP. Note that the latter is not addressed or analyzed in the Draft EIR, but likely should be, because it is part of the whole of the project action. 6.14
15. Page III-18. Table III-5. Land Use and Planning should also consider the City of Morro Bay's relevant policies, as they relate to pipelines traversing the City, the continued use of the existing outfall, and the decommissioning of the existing WWTP. Impacts to biological and cultural resources associated with the WWTP decommissioning should also be considered in the context of City of Morro Bay policies. 6.15
16. Section IV-A. General. Geologic impacts associated with continued pipeline operation and maintenance through the City of Morro Bay should be discussed. The maps in this section clearly show potential issues for analysis and possible mitigation, such as liquefaction and tsunami inundation. 6.16
17. Page IV-B-33. Pipelines through the City of Morro Bay, use of the exiting outfall, and the decommissioning of the existing WWTP are appropriately referenced as project components in the analysis of impacts to agricultural resources. These facilities should be analyzed for all other issues as well in the EIR. 6.17
18. Section IV-C. General. Need to discuss biological resource impacts associated with the decommissioning of the existing WWTP in the City of Morro Bay. Refer to appropriate City LCP and Coastal policies as needed. 6.18
19. Section IV-E. General. Need to discuss cultural resource impacts associated with the decommissioning of the existing WWTP in the City of Morro Bay. Refer to appropriate City LCP and Coastal policies as needed. 6.19
20. Page IV-G-11 and page IV-G-13. Pipelines through the City of Morro Bay, as well as the decommissioning of the existing WWTP, are appropriately analyzed as a project component in the traffic section (see Table IV-G3). These facilities should also be analyzed for all other issues as well in order in the EIR. 6.20
21. Section IV-H. General. Need to discuss noise impacts associated with the decommissioning of the existing WWTP in the City of Morro Bay. Refer to appropriate City LCP and Coastal policies as 6.21

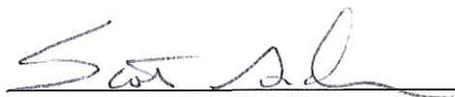
- 6.13 The alternative outfall is located primarily within the Coastal Zone original jurisdiction area since it is re-activating an existing pipeline. However, the actual tie-in location east of SR 1 is outside original jurisdiction and would require a CDP from the County.
- 6.14 See revised pages IV-L8 to L13 in the FEIR, and response 6.1.
- 6.15 See revised pages IV-L8 to L13 in the FEIR, and response 6.1. With respect to continued operation and maintenance of pipelines, the effects would be the same as the existing baseline condition: hazards due to breakage, liquefaction and tsunami inundation are inherent in both the baseline condition and new pipelines. There are no other substantial issues related to continued operation of pipelines.
- 6.16 The Geologic effects of pipeline operation in the City of Morro Bay are addressed in section IV-A and depicted on Map IV-A3 Liquefaction Hazard and Map IV-A4 Tsunami Inundation Zone.
- 6.17-6.21 See response to 6.1.

needed. Discussion in the cumulative section regarding decommissioning should be reframed to be part of the overall project, as discussed in previous comments.

22. Section IV-J. General. Need to discuss hazards impacts associated with the decommissioning of the existing WWTP in the City of Morro Bay. There is little or no analysis to support the conclusion that such impacts would be less than significant, although that conclusion may be possible with additional analysis. Refer to appropriate City LCP and Coastal policies as needed. 6.22
23. Section IV-L. General. Need to discuss land use and planning impacts associated with the use and maintenance of pipelines in the City of Morro Bay, decommissioning of the existing WWTP in the City of Morro Bay, and continued use of the existing outfall. Refer to appropriate City LCP and Coastal policies as needed. 6.23
24. Section IV-N. General. See previous comments related to the discussion of project alternatives, particularly the appropriate discussion of the No Project Alternative. 6.24
25. Page V-20. Table V-3. Does the righthand column compare the existing outfall to the Chevron outfall, or vice versa? It's hard to tell which option "less impact" is referring to, for example. 6.25

We appreciate the opportunity to provide comment on the DEIR for the Cayucos Sustainable Water Project. Should you have any questions concerning the comments noted above, please feel free to contact me at your convenience.

Regards,



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- 6.22 The DEIR makes no conclusion regarding the potential for impacts from hazardous material during decommissioning of the WWTF because decommissioning is not part of the Proposed Project or the whole action as described in response 6.1.
- 6.23 Use and maintenance of the pipelines in Morro Bay are addressed in response 6.15 above. See also response 6.14.
- 6.24 See response 6.7.
- 6.25 See revised Table on page V-20 of the FEIR. The header was switched to read Chevron Outfall vs Existing Outfall so that "less impact" means the Chevron outfall is less than the existing outfall.

### **C. Draft EIR Pages with text additions and deletions**

The following pages show the additions and deletions to the Draft EIR based on comments received and additional information to reduce and avoid impacts. The entire Table II Summary of Impacts and Mitigation Measures from the DEIR with changes is included for convenience.

**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS I. SIGNIFICANT UNAVOIDABLE IMPACTS THAT CANNOT BE FULLY MITIGATED**

<p><b>Impact GEO-8.</b> Due to the locations of critical infrastructure sites that will be connected via pipelines, certain pipeline sections will not be able to avoid portions of the tsunami inundation zone. Pipeline segments along SR1, the CSA 10 facility, and the outfall segment between SR1 and the coast, are located within the maximum tsunami inundation zone (i.e., less than 50 feet above mean sea level). Mitigation measures can be implemented to reduce the impact. However, the pipeline outfall will be vulnerable to damage from wave erosion if a significant tsunami occurs at that location. The potential impact of tsunami inundation on Project components near the coast is a significant and unavoidable impact</p> <p><b>Impact AG-1:</b> Construction of the WRRF and solar array on the Project Site will result in the permanent conversion of Prime Farmland as defined by the San Luis Obispo County Conservation and Open Space Element. This impact is considered significant and unavoidable</p>	<p><b>Mitigation Measure GEO-8.</b> Mitigation strategies for infrastructure located within tsunami inundation zones shall be implemented and include, as determined applicable, measures such as flexible connections, double lined pipes, strengthened pipes, automatic shutoff valves and similar measures to prevent the release of wastewater and treated water to the environment</p> <p><b>Mitigation Measure AG-1:</b> Prior to the issuance of grading permits, the Cayucos Sanitary District shall provide evidence to the County Department of Planning and Building that a farmland conservation easement, a farmland deed restriction, or other farmland conservation mechanism has been granted in perpetuity to the County or a qualifying entity approved by the County Agricultural Commissioner (or designee). The easement shall provide conservation acreage at a ratio of 2:1 for direct project impacts. The area conserved shall be of a quality that is reasonably similar to that of farmland within the project limits (as determined by the County Agricultural Commissioner or designee).</p>	<p>Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS I. SIGNIFICANT UNAVOIDABLE IMPACTS THAT CANNOT BE FULLY MITIGATED**

<p><b>Impact AG-6:</b> Development of the WRRF on either the Project Site of the Alternative Site, together with regional development, will contribute to the cumulative loss of Prime Farmland as defined by the County Conservation and Open Space Element. This impact is considered cumulatively considerable and significant and unavoidable.</p> <p><b>Impact N-2:</b> Construction activities associated with the pipeline conveyances and outfall connection would result in short term exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. This impact is considered significant and unavoidable (Class I) after application of Mitigation Measure N-1.</p> <p><b>Impact N-4:</b> Construction related activities associated with the Project pipeline infrastructure, together with noise generated by the construction of other reasonably foreseeable related projects in the region, will temporarily increase noise levels</p>	<p><b>Mitigation Measure N-1:</b> The CSD shall require construction contractors to adhere to the following noise attenuation requirements:</p> <ul style="list-style-type: none"> <li>• Construction activities shall be limited to between the hours of 7 a.m. to 9 p.m. on any day except Saturday or Sunday or between the hours of 8 a.m. to 5 p.m. on Saturday or Sunday.</li> <li>• All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.</li> <li>• Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 300 feet from the nearest residence, unless safety or technical factors take precedence.</li> <li>• Stationary combustion equipment such as pumps or generators operating within 100 feet of any residence shall be shielded with a noise protection barrier.</li> </ul>	
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**CLASS I. SIGNIFICANT UNAVOIDABLE IMPACTS THAT CANNOT BE FULLY MITIGATED**

<p>in the region and result in temporary noise impacts. These impacts are considered than cumulatively considerable and unavoidable (Class I) after application of Mitigation Measure N-1.</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact GEO-1.</b> The geologic impact of site construction activities and operation is a significant impact that can be mitigated with appropriate mitigation measures</p>	<p><b>Mitigation Measure GEO-1.</b> Design-Level Geotechnical Investigation and Report: a geotechnical design investigation should be performed to provide final recommendations and geotechnical design criteria for specific project components, such as structures, foundations, pipelines, pump stations, loading conditions, excavations, grading, dewatering, drainage and other site work. The geotechnical design investigation should include additional field exploration for specific structures, and include testing and analyses as needed to provide a basis for design criteria and construction recommendations in accordance with local (County of San Luis Obispo) regulations and the applicable California Building Code (CBC). As part of the geotechnical design investigation for the Project, creek crossings for pipelines should be investigated and evaluated with respect to the methods of crossings. If horizontal directional drilling methods (HDD) are proposed, then HDD feasibility investigations should be performed for each location where that method is being considered. The geotechnical design report shall include geotechnical design criteria for creek crossings, which may include recommendations for pipeline burial depths, methods of crossing, trench or trenchless design parameters, and lateral setbacks. Recommendations for specific crossings shall be incorporated into the Project plans and specifications prior to construction of the pipeline.</p>	<p align="center">Less than Significant</p>
<p><b>Impact GEO-2.</b> The impact of surface fault rupture on certain pipeline segments is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-2A.</b> The geotechnical design investigation for the project (Mitigation Measure GEO-1) should include appropriate geologic fault evaluations of the Cambria fault to develop project-specific design parameters for pipeline sections crossing the fault. The fault evaluations should be directed towards, but not necessarily be limited to, defining the location and width of the fault zone at the pipeline-fault crossings. Since the fault traces are concealed beneath young geologic deposits, the fault zones may be difficult to define with precision. Consequently, fault zone widths should incorporate conservative</p>	

**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact GEO-3:</b> The impact of strong seismic shaking on project structures is a significant impact that can be mitigated with appropriate mitigation measures.</p> <p><b>Impact GEO-4.</b> The impact of seismically-induced ground failures, including liquefaction, lateral spreading and seismic densification, is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p>assumptions for pipeline design. Pipeline crossings of fault traces shall be designed to accommodate potential flexure and horizontal and vertical offsets based on the results of the geologic fault evaluations (Mitigation Measure GEO-2A). Fault rupture mitigation strategies for pipelines may include measures such as flexible connections, gravel trench backfill, double lined pipes, strengthened pipes, automatic shutoff valves and similar measures to prevent the release of product to the environment.</p> <p><b>Mitigation Measure GEO-3:</b> Project structures should be designed to resist lateral forces generated by earthquake shaking in accordance with the current building code, State pipeline safety standards and applicable design practice. The design-level geotechnical report (Mitigation Measure GEO-1) should include recommendations for seismic data for design that may be updated for the new code requirements, additional subsurface information, or further site-specific analyses. Appropriate seismic ground motion parameters should be estimated and incorporated into project design by the project engineer.</p> <p><b>Mitigation Measure GEO-4.</b> The design-level geotechnical report (Mitigation Measure GEO-1) should include evaluations of liquefaction potential and estimated liquefaction-induced settlement based on field exploration, testing and analysis of site conditions for final project components (WRRF and pipelines). The potential effects of other seismically induced ground failures should also be evaluated, including lateral spreading and seismic densification. Engineering design measures should be provided where estimated ground deformations exceed typical foundation and structural design parameters. seismic densification. Engineering design measures should be provided where estimated ground deformations exceed typical foundation and structural design parameters.</p> <p>The liquefaction, lateral spreading and</p>	<p align="center">Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact GEO-5.</b> The impact of landsliding and slope instability is a significant impact that can be mitigated with appropriate mitigation measures.</p> <p><b>Impact GEO-6.</b> The impact of soil erosion and loss of topsoil due to construction and operation of Project components is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p>seismic settlement evaluations should be conducted in accordance with guidelines published by the California Geologic Survey (formerly the California Division of Mines and Geology) and relevant local and professional standards. At a minimum, the liquefaction hazard evaluation and mitigation study should be undertaken in a manner consistent with the Guidelines for Evaluation and Mitigation of Seismic Hazards in California, Chapter 6, Analysis of Liquefaction Hazards (CGS Special Publication 117A, 2008).</p> <p><b>Mitigation Measure GEO-5.</b> The design-level geotechnical report (Mitigation Measure GEO-1) should include evaluations of landsliding, creek bank instability and other types of slope instability settlement based on field exploration, testing and analysis of site conditions for final project components (WRRF and pipelines). The potential impact of slope instability on the construction and operation of the WRRF should be evaluated as part of the geotechnical design investigation and report (Mitigation Measure GEO-1). Mitigation measures to reduce the potential for damage due to slope movement should be developed for the depths and types of slope movements that may impact the pipelines at the locations identified in the landslide evaluations.</p> <p><b>Mitigation Measure GEO-6.</b> An Erosion Control Plan (ECP), including elements of a Storm Water Pollution Prevention Plan (SWPPP), should be prepared by a geotechnical or civil engineer, consistent also with Mitigation Measure WQ-1. The ECP and SWPPP would describe measures intended to reduce erosion and deposition in to local creeks and the Pacific Ocean.</p>	<p>Less than Significant</p>
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact GEO-7.</b> The impact of expansive soils on Project components is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-7.</b> Testing of samples in a geotechnical laboratory is the standard method of quantifying the expansibility of materials, and should be performed as part of design-level geotechnical studies for the selected WRRF site and pipeline routes (Mitigation Measure GEO-1). If expansive materials are identified, then appropriate design and construction measures should be provided to mitigate the adverse effects. The design-level geotechnical investigation should provide specific recommendations to address expansive soil conditions for the design of foundations, flatwork, pavement, pipelines and other site work.</p>	<p align="center">Less than Significant</p>
<p><b>Impact WQ-3:</b> The Proposed Project could result in significant construction-stage erosion and sedimentation impacts until site grading and preparation reached the stage that the proposed spill containment basin is functioning to capture all site runoff This is a significant but mitigable impact.</p>	<p><b>Mitigation Measure WQ-1:</b> To mitigate impacts identified in Impact WQ-3 related to construction stage erosion and sedimentation, the Project will be required to comply with the General Permit including but not limited to compliance with 1) the State General Construction Activity Permit, as most recently modified by the State Water Resources Control Board (SWRCB), and 2) County standards under the Stormwater Ordinance Title 19 chapter 19.09, ensuring that construction-related sediment or other contaminants that could adversely affect receiving water would be reduced to a less-than-significant impact.</p>	
<p><b>Impact CUL-2:</b> Without special design considerations, installation of the new pipelines to and from the WRRF along Toro Creek Road would have the potential to significantly and adversely impact CA-SLO-879/H, a significant historical resource and a tribal cultural resource. However, implementation of Mitigation Measure CUL-2 would avoid and minimize these effects. With implementation of this measure, no historical or tribal cultural resources would be disturbed by the project, and</p>	<p><b>Mitigation Measure CUL-2:</b> To avoid any adverse effect on CA-SLO-879/H, the proposed pipelines along Toro Creek Road shall be placed only on the north side of the road and shall be directionally drilled under the maximum depth of cultural deposits. Three bore pits shall be installed along the pipeline alignment in previously disturbed areas, where cultural materials are sparse and lack integrity. The exact location of the bore pits and segment to be directionally drilled shall be dictated in the Final Cultural Resources Impact Assessment Report prepared for the project by Applied Earthworks. All work related to pipeline installation along Toro Creek Road shall be</p>	

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p>impacts would be reduced to less than significant levels.</p> <p><b>Impact CUL-3:</b> The potential exists for inadvertent discovery of cultural resources during pipeline construction. This impact is potentially significant</p> <p><b>Impact VIS-3:</b> The proposed project would result in a short term but significant impact on visual resources until the proposed screen planting grows to an extent to substantially screen the WRRF. This impact is significant can be mitigated to less than significant.</p> <p><b>Impact VIS-4:</b> The Project will add a new source of substantial light or glare which would adversely affect nighttime views in the area, a significant but mitigable impact.</p>	<p>monitored by an archaeologist and Native American representatives. If at any point, the pipeline design requirements specified in the Cultural Resources Impact Assessment Report cannot be met, the project shall be halted and San Luis Obispo County and other responsible agencies contacted to determine the next course of action to protect historical or tribal cultural resources in compliance with California and federal law.</p> <p><b>Mitigation Measure CUL-3:</b> To minimize potential impacts due to inadvertent discovery of cultural resources in site and pipeline areas with no evidence of resources, and consistent with LUO sections 22.05.140 and 23.10.040, the applicant shall prepare and implement a pre-construction Worker Education Program to train workers to recognize cultural resources and understand the procedures for stopping work and reporting the discovery.</p> <p><b>Mitigation Measure VIS-2:</b> To mitigate short-term impacts on visual resources until planting matures, a final landscaping plan shall be prepared for the project site consistent with the preliminary landscape plan evaluated in the EIR and approved by the County prior to building permit issuance. The landscape plan shall emphasize native plant materials and shall include sufficient planting to screen views of the project from Toro Creek Road. The planting shall be designed to achieve substantial screening of the WRRF within 7 years.</p> <p><b>Mitigation VIS-3:</b> To mitigate potentially significant impacts from a new source of substantial light or glare which would adversely affect nighttime views in the area, a final lighting plan shall be prepared and implemented for the WRRF. The plan shall include proper shielding, proper orientation, and minimum height standards to achieve safe light levels on the ground. All lighting fixtures shall be shielded so that neither the lamp nor the related reflector interior surface is visible from adjacent properties. Light</p>	<p>Less than Significant</p>
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact TR-2:</b> Construction activities associated with the Project Site or Alternative Site, along with connection to the outfall at the existing WWTF, and construction of pipeline conveyances will result in temporary and short-term impacts related to the safe operation of streets and intersections due to the presence of workers, equipment, lane closures and open trenches. This impact is considered significant unless mitigated.</p>	<p>hoods shall be dark-colored.</p> <p><b>Mitigation Measure TR-1:</b> Prior to building permit issuance a Traffic Management Plan shall be prepared for review and approval by the County of San Luis Obispo Public Works Department and the City of Morro Bay Public Works Department. The traffic management plan shall be based on the type of roadway, traffic conditions, duration of construction, physical constraints, nearness of the work zone to traffic and other facilities (bicycle, pedestrian, driveway access, etc.). The traffic management plan shall include:</p> <ul style="list-style-type: none"> <li>• Advertisement. An advertisement campaign informing the public of the proposed construction activities should be developed. Advertisements should occur prior to beginning work and periodically during the course of project construction.</li> <li>• Property Access. Access to parcels along the construction area shall be maintained to the greatest extent feasible. Affected property owners shall receive advance notice of work adjacent to their property access and when driveways would be potentially closed.</li> <li>• Schools. Any construction adjacent to schools shall ensure that access is maintained for vehicles, pedestrians, and bicyclists, particularly at the beginning and end of the school day.</li> <li>• Buses, Bicycles and Pedestrians. The work zone shall provide for passage by buses, bicyclists and pedestrians, particularly in the vicinity of schools.</li> <li>• Intersections. Traffic control (i.e. use of flag men) shall be used at intersections that are determined to be unacceptably congested due to construction traffic.</li> </ul>	<p align="center">Less than Significant</p>
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<p><b>Impact AQ-1</b> Construction emissions are below the SLOAPCD significance thresholds. Therefore, construction of the Proposed Project would be consistent with the Clean Air Plan. However, fugitive dust from construction has the potential to result in a violation of SLOAPCD Rule 401 (Visibility) and/or Rule 402 (Nuisance) without mitigation. Impacts would be significant but reduced to less</p>	<p><b>Mitigation Measure TR-2:</b> To mitigate construction stage impacts (Impact TR-2), prior to commencing work the CSD shall submit for review and approval by the County Department of Public Works, and other affected agencies as requested, a Road Restoration Plan (RRP) to maintain public roads during construction and to repair the roadways to pre-construction conditions or better prior to final closeout of County permit(s). At a minimum the RRP should address the following: RRP should address the following:</p> <ul style="list-style-type: none"> <li>• A video or photo log of the proposed construction route roads to establish baseline (before construction) conditions of the pavement and adjacent shoulders.</li> <li>• Identify the current Pavement Condition Index (PCI) of the construction route roadways.</li> <li>• Identify a procedure for addressing public complaints in a timely manner on public roads due to construction related traffic operations.</li> <li>• Identify a procedure for timely response to repair damage to public roads during construction including but not limited to, pothole repairs, edge of pavement repairs, and shoulder repairs.</li> <li>• Identify a procedure to restore public roads to a condition equal to or better than pre-construction conditions prior to final permit closeout.</li> </ul> <p><b>Mitigation Measure AQ-1:</b> The following standard SLOAPCD dust control measures shall be implemented:</p> <ol style="list-style-type: none"> <li>a. The amount of the disturbed area shall be minimized;</li> <li>b. Water trucks or sprinkler systems shall be used in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency shall be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water or an</li> </ol>	<p>Less than Significant</p>
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<p>than significant levels with implementation of mitigation measures.</p> <p><b>Impact AQ-3:</b> Construction of the new pipelines associated with the Proposed Project could disturb rock formations containing NOA. Impacts would be significant without mitigation.</p>	<p>APCD-approved dust suppressant should be used whenever possible;</p> <p>c. All dirt stock pile areas shall be sprayed daily and covered with tarps or other dust barriers as needed;</p> <p>d. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established;</p> <p>e. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;</p> <p>f. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;</p> <p>g. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;</p> <p>h. All trucks hauling dirt, sand, soil, or other loose materials shall be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;</p> <p>i. Wheel washers and/or rumble strips shall be installed where vehicles enter and exit unpaved roads onto streets; and</p> <p>The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. The name and telephone number of such persons shall be provided to the APCD Engineering &amp; Compliance Division prior to the start of any grading, earthwork or demolition.</p> <p><b>Mitigation Measure AQ-2:</b> Prior to starting any ground-disturbing construction activities for the new influent, effluent, or RW pipelines to CSA-10, the applicant shall conduct a geologic evaluation for NOA along the pipeline routes following the Guidelines for</p>	<p>Less than Significant</p>
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact AQ-4:</b> Due to the proximity of Morro Bay High School and several residences to the installation routes for new pipelines, idling of construction equipment could pose a significant health risk to these sensitive receptors due to diesel particulate matter emissions.</p>	<p>Geologic Investigations of Naturally Occurring Asbestos in California (California Geologic Survey [CGS] Special Publication 124, 2002) to determine whether the construction of the pipelines has the potential to disturb NOA, and if so, how many acres. If no NOA is expected to be disturbed, the applicant shall submit a request for an exemption from CARB's Asbestos ATCM, along with the geologic evaluation report. If NOA is expected to be disturbed, the SLOAPCD must be notified and preparation and approval of an Asbestos Dust Mitigation Plan and Asbestos Health and Safety Program may be required.</p> <p><b>Mitigation Measure AQ-3:</b> The applicant shall implement the following idling control techniques:</p> <p>California Diesel Idling Regulations</p> <p>a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:</p> <ul style="list-style-type: none"> <li>• Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and</li> <li>• Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.</li> </ul> <p>b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.</p> <p>c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.</p>	<p>Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact AQ-5:</b> Potential odor nuisance impacts on nearby residents would be potentially significant without mitigation. However, implementation of mitigation would ensure that impacts are reduced to less than significant levels.</p> <p><b>Impact HZ-2:</b> Operation of the WRRF on either the Project Site or Alternative Site will involve the transport, storage, usage, and disposal of hazardous materials associated with the wastewater treatment process. This impact is considered significant unless mitigated.</p> <p><b>Impact HZ-4:</b> Operation of the WRRF on either the Project Site or Alternative Site and conveyance pipelines may result in the accidental spill of untreated wastewater which could adversely impact surface water quality and other pose a threat to human health and biological resources.</p>	<p>Diesel Idling Restrictions Near Sensitive Receptors (i.e., Morro Bay High School and Residential Dwellings along the Pipeline Routes)</p> <p>In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:</p> <ul style="list-style-type: none"> <li>a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;</li> <li>b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;</li> <li>c. Use of alternative fueled equipment is recommended; and</li> </ul> <p>Signs that specify the no idling areas must be posted and enforced at the site.</p> <p><b>Mitigation Measure AQ-4:</b> Prior to receipt of the Authority to Construct (ATC) from the SLOAPCD for the project, the applicant must submit an Odor Monitoring and Complaint Response Plan for review and approval by the SLOAPCD.</p> <p><b>Mitigation Measure HZ-1:</b> Prior to final occupancy/operation of the project, a Hazardous Materials Business Plan in accordance with California Health and Safety Code Sections 25503 and 25505 shall be submitted to, and approved by, the San Luis Obispo County Department of Environmental Health.</p> <p><b>Mitigation Measure HZ-2:</b> To mitigate impacts related to a untreated wastewater spill the CSD shall modify it's existing Sanitary Sewer Management Plan to include WRRF and pipeline operations.</p>	<p align="center">Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p>This impact is considered significant unless mitigated.</p> <p><b>Impact HZ-6:</b> Construction of the WRRF on either the Project Site or Alternative Site and associated solar array will expose people and structures to a significant risk of loss, injury or death associated with wildfires. This impact is considered significant unless mitigated.</p> <p><b>Impact HZ-7:</b> Construction activities associated with the WRRF on either the Project Site or Alternative Site and pipeline conveyances has the potential to result in a hazard to the public or the environment by mobilizing disease vectors, such as the fungus that causes Valley Fever, that may be present in the soil. This impact is considered significant unless mitigated.</p>	<p><b>Mitigation Measure HZ-3:</b> The Applicant shall provide a written Fire Safety and Evacuation Plan whose contents shall be in accordance with sections California Fire Code Chapter 4 Emergency Planning and Preparedness. Employee training, record keeping, hazard communication and drills will also comply with this chapter. The written plan will include at a minimum the detail outlined in sections 404.3.1 (Evacuations Plans) and 404.3.2 (Fire Safety Plans).</p> <p><b>Mitigation Measure HZ-4:</b> To minimize the risk of exposure to disease vectors, activities with the potential to mobilize spores associated with Valley Fever, the CSD shall implement the following measures, <u>as applicable</u>:</p> <ol style="list-style-type: none"> <li>a. Implement all of the mitigation measures relating to the control of dust during construction activities;</li> <li>b. Prohibit eating and smoking at the project site and provide separate, clean eating areas with hand-washing facilities;</li> <li>c. Avoid outdoor operations during unusually windy conditions;</li> <li>d. Limit ground disturbing activities during the fall to essential jobs only, as the risk of cocci infection is higher during this season.</li> <li>e. Thoroughly clean equipment, vehicles, and other items before they are moved off-site to other work locations;</li> <li>f. Train workers to recognize that cocci may be transported offsite on contaminated equipment, clothing, and shoes; alternatively, consider installing boot-washing stations; and</li> <li>g. Post warnings onsite and consider limiting access to visitors, especially those without adequate training and</li> </ol>	<p align="center">Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact HZ-8:</b> Construction activities associated with the WRRF on either the Project Site or Alternative Site has the potential to expose construction workers and CSD staff to potentially hazardous concentrations of environmentally-persistent pesticides, herbicides and fertilizers. This impact is considered significant unless mitigated.</p> <p><b>Impact GRO-1:</b> The Project could result in indirect impacts on the environment related to growth induced by the provision of an additional water supply, including but not limited to, increased traffic, noise, vehicular emissions, loss of vegetation and wildlife forage area, loss of visual quality and watershed impacts. This impact is significant but mitigable.</p>	<p align="center">respiratory protection.</p> <p><b>Mitigation Measure HZ-5:</b> Prior to construction activities that involve soil disturbance, the CSD shall develop and implement a Soil Sampling and Analysis Plan to determine the presence and extent of any residual herbicides, pesticides, and fumigants on historically-farmed land in agricultural areas that would be disturbed during ground-disturbing activities associated with the project. The Plan shall be prepared in consultation with the San Luis Obispo County Department of Environmental Health Services and the work shall be conducted by an appropriate California-licensed professional and samples sent to a California Certified laboratory. At a minimum, the Plan shall document the areas proposed for sampling, the procedures for sample collection, the laboratory analytical methods to be used, and the pertinent regulatory threshold levels for determining proper excavation, handling, and, if necessary, treatment or disposal of any contaminated soils. The Plan shall be submitted to the Department and the San Luis Obispo County Department of Environmental Health Services for review and approval at least 60 days before construction. Results of the laboratory testing and recommended resolutions for excavation, handling, dust control, and treatment/disposal of material found to exceed regulatory Practices shall be submitted to the Department prior to construction.</p> <p><b>Mitigation Measure GRO-1:</b> To avoid potentially significant growth inducing effects, the CSD shall limit the sale of tertiary treated water for domestic use to water purveyors serving lots within the Urban Reserve Line for Cayucos as set by the County and LAFCO.</p>	<p align="center">Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact BIO-2:</b> Impacts to nesting birds, including special status birds, may occur in ruderal areas with thick vegetation, eucalyptus trees and riparian trees within the Proposed Project construction area. Impacts to nesting birds are potentially significant, but mitigable.</p> <p><b>Impact BIO-3:</b> Potential habitat for the special status plant Club-haired mariposa lily occurs in a small patch of annual grassland at the southern end of the Proposed Project Study Area. This habitat is outside the limits of grading, however potential adverse effects are possible therefore the impact is significant but mitigable.</p> <p><b>Impact BIO-4:</b> Construction equipment and vehicle traffic, sedimentation due to earthmoving, or spills during construction or operation of the WRRF may impact special status reptiles and amphibians, a potentially significant but mitigable impact.</p>	<p><b>Mitigation Measure BIO-1:</b> Within one week of ground disturbance or vegetation removal activities, if work occurs between March 1 and August 31, nesting bird surveys shall be conducted. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests until chicks are fledged. Occupied nests of special status bird species shall be mapped using GPS or survey equipment and submitted in monitoring reports. If nesting birds are located, no construction activities shall occur within 100 feet of nests (or other setback distance determined by a qualified ornithologist) until chicks are fledged. Construction activities shall observe a 300-foot buffer for active raptor nests. Occupied nests of special status bird species shall be monitored every two weeks to document nest success and check for compliance with buffer zones.</p> <p><b>Mitigation Measure BIO-2:</b> Limits of grading shall be clearly delineated in the field prior to initiation of construction activities to demonstrate avoidance in impacting the area identified in the Biological Technical Report as habitat for club-haired mariposa lily.</p> <p><b>Mitigation Measure BIO-3:</b> To mitigate adverse impacts to potentially present status reptiles and amphibians western pond turtle, foothill yellow-legged frog, coast range newt, and two-striped garter snake, in addition to Mitigation Measure BIO-4, the following shall be implemented:</p> <ul style="list-style-type: none"> <li>• Construction Plans shall show how construction at stream crossings will utilize low-flow periods, incorporate sediment retention devices and minimize time and area of disturbance.</li> </ul>	<p align="center">Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact BIO-5:</b> Construction equipment and vehicle traffic, sedimentation due to earthmoving, or spills during construction or operation of the WRRF may impact California red-legged frog (CRLF), a potentially significant but mitigable impact.</p>	<ul style="list-style-type: none"> <li>• A pre-construction survey would be conducted within 48 hours prior to starting work in or within 50 feet of habitats likely to support sensitive reptiles and amphibians such as seasonal drainages and riparian. The survey would be conducted by a qualified biologist approved to relocate sensitive species should they occur. If sensitive reptile or amphibian species are located during the pre-construction survey, a biologist would monitor ground-breaking work conducted within 50 feet of habitat.</li> <li>• Qualified biologists will brief all project personnel prior to participating in construction activities. At a minimum, the briefing will include a description of the project components and techniques, a description of the listed species occurring in the project area, and the general and specific measures and restrictions to protect the species during implementation of the project.</li> <li>• Post construction re-vegetation plans for work areas disturbed within 100 feet of ESHA at Toro Creek Bridge shall be submitted for County approval and implemented upon completion of pipeline work in that area. The re-vegetation plan shall use only native plant species pursuant to Coastal Policy 30. The species shall be selected to provide permanent erosion control and soil cover pursuant to Coastal Policy 21.</li> </ul> <p><b>Mitigation Measure BIO-4:</b> To mitigate adverse impacts to potentially present California red-legged frog (CRLF), the following shall be implemented:</p> <p><b>Pre-construction Survey.</b> Prior to commencement of grading activities, a USFWS-approved biologist will survey the project site 48 hours before the onset of work activities. If any life stage of the California Red-legged Frog (CRLF) is found and these individuals are likely to be killed or injured by work activities, the biologist will be allowed sufficient time to move them from the site before work activities begin. The biologist will</p>	<p align="center">Less than Significant</p>
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

	<p>relocate the CRLF the shortest distance possible to a location that contains suitable habitat and will not be affected by activities associated with the proposed project. The biologist will maintain detailed records of any individuals that are moved (e.g., size, coloration, distinguishing features, digital images, etc.) to assist in determining whether translocated animals are returning to the original point of capture.</p> <p><b>Pre-construction Training.</b> Prior to commencement of grading activities, a USFWS-approved biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of the CRLF and its habitat, the specific measures that are being implemented to conserve the CRLF for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.</p> <p><b>Biologist Present during Construction.</b> A USFWS-approved biologist will be present at the work site until all CRLF have been removed, workers have been instructed, and disturbance of habitat has been completed. After this time, the County will designate a person to monitor on-site compliance with all minimization measures. The biologist will ensure that this monitor receives the training outlined above and in the identification of CRLF. If the monitor/biologist determine CRLF impacts are greater than anticipated or approved, work shall stop until the issue is resolved. The monitor/biologist shall immediately contact the resident engineer (the engineer overseeing and in command of construction activities), where the resident engineer will either resolve the situation by eliminating the effect immediately, or require that all actions which are causing these effects be halted. If work is stopped, the County/ USFWS will be notified as soon as is reasonably possible.</p>	<p>Less than Significant</p>
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

	<p><b>Trash Removal.</b> During construction/ground disturbing activities, all trash that may attract CRLF predators will be properly contained, removed from the work site, and disposed of regularly. Prior to occupancy or final inspection, whichever occurs first, all trash and construction debris will be removed from work areas.</p> <p><b>Equipment Maintenance.</b> During construction/ ground disturbing activities, all refueling, maintenance, and staging of equipment and vehicles will occur at least 100 feet from riparian habitat or water bodies and not in a location from where a spill would drain directly toward aquatic habitat. The monitor will ensure contamination of habitat does not occur during such operations. Prior to commencement of grading/construction activities, the monitor will ensure that a plan is in place for prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.</p> <p><b>Revegetation.</b> Prior to occupancy or final inspection, whichever occurs first, for disturbed areas within the project boundaries, they shall be revegetated with an assemblage of native riparian, wetland and upland vegetation suitable for the area. Locally collected plant materials will be used to the extent practical. Invasive, exotic plants will be controlled to the maximum extent practical and not included in any landscaping efforts. This measure shall apply to all disturbed areas unless determined not practical or feasible by the County.</p> <p><b>Land Restoration.</b> Prior to occupancy or final inspection, whichever occurs first, to the extent practical, contours shall be returned to as close to original, unless it is determined by the biologist that the new contours provide greater benefit for the CRLF.</p>	
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

	<p><b>Work Scheduling.</b> Prior to commencement of grading/construction activities, the applicant shall make all efforts to schedule work activities for times of the year when impacts to the CRLF would be minimal. As examples: a) work that would affect large pools that may support breeding would be avoided, to the maximum extent practical, during the breeding season (November through May); b) isolated pools that are important to maintain CRLF through the driest portions of the year (late summer, early fall) would be avoided to the maximum extent practical. When such conditions exist, the applicant will work with the biologist to coordinate the construction schedule to minimize impacts to the CRLF.</p> <p><b>Sedimentation and Erosion Control.</b> Prior to issuance of construction permit(s), sedimentation and erosion control plans shall be submitted using Best Management Practices (BMPs) to minimize sediment from entering nearby water bodies or prominent drainage courses, consistent with Mitigation Measure WQ-1. During or after construction/ground disturbing activities, if these BMPs are ineffective, the applicant will work with the monitor/biologist and resident engineer, in consultation with USFWS, to install effective measures prior to the next rain event.</p> <p><b>Water impoundment.</b> Unless approved by the USFWS, water will not be impounded in a manner that may attract CRLF.</p> <p><b>Completion Report.</b> Prior to occupancy or final inspection, whichever occurs first, the applicant shall submit to the County and USFWS, a project completion report form, completed by the USFWS-approved biologist. The report form should identify any recommended modifications or protective measures, if additional stipulations to protect CRLF are warranted, or if alternative measures would facilitate compliance with the provisions of this consultation.</p>	
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact BIO-6:</b> Steelhead and tidewater goby habitat may be affected by sedimentation due to earthmoving, or spills during construction or operation of the WRRF and pipeline construction activities along <u>Toro Creek, and crossing, <del>Toro</del> Old Creek</u> (EHSA within the Coastal Zone). This is a significant but mitigable impact (Class II).</p>	<p><b>Mitigation Measure BIO-5:</b> To mitigate potential adverse effects to water quality and special status species habitat in project area creeks, in addition to measures described in measure WQ-1 including appropriate best management practices (BMPs) utilized within the construction areas to prevent excess sediment from entering Toro Creek or Willow Creek, Storm Water Pollution Prevention Plan (SWPPP) implementation, and long-term measures identified in the SWPPP, the following additional measures are required:</p> <ul style="list-style-type: none"> <li>• The applicant shall prepare a spill containment and spill clean-up plan that includes provisions for response to frack-out of pipeline bore spoils within 100 feet of ESHA. Directional drill activities within 100 feet of ESHA shall be specified in the plan to require on-site monitoring.</li> <li>• During construction of the conveyance pipelines across <del>all creeks</del> <u>Old Creek</u>, no ground disturbing activities will take place within the riparian corridor or within the top of bank channel.</li> <li>• The edge of riparian vegetation will be shown on construction plans and boundaries of the work area will be shown on construction plans. Limits of grading will be clearly delineated in the field prior to initiation of construction activities.</li> <li>• All hazardous materials required to operate and maintain equipment will be properly used in accordance with manufacturer's specifications.</li> <li>• The contractor will follow an approved spill prevention plan, including procedures to ensure that all equipment is properly maintained and free of leaks and all necessary repairs incorporate proper spill containment.</li> <li>• Hazardous materials will be properly stored and managed in secured areas located outside riparian corridors.</li> <li>• Mobile equipment will be staged, repaired,</li> </ul>	
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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

<p><b>Impact BIO-7:</b> Construction of pipeline conveyances at the bridges across Toro Creek, Old Creek, and Paul Alva Creek box culvert could impact Pallid Bats, a significant but mitigable impact.</p> <p><b>Impact BIO-8:</b> Construction activities impacting the eucalyptus habitat for Monarch butterfly are a potentially significant, but mitigable, impact</p>	<p>and maintained 300 ft from top of bank of Toro Creek <u>and Old Creek</u>, or on existing paved road surfaces. Fueling of equipment will be conducted in pre-designated areas at least 300 ft from the top of bank drainages, or on existing paved road surfaces. Spill containment materials will be placed around the equipment before refueling. Standing equipment will be outfitted with drip pans and hydrocarbon absorbent pads.</p> <p><b>Mitigation Measure BIO-6:</b> Prior to installation of conveyance structures adjacent to road bridges over <del>Toro Creek</del>, Willow Creek, Old Creek, or Paul Alva Creek, a qualified biologist shall conduct a survey of the bridge to determine if roosting bats are present. If possible, the survey shall be conducted during the non-breeding season (November through March). If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If the bats are not part of an active maternity colony, passive exclusion measures may be implemented with approval from CDFW. November is the best time of the year to exclude bats from a roost because it is after the breeding season and before winter hibernation (not all species hibernate).</p> <p><b>Mitigation Measure BIO-7:</b> To avoid impacts to overwintering monarchs, tree trimming/removal and construction activities that affect eucalyptus trees near or within the overwintering grove shall not be conducted during the overwintering season from October 1 through March 31. If construction activities must be conducted during this period, overwintering monarch surveys shall take place within one week of habitat disturbance. If surveys do not locate clustering monarchs, construction activities may be conducted. If clustering monarchs are located, no construction activities shall occur within 100 feet of the edge of the overwintering grove.</p>	
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED TO LESS THAN SIGNIFICANT**

**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p><b>Impact AG-3:</b> The use of a 3-acre construction staging area sited on land to be converted by construction by the solar array area, will result in the temporary loss of agricultural productivity of Prime Farmland as defined by the County Conservation and Open Space Element. This is considered a less than significant impact</p> <p><b>Impact AG-4:</b> Construction of the WRRF on the Project Site or Alternative Site is not expected to result in other changes to the existing environment, which due to their location or nature, could result in the conversion of Prime Farmland or Farmland of Statewide Importance (as defined by the Conservation and Open Space Element) to non-agricultural use, or conflicts with agricultural use or agricultural operations (e.g. placement of urban and other uses adjacent to agricultural uses resulting in potential conflicts). This impact is considered less than significant.</p> <p><b>Impact AG-5:</b> Construction of the WRRF on either the Project Site or the Alternative Site is not expected to result in the indirect conversion of Prime Farmland or Farmland of Statewide Importance, resulting from a net decrease in the amount of designated agricultural land in the county, as represented by the Agriculture land use designation of the current San Luis Obispo County General Plan Land Use Map. This impact is considered Less Than Significant.</p> <p><b>Impact WQ-1:</b> Construction of the Proposed Project in the Toro Creek Valley would not result in exposure of people or structures to flooding in a 100 year storm</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p>event or result in a substantial increase in the flood level. This impact is less than significant.</p> <p><b>Impact WQ 2:</b> The Proposed Project includes design features that would result in less than significant impacts on stormwater volumes, erosion and sedimentation hazard, and stormwater runoff quality.</p> <p><b>Impact WQ-4:</b> Impacts for annual WRRF tank filling operations requiring 1.8 acre feet of groundwater would be less than significant based on a dry weather sub-basin storage of 90 acre feet that accounts for other pumping in the subbasin. This impact is less than significant.</p> <p><b>Impact CUL-1:</b> The proposed project has the potential to adversely affect tribal cultural resources, however this effect is less than significant.</p>	<p><b>Mitigation Measure CUL-1:</b> To mitigate potential effects to tribal cultural resources, the CSD shall place portions of parcels 8 and 10 owned by the CSD between Toro Creek Road and Toro Creek in a conservation easement in favor of an appropriate entity to protect and manage the land for the type of historic agriculture uses that have occurred on the property, and preclude deep ripping agricultural activities such as used for vineyard installation. Additionally, the Cultural Resource Impact Assessment Report shall include a full technical analysis of all artifacts and other cultural remains collected during the Phase II study.</p>	
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p><b>Impact VIS 1:</b> The construction of pipe bridge crossings at Toro Creek and Old Creek will result in impacts to visual resources that are less than significant.</p> <p><b>Impact VIS 2:</b> The construction of the pipelines in approximately a ½ mile segment from the Coastal Zone boundary at Toro Creek west to SR 1 and then north along SR1 will result in a disturbed ground surface that could be visually adverse.</p> <p><b>Impact TR-1:</b> Based on the acceptable status of the existing pavement on both roads, the addition of periodic trips by trucks with heavy loads for the duration of the 18-24 month construction period would not be considered a significant impact on pavement.</p> <p><b>Impact TR-3:</b> Operational activities associated with the WRRF will increase traffic levels on streets and intersections serving the project. This impact is considered less than significant.</p> <p><b>Impact TR-4:</b> Construction related activities associated with the CSWP, together with traffic generated by the construction of other reasonably foreseeable related projects in the region, will temporarily increase traffic levels on streets and intersections serving the region and result in temporary traffic safety and traffic management impacts. These impacts are considered less than cumulatively considerable.</p>	<p><b>Mitigation Measure VIS-1:</b> To mitigate post-construction disturbed soil on the pipeline trenches in the Coastal Zone, the applicant shall prepare and implement an approved restoration plan that uses native seed species and is consistent with Coastal Plan policy 30.</p>	
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p><b>Impact TR-5:</b> Construction related activities associated with the CSWP, together with traffic generated by the construction of other reasonably foreseeable related projects in the region, will temporarily increase traffic levels on streets and intersections serving the region and result in temporary traffic safety and traffic management impacts. These impacts are considered less than cumulatively considerable.</p> <p><b>Impact N-1:</b> Construction activities associated with the Project Site or Alternative Site will result in a temporary or periodic increase in ambient noise levels in the project vicinity above existing levels without the project. This impact is considered less than significant because it is below the County threshold of significance for stationary noise.</p> <p><b>Impact N-3:</b> Operational activities associated with the WRRF at the Project Site would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies or result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. This impact is considered less than significant.</p> <p><b>Impact N-5:</b> Noise generated by the Project and related project traffic at either the Project Site or Alternative Site, together with noise generated by other reasonably foreseeable related projects in the region, are unlikely to result in exposure of persons to, or the generation of, noise levels in excess of</p>		
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Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p>standards established in the local general plan or noise ordinance, or applicable standards of other agencies and result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. These impacts are considered less than cumulatively considerable.</p> <p><b>Impact AQ-2</b> Foreseeable future projects near the Proposed Project aggregated together would be well below the size expected to have significant air quality impacts associated with construction or operation. Because construction of the Proposed Project would also result in emissions well below significance thresholds, and Mitigation Measure AQ-1 would be implemented, the Proposed Project would not have a significant contribution to cumulative air quality impacts in the area.</p> <p><b>Impact AQ-6:</b> GHG emissions from the Proposed Project would be below the SLOAPCD threshold. Therefore, the project would not result in GHG emissions that would have a significant effect on the environment nor conflict with the SLOAPCD, SLOCOG, and County's GHG emissions reduction targets in compliance with AB 32, or SB 32, no mitigation is required.</p> <p><b>Impact HZ-1:</b> Construction activities associated with the WRRF on either the Project Site or Alternative Site and pipeline conveyances may involve the limited transport, storage, usage, or disposal of hazardous materials, such petroleum products for fueling and servicing</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p>of construction equipment. The potential impact associated with the temporary use and storage of hazardous materials for construction is considered less than significant.</p> <p><b>Impact HZ-3:</b> Construction of the WRRF on either the Project Site or Alternative Site, decommissioning of the existing WWTF and the construction of conveyance pipelines may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions. This impact is considered less than significant.</p> <p><b>Impact HZ-5:</b> Based on the project description, the project is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project may conflict with other adopted goals, policies and standards associated with hazards and hazardous materials. This impact is considered less than significant.</p> <p><b>Impact HZ-9:</b> The limited transport, storage, usage, or disposal of hazardous materials during construction activities associated with the WRRF on either the Project Site or Alternative Site, decommissioning of the existing WWTF and pipeline conveyances, together with other reasonably foreseeable projects in the area would contribute to the cumulative risk to the public. This impact is considered less than cumulatively considerable.</p> <p><b>Impact HZ-10:</b> The transport,</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p>storage, usage, and disposal of hazardous materials associated with the wastewater treatment process during operation of the WRRF on either the Project Site or Alternative Site, together with other reasonably foreseeable projects in the area would contribute to the cumulative risk to the public. This impact is considered less than cumulatively considerable.</p> <p><b>Impact HZ-11:</b> Construction of the WRRF on either the Project Site or Alternative Site, decommissioning of the existing WWTF and the construction of conveyance pipelines, together with other reasonably foreseeable projects in the area would contribute to the cumulative risk to the public. This impact is considered less than cumulatively considerable.</p> <p><b>Impact HZ-12:</b> Operation of the WRRF on either the Project Site or Alternative Site and conveyance pipelines, together with other reasonably foreseeable projects in the area, would contribute to the cumulative risk to the public associated with the accidental spill of untreated wastewater which could adverse impact surface water quality and other pose a threat to human health and biological resources. This impact is considered less than cumulatively considerable</p> <p><b>Impact HZ-13:</b> Based on the project description, the project, together with other reasonably foreseeable projects in the area, is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or to conflict with other adopted goals,</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p>policies and standards associated with hazards and hazardous materials. This impact is considered less than cumulatively considerable.</p> <p><b>Impact HZ-14:</b> Construction of the WRRF and associated solar array on either the Project Site or Alternative Site, together with other reasonably foreseeable projects in the area, will increase the cumulative risk to people and structures to a significant risk of loss, injury or death associated with wildfires. This impact is considered less than cumulatively considerable.</p> <p><b>Impact HZ-15:</b> Construction activities associated with the WRRF and pipeline conveyances on either the Project Site or Alternative Site, together with other reasonably foreseeable projects in the area, has the potential to result in an increase to the cumulative hazard to the public or the environment associated with the mobilization of disease vectors, such as the fungus that causes Valley Fever, that may be present in the soil. This impact is considered less than cumulatively considerable.</p> <p><b>Impact HZ-16:</b> Construction activities associated with the WRRF on either the Project Site or Alternative Site, together with other reasonably foreseeable projects in the area, has the potential to increase the cumulative exposure of construction workers and CSD staff to potentially hazardous concentrations of environmentally-persistent pesticides, herbicides and fertilizers. This impact is considered significant less than cumulatively considerable.</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p><b>Impact LU-1:</b> The project will not divide an existing community. This impact is considered less than significant.</p> <p><b>Impact LU-2:</b> The project will not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. This impact is considered less than significant.</p> <p><b>Impact LU-3:</b> The project will not divide the existing community of Morro Bay. The project will not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. This impact is considered less than significant.</p> <p><b>Impact LU-4:</b> The project will not divide an existing community, conflict with applicable land use plan, policy, or regulation of an agency or be inconsistent with an adopted habitat conservation plan or other natural plan to a degree that would be cumulatively considerable. This impact is considered less than significant.</p> <p><b>Impact EJ-1:</b> Construction and operation of the WRRF may disproportionately impact Low-Income Populations and Minority Populations. This impact is considered less than significant.</p> <p><b>Impact EJ-2:</b> Construction of the</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS III. OTHER ENVIRONMENTAL IMPACTS WHICH ARE ADVERSE BUT NOT SIGNIFICANT**

<p>pipeline conveyances will not disproportionately impact Low-Income Populations and Minority Populations. This impact is considered less than significant.</p> <p><b>Impact EJ-3:</b> Decommissioning the existing WWTF will not disproportionately impact Low-Income Populations and Minority Populations. This impact is considered less than significant.</p> <p><b>Impact BIO-1:</b> At the Proposed WRRF, only agricultural land and ruderal vegetation would be permanently impacted. For the conveyance pipelines no permanent impacts would occur. No other habitats, or Environmentally Sensitive Habitat Areas, would be significantly or permanently impacted. Impacts to the seven identified biological habitats in the Project Area (including Willow Riparian ESHA) would be less than significant.</p> <p><b>Impacts BIO-9:</b> The Proposed Project would not permanently remove or alter any sensitive habitat or plant community. With project-level implementation of all mitigation measures the Project's contribution to cumulative impacts on biological resources is less than significant.</p>		
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**Table II-1: SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Impact After Mitigation
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**CLASS IV. BENEFICIAL EFFECT TO THE ENVIRONMENT**

<p><b>Impact AG-2:</b> The WRRF is expected to generate an average annual daily flow (AADF) of 0.33 to 0.4 million gallons per day (MGD) of tertiary treated non-potable water. The project will make available 40 acre-feet per year to agricultural lands adjoining or near the WRRF. This is considered a beneficial impact.</p> <p><b>Impact AQ-7:</b> The Proposed Project would involve the generation of reclaimed water, and potential potable water in the future, which would further reduce energy demand in the region through water conservation. Operation of the Proposed Project would also not involve the use of digester boilers that are currently used to treat wastewater from the Cayucos community at the Morro Bay WWTP. Therefore, these benefits would further offset GHG emissions generated by the Proposed Project.</p>		
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## **NORTH COUNTY AREA PLAN – ADELAIDA SUB-AREA**

The North Coast Area Plan (NCAP) consolidates and reorganizes the former Adelaida, El Pomar-Estrella, Las Pilitas, Nacimiento, and Salinas River planning areas, and the northern portions of the Los Padres and Shandon-Carrizo planning areas, into a single watershed-based planning area called the North County planning area (Figure III-4).

Encompassing 1,035,714 acres, the North County planning area is the largest of the County's four planning areas. It includes the unincorporated areas north of the Cuesta Ridge to Monterey County, and is bounded by the Coastal Zone to the west and Kern County to the east. It contains four unincorporated urban areas (San Miguel, Templeton, Santa Margarita, and Shandon), all located along Highway 101, and six village areas (Creston, Heritage Ranch, Oak Shores, Garden Farms, Whitley Gardens, and Pozo). The plan contains policies and programs for the rural portions of the North County planning area. It also contains regional policies and programs that affect both urban and rural areas.

The Project Site and Alternative site for the WRRF are located at the western boundary of the Adelaida Sub-Area of the NCAP. The primary land use in this area is agriculture on large lots. Accordingly, the planning goals for the area encourage the preservation of agriculture while focusing urban development within the incorporated cities and existing unincorporated urban areas.

## **Land Use Ordinances**

### **INLAND**

All development in the unincorporated County landward of the Coastal Zone is subject to the Inland portion of the County Land Use ordinance (LUO, Title 22 of the County Code). Consistency with the Inland LUO and Coastal Zone LUO is discussed in EIR section IV-L Land Use Planning. The Project Site and Alternative Site are located on land within the *Agriculture* land use category. According to Table 2-2 of the LUO, *Public Utility Facilities* (which includes wastewater treatment facilities) is an allowed use in the Agriculture land use category subject to the approval of a Conditional Use Permit (CUP) by the County Planning Commission. Section 22.30.370 describes certain planning area standards applicable to the development of public utility facilities, including the contents of the required CUP application as well as development standards that will apply as conditions of approval. In addition to the provisions of Section 22.30.370, the development of land on property subject to a Williamson Act Contract must adhere to the *County's Rules of Procedure to Implement The California Land Conservation Act of 1965* (discussed below). Neither the Project Site nor the Alternative Site are subject to an active Williamson Act contract.

### **COASTAL ZONE**

Development within the Coastal Zone as defined by the Coastal Act of 1976 is subject to the Coastal Zone Land Use Ordinance (CZLUO). As set forth in Section 30106 of the Coastal Act, "development" in the Coastal Zone means:

*"... construction, reconstruction, demolition, or alteration of size of any structure, including any facility of any private, public or municipal utility..."* As used in the CZLUO, "structure includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line."

Therefore, construction of pipelines and other facilities within the Coastal Zone in support of the CSWP will require the approval of a Coastal Development Permits by the County and the City of Morro Bay. Chapter 23.08.286 of the County CZLUO provides planning area standards for the

Housing	66,780	90,200	102,275	117,305	--	1.43%
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Source: US Census and SLOCOG Notes: 1. Compounded annual growth rate.

### THE COMMUNITY OF CAYUCOS

Cayucos is considered a “bedroom community” in that roughly 85 to 90 percent of their workers commute to jobs in other communities. Although the city of Morro Bay provides some employment for local residents (and contributes significantly to the area's economy), a large percentage of local workers find employment in the San Luis Obispo area.

Cayucos has some businesses that provide retail and service uses to local residents, but it lacks major employers, large-scale manufacturing and industrial uses. Tourism and visitor-serving businesses are the most important sector of the local economy.

As shown in Table III-2 above, the San Luis Obispo Council of Governments estimates that the population within the Cayucos urban reserve line was 2,558 in 2015.

### THE CAYUCOS SANITARY DISTRICT

The Cayucos Sanitary District (CSD) was formed in 1942 to provide sewer service to the unincorporated community of Cayucos. In 1954, the CSD constructed a sewer system and treatment plant under a joint powers agreement with the Morro Sanitary District (now City of Morro Bay). The plant ultimately was reconstructed in 1984 under a joint powers agreement. The CSD owns and holds capacity rights to 35% of the ocean outfall and sewage treatment plant and 40% of the land with the remainder being owned by the City of Morro Bay. The ~~district~~ CSD collects wastewater from ~~2,592~~ 2,244 service connections and transports it to the treatment plant in Morro Bay which has a peak dry-weather flow capacity of 2.36 million gallons. As of 2015 the district generates approximately 0.274 mgd of wastewater, or about 33.2 percent of its 0.826 mgd gallon entitlement. All of the treated effluent is discharged through the Morro Bay outfall.

As noted above, the service population for the CSD is estimated to be 2,558. It should be noted that the service area boundaries of the CSD cover an area that is slightly larger than the urban reserve line (URL) for the community of Cayucos (Map III-6). However, these areas consist primarily of antiquated subdivisions that are proposed for detachment from the ~~District~~ CSD by the Local Agency Formation Commission (LAFCo). The CSD's *sphere of influence* (the area outside the current service boundary where the CSD will eventually extend services) includes areas along the coast, and north of State Route 1.

Invasive, exotic plants will be controlled to the maximum extent practical and not included in any landscaping efforts. This measure shall apply to all disturbed areas unless determined not practical or feasible by the County.

**Land Restoration.** Prior to occupancy or final inspection, whichever occurs first, to the extent practical, contours shall be returned to as close to original, unless it is determined by the biologist that the new contours provide greater benefit for the CRLF.

**Work Scheduling.** Prior to commencement of grading/construction activities, the applicant shall make all efforts to schedule work activities for times of the year when impacts to the CRLF would be minimal. As examples: a) work that would affect large pools that may support breeding would be avoided, to the maximum extent practical, during the breeding season (November through May); b) isolated pools that are important to maintain CRLF through the driest portions of the year (late summer, early fall) would be avoided to the maximum extent practical. When such conditions exist, the applicant will work with the biologist to coordinate the construction schedule to minimize impacts to the CRLF.

**Sedimentation and Erosion Control.** Prior to issuance of construction permit(s), sedimentation and erosion control plans shall be submitted using Best Management Practices (BMPs) to minimize sediment from entering nearby water bodies or prominent drainage courses, consistent with Mitigation Measure WQ-1. During or after construction/ ground disturbing activities, if these BMPs are ineffective, the applicant will work with the monitor/biologist and resident engineer, in consultation with USFWS, to install effective measures prior to the next rain event.

**Water impoundment.** Unless approved by the USFWS, water will not be impounded in a manner that may attract CRLF.

**Completion Report.** Prior to occupancy or final inspection, whichever occurs first, the applicant shall submit to the County and USFWS, a project completion report form, completed by the USFWS-approved biologist. The report form should identify any recommended modifications or protective measures, if additional stipulations to protect CRLF are warranted, or if alternative measures would facilitate compliance with the provisions of this consultation.

**Special Status Fish** - Two federally listed fish species may occur within the vicinity of the Proposed and Alternative Project Study Areas: tidewater goby and steelhead. Both species have been observed in Toro Creek, and gobies have been observed in Willow Creek. Steelhead fry were observed in Toro Creek during an October 2015 site visit to the Proposed Project Study Area. Steelhead and tidewater goby habitat may be affected by sedimentation due to earthmoving, or spills during construction or operation of the WRRF. As described in the Project Description, check valves in the wastewater conveyance pipes will be installed on both sides of creek crossings to reduce the risk of spill into the creeks. In addition, as described in the Project Description, during and after construction a 300 foot setback will be maintained between the WRRF and Toro Creek.

**Impact BIO-6:** Steelhead and tidewater goby habitat may be affected by sedimentation due to earthmoving, or spills during construction or operation of the WRRF and pipeline construction activities along Toro Creek, and crossing Old Creek (EHSA within the Coastal Zone). This is a significant but mitigable impact (Class II).

**Mitigation Measure BIO-5:** To mitigate potential adverse effects to water quality and special status species habitat in project area creeks, in addition to measures described in measure WQ-1 including appropriate best management practices (BMPs) utilized within the construction areas to prevent excess sediment from entering Toro Creek or Willow Creek, Storm Water Pollution Prevention Plan (SWPPP) implementation, and long-term measures identified in the SWPPP, the following additional measures are required:

- The applicant shall prepare a spill containment and spill clean-up plan that includes provisions for response to frack-out of pipeline bore spoils within 100 feet of ESHA. Directional drill activities within 100 feet of ESHA shall be specified in the plan to require on-site monitoring.
- During construction of the Phase 2 conveyance pipelines across ~~all creeks~~ Old Creek, no ground disturbing activities will take place within the riparian corridor or within the top of bank channel.
- The edge of riparian vegetation will be shown on construction plans and boundaries of the work area will be shown on construction plans. Limits of grading will be clearly delineated in the field prior to initiation of construction activities.
- All hazardous materials required to operate and maintain equipment will be properly used in accordance with manufacturer's specifications.
- The contractor shall follow an approved spill prevention plan, including procedures to ensure that all equipment is properly maintained and free of leaks and all necessary repairs incorporate proper spill containment.
- Hazardous materials will be properly stored and managed in secured areas located outside riparian corridors.
- Mobile equipment will be staged, repaired, and maintained 300 ft from top of bank of Toro Creek and Old Creek, or on existing paved road surfaces. Fueling of equipment will be conducted in pre-designated areas at least 300 ft from the top of bank drainages, or on existing paved road surfaces. Spill containment materials will be placed around the equipment before refueling. Standing equipment will be outfitted with drip pans and hydrocarbon absorbent pads.

**Bats** - Pallid bat is a special status bat species that may occur along the conveyance pipeline route under road bridges across Toro Creek, Old Creek, Willow Creek, or Paul Alva Creek. Maternal bat colonies are protected by the California Department of Fish and Wildlife but are not expected to occur in the Proposed or Alternative Project Study Areas or along the conveyance pipeline route.

**Impact BIO-7:** Construction of pipeline conveyances at the bridges across Toro Creek, Old Creek, and Paul Alva Creek box culvert could impact Pallid Bats, a significant but mitigable impact (Class II).

**Mitigation Measure BIO-6:** Prior to installation of conveyance structures adjacent to road bridges over ~~Toro Creek~~, Willow Creek, Old Creek, or Paul Alva Creek, a qualified biologist shall conduct a survey of the bridge to determine if roosting bats are present. If possible, the survey shall be conducted during the non-breeding season (November through March). If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If

the bats are not part of an active maternity colony, passive exclusion measures may be implemented with approval from CDFW. November is the best time of the year to exclude bats from a roost because it is after the breeding season and before winter hibernation (not all species hibernate).

**Monarch Butterflies** - There is a monarch butterfly overwintering site in a grove of eucalyptus along Toro Creek Road, adjacent to the bridge over Toro Creek, south of the Proposed Project Study Area. Monarch butterflies have been observed clustering in eucalyptus trees located in the grove approximately 80 to 100 feet south of Toro Creek Road. In November 2016, 110 monarchs were observed at the roost trees, while 1700 monarchs were observed in 2015, none were documented in 2014, and 3200 were documented in 2013. Butterflies are likely to be present at the site, in varying numbers, from year to year. If eucalyptus branches are trimmed for pipeline construction along Toro Creek Road, monarch butterfly aggregations may be impacted.

**Impact BIO-8:** Construction activities impacting the eucalyptus habitat for Monarch butterfly are a potentially significant, but mitigable, impact (Class II).

**Mitigation Measure BIO-7:** To avoid impacts to overwintering monarchs, tree trimming/removal and construction activities that affect eucalyptus trees near or within the overwintering grove shall not be conducted during the overwintering season from October 1 through March 31. If construction activities must be conducted during this period, overwintering monarch surveys shall take place within one week of habitat disturbance. If surveys do not locate clustering monarchs, construction activities may be conducted. If clustering monarchs are located, no construction activities shall occur within 100 feet of the edge of the overwintering grove.

## COASTAL ZONE BIOLOGICAL IMPACTS AND MITIGATION MEASURES

### Impacts to Environmentally Sensitive Habitat Areas (ESHA)

ESHA's are defined by the California Coastal Act as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Under this definition wetlands and jurisdictional waters, riparian habitat, designated critical habitat, and CNDDDB special communities are ESHAs.

No significant impacts will occur to special status plant or wildlife species or any Environmentally Sensitive Habitat Areas (ESHA) with implementation of avoidance and minimization measures detailed following because no wetlands and jurisdictional waters, riparian habitat, designated critical habitat, and CNDDDB special communities are significantly or permanently affected.

**Willow riparian** - The riparian area at the existing Toro Creek bridge is within the Coastal Zone (see Map IV-C1 for the Coastal Zone boundary relative to the Toro Creek Bridge) and this creek area is ESHA. Construction of the crossing of Toro Creek will be by a directional bore under the creek. No trimming or disturbance of vegetation in ESHA will occur. Bore pits for the directional boring will occur approximately 350 feet from the ESHA boundary of riparian vegetation. Where conveyance structures will be installed adjacent to the Toro Creek Road bridge, there may be minimal trimming of riparian canopy above the banks of the stream to allow access for crane placement of the pipe conduit spanning the creek banks.

~~In addition, bore pits approximately 8 feet by 8 feet and 4 feet deep will be constructed on both sides of the creek approximately 50 feet from top of creek bank but with 100 feet of ESHA. The pipeline will be directionally bored within the 100 from ESHA except for the bore pits where the pipeline will surface to the pipe bridge. Where the pipe surfaces excavation will occur for concrete foundations to support the pipe bridge. Disturbance for these foundations is estimated at and excavation 6 feet by 6 feet and 8 feet deep.~~

The riparian area at the existing Old Creek foot-bridge is within the Coastal Zone and this creek area is ESHA. Where conveyance structures will be installed adjacent to the Old Creek foot-bridge, there would likely be no trimming of riparian canopy above the banks of the stream to allow access for crane placement of the pipe conduit spanning the creek banks. In addition, where the pipe surfaces, excavation will occur for concrete foundations to support the pipe bridge. Disturbance for these foundations is estimated at and excavation 6 feet by 6 feet and 8 feet deep. This disturbance will occur in or on the shoulder of the existing path and pavements in that location with no disturbance to adjacent vegetation.

### **CZLUO and Coastal Plan Policy Consistency**

The proposed directional bore under Toro Creek is consistent with CZLUO 23.07.174 b.(3) c because the bore under the creek is one of the specified best mitigation measures to avoid surface streambed disturbance.

The bore pit excavation surface the directionally bored pipes, pipe bridge support foundation excavation and trimming activity to place the pipe bridge conduit appears consistent with findings required by the CZLUO:

- There will be no significant negative impact on the identified sensitive habitat and the proposed use will be consistent with the biological continuance of the habitat.
- The proposed use will not significantly disrupt the habitat.

The type of project activity meets the types of allowable development in ESHA:

- Incidental public services and utilities in wetlands. Essential incidental public services and utilities pursuant to ESHA Policy 13 and CZLUO Section 23.07.172(e).

Further, the trimming activity to place the Phase 2 Old Creek pipe bridge conduit would not result in grading within in ESHA, takings, stream diversions, diversion of surface or subsurface water, placement of barriers to fish, destruction of fish rearing habitat, or disturbance of native riparian vegetation on the banks of the stream. These vegetation trimming impacts would not be significant.

The proposed actions within 100 feet of ESHA will not significantly disrupt the resources present and is consistent with Coastal Plan Policy 1.

Coastal Plan Policy 3 is implemented with the re-vegetation in mitigation measure BIO-3 below. Mitigation Measures BIO-3 and BIO-4 and WQ-1 ensure the creek hydrological and ecological functions are preserved and protected pursuant to Policies 20 and 21.

Because the proposed location of the pipe bridge is the least disruptive means to implement the required pipeline crossing of Old ~~Toro~~ Creek and no feasible alternative exists to crossing Old Toro Creek<sup>1</sup>, the proposed riparian trimming to implement the pipe bridge is consistent with Policy 26.

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<sup>1</sup> Directional boring under the creek is not feasible due to the likely presence of bedrock at or near the channel bottom.

The incorporation of mitigation measures to protect water quality during construction detailed in Mitigation Measures BIO-5 and WQ-1 would reduce potential adverse effects to stream water quality related to the bore pits and bridge supports adjoining ESHA and other pipeline routes to less than significant.

The incorporation of mitigation measures to protect special status fish, amphibians and reptiles during construction detailed in Mitigation Measures BIO-3 and BIO-4 below would reduce potential adverse effects to these species to less than significant. Measure BIO-3 includes permanent re-vegetation of the bore pit and foundation excavations within 100 feet of ESHA. Measure BIO-4 includes restrictions for equipment re-fueling outside the 100 foot ESHA setback.

The incorporation of mitigation measures to protect special status bats potentially roosting under the existing creek bridges during construction detailed in Mitigation Measures BIO-6 would reduce potential adverse effects to these species to less than significant.

#### **OTHER COASTAL ZONE HABITATS and SPECIAL STATUS SPECIES**

The proposed pipeline routes occur both within the Coastal Zone and the Inland area. Of the total 1.62 acres of temporary ground disturbance for the pipelines, approximately 1.14 acres occur within the Coastal Zone. Of this area, approximately 0.4 acres occur in ruderal grassland and 0.02 acres within ~~400~~ 350 feet of ESHA at Toro Creek and 0.01 acres at Old Creek.

**California annual grassland** -There will be no areas of California annual grassland impacted within the Coastal Zone construction areas.

**Developed** - Road bridges within the Coastal Zone over Toro Creek, Willow Creek, Old Creek, and Alva Paul Creek box culvert may provide roosting habitat for bats, including pallid bats, or habitat for nesting birds. This is not a sensitive habitat type and does not require mitigation, but a survey for roosting bats and nesting birds is required before construction begins at road bridges. The existing WTTTF facility in Morro Bay is a developed habitat.

Impact and Mitigation Measure: Refer to Impact BIO-2 and Measure BIO-1 under impacts to nesting birds.

**Eucalyptus** - Eucalyptus forest may be temporarily impacted at the Proposed Project Study Area when the conveyance pipeline is constructed across Toro Creek at the Toro Creek Road bridge. Impacts that may occur would be to eucalyptus canopy only, if trimming is required. No trees are proposed for removal. The trees provide habitat and potential habitat for a variety of common and sensitive bird species including raptors. The eucalyptus trees are also a known winter aggregation location for monarch butterflies. Eucalyptus forest is not a sensitive habitat and does not require mitigation, but a survey for nesting birds is required prior to any tree trimming. Monarch aggregations have been observed in the eucalyptus trees on the south side of Toro Creek Road, approximately 80 to 100 feet from the road.

Impact and Mitigation Measure: Refer to Impact BIO-2 and Measure BIO-1 below under impacts to nesting birds.

**Ruderal vegetation** - In the proposed pipeline route within the Coastal Zone, approximately 0.40 acres of ruderal vegetation would be temporarily impacted for construction. The ruderal habitat is highly disturbed and dominated by non-native species, but may provide foraging

## **Inland Area Impacts and Mitigation Measures**

### **PROPOSED PROJECT SITE**

No previously unknown sites or historic properties were found during the inventory survey. Additionally, subsequent excavation of 22 backhoe trenches within the WRRF parcel revealed that no subsurface cultural deposits are present.

### **ALTERNATIVE PROJECT SITE**

There are no existing records of cultural resources within the project area and the field survey (2015) did not identify any prehistoric cultural resources. No impacts to prehistoric cultural resources would result from any component of the proposed project.

### **INLAND AREA PIPELINE ROUTES**

No previously unknown sites or historic properties were found during the inventory survey of the proposed pipeline. Subsequent to the surface survey, excavations were undertaken between the WRRF site and Highway 1. The portion of this investigation area outside the Coastal Zone had no significant resources.

## **Coastal Zone Impacts and Mitigation Measures**

### **COASTAL ZONE PIPELINE ROUTES**

The pipelines from and to the WRRF will pass through the recorded boundaries of archaeological site CA-SLO-879/H. Testing along the proposed pipeline corridor on Toro Creek Road within the Coastal Zone provided information regarding the distribution, density, content, and integrity of archaeological remains in that corridor. The findings discussed below are preliminary; laboratory processing and analysis of the materials recovered from CA-SLO-879/H must be completed to properly address questions of significance and integrity.

Fieldwork along the proposed pipeline corridor revealed a detailed picture of the nature, extent, and integrity of archaeological deposits in this area. Preliminary data suggests that most of the pipeline corridor either lacks cultural materials or contains intact cultural material buried under deep layers of fill deposited during road construction. The pipeline corridor can be divided into three zones. Two zones comprising most of the pipeline route, the segment from the WRRF to the Coastal Zone Boundary and a segment within the Coastal Zone, lack significant cultural materials.

A third zone of about 800 feet in length contains the highest density of cultural materials in the study area. Although the density is high, many of the test pits revealed a mix of road fill and disturbed sediments. Intact deposits were revealed in six test pits. A detailed analysis of the test excavation unit materials will be necessary to evaluate the nature and integrity of the archaeological deposit within this zone. Results of artifact analysis and radiocarbon dating will allow for a formal determination of significance and assessment of site integrity within this zone.

On the basis of subsequent investigations after the DEIR publication, it is determined that a directional bore is feasible that completely avoids the zone identified above with the highest density of cultural materials. These investigations include geotechnical borings and evaluations for boring under Toro Creek and a constructability assessment by the WRRF contractor. These documents are in the Appendix for the FEIR Response to Comments Volume.

**Impact CUL-2:** Without special design considerations, installation of the new pipelines to and from the WRRF along Toro Creek Road would have the potential to significantly and adversely impact CA-SLO-879/H, a significant historical resource and a tribal cultural resource. However, implementation of Mitigation Measure CUL-2 would avoid and minimize these effects. With implementation of this measure, no historical or tribal cultural resources would be disturbed by the project, and impacts would be reduced to less than significant levels.

**Mitigation Measure CUL-2:** To avoid any adverse effect on CA-SLO-879/H, the proposed pipelines along Toro Creek Road shall be placed only on the north side of the road and shall be directionally drilled under the maximum depth of cultural deposits. Three bore pits shall be installed along the pipeline alignment in previously disturbed areas, where cultural materials are sparse and lack integrity. The exact location of the bore pits and segment to be directionally drilled shall be dictated in the Final Cultural Resources Impact Assessment Report prepared for the project by Applied Earthworks. All work related to pipeline installation along Toro Creek Road shall be monitored by an archaeologist and Native American representatives. If at any point, the pipeline design requirements specified in the Cultural Resources Impact Assessment Report cannot be met, the project shall be halted and San Luis Obispo County and other responsible agencies contacted to determine the next course of action to protect historical or tribal cultural resources in compliance with California and federal law.

As detailed in the letter from Applied Earthworks in the Appendix of this FEIR<sup>1</sup>, implementation of this measure would result in less than significant effects to CA-SLO-879/H.

The remaining pipeline routes in the Coastal Zone do not pass through or near other recorded sites, except the pipeline will pass with the recorded boundaries of archaeological site CA-SLO-165 in the vicinity of Main Street, SR41 and SR1. Because the existing pipeline route is disturbed and backfilled with sand and the location is established by survey, and the new pipeline shall be placed in exactly the same location with no disturbance deeper than the existing pipeline, there will be no adverse effect to cultural resources in this location.

**Impact CUL-3:** The potential exists for inadvertent discovery of cultural resources during pipeline construction. This impact is potentially significant (Class II).

**Mitigation Measure CUL-3:** To minimize potential impacts due to inadvertent discovery of cultural resources in site and pipeline areas with no evidence of resources, and consistent with LUO sections 22.05.140 and 23.10.040, the applicant shall prepare and implement a pre-construction Worker Education Program to train workers to recognize cultural resources and understand the procedures for stopping work and reporting the discovery.

### **Cumulative Impacts**

The cumulative project list includes development primarily within the urban area of Cayucos. Construction activities related to the development of residences and small commercial projects have the potential to encounter cultural resources in these areas. The nature and significance of any encountered resources is speculative because the area is disturbed urban land. Potential land development in the rural area adjoining the Cayucos Sanitary

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<sup>1</sup> Cayucos Sustainable Water Project Finding of No Adverse Effect, Applied Earthworks dated March 27, 2017, describes the effects in federal NEPA terminology. For the purposes of CEQA the mitigation measure avoids impacts to the resource.

nighttime views in the area?

The change from a primarily natural landscape to a wastewater facility may be generally considered a substantial negative effect on visual quality. However, “any” or “some” change in a natural visual setting is not necessarily automatically considered substantial or adverse.

In practice under CEQA, the determination of significance is derived from community values. This means the degree of change to the visual setting is measured for consistency with the adopted plans and policies the local jurisdiction in Section 4 Regulatory Setting to judge the significance of the visual change.

## Impact Analysis

### Impacts and Mitigation Measures in the Coastal Zone

#### COUNTY COASTAL ZONE

The proposed recycled water return pipelines along Highway 1, Main Street in Morro Bay and Ocean Avenue in Cayucos are located within a Coastal Visual Resource area in the County's Local Coastal Program and within Sensitive Resource Area for scenic corridor. The pipeline route down Main Street in Morro Bay is in close proximity to the Highway 1 Scenic Route. Because the pipeline routes are subsurface no adverse effects to visual resources would occur along these scenic routes.

The proposed pipeline would cross Old Creek near the CAS 10 facility attached to an existing pedestrian bridge. The pipe crossing would be a pipe conduit for three pipes set on concrete abutments roughly at or below the height of the bridge guardrail. The pipeline in this location is not visible from Highway or any nearby public street, being at a low elevation and screened by existing riparian vegetation. For this reason the pipe crossing will be subordinate to, and blend with, the character of the area. This area is not visible from the shoreline, public beaches, the Scenic Highway 1 corridor or SRA. As such, the action may be exempt from section CZLUO 23.04.210. This impact is less than significant.

~~The proposed pipelines would be directionally bored under Toro Creek beginning in positions 350 from ESHA. Therefore, the pipeline would not be visible in any of its length in the Coastal Zone. cross Toro Creek on a pipe bridge located immediately adjacent to the existing vehicular bridge. The existing character of this bridge is rural, not urban, and it is in character with its larger surroundings. The pipe crossing would be a pipe conduit (approximately 16 inches in diameter) set on concrete abutments roughly at the height of the bridge guardrail. The pipe bridge would be marginally visible to a passing vehicle, but not out of scale with the bridge itself and is subordinate to the setting of riparian vegetation. For this reason, the pipe crossing will be subordinate to, and blend with, the character of the area and is therefore not considered an adverse impact on visual resources. The pipeline in this location is not visible from the shoreline, public beach, or scenic highway and is substantially obscured by surrounding intact riparian vegetation and the bridge itself. As such, the action may be exempt from the requirements of section CZLUO 23.04.210. This impact is less than significant.~~

The proposed WRRF is located about 0.75 mile of Highway 1 and is not visible to viewers traveling on Highway 1 due to intervening topography. Therefore, construction of pipelines and related infrastructure and the WRRF would not substantially damage scenic resources within the Highway 1 State Scenic Highway.

**Impact VIS 1:** The construction of pipe bridge crossings at Toro Creek and Old Creek will result in impacts to visual resources that are less than significant. (Class III)

receive advance notice of work adjacent to their property access and when driveways would be potentially closed.

- Schools. Any construction adjacent to schools shall ensure that access is maintained for vehicles, pedestrians, and bicyclists, particularly at the beginning and end of the school day.
- Buses, Bicycles and Pedestrians. The work zone shall provide for passage by buses, bicyclists and pedestrians, particularly in the vicinity of schools.
- Intersections. Traffic control (i.e. use of flag men) shall be used at intersections that are determined to be unacceptably congested due to construction traffic.

**Mitigation Measure TR-1: To mitigate construction stage impacts (Impact TR-2), prior to commencing work the CSD shall submit for review and approval by the County Department of Public Works, and other affected agencies as requested, a Road Restoration Plan (RRP) to maintain public roads during construction and to repair the roadways to pre-construction conditions or better prior to final closeout of County permit(s). At a minimum the RRP should address the following:**

- A video or photo log of the proposed construction route roads to establish baseline (before construction) conditions of the pavement and adjacent shoulders.
- Identify the current Pavement Condition Index (PCI) of the construction route roadways.
- Identify a procedure for addressing public complaints in a timely manner on public roads due to construction related traffic operations.
- Identify a procedure for timely response to repair damage to public roads during construction including but not limited to, pothole repairs, edge of pavement repairs, and shoulder repairs.
- Identify a procedure to restore public roads to a condition equal to or better than pre-construction conditions prior to final permit closeout.

## **COASTAL ACCESS DURING CONSTRUCTION**

During construction of project pipeline infrastructure within the Coastal Zone, activities would be limited to the localized staging of equipment within public rights of way for segments of pipeline work that progresses along the route. Work in the Highway 1 right of way will be in the wide shoulder area outside the paved travel lane and no highway closures that would affect coastal access are foreseen. Ocean Avenue will experience possible short-term single lane closure, however, because Ocean Avenue is a through Street closure would not preclude a coastal user from accessing the coastal area from an alternate route. The same holds true of both Main Street and Atascadero Avenue in Morro Bay: single lane closures would not impede through traffic in reaching the coast. Likewise, pedestrians and cyclists would not be impeded by construction activities from accessing the coast. The maintenance of a safe environment for persons desiring coastal access would be ensured by Mitigation Measure TR-1, above.

## **OPERATIONAL TRAFFIC**

Trip generation associated with operation of the WRRF is summarized in Table IV-G4. During operation, the proposed facility would generate about 10 daily trips per day from employees (approximately four persons). The delivery of materials to the WRRF site would

**Table IV-L2 Consistency with City of Morro Bay General Plan / LCP**

<b>Land Use, Open Space and Conservation Elements</b>	
<b>Policy</b>	<b>Analysis of Consistency</b>
<p><u>LU-1, LU-2, LU-3, LU-5, LU-6, LU-7, LU-8, LU-9, LU-10, LU-12, LU-13, LU-14, LU-15, LU-16, LU-17, LU-18, LU-21, LU-22, LU-23, LU-25, LU-26, LU-27, LU-28, LU-29, LU-30, LU-31, LU-32, LU-33, LU-34, LU-35, LU-36, LU-37, LU-38, LU-40, LU-41, LU-42, LU-43, LU-45, LU-46, LU-47, LU-48, LU-51, LU-52, LU-53, LU-56, LU-57, LU-58, LU-59, LU-61, LU-6, LU-63, LU-64, LU-65, LU-66, LU-67, LU-68, LU-69, LU-70, LU-71, LU-72, LU-73, LU-74, LU-75, LU-76, LU-77, LU-77, LU-78, LU-79, LU-80, LU-84, LU-85, LU-86, LU-87</u></p>	<p><u>Based on the project description, these policies are not applicable.</u></p>
<p><u>LU-4/LCP 29: Prior to the issuance of a coastal development permit, the City shall make the finding that the development complies with all applicable Land Use Plan policies.</u></p>	<p><u>The analyses provided in the Draft EIR, together with the responses to comments, provide evidence to make findings of consistency.</u></p>
<p><u>LU-11: Protection of the existing social environment of the community, of which individuality and diversity are such attractive features, should be a priority.</u></p>	<p><u>As discussed in Section M, Environmental Justice, the project will not adversely impact low income or minority populations. As discussed in Section IV-L, the project is not expected to divide an existing community. Accordingly, the project is consistent with this policy.</u></p>
<p><u>LU-19: The City should do everything it possibly can to keep the fishing village atmosphere and balance the mixture of the land uses on the Embarcadero.</u></p> <p><u>LU-20: The City should explore all means to maintain and encourage the development of harbor-related land uses along the Embarcadero. Opportunities for such forms of development should be given priority over those that are not dependent on waterfront locations or related to the public's use and enjoyment of this area.</u></p>	<p><u>Neither the pipeline conveyances, outfall, or existing WWTF are located along the Embarcadero.</u></p>
<p><u>LU-24: Recognition of the growth inducing characteristics of development shall be an integral part of managing growth.</u></p>	<p><u>The CSWP pipeline infrastructure will be sized to accommodate effluent generated by build-out the community of Cayucos, see Section I and III of the DEIR.</u></p>
<p><u>LU-39: Industrial uses located on or adjacent to the harbor and beaches shall be regulated to protect the environment and priorities shall be established for coastal dependent land uses.</u></p>	<p><u>The Draft EIR recommends mitigation measures to protect the environment from potential construction related impacts of the ocean outfall tie-in.</u></p>
<p><u>LU-50: It is imperative that methods should be implemented to insure environmental quality and insure that no environmental damage occurs.</u></p>	<p><u>Implementation of the mitigation measures recommended by the Draft EIR will insure consistency with this policy.</u></p>
<p><u>LU-54: Development along the shoreline and open sea shall be consistent with the requirements of the Coastal Act.</u></p>	<p><u>Consistency with the Coastal Act is discussed below and in section H. of the Draft EIR..</u></p>
<p><u>LU-55: All environmentally sensitive habitat areas shall be protected against adverse impacts to the maximum extent feasible.</u></p> <p><u>LU-60 The precise location and thus boundary line of environmentally sensitive habitat areas shall be determined based upon a field study paid for by the applicants and performed by the City of the City's consultants and approved by City Council and/or their designee. Prior to approval of development on the site, including, but not limited to a division of land, provision of public access, or restoration of the ESH.</u></p>	<p><u>Portions of the conveyance infrastructure will be constructed on existing bridges over two coastal streams which are considered ESHA. The pipeline routes have been extensively surveyed for biological resources by qualified professionals. Potential impacts to biological resources, including ESHA, are discussed in Section IV-C of this DEIR which includes measures to protect such resources. Where necessary, damaged habitats will be restored and enhanced.</u></p> <p><u>The chosen conveyance routes represent the environmentally superior feasible alternative because:</u></p>

	<ul style="list-style-type: none"> <li>• <u>Potential pipeline alignments were extensively surveyed for the presence of ESHA/biological resources. Areas with ESHA were avoided where feasible.</u></li> <li>• <u>Pipelines are located within public rights-of-way which have been previously disturbed and where ESHA is limited.</u></li> <li>• <u>Pipeline conveyances utilize existing infrastructure where feasible to minimize impacts to ESHA. For example, portions of the conveyance infrastructure will be constructed on existing bridges over coastal streams which are considered ESHA.</u></li> <li>• <u>Refer to section IV-C for further discussion.</u></li> </ul>
<u>LU-62: Development of the harbor and beach areas should preserve, protect and enhance the use of these natural resources for the public.</u>	<u>Implementation of the mitigation measures recommended by the Draft EIR will ensure that the Project protects sensitive natural resources consistent with this policy.</u>
<u>LU-81: The City shall endeavor to implement its Wastewater Treatment Program.</u>	<u>The Project will facilitate implementation of the City's Wastewater Treatment Plan by reducing flows and processing load at the WWTF.</u>
<u>LU-82: Where necessary, significant archaeological and historic resources shall be preserved to the greatest extent possible both on public and privately held lands.</u>	<u>A preliminary archaeological investigation was prepared for the proposed pipeline routes, including the City of Morro Bay. Potential impacts to archaeological resources are discussed in Section IV-E of the DEIR. Monitoring and mitigation measures are recommended to address the potential for impacts to archaeological resources.</u>
<u>LU-83: Soil erosion should be kept at the absolute minimum possible through the practice of proper custodianship.</u>	<u>The CDP application will include a route-specific geologic investigation for pipelines. Final Plans detailing construction methods used on stream crossings, restoration and erosion control will implement mitigation measures WQ-1, BIO-3 and BIO-4.</u>
<b><u>Circulation Element</u></b>	
<u>C-1, C-3, C-4, C-6, C-7, C-8, C-9, C-10, C-11, C-13, C-14, C-15, C-17, C-18, C-20, C-21, C-23, C-24, C-25, C-26, C-27, C-28, C-29, C-30, C-31, C-32, C-33, C-34, C-35, C-37, C-38</u>	<u>Based on the project description, these policies are not applicable.</u>
<u>C-5: Pedestrian crossings of streets shall be designed to minimize hazards to the pedestrian.</u>  <u>C-12: The City will continue to promote safety in the use of the bikeway system.</u>  <u>C-16: New streets and reconstruction of existing streets shall incorporate measures which ensure safe and efficient operation of the traffic system.</u>  <u>C-19: The City will, when possible and where necessary, reduce traffic congestion and circulation problems that may be caused by trucks making deliveries in high-activity commercial areas.</u>  <u>C-22: Parking should be designed for safe and easy access.</u>	<u>Mitigation measure TR-1 requires the preparation of a Traffic Management Plan to ensure construction activities do not adversely impact safety and access for bicyclists, motorists, and transit, and ensures safe and continued access for emergencies, and access to schools and individual properties.</u>
<u>C-36: Leakage of sewers should be minimized.</u>	<u>The Project reduces the chance of leakage by processing effluent outside the City Limits.</u>
<b><u>Visual Resources and Scenic Highway Element</u></b>	
<u>VR-1, VR-4, VR-5, VR-6, VR-7, S-6.</u>	<u>Based on the project description, these policies are not applicable.</u>

<p><u>VR-2: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic and coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designed on Figure VR-1, shall be subordinate to the character of its setting.</u></p> <p><u>VR-3: The City shall implement the Coastal Land Use Plan/Coastal Element map and policies, through the adoption of appropriate ordinances, to protect and enhance the visual resources associated with the corridors of the City's scenic highways and local designated routes.</u></p>	<p><u>Portions of the conveyance infrastructure will be constructed within the right-of-way for State Route 1 which is a designated scenic corridor. However, the pipelines will not be visible.</u></p> <p><u>Project consistency with the Local Coastal Program is discussed below.</u></p>
<p><b><u>Safety Element</u></b></p>	
<p><u>S-2, S-4, S-8, S-9, S-10, S-11,</u></p>	<p><u>Based on the project description, these policies are not applicable.</u></p>
<p><u>S-1: To the extent feasible, the City will ensure that development within the City's jurisdiction is designed to withstand natural and man-made hazards to acceptable levels of risk.</u></p>	<p><u>Futree Participation in the decommissioning of the existing WWTP is consistent with this policy.</u></p>
<p><u>S-5: The City will continue to enforce measures to ensure seismic safety hazards are minimized.</u></p>	<p><u>Pipeline conveyances within the City will be constructed to withstand seismic events. Implementation of Mitigation measure GEO-2A will ensure consistency with this policy.</u></p>
<p><u>S-7: Measures should be instituted to reduce the incidence of erosion.</u></p>	<p><u>The CDP application will include a route-specific geologic investigation for pipelines. Final Plans detailing construction methods used on stream crossings, restoration and erosion control will implement mitigation measures WQ-1, BIO-3 and BIO-4.</u></p>
<p><b><u>Noise Element</u></b></p>	
<p><u>N-1, N-2, N-3, N-4, N-6,</u></p>	<p><u>Based on the project description, these policies are not applicable.</u></p>
<p><u>N-5: The City will coordinate noise control activities with those of other responsible jurisdictions.</u></p>	<p><u>The project will coordinate with the City of Morro Bay regarding construction activities.</u></p>
<p><u>Noise Implementation Measure 3. Outdoor activity areas.</u></p> <p><u>The existing or projected future noise exposure at the exterior of buildings which will contain noise sensitive uses or within proposed outdoor activity areas (other than playgrounds and neighborhood parks) does not exceed 65 dB Ldn (or CNEL) prior to mitigation.</u></p>	<p><u>The construction of pipeline conveyances would be located primarily on Ocean Blvd and Cabrillo Drive in Cayucos, Main Street and Atascadero Road in Morro Bay, as well within the SR-1 right of way outside the northbound travel lanes. Construction activities would be temporary, lasting 16-24 months but construction activities at any specific location along the collection system may be a few days to a few weeks.</u></p> <p><u>Construction activities associated with a comparable gravity collection system concluded that construction of the pipeline conveyances would create an average noise level of 85.5 Leq and a peak noise level of 87.0 dBA Lmax at a distance of 25 feet from the source.</u></p> <p><u>Shielding of construction equipment along a pipeline construction route that is moving daily is not feasible. Likewise, noise attenuating shields on engines are not feasible because the equipment is not stationary. Therefore, temporary construction noise impacts to sensitive uses will not be consistent with this measure.</u></p>

<b><u>Housing Element</u></b>	
No relevant policies were identified.	
<b><u>Access and Recreation Element</u></b>	
No relevant policies were identified.	

<b><u>Local Coastal Plan Policies</u></b>	<b><u>Analysis of Consistency</u></b>
<b><u>General Land Use Policies</u></b>	
0.1, 0.2, 0.3, 0.5, 0.6	Based on the project description, these policies are not applicable.
Policy 0.4: Prior to the issuance of a coastal development permit, the City shall make the finding that the development complies with all applicable Land Use Plan policies.	The analyses provided in the Draft EIR, together with the responses to comments, provide evidence to make findings of consistency.
<b><u>Shoreline Access</u></b>	
No relevant policies were identified.	
<b><u>Visitor Serving Facilities</u></b>	
No relevant policies were identified.	
<b><u>Public Works and Locating and Planning New Development</u></b>	
Policy 3.01, 3.02, 3.03, 3.04, 3.06, 3.07	Based on the project description, these policies are not applicable.
<b><u>Archaeology</u></b>	
Policy 4.02, 4.06, 4.07, 4.08	Based on the project description, these policies are not applicable.
Policy 4.01: Where necessary significant and historic resources shall be preserved to the greatest extent possible both on public and privately held land.	A preliminary archaeological investigation was prepared for the proposed pipeline routes. Potential impacts to archaeological resources are discussed in Section IV-E of the DEIR. Monitoring and mitigation measures are recommended to address the potential for impacts to archaeological resources.
Policy 4.03: An archaeological reconnaissance performed by a qualified archaeologist shall be required as part of the permit review process for projects with areas identified as having potential archaeological sites. An archaeological reconnaissance will be required for all projects requiring an Environmental Impact Report under CEQA.	
Policy 4.04: Where archaeological resources are found as a result of a preliminary site survey before construction, the City shall require a mitigation plan to protect the site.	
Policy 4.05: Where archaeological resources are discovered during construction of new development, or through other non-permit activities (such as repair and maintenance of public works projects) all activities shall cease until a qualified archaeologist knowledgeable in Chumash culture can determine the significance of the resource and designate alternative mitigation measures.	
<b><u>Energy/Industrial Development</u></b>	
Policy 5.01, 5.02, 5.05, 5.09, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15, 5.16, 5.18, 5.19, 5.20, 5.21, 5.22	Based on the project description, these policies are not applicable.
Policy 5.03: The Morro Bay Wastewater Treatment facilities shall be protected in their present location since an important operational element, the outfall line, is coastal-dependent.	The project is consistent with this element because the present outfall will be retained.
Policy 5.06: The routing of any new pipelines or transmission lines shall utilize whenever possible existing pipeline or transmission line corridors.	The pipeline conveyances within the City will be located within existing rights-of-way and within existing trenches wherever possible.

<u>Policy 5.07: Except for these pipelines and transmission lines exempted from coastal development permits under Section 30610(d) and (f) of the Coastal Act as defined by the State Coastal Zone Conservation Commission's interpretive guidelines adopted September 5, 1978, the City shall review and approve all proposed plans for expansion of the transmission lines and pipelines in and through City boundaries.</u>	<u>The portions of the project within the City will be subject to the review and approval of the City through the coastal development permit process, consistent with this policy.</u>
<u>Policy 5.08: The City will require that new pipelines and transmission lines are installed with suitable mitigation measures such as erosion control, revegetation, and other measures necessary to protect all scenic resources and habitat values.</u>	<u>Implementation of the mitigation measures recommended by the Draft EIR will ensure consistency with this policy.</u>
<b><u>Coastal Agriculture</u></b>	
<u>No relevant policies were identified.</u>	
<b><u>Commercial Fishing and Recreational Boating</u></b>	
<u>No relevant policies were identified.</u>	
<b><u>Hazards</u></b>	
<u>Policy 9.05, 9.06, 9.07, 9.08, 9.09, 9.10, 9.11, 9.13, 9.14, 9.15, 9.16, 9.17, 9.18</u>	<u>Based on the project description, these policies are not applicable.</u>
<u>Policy 9.01: All new development located within areas subject to natural hazards from geologic, flood and fire conditions, shall be located so as to minimize risks to life and property.</u>	<u>All pipeline conveyances will be constructed underground and designed to resist seismic events or other geologic hazards.</u>
<u>Policy 9.02: All new development shall ensure structural stability while not creating nor contributing to erosion or geologic instability or destruction of the site or surrounding area.</u>	
<u>Policy 9.03: All development, including construction, excavation and grading, except for flood control projects and agricultural uses shall be prohibited in the 100-year floodplain areas.</u>	<u>With the exception of the pipeline from SR1 to the end of Atascadero Road, none of the facilities to be constructed within the City are located within a 100-year floodplain as mapped by FEMA. The Project will reduce hazards by conveying tertiary treated water to this location instead of the current untreated effluent.</u>
<u>Policy 9.04: Soils report prepared by a licensed civil engineer with expertise in soils and geology and reports prepared by a certified engineering geologist shall be required.</u>	<u>Mitigation measure GEO-1 requires the preparation of a Design Level Geotechnical Investigation and Report which will address the requirements of this policy.</u>
<u>Policy 9.12: To protect the sensitive Morro Bay Estuary, the City shall require all development including interim agricultural uses to follow Best Management Practices.</u>	<u>Mitigation Measure WQ-1 requires compliance with the General Permit including but not limited to compliance with 1) the State General Construction Activity Permit, as most recently modified by the State Water Resources Control Board (SWRCB), and 2) County standards under the Stormwater Ordinance Title 19 chapter 19.09.</u>
<b><u>Diking, Dredging, Filling and Shoreline Protection</u></b>	
<u>No relevant policies were identified.</u>	
<b><u>Visual Resources</u></b>	
<u>Policy 12.02, 12.02A, 12.02B, 12.02C, 12.03, 12.04, 12.05, 12.06, 12.07, 12.08, 12.09, 12.10, 12.11</u>	<u>Based on the project description, these policies are not applicable.</u>
<u>Policy 12.01: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic and coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually</u>	<u>Portions of the conveyance infrastructure will be constructed within the right-of-way for State Route 1 which is a designated scenic corridor. However, the pipelines will not be visible.</u>

<u>degraded areas. New development in highly scenic areas such as those designed on Figure VR-1, shall be subordinate to the character of its setting.</u>	
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## **Environmental Setting**

### **PROJECT SITE**

The project site consists of about 221 acres located on Toro Creek Road about 0.75 miles east of State Route 1 between the City of Morro Bay and the community of Cayucos. The project site occupies a portion of an alluvial plain formed along the southern side of Toro Creek, an ephemeral creek that flows to the ocean from the foothills of the Santa Lucia Range. Surrounding land uses include grazing and dry farming on agricultural properties of 80 or more acres. To the west is a tank farm associated with petroleum operations. There are no structures or other improvements on the project site except for a shed housing an existing well; the nearest dwellings are located approximately 0.5 miles to the west along Toro Creek Road and another farmhouse located approximately 0.7 miles to the east. A portion of the Project Site has been cultivated as recently as 2015. At the time of distribution of the Notice of Preparation, the site was fallow.

### **ALTERNATIVE PROJECT SITE**

The Alternative Site consists of about 215 acres located on the north side of Montecito Road and east of Old Creek Road along Willow Creek, about 1.2 miles east of the community of Cayucos. The project site contains two dwellings and agricultural accessory structures. At the time of distribution of the Notice of Preparation, the site was under cultivation with lima beans.

## **5. Standards of Significance**

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Project could have a significant adverse impact on the environment if it would:

- Physically divide an established community.
- Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

## **6. Project Impacts and Mitigation Measures**

### **METHODOLOGY**

The various components of the project were compared with relevant policies and standards for consistency.

### **CONSISTENCY WITH THE SAN LUIS OBISPO COUNTY GENERAL PLAN**

**Impact LU-1:** The project will not divide an existing community. This impact is considered less than significant (Class III).

An alternative to continued use of the existing outfall pipe is to use an existing pipeline owned by Chevron shown on Map V-3. This pipeline is 3,180 ft in length, about 480 feet longer than the line at the Morro Bay WWTF outfall.

The environmental advantages of using this outfall compared to the existing outfall have been determined to make this a reasonable alternative to this aspect of the Proposed Project.

## **ALTERNATIVES CARRIED FORWARD FOR ANALYSIS**

The alternatives to be examined were determined to be:

- **No Project**
- **Alternative Site**
- **Alternative Ocean Outfall Pipe**

### **C. NO PROJECT**

Under the No Project alternative, the Proposed Project would not occur on the proposed site or at the alternative site described in this EIR. In this instance, No Project would mean the CSD would return to cooperation with the City of Morro Bay in developing of a new facility in that jurisdiction.

Simply not constructing a new wastewater treatment facility is not an option because 1) upgrade to the MBCSD WWTP is mandated to improve discharged water quality to at least full secondary eliminating the need for the Clean Water Act Section 301(h) modified discharge permit based on a Settlement Agreement with the Central Coast Regional Water Quality Control Board (RWQCB) and 2) the California Coastal Commission (CCC) determined that upgrading and maintaining wastewater facilities at the location of the existing MBCSD WWTP would violate the Coastal Act, effectively mandating the abandonment of the CSD's historic wastewater treatment infrastructure.

However, under CEQA a discussion of the results of not constructing the WRRF in Cayucos and the existing WWTF in Morro Bay continuing to operate as it is may be considered as one No Project scenario. In this event, the existing (baseline) environmental conditions to convey and process effluent would continue. Under this scenario, the wastewater quality discharged to the ocean outfall would continue to violate the Clean Water Act and be in violation of the legal settlement in place today that is pending construction of new facilities. The facility would continue to violate the Coastal Act as set forth by the Coastal Commission.<sup>2</sup> The table below compares the impacts continued use of the existing WWTF with the Proposed Project.

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<sup>2</sup> Staff Report for CDP Application A-3-MRB-11-001, January 10, 2013 incorporated herein by reference.

**Table V-3 Comparison of Proposed WRRF to Existing WWTF**

Issue	Proposed Project level of impacts	Existing WWTF
Geology	Not fully mitigable (tsunami)	Wave run-up attributable to sea level rise could result in significant, but potentially mitigable impacts. Existing threat of liquefaction and tsunami would persist.
Agricultural Resources	Not fully mitigable	No effect.
Biological Resources	Mitigable	No existing significant effects.
Drainage and Water Quality	Mitigable	Water quality violation, significant effect.
Cultural Resources	Mitigable	No existing significant effects.
Visual Resources	Mitigable	No existing significant effects under current LCP.
Traffic	Not fully mitigable in short term	No existing significant effects.
Noise	Not fully Mitigable in short term	Existing noise levels at the WWTF would continue to affect neighbors.
Air Quality and GHG	Mitigable	Any current exceedance under latest APCD thresholds for new construction would persist.
Hazards	Mitigable	Existing potentially significant
Growth Inducing Effects	Mitigable	No effect.
Land Use and Planning	Mitigable	Inconsistent with the Coastal Act per Coastal Commission determination. Current LCP identifies the use of the site as only for wastewater facility.
Environmental Justice	Not significant	Not significant.

In conclusion, significant water quality and flooding / wave run-up impacts would persist. Continued operation of the WWTF would avoid new impacts associated with the WRRF project for various topics. This comparison is useful to highlight the reasons why long term continued use of the WWTF is not environmentally beneficial.

Therefore, No Project means the CSD would pursue jointly developing a new facility at a site yet to be finally determined. At the time of this DEIR publication, the City of Morro Bay has completed a comparative analysis of several candidate facility sites and having selected the South Bay Boulevard (Tri-W) site has issued a Notice of Preparation for an Environmental Impact Report in August 2016.

Therefore, what can be determined about the potential environmental impacts of the development of a new facility for the new Morro Bay facility must rely on preliminary environmental screening data on the proposed South Bay Boulevard Tri-W site contained in the *New Water Reclamation Project Report on Reclamation and Council Recommended Site* (“Project Report”) dated May 8, 2014 for various sites under consideration by the City, incorporated herein by reference.

### **Morro Bay Tri-W Site Location and Project Characteristics**

According to the City NOP, the proposed site is located on an approximately 10 acre site within a 396 acre parcel (APN 073-101-017) in the unincorporated area adjacent to the city boundary, north of State Highway 1. The project would be done in two phases, the first to construct a 1.2 MGD MMF tertiary level treatment facility to allow decommissioning of the existing WWTP utilizing the existing ocean outfall. Phase 2 would a component for yet to be determined beneficial use of recycled water.

Phase 1 would include a new force main from the existing WWTF to the new facility, associated lift stations improvements and a recycled water pipeline to the existing ocean outfall.

According to the Project Report, “the most developable 10 to 15-acre portion of the site is relatively level and located about 100 to 120 feet above sea level. This is well below the 250-foot contour, above which a new facility would likely require several lift stations and/or high pressure mains to convey untreated wastewater. There is no existing development on the site.”

The site is not encumbered with regulatory issues such as Land Conservation Act contracts, Habitat Conservation Plan restrictions, conservation easements, or Alquist-Priolo Fault Zones.

The Project Report concludes: “ While there would need to be investigations of the site with respect to biological resources, cultural resources, and geologic hazards, preliminary indications appear to be that the site does not face unusual or unique challenges with respect to these issues that may result in substantial restrictions on the design and resulting permitting time frame for the project.”

The Project Report notes: “the site is adjacent to Caltrans right-of-way (Highway 1), but development of the new WRF would not affect nor encroach upon Caltrans property. It may be necessary build pipelines within or across Caltrans rights-of-way either to bring wastewater to the site, or to distribute reclaimed water to potential users.”

The site is about 1.7 miles from the Morro Bay estuary and 2.3 miles from the ocean, separated from each by intervening topography. It is not subject to coastal hazards such

**Table V-3 V-4: Comparison of Project Alternatives – With Mitigation**

<b>Issue</b>	<b>Proposed Project, with Mitigation Measures</b>	<b>No Project *</b>	<b>Alternative Site</b>	<b><del>Existing Outfall vs Chevron Outfall</del> <u>Chevron Outfall vs Existing Outfall</u></b>
<b>Slope/Geology</b>	Less than significant	Similar impact	Similar impact	Less ground disturbance
<b>Agricultural Resources</b>	Significant and avoidable	Less impact	Similar impact	Similar impact
<b>Biological Resources</b>	Less than significant	Similar impact	Greater impact	Similar impact
<b>Water Quality &amp; Drainage</b>	Less than significant	Similar impact	Similar impact	Less impact
<b>Cultural Resources</b>	Less than significant	Less impact	Less impact	Similar impact
<b>Traffic</b>	Less than significant	Similar impact	Similar impact	Less impact
<b>Greenhouse Gases</b>	Less than significant	Greater impact	Similar impact	Less Impact
<b>Growth inducing effects</b>	Less than significant	Similar or greater impact	Similar Impact	NA
<b>Visual Quality</b>	Less than significant	Similar impact	Greater impact (Class I)	Similar
<b>Noise</b>	Less than significant	Similar impact	Similar or greater impact (Class I)	Similar impact.
<b>Air Quality &amp; GHG</b>	Less than significant	Similar impact	Similar impact	Less impact
<b>Hazards</b>	Less than significant	Similar impact	Similar impact	Less impact

\* No Project is development of a wastewater facility in conjunction with the City of Morro Bay at the South Bay Boulevard Site (Tri-W site).

## **Appendix A- Directional Boring Information**





## SUBSURFACE DATA REPORT

April 6, 2017  
SL10070-1

Dear Mr. Koon:

**Client:**  
Attn: Rick Koon  
Cayucos Sanitary  
District  
PO Box 333  
Cayucos, California  
93430

This Subsurface Data Report has been prepared for the proposed Cayucos Sanitary District pipeline construction along Toro Creek Road from approximately Sta 1+00 to Sta 10+00 in the Cayucos area of San Luis Obispo County, California. Results of the field investigation and laboratory testing performed for the project are provided in this report.

It is our understanding that horizontal directional drill (HDD) techniques will be used to construct the pipeline along Toro Creek Road and beneath Toro Creek, extending from about Sta 1+00 to about Sta 10+00. Geotechnically, the site is suitable for the proposed HDD construction. Variable site conditions including hard rock and very loose to soft soils should be anticipated. Groundwater was encountered in the creek vicinity at depths of about 13 and 15 feet during our field investigation.

Thank you for the opportunity to have been of service in preparing this report. If you have any questions or require additional assistance, please feel free to contact the undersigned at (805) 543-8539.

Sincerely,  
**GeoSolutions, Inc.**

Kelly Robinson, PhD, PE  
Project Engineer, C76737



220 High Street  
San Luis Obispo CA 93401  
805.543.8539

1021 Tama Lane, Suite 105  
Santa Maria, CA 93455  
805.614.6333

PO Box 30159  
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[sbinfo@geosolutions.net](mailto:sbinfo@geosolutions.net)

March 22, 2017

Rick Koon  
Cayucos Sanitary District  
200 Ash Avenue  
PO Box 333  
Cayucos, CA 93430

Re: Cayucos Sustainable Water Project

Subject: Horizontal Directional Drilling (HDD)

Mr. Koon,

We have reviewed the boring log information for the section of Toro Creek Road referenced as Zone 2 on the Applied Earthworks archeological report.

In consultation with our Horizontal Directional Drilling (HDD) subcontractor, we feel that HDD is constructible in this area. The HDD will consist of two bores and extend from station 0+00 to station 10+00 in order for the pipes to go under the creek.

Please feel free to contact me should you require additional information.

Best regards,  
J.R. Filanc Construction Company



Omar Rodea, P.E., DBIA  
Director of Construction Engineering

27 March 2017

Cayucos Sanitary District  
Attn: Mr. Rick Koon  
P.O. Box 333  
Cayucos, CA 93430

RE: Cayucos Sustainable Water Project  
Finding of No Adverse Effect on Archaeological Site CA-SLO-879/H

Dear Mr. Koon:

The Cayucos Sanitary District (CSD) is planning to develop a new water treatment plant on a 5-acre parcel on Toro Creek Road approximately 0.75 mile northeast of State Route 1 (SR 1). CSD will install pipelines along Toro Creek Road to connect the new plant with an existing pumping station at SR 1. Funding for the Project will be supplied by the United States Department of Agriculture (USDA), and the project is thus classified as a federal undertaking pursuant 36 CFR 800.16(y), which is part of the implementing regulations for Section 106 of the National Historic Preservation Act. To comply with Section 106, the USDA will consult with the California State Historic Preservation Officer (SHPO) to define the Project's Area of Potential Effects (APE), identify historic properties in the APE (i.e., properties listed or eligible for listing on the National Register of Historic Places [NRHP]), assess project effects on identified historic properties, and develop a plan to resolve any adverse effects, if necessary.

At least one historic property will be affected by the Project. CA-SLO-879/H is a large prehistoric archaeological site that occupies a substantial area on both sides of Toro Creek, extending from SR 1 upstream for at approximately 1400 meters. The site also contains historic ranching and industrial components. CA-SLO-879/H has been studied for several prior projects, and has been judged significant and eligible for listing on the NRHP because it contains important archaeological data regarding local and regional prehistory, cultural chronology, prehistoric economics, native technological and social development, and related questions. The site also is culturally significant to local Chumash and Salinan people because it is recognized as a major village location and known cemetery (Gibson 1980; White 1993a, 1993b; Price et al. 2004; Lloyd et al. 2005; Applied EarthWorks 2017; Enright and Schinsing 2017).

The alignment of the pipelines to connect the new treatment plant with the existing pumping station at the intersection of SR 1 and Toro Creek Road passes across CA-SLO-879/H for a distance of approximately 650 meters. Applied EarthWorks, Inc. (Æ) excavated 53 shovel test pits and 4 test excavation units along the pipeline alignment, which follows the shoulder of Toro Creek Road, to define the distribution, density, content, and integrity of archaeological deposits. Testing demonstrated that the portion of the pipeline alignment that crosses the archaeological site can be divided into two zones (Figure 1). Zone 1 extends up Toro Creek Road from SR 1 for approximately 200 meters; it contains very sparse cultural material in disturbed contexts. Cultural deposits in Zone 1 lack the quantity and variety of material remains, integrity, or contextual associations needed to offer important new information on local prehistory or history; thus, these portions of the site do not contain qualities that



make the site eligible for the NRHP (Applied EarthWorks 2017). Trenching in this area for pipeline installation will not constitute an adverse effect on the historic property because it will not diminish the integrity of those qualities that make the site eligible for listing on the NRHP.

For about 380 meters the alignment crosses high density midden deposits (Zone 2). This section of CA-SLO-879/H has substantial archaeological data potential and thus embodies the qualities that make the site eligible for inclusion in the NRHP. Any direct disturbance of intact archaeological deposits in Zone 2 would constitute an adverse effect on the historic property. To avoid adverse effects, CSD has engineered pipeline installation to use directional drilling to bore underneath Toro Creek and below the maximum depth of the archaeological deposit in Zone 2. The initial bore pit will be placed approximately 200 feet east of Toro Creek at the edge of Zone 2 (Sta 10+00), along the road shoulder where it has already been cut well below the depth of the cultural deposit. The receiving pit will be approximately 800 feet west of the creek, at the opposite edge of Zone 2 (Sta 0+00), where the midden terminates in an admixture of cultural material with road fill. By boring underneath the intact midden deposit, the Project avoids impacts that will diminish the integrity of those deposits. Thus, it is our judgement that implementation of the Project will not create an adverse effect on CA-SLO-879/H.

We recommend that an archaeologist and a tribal representative monitor excavation of the bore pit and receiving pit, but no other treatment is warranted. Please contact me if you require additional information or have any questions about our findings.

Sincerely,

Barry A. Price, M.A., RPA  
Principal Archaeologist  
Applied EarthWorks, Inc.



## **Appendix B-Mitigation Monitoring Plan**



## Mitigation Monitoring Plan

### Final Environmental Impact Report Appendix B Cayucos Sustainable Water Project

The Cayucos Sanitary District (CSD) shall adopt mitigation measures for implementation as specified below in this Mitigation Monitoring Plan (MMP). The MMP is implemented as a requirement of CEQA (State CEQA Guidelines Section 15097) and also to comply with similar requirements in the County of San Luis Obispo's (County) Land Use Ordinance (Section 22.32.030(b)) which requires implementation of an Environmental Quality Assurance Program.

This MMP will be in place through all Project phases, and will help ensure that Project objectives are achieved. As the Land Use authority, the County shall be responsible for administering the MMP and ensuring that all parties comply with its provisions. The County may delegate monitoring activities to staff, consultants, or the CSD. The County also will ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems, including, but not limited to, revocation of the approved Conditional Use Permit (CUP)/Coastal Development Permit (CDP) and related Notices to Proceed (NTPs).

This MMP was prepared and is accompanied by the associated report forms utilized to verify compliance with individual mitigation measures. This MMP identifies each mitigation measure by discipline, the entity (organization) responsible for its implementation, the report/permit/certification required for each measure, and an accompanying County MMP form used to certify completion. Certain inspections and reports may require preparation by qualified individuals, and these are specified as needed. The timing and method of verification for each measure is also specified.

#### **Responsibilities of the Parties**

Responsibility for implementing adopted mitigation measures, and for reporting on the implementation of these measures, rests with the CSD. The County has primary responsibility for ensuring that the measures are implemented as adopted as land use entitlement Conditions of Approval. The County may use its monitoring authority by evaluating written reports and plans, and also by active field evaluation of activities at the Project site to ensure compliance with the requirements of adopted measures.

#### **Compliance and Non-Compliance Violation Levels**

Project compliance and non-compliance violation levels and the specific corrective actions are defined as follows:

- **Compliance.** At this level indicates that all mitigation measures and permit conditions are being complied with and that there are no violations. No corrective action is necessary.
- **Level 1 Non-Compliance.** One aspect of a mitigation measure has not been complied with resulting in only partial implementation of a mitigation measure, but no significant impact results. An oral warning shall be issued to Applicant's Environmental Coordinator (or assigned designee) and corrective action shall be required within a stated maximum period, to be determined by the County's Environmental Coordinator. If corrective action is not taken within the stated period, a Memorandum of warning will be issued.

- **Level 2 Non-Compliance.** One or more aspects of a mitigation measure have not been complied with, making the mitigation ineffective, thereby resulting in minor impacts. If allowed to continue, this non-compliance could result in a significant adverse impact over time. An oral warning followed by a Memorandum of warning shall be submitted to the Applicant's Environmental Coordinator (or assigned designee). Corrective action shall begin by the next day. If corrective action is not begun by the next day, a Non-Compliance Report shall be issued.
- **Level 3 Non-Compliance.** One or more aspects of a mitigation measure are not complied with and the implementation of a mitigation measure is deficient or non-existent, thereby resulting in either significant adverse impact(s), or there is immediate threat of major, irreversible environmental damage or property loss. An oral warning, followed by a Non-Compliance Report, shall be submitted to the Applicant's Environmental Coordinator (or assigned designee). Corrective action shall begin immediately.

Based on the severity of a given infraction or pattern of non-compliance activity, the County's Environmental Coordinator has the authority to issue a stop work order. If a shutdown of activity occurs, operation may resume based on approval by the County's Environmental Coordinator. The Environmental Coordinator's representative at the Project site has the authority to order a stop work notice if he/she determines that a serious non-compliance event is occurring, personnel safety is at risk, or damage to resources is occurring, and if the Environmental Coordinator or other senior County official is unavailable.

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
<b>Agricultural Resources</b>				
<p><b>Impact AG-1:</b> Construction of the WRRF and solar array on the Project Site will result in the permanent conversion of Prime Farmland as defined by the San Luis Obispo County Conservation and Open Space Element. This impact is considered significant and unavoidable.</p>	<p><b>Mitigation Measure AG-1:</b> Prior to the issuance of grading permits, the Cayucos Sanitary District shall provide evidence to the County Department of Planning and Building that a farmland conservation easement, a farmland deed restriction, or other farmland conservation mechanism has been granted in perpetuity to the County or a qualifying entity approved by the County Agricultural Commissioner (or designee). The easement shall provide conservation acreage at a ratio of 2:1 for direct project impacts. The area conserved shall be of a quality that is reasonably similar to that of farmland within the project limits (as determined by the County Agricultural Commissioner or designee).</p>	<p>CSD to record farmland conservation easement or approved mechanism to provide the required conservation acreage.</p>	<p>Prior to issuance of grading permit.</p>	<p>CSD and County of SLO in coordination with the San Luis Obispo County Agricultural Commissioner.</p>
<b>Air Quality</b>				
<p><b>Impact AQ-1</b> Construction emissions are below the SLOAPCD significance thresholds. Therefore, construction of the Proposed Project would be consistent with the Clean Air Plan. However, fugitive dust from construction has the potential to result in a violation of SLOAPCD Rule 401 (Visibility) and/or Rule 402 (Nuisance) without mitigation. Impacts would be significant but reduced to less than significant levels with implementation of mitigation measures.</p>	<p><b>Mitigation Measure AQ-1:</b> The following standard SLOAPCD dust control measures shall be implemented:</p> <ul style="list-style-type: none"> <li>a. The amount of the disturbed area shall be minimized;</li> <li>b. Water trucks or sprinkler systems shall be used in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency shall be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water or an APCD-approved dust suppressant should be used whenever possible;</li> <li>c. All dirt stock pile areas shall be sprayed daily and covered with tarps or other dust barriers as needed;</li> <li>d. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive, grass seed and watered until vegetation is established;</li> <li>e. All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the APCD;</li> </ul>	<p>Review and approval of Measures on Grading Plan, and an Activities Management Plan, acceptable to San Luis Obispo County Air Pollution Control District.</p>	<p>Prior to grading permit and ongoing during construction.</p>	<p>County of San Luis Obispo, Planning and Building Department, coordinated with San Luis Obispo County Air Pollution Control District.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM AQ-1</b> con't</p> <p>f. All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible. In addition, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;</p> <p>g. Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;</p> <p>h. All trucks hauling dirt, sand, soil, or other loose materials shall be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with CVC Section 23114;</p> <p>i. Wheel washers and/or rumble strips shall be installed where vehicles enter and exit unpaved roads onto streets; and</p> <p>The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below the APCD's limit of 20% opacity for greater than 3 minutes in any 60-minute period. The name and telephone number of such persons shall be provided to the APCD Engineering &amp; Compliance Division prior to the start of any grading, earthwork or demolition.</p>			
<p><b>Impact AQ-3:</b> construction of the new pipelines associated with the Proposed Project could disturb rock formations containing NOA. Impacts would be significant without mitigation.</p>	<p><b>Mitigation Measure AQ-2:</b> Prior to starting any ground-disturbing construction activities for the new influent, effluent, or RW pipelines to CSA-10, the applicant shall conduct a geologic evaluation for NOA along the pipeline routes following the Guidelines for Geologic Investigations of Naturally Occurring Asbestos in California (California Geologic Survey [CGS] Special Publication 124, 2002) to determine whether the construction of the pipelines has the potential to disturb NOA, and if so, how many acres. If no NOA is expected to be disturbed, the applicant shall submit a request for an exemption from CARB's Asbestos ATCM, along with the geologic evaluation report. If NOA is expected to be disturbed, the SLOAPCD must be notified and preparation and approval of an Asbestos Dust Mitigation Plan and Asbestos Health and Safety Program may be required.</p>	<p>Conduct geologic evaluation for the presence of NOA and if deemed applicable, prepare Asbestos Dust Mitigation Program. Review and approval of Measures, and an Activities Management Plan, acceptable to San Luis Obispo County Air Pollution Control District.</p>	<p>Prior to issuance of grading permit.</p>	<p>County of San Luis Obispo, Planning and Building Department, coordinated with San Luis Obispo County Air Pollution Control District.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
<p><b>Impact AQ-4:</b> Due to the proximity of Morro Bay High School and several residences to the installation routes for new pipelines, idling of construction equipment could pose a significant health risk to these sensitive receptors due to diesel particulate matter emissions.</p>	<p><b>Mitigation Measure AQ-3:</b> The applicant shall implement the following idling control techniques:</p> <p style="padding-left: 40px;">California Diesel Idling Regulations</p> <p>a. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:</p> <ul style="list-style-type: none"> <li>• Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and</li> <li>• Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.</li> </ul> <p>b. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.</p> <p>c. Signs must be posted in the designated queuing areas and job sites to remind drivers and operators of the state's 5-minute idling limit.</p> <p>Diesel Idling Restrictions Near Sensitive Receptors (i.e., Morro Bay High School and Residential Dwellings along the Pipeline Routes)</p> <p>In addition to the State required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:</p> <p style="padding-left: 40px;">a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;</p>	<p>Implement California diesel idling regulations and restrictions near sensitive receptors and conduct pre-con awareness training for contractors regarding diesel idling regulations and sensitive receptors.</p>	<p>Pre construction /during construction.</p>	<p>CSD in coordination with contractors/ equipment operators.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM AQ-3</b> con't</p> <p>b. Diesel idling within 1,000 feet of sensitive receptors shall not be permitted;</p> <p>c. Use of alternative fueled equipment is recommended; and</p> <p>Signs that specify the no idling areas must be posted and enforced at the site.</p>			
<p><b>Impact AQ-5:</b> Potential odor nuisance impacts on nearby residents would be potentially significant without mitigation. However, implementation of mitigation would ensure that impacts are reduced to less than significant levels.</p>	<p><b>Mitigation Measure AQ-4:</b> Prior to receipt of the Authority to Construct (ATC) from the SLOAPCD for the project, the applicant must submit an Odor Monitoring and Complaint Response Plan for review and approval by the SLOAPCD.</p>	CSD submit Odor Monitoring and Complaint Response Plan.	Prior to ATC.	CSD in coordination with County of SLO and APCD.
<b>Biological Resources</b>				
<p><b>Impact BIO-2:</b> Impacts to nesting birds, including special status birds, may occur in ruderal areas with thick vegetation, eucalyptus trees and riparian trees within the Proposed Project construction area. Impacts to nesting birds are potentially significant, but mitigable.</p>	<p><b>Mitigation Measure BIO-1:</b> Within one week of ground disturbance or vegetation removal activities, if work occurs between March 1 and August 31, nesting bird surveys shall be conducted. If surveys do not locate nesting birds, construction activities may be conducted. If nesting birds are located, no construction activities shall occur within 100 feet of nests until chicks are fledged. Occupied nests of special status bird species shall be mapped using GPS or survey equipment and submitted in monitoring reports. If nesting birds are located, no construction activities shall occur within 100 feet of nests (or other setback distance determined by a qualified ornithologist) until chicks are fledged. Construction activities shall observe a 300-foot buffer for active raptor nests. Occupied nests of special status bird species shall be monitored every two weeks to document nest success and check for compliance with buffer zones.</p>	CSD retain County approved Biologist to perform survey.	Prior to beginning construction.	CSD and County of SLO in coordination with County-Approved Environmental Monitor
<p><b>Impact BIO-3:</b> Potential habitat for the special status plant Club-haired mariposa lily occurs in a small patch of annual grassland at the</p>	<p><b>Mitigation Measure BIO-2:</b> Limits of grading shall be clearly delineated in the field prior to initiation of construction activities to demonstrate avoidance in impacting the area identified in the Biological Technical Report as habitat for club-haired mariposa</p>	CSD retain County-approved Biologist to perform survey.	Prior to beginning construction.	CSD and County of SLO in coordination with County-approved Environmental Monitor.

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
<p><b>Impact Bio-3</b> con't southern end of the Proposed Project Study Area. This habitat is outside the limits of grading, however potential adverse effects are possible therefore the impact is significant but mitigable.</p>	<p><b>MM BIO-2</b> con't lily.</p>			
<p><b>Impact BIO-4:</b> Construction equipment and vehicle traffic, sedimentation due to earthmoving, or spills during construction or operation of the WRRF may impact special status reptiles and amphibians, a potentially significant but mitigable impact.</p>	<p><b>Mitigation Measure BIO-3:</b> To mitigate adverse impacts to potentially present status reptiles and amphibians western pond turtle, foothill yellow-legged frog, coast range newt, and two-striped garter snake, in addition to Mitigation Measure BIO-4, the following shall be implemented:</p> <ul style="list-style-type: none"> <li>• Construction Plans shall show how construction at stream crossings will utilize low-flow periods, incorporate sediment retention devices and minimize time and area of disturbance.</li> <li>• A pre-construction survey would be conducted within 48 hours prior to starting work in or within 50 feet of habitats likely to support sensitive reptiles and amphibians such as seasonal drainages and riparian. The survey would be conducted by a qualified biologist approved to relocate sensitive species should they occur. If sensitive reptile or amphibian species are located during the pre-construction survey, a biologist would monitor ground-breaking work conducted within 50 feet of habitat.</li> <li>• Qualified biologists will brief all project personnel prior to participating in construction activities. At a minimum, the briefing will include a description of the project components and techniques, a description of the listed species occurring in the project area, and the general and specific measures and restrictions to protect the species during implementation of the project.</li> </ul>	<p>CSD retain County-approved Environmental Monitor to verify completion of Pre-construction surveys, project personnel briefings and preparation and implementation of revegetation plans as related to sensitive reptiles and amphibians.</p>	<p>Pre-construction, ongoing monitoring during construction and post construction implementation of revegetation plan.</p>	<p>CSD and County of SLO in coordination with County-Approved Environmental Monitor.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM Bio-3</b> con't</p> <ul style="list-style-type: none"> <li>Post construction re-vegetation plans for work areas disturbed within 100 feet of ESHA at Toro Creek Bridge shall be submitted for County approval and implemented upon completion of pipeline work in that area. The re-vegetation plan shall use only native plant species pursuant to Coastal Policy 30. The species shall be selected to provide permanent erosion control and soil cover pursuant to Coastal Policy 21.</li> </ul>			
<p><b>Impact BIO-5:</b> Construction equipment and vehicle traffic, sedimentation due to earthmoving, or spills during construction or operation of the WRRF may impact California red-legged frog (CRLF), a potentially significant but mitigable impact.</p>	<p><b>Mitigation Measure BIO-4:</b> To mitigate adverse impacts to potentially present California red-legged frog (CRLF), the following shall be implemented:</p> <p><b>Pre-construction Survey.</b> Prior to commencement of grading activities, a USFWS-approved biologist will survey the project site 48 hours before the onset of work activities. If any life stage of the California Red-legged Frog (CRLF) is found and these individuals are likely to be killed or injured by work activities, the biologist will be allowed sufficient time to move them from the site before work activities begin. The biologist will relocate the CRLF the shortest distance possible to a location that contains suitable habitat and will not be affected by activities associated with the proposed project. The biologist will maintain detailed records of any individuals that are moved (e.g., size, coloration, distinguishing features, digital images, etc.) to assist in determining whether translocated animals are returning to the original point of capture.</p> <p><b>Pre-construction Training.</b> Prior to commencement of grading activities, a USFWS-approved biologist will conduct a training session for all construction personnel. At a minimum, the training will include a description of the CRLF and its habitat, the specific measures that are being implemented to conserve the CRLF for the current project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be</p>	<p>CSD retain County-approved Environmental Monitor to verify completion of Pre-construction surveys, project personnel briefings and preparation and implementation of site protocols.</p>	<p>Prior to construction Permit Issuance. Pre-construction surveys, ongoing awareness training and biological monitoring during construction.</p>	<p>CCSD in coordination with USFWS-approved biologist and County-approved Environmental Monitor.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM Bio-4</b> con't used in the training session, provided that a qualified person is on hand to answer any questions.</p> <p><b>Biologist Present during Construction.</b> A USFWS-approved biologist will be present at the work site until all CRLF have been removed, workers have been instructed, and disturbance of habitat has been completed. After this time, the County will designate a person to monitor on-site compliance with all minimization measures. The biologist will ensure that this monitor receives the training outlined above and in the identification of CRLF. If the monitor/biologist determine CRLF impacts are greater than anticipated or approved, work shall stop until the issue is resolved. The monitor/biologist shall immediately contact the resident engineer (the engineer overseeing and in command of construction activities), where the resident engineer will either resolve the situation by eliminating the effect immediately, or require that all actions which are causing these effects be halted. If work is stopped, the County/USFWS will be notified as soon as is reasonably possible.</p> <p><b>Trash Removal.</b> During construction/ground disturbing activities, all trash that may attract CRLF predators will be properly contained, removed from the work site, and disposed of regularly. Prior to occupancy or final inspection, whichever occurs first, all trash and construction debris will be removed from work areas.</p> <p><b>Equipment Maintenance.</b> During construction/ ground disturbing activities, all refueling, maintenance, and staging of equipment and vehicles will occur at least 100 feet from riparian habitat or water bodies and not in a location from where a spill would drain directly toward aquatic habitat. The monitor will ensure contamination of habitat does not occur during such operations. Prior to commencement of grading/construction activities, the monitor will ensure that a plan is in place for</p>			

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM Bio-4</b> con't prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.</p> <p><b>Revegetation.</b> Prior to occupancy or final inspection, whichever occurs first, for disturbed areas within the project boundaries, they shall be revegetated with an assemblage of native riparian, wetland and upland vegetation suitable for the area. Locally collected plant materials will be used to the extent practical. Invasive, exotic plants will be controlled to the maximum extent practical and not included in any landscaping efforts. This measure shall apply to all disturbed areas unless determined not practical or feasible by the County.</p> <p><b>Land Restoration.</b> Prior to occupancy or final inspection, whichever occurs first, to the extent practical, contours shall be returned to as close to original, unless it is determined by the biologist that the new contours provide greater benefit for the CRLF.</p> <p><b>Work Scheduling.</b> Prior to commencement of grading/construction activities, the applicant shall make all efforts to schedule work activities for times of the year when impacts to the CRLF would be minimal. As examples: a) work that would affect large pools that may support breeding would be avoided, to the maximum extent practical, during the breeding season (November through May); b) isolated pools that are important to maintain CRLF through the driest portions of the year (late summer, early fall) would be avoided to the maximum extent practical. When such conditions exist, the applicant will work with the biologist to coordinate the construction schedule to minimize impacts to the CRLF.</p>			

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM Bio-4</b> con't</p> <p><b>Sedimentation and Erosion Control.</b> Prior to issuance of construction permit(s), sedimentation and erosion control plans shall be submitted using Best Management Practices (BMPs) to minimize sediment from entering nearby water bodies or prominent drainage courses, consistent with Mitigation Measure WQ-1. During or after construction/ ground disturbing activities, if these BMPs are ineffective, the applicant will work with the monitor/biologist and resident engineer, in consultation with USFWS, to install effective measures prior to the next rain event.</p> <p><b>Water impoundment.</b> Unless approved by the USFWS, water will not be impounded in a manner that may attract CRLF.</p> <p><b>Completion Report.</b> Prior to occupancy or final inspection, whichever occurs first, the applicant shall submit to the County and USFWS, a project completion report form, completed by the USFWS-approved biologist. The report form should identify any recommended modifications or protective measures, if additional stipulations to protect CRLF are warranted, or if alternative measures would facilitate compliance with the provisions of this consultation.</p>			
<p><b>Impact BIO-6:</b> Steelhead and tidewater goby habitat may be affected by sedimentation due to earthmoving, or spills during construction or operation of the WRRF and pipeline construction activities along Toro Creek, and crossing Old Creek (EHSA within the Coastal Zone). This is a significant but mitigable impact (Class II).</p>	<p><b>Mitigation Measure BIO-5:</b> To mitigate potential adverse effects to water quality and special status species habitat in project area creeks, in addition to measures described in measure WQ-1 including appropriate best management practices (BMPs) utilized within the construction areas to prevent excess sediment from entering Toro Creek or Willow Creek, Storm Water Pollution Prevention Plan (SWPPP) implementation, and long-term measures identified in the SWPPP, the following additional measures are required:</p> <ul style="list-style-type: none"> <li>• During construction of the conveyance pipelines across all creeks, no ground disturbing activities will take place within the riparian corridor or within the top of bank channel.</li> </ul>	<p>Construction Permit Authorization for SWPPP and Environmental Monitor observations and reporting.</p>	<p>Prior to grading permit issuance and during Construction.</p>	<p>CSD and County of SLO in coordination with County-Approved Environmental Monitor.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<p><b>MM Bio-5</b> con't</p> <ul style="list-style-type: none"> <li>• The edge of riparian vegetation will be shown on construction plans and boundaries of the work area will be shown on construction plans. Limits of grading will be clearly delineated in the field prior to initiation of construction activities.</li> <li>• All hazardous materials required to operate and maintain equipment will be properly used in accordance with manufacturer's specifications.</li> <li>• The contractor will follow an approved spill prevention plan, including procedures to ensure that all equipment is properly maintained and free of leaks and all necessary repairs incorporate proper spill containment.</li> <li>• Hazardous materials will be properly stored and managed in secured areas located outside riparian corridors.</li> <li>• Mobile equipment will be staged, repaired, and maintained 300 ft from top of bank of Toro Creek and Old Creek, or on existing paved road surfaces. Fueling of equipment will be conducted in pre-designated areas at least 300 ft from the top of bank drainages, or on existing paved road surfaces. Spill containment materials will be placed around the equipment before refueling. Standing equipment will be outfitted with drip pans and hydrocarbon absorbent pads.</li> </ul>			
<p><b>Impact BIO-7:</b> Construction of pipeline conveyances at the bridges across Toro Creek, Old Creek, and Paul Alva Creek box culvert could impact Pallid Bats, a significant but mitigable impact.</p>	<p><b>Mitigation Measure BIO-6:</b> Prior to installation of conveyance structures adjacent to road bridges over Willow Creek, Old Creek, or Paul Alva Creek, a qualified biologist shall conduct a survey of the bridge to determine if roosting bats are present. If possible, the survey shall be conducted during the non-breeding season (November through March). If a colony of bats is found roosting in any structure, further surveys shall be conducted sufficient to determine the species present and the type of roost (day, night, maternity, etc.) If the bats are not part of an active maternity colony, passive exclusion measures may be</p>	<p>CSD retain County approved biologist for pre-construction survey and reporting.</p>	<p>Prior to work at bridges over creek from November through March.</p>	<p>CSD and County of SLO in coordination with County-Approved Environmental Monitor.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<b>MM BIO-6</b> can't implemented with approval from CDFW. November is the best time of the year to exclude bats from a roost because it is after the breeding season and before winter hibernation (not all species hibernate).			
<b>Impact BIO-8:</b> Construction activities impacting the eucalyptus habitat for Monarch butterfly are a potentially significant, but mitigable, impact.	<b>Mitigation Measure BIO-7:</b> To avoid impacts to overwintering monarchs, tree trimming/removal and construction activities that affect eucalyptus trees near or within the overwintering grove shall not be conducted during the overwintering season from October 1 through March 31. If construction activities must be conducted during this period, overwintering monarch surveys shall take place within one week of habitat disturbance. If surveys do not locate clustering monarchs, construction activities may be conducted. If clustering monarchs are located, no construction activities shall occur within 100 feet of the edge of the overwintering grove.	CSD retain County approved biologist for pre-construction survey and reporting.	During Construction during October 1 to March 31.	CSD and County of SLO in coordination with County-Approved Environmental Monitor.
<b>Cultural Resources</b>				
<b>Impact CUL-1:</b> The proposed project has the potential to adversely affect tribal cultural resources, however this effect is less than significant.	<b>Mitigation Measure CUL-1:</b> To mitigate potential effects to tribal cultural resources, the CSD shall place portions of parcels 8 and 10 owned by the CSD between Toro Creek Road and Toro Creek in a conservation easement in favor of an appropriate entity to protect and manage the land for the type of historic agriculture uses that have occurred on the property, and preclude deep ripping agricultural activities such as used for vineyard installation. Additionally, the Cultural Resource Impact Assessment Report shall include a full technical analysis of all artifacts and other cultural remains collected during the Phase II study.	CSD to record conservation easement to provide the required land protection. CSD shall complete full Assessment Report.	Prior to ATC.	CSD and County of SLO Department of Planning and Building in coordination with County-Approved Archaeologist.
<b>Impact CUL-2:</b> Without special design considerations, installation of the new pipelines to and from the WRRF along Toro Creek Road would have the potential to significantly and adversely impact CA-SLO-879/H, a significant	<b>Mitigation Measure CUL-2:</b> To avoid any adverse effect on CA-SLO-879/H, the proposed pipelines along Toro Creek Road shall be placed only on the north side of the road and shall be directionally drilled under the maximum depth of cultural deposits. Three bore pits shall be installed along the pipeline alignment in previously disturbed areas, where cultural materials are sparse and lack integrity. The exact location of the bore pits	CSD and County of SLO in coordination with County-Approved Archaeologist.	Prior to issuance of grading permit and ongoing during construction in resource areas.	CSD and County of SLO in coordination with County-Approved Archaeologist.
Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

<p><b>Impact CUL-2</b> con't historical resource and a tribal cultural resource. However, implementation of Mitigation Measure CUL-2 would avoid and minimize these effects. With implementation of this measure, no historical or tribal cultural resources would be disturbed by the project, and impacts would be reduced to less than significant levels.</p>	<p><b>MM CUL-2</b> con't and segment to be directionally drilled shall be dictated in the Final Cultural Resources Impact Assessment Report prepared for the project by Applied Earthworks. All work related to pipeline installation along Toro Creek Road shall be monitored by an archaeologist and Native American representatives. If at any point, the pipeline design requirements specified in the Cultural Resources Impact Assessment Report cannot be met, the project shall be halted and San Luis Obispo County and other responsible agencies contacted to determine the next course of action to protect historical or tribal cultural resources in compliance with California and federal law.</p>			
<p><b>Impact CUL-3:</b> The potential exists for inadvertent discovery of cultural resources during pipeline construction. This impact is potentially significant.</p>	<p><b>Mitigation Measure CUL-3:</b> To minimize potential impacts due to inadvertent discovery of cultural resources in site and pipeline areas with no evidence of resources, and consistent with LUO sections 22.05.140 and 23.10.040, the applicant shall prepare and implement a pre-construction Worker Education Program to train workers to recognize cultural resources and understand the procedures for stopping work and reporting the discovery.</p>	<p>CSD retain County approved Archaeologist to prepare Worker Education Program and implement training.</p>	<p>Prior to issuance of grading permit and before ground disturbance activities.</p>	
<b>Geology</b>				
<p><b>Impact GEO-1.</b> The geologic impact of site construction activities and operation is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-1.</b> Design-Level Geotechnical Investigation and Report: a geotechnical design investigation should be performed to provide final recommendations and geotechnical design criteria for specific project components, such as structures, foundations, pipelines, pump stations, loading conditions, excavations, grading, dewatering, drainage and other site work. The geotechnical design investigation should include additional field exploration for specific structures, and include testing and analyses as needed to provide a basis for design criteria and construction recommendations in accordance with local (County of San Luis Obispo) regulations and the applicable California Building Code (CBC). As part of the geotechnical design investigation for the Project, creek crossings for pipelines should be investigated and evaluated with respect to the methods of crossings. If horizontal</p>	<p>Building Permit Review / Construction Permit Authorization.</p>	<p>Prior to issuance of construction permit.</p>	<p>CSD and County of SLO in coordination with County-Approved Archaeologist.</p>
<b>Impact</b>	<b>Mitigation Measure</b>	<b>Compliance Verification</b>		
		<b>Method</b>	<b>Timing</b>	<b>Responsible Party</b>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

	<p><b>MM GEO-1</b> can't directional drilling methods (HDD) are proposed, then HDD feasibility investigations should be performed for each location where that method is being considered. The geotechnical design report shall include geotechnical design criteria for creek crossings, which may include recommendations for pipeline burial depths, methods of crossing, trench or trenchless design parameters, and lateral setbacks. Recommendations for specific crossings shall be incorporated into the Project plans and specifications prior to construction of the pipeline.</p>	<p>CSD retain qualified geologist /geotechnical engineers for preparation of required investigative reports.</p>	<p>Prior to issuance of Building Permit.</p>	<p>CSD and County of SLO in coordination with Geologist / Geotechnical Engineer of record.</p>
<p><b>Impact GEO-2.</b> The impact of surface fault rupture on certain pipeline segments is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-2A.</b> The geotechnical design investigation for the project (Mitigation Measure GEO-1) should include appropriate geologic fault evaluations of the Cambria fault to develop project-specific design parameters for pipeline sections crossing the fault. The fault evaluations should be directed towards, but not necessarily be limited to, defining the location and width of the fault zone at the pipeline-fault crossings. Since the fault traces are concealed beneath young geologic deposits, the fault zones may be difficult to define with precision. Consequently, fault zone widths should incorporate conservative assumptions for pipeline design. Pipeline crossings of fault traces shall be designed to accommodate potential flexure and horizontal and vertical offsets based on the results of the geologic fault evaluations (Mitigation Measure GEO-2A). Fault rupture mitigation strategies for pipelines may include measures such as flexible connections, gravel trench backfill, double lined pipes, strengthened pipes, automatic shutoff valves and similar measures to prevent the release of product to the environment.</p>	<p>CSD retain qualified geologist /geotechnical engineers for preparation of required investigative reports.</p>	<p>Prior to issuance of Building Permit.</p>	<p>CSD and County of SLO in coordination with Geologist / Geotechnical Engineer of record</p>
<p><b>Impact GEO-3:</b> The impact of strong seismic shaking on project structures is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-3:</b> Project structures should be designed to resist lateral forces generated by earthquake shaking in accordance with the current building code, State pipeline safety standards and applicable design practice. The design-level geotechnical report (Mitigation Measure GEO-1) should include recommendations for seismic data for design that</p>	<p>CSD retain qualified geologist /geotechnical engineers for preparation of required investigative reports.</p>	<p>Prior to issuance of construction permit</p>	<p>CSD and County of SLO in coordination with Geologist / Geotechnical Engineer of record</p>
Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

	<p><b>Mitigation Measure GEO-3</b> can't          may be updated for the new code requirements, additional subsurface information, or further site-specific analyses. Appropriate seismic ground motion parameters should be estimated and incorporated into project design by the project engineer.</p>			
<p><b>Impact GEO-4.</b> The impact of seismically-induced ground failures, including liquefaction, lateral spreading and seismic densification, is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-4.</b> The design-level geotechnical report (Mitigation Measure GEO-1) should include evaluations of liquefaction potential and estimated liquefaction-induced settlement based on field exploration, testing and analysis of site conditions for final project components (WRRF and pipelines). The potential effects of other seismically induced ground failures should also be evaluated, including lateral spreading and seismic densification. Engineering design measures should be provided where estimated ground deformations exceed typical foundation and structural design parameters. seismic densification. Engineering design measures should be provided where estimated ground deformations exceed typical foundation and structural design parameters.</p> <p>The liquefaction, lateral spreading and seismic settlement evaluations should be conducted in accordance with guidelines published by the California Geologic Survey (formerly the California Division of Mines and Geology) and relevant local and professional standards. At a minimum, the liquefaction hazard evaluation and mitigation study should be undertaken in a manner consistent with the Guidelines for Evaluation and Mitigation of Seismic Hazards in California, Chapter 6, Analysis of Liquefaction Hazards (CGS Special Publication 117A, 2008).</p>	<p>CSD retain qualified geologist /geotechnical engineers for preparation of required investigative reports.</p>	<p>Prior to issuance of construction permit.</p>	<p>CSD and County of SLO in coordination with Geologist / Geotechnical Engineer of record.</p>
<p><b>Impact GEO-5.</b> The impact of landsliding and slope instability is a significant impact that can be mitigated with appropriate mitigation measures.</p>	<p><b>Mitigation Measure GEO-5.</b> The design-level geotechnical report (Mitigation Measure GEO-1) should include evaluations of landsliding, creek bank instability and other types of slope instability settlement based on field exploration, testing and analysis of site conditions for final project components (WRRF</p>	<p>CSD retain qualified geologist /geotechnical engineers for preparation of required investigative reports.</p>	<p>Prior to issuance of construction permit.</p>	<p>CSD and County of SLO in coordination with Geologist / Geotechnical Engineer of record.</p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
	<b>MM GEO-5</b> con't and pipelines). The potential impact of slope instability on the construction and operation of the WRRF should be evaluated as part of the geotechnical design investigation and report (Mitigation Measure GEO-1). Mitigation measures to reduce the potential for damage due to slope movement should be developed for the depths and types of slope movements that may impact the pipelines at the locations identified in the landslide evaluations.			
<b>Impact GEO-6.</b> The impact of soil erosion and loss of topsoil due to construction and operation of Project components is a significant impact that can be mitigated with appropriate mitigation measures.	<b>Mitigation Measure GEO-6.</b> An Erosion Control Plan (ECP), including elements of a Storm Water Pollution Prevention Plan (SWPPP), should be prepared by a geotechnical or civil engineer, consistent also with Mitigation Measure WQ-1. The ECP and SWPPP would describe measures intended to reduce erosion and deposition in to local creeks and the Pacific Ocean.	CSD retain engineer to prepare SWPPP for submittal to County.	Prior to issuance of construction permit.	CSD and County of SLO in coordination with Engineer of record.
<b>Impact GEO-7.</b> The impact of expansive soils on Project components is a significant impact that can be mitigated with appropriate mitigation measures.	<b>Mitigation Measure GEO-7.</b> Testing of samples in a geotechnical laboratory is the standard method of quantifying the expansibility of materials, and should be performed as part of design-level geotechnical studies for the selected WRRF site and pipeline routes (Mitigation Measure GEO-1). If expansive materials are identified, then appropriate design and construction measures should be provided to mitigate the adverse effects. The design-level geotechnical investigation should provide specific recommendations to address expansive soil conditions for the design of foundations, flatwork, pavement, pipelines and other site work.	CSD retain engineer to prepare investigative report for submittal to County.	Prior to issuance of construction permit.	CSD and County of SLO in coordination with Engineer of record.
<b>Impact GEO-8.</b> Due to the locations of critical infrastructure sites that will be connected via pipelines, certain pipeline sections will not be able to avoid portions of the tsunami inundation zone. Pipeline segments along SR1, the CSA 10 facility, and the outfall segment	<b>Mitigation Measure GEO-8.</b> Mitigation strategies for infrastructure located within tsunami inundation zones shall be implemented and include, as determined applicable, measures such as flexible connections, double lined pipes, strengthened pipes, automatic shutoff valves and similar measures to prevent the release of wastewater and treated water to the environment.	CSD retain engineer to prepare investigative report for submittal to County.	Prior to issuance of construction permit.	CSD and County of SLO in coordination with Engineer of record.
Impact	Mitigation Measure	Compliance Verification		

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

		Method	Timing	Responsible Party
<p><b>Impact GEO-8.</b> Con't between SR1 and the coast, are located within the maximum tsunami inundation zone (i.e., less than 50 feet above mean sea level). Mitigation measures can be implemented to reduce the impact. However, the pipeline outfall will be vulnerable to damage from wave erosion if a significant tsunami occurs at that location. The potential impact of tsunami inundation on Project components near the coast is a significant and unavoidable impact.</p>				
<b>Growth Inducing Effects</b>				
<p><b>Impact GRO-1:</b> The Project could result in indirect impacts on the environment related to growth induced by the provision of an additional water supply, including but not limited to, increased traffic, noise, vehicular emissions, loss of vegetation and wildlife forage area, loss of visual quality and watershed impacts. This impact is significant but mitigable.</p>	<p><b>Mitigation Measure GRO-1:</b> To avoid potentially significant growth inducing effects, the CSD shall limit the sale of tertiary treated water for domestic use to water purveyors serving lots within the Urban Reserve Line for Cayucos as set by the County and LAFCO.</p>	<p>CSD shall adopt policy consistent with this measure and provide verification to County of SLO Department of Planning and Building.</p>	<p>Prior to issuance of grading permit.</p>	<p>County of San Luis Obispo Department of Planning and Building.</p>
<b>Impact</b>	<b>Mitigation Measure</b>	<b>Compliance Verification</b>		
		<b>Method</b>	<b>Timing</b>	<b>Responsible Party</b>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

Hazards and Hazardous Materials				
<b>Impact HZ-2:</b> Operation of the WRRF on either the Project Site or Alternative Site will involve the transport, storage, usage, and disposal of hazardous materials associated with the wastewater treatment process. This impact is considered significant unless mitigated.	<b>Mitigation Measure HZ-1:</b> Prior to final occupancy/operation of the project, a Hazardous Materials Business Plan in accordance with California Health and Safety Code Sections 25503 and 25505 shall be submitted to, and approved by, the San Luis Obispo County Department of Environmental Health	CSD develop and maintain a facility Hazardous Materials Business Plan (HMBP) for submittal to County Environmental Health.	Prior to WRRF Operations, ongoing operational implementation.	CSD in coordination with SLO County Dept. of Environmental Health.
<b>Impact HZ-4:</b> Operation of the WRRF on either the Project Site or Alternative Site and conveyance pipelines may result in the accidental spill of untreated wastewater which could adverse impact surface water quality and other pose a threat to human health and biological resources. This impact is considered significant unless mitigated.	<b>Mitigation Measure HZ-2:</b> To mitigate impacts related to a untreated wastewater spill the CSD shall modify it's existing Sanitary Sewer Management Plan to include WRRF and pipeline operations.	CSD shall the Update Sanitary Sewer Management Plan.	Prior to WRRF Operations, ongoing operational implementation.	CSD and County of San Luis Obispo Department of Planning and Building.
<b>Impact HZ-6:</b> Construction of the WRRF on either the Project Site or Alternative Site and associated solar array will expose people and structures to a significant risk of loss, injury or death associated with wildfires. This impact is considered significant unless mitigated.	<b>Mitigation Measure HZ-3:</b> The Applicant shall provide a written Fire Safety and Evacuation Plan whose contents shall be in accordance with sections California Fire Code Chapter 4 Emergency Planning and Preparedness. Employee training, record keeping, hazard communication and drills will also comply with this chapter. The written plan will include at a minimum the detail outlined in sections 404.3.1 (Evacuations Plans) and 404.3.2 (Fire Safety Plans).	CSD shall develop and Maintain a Fire Safety and Evacuation Plan.	Prior to WRRF Operations, ongoing operational implementation.	CSD and CALFire.
<b>Impact HZ-7:</b> Construction activities associated with the WRRF on either the Project Site or Alternative Site and pipeline conveyances has the potential to	<b>Mitigation Measure HZ-4:</b> To minimize the risk of exposure to disease vectors, activities with the potential to mobilize spores associated with Valley Fever, the CSD shall implement the following measures, <u>as applicable</u> :	CSD shall determine appropriate measures and submit documentation.	Prior to commencing construction and during earthwork operations.	CSD and County of San Luis Obispo Department of Planning and Building.
Impact	Mitigation Measure	Compliance Verification		
		Method	Timing	Responsible Party
<b>Impact HZ-7 con't</b>	<b>MM HZ-4 con't</b>			

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

<p>result in a hazard to the public or the environment by mobilizing disease vectors, such as the fungus that causes Valley Fever, that may be present in the soil. This impact is considered significant unless mitigated.</p>	<ol style="list-style-type: none"> <li>a. Implement all of the mitigation measures relating to the control of dust during construction activities;</li> <li>b. Prohibit eating and smoking at the project site and provide separate, clean eating areas with hand-washing facilities;</li> <li>c. Avoid outdoor operations during unusually windy conditions;</li> <li>d. Limit ground disturbing activities during the fall to essential jobs only, as the risk of cocci infection is higher during this season.</li> <li>e. Thoroughly clean equipment, vehicles, and other items before they are moved off-site to other work locations;</li> <li>f. Train workers to recognize that cocci may be transported offsite on contaminated equipment, clothing, and shoes; alternatively, consider installing boot-washing stations; and</li> <li>g. Post warnings onsite and consider limiting access to visitors, especially those without adequate training and respiratory protection.</li> </ol>			
<p><b>Impact HZ-8:</b> Construction activities associated with the WRRF on either the Project Site or Alternative Site has the potential to expose construction workers and CSD staff to potentially hazardous concentrations of environmentally-persistent pesticides, herbicides and fertilizers. This impact is considered significant unless mitigated.</p>	<p><b>Mitigation Measure HZ-5:</b> Prior to construction activities that involve soil disturbance, the CSD shall develop and implement a Soil Sampling and Analysis Plan to determine the presence and extent of any residual herbicides, pesticides, and fumigants on historically-farmed land in agricultural areas that would be disturbed during ground-disturbing activities associated with the project. The Plan shall be prepared in consultation with the San Luis Obispo County Department of Environmental Health Services and the work shall be conducted by an appropriate California-licensed professional and samples sent to a California Certified laboratory. At a minimum, the Plan shall document the areas proposed for sampling, the procedures for sample collection, the laboratory analytical methods to be used, and the</p>	<p>CSD shall retain County approved consultant to prepare investigative reports.</p>	<p>Prior to issuance of construction permit.</p>	<p>CSD in consultation with SLO County Environmental Health Services</p>
<b>Impact</b>	<b>Mitigation Measure</b>	<b>Compliance Verification</b>		
		<b>Method</b>	<b>Timing</b>	<b>Responsible Party</b>
	<b>MM HZ-5 con't</b>			

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

	<p>pertinent regulatory threshold levels for determining proper excavation, handling, and, if necessary, treatment or disposal of any contaminated soils. The Plan shall be submitted to the Department and the San Luis Obispo County Department of Environmental Health Services for review and approval at least 60 days before construction. Results of the laboratory testing and recommended resolutions for excavation, handling, dust control, and treatment/disposal of material found to exceed regulatory Practices shall be submitted to the Department prior to construction.</p>			
<b>Noise</b>				
<p><b>Impact N-2:</b> Construction activities associated with the pipeline conveyances and outfall connection would result in short term exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. This impact is considered significant and unavoidable (Class I) after application of Mitigation Measure N-1.</p>	<p><b>Mitigation Measure N-1:</b> The CSD shall require construction contractors to adhere to the following noise attenuation requirements:</p> <ul style="list-style-type: none"> <li>• Construction activities shall be limited to between the hours of 7 a.m. to 9 p.m. on any day except Saturday or Sunday or between the hours of 8 a.m. to 5 p.m. on Saturday or Sunday.</li> <li>• All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.</li> <li>• Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 300 feet from the nearest residence, unless safety or technical factors take precedence.</li> <li>• Stationary combustion equipment such as pumps or generators operating within 100 feet of any residence shall be shielded with a noise protection barrier.</li> </ul>	<p>Construction Plans shall have notes describing the limitations and practices in the measure.</p>	<p>Prior permit issuance and ongoing during construction.</p>	<p>CSD and County of San Luis Obispo Department of Planning and Building.</p>
<b>Impact</b>	<b>Mitigation Measure</b>	<b>Compliance Verification</b>		
		<b>Method</b>	<b>Timing</b>	<b>Responsible Party</b>
<b>Traffic</b>				

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

<p><b>Impact TR-2:</b> Construction activities associated with the Project Site or Alternative Site, along with connection to the outfall at the existing WWTF, and construction of pipeline conveyances will result in temporary and short-term impacts related to the safe operation of streets and intersections due to the presence of workers, equipment, lane closures and open trenches. This impact is considered significant unless mitigated.</p>	<p><b>Mitigation Measure TR-1:</b> Prior to building permit issuance a Traffic Management Plan shall be prepared for review and approval by the County of San Luis Obispo Public Works Department and the City of Morro Bay Public Works Department. The traffic management plan shall be based on the type of roadway, traffic conditions, duration of construction, physical constraints, nearness of the work zone to traffic and other facilities (bicycle, pedestrian, driveway access, etc.). The traffic management plan shall include:</p> <ul style="list-style-type: none"> <li>• Advertisement. An advertisement campaign informing the public of the proposed construction activities should be developed. Advertisements should occur prior to beginning work and periodically during the course of project construction.</li> <li>• Property Access. Access to parcels along the construction area shall be maintained to the greatest extent feasible. Affected property owners shall receive advance notice of work adjacent to their property access and when driveways would be potentially closed.</li> <li>• Schools. Any construction adjacent to schools shall ensure that access is maintained for vehicles, pedestrians, and bicyclists, particularly at the beginning and end of the school day.</li> <li>• Buses, Bicycles and Pedestrians. The work zone shall provide for passage by buses, bicyclists and pedestrians, particularly in the vicinity of schools.</li> <li>• Intersections. Traffic control (i.e. use of flag men) shall be used at intersections that are determined to be unacceptably congested due to construction traffic.</li> </ul> <p><b>Mitigation Measure TR-2:</b> To mitigate construction stage impacts (Impact TR-2), prior to commencing work the CSD shall submit for review and approval by the County Department of Public Works, and other affected agencies as requested, a Road Restoration Plan (RRP) to maintain public roads during construction and to repair the roadways to pre-construction conditions or better prior to final closeout of County permit(s). At a minimum the RRP should address the</p>	<p>CSD shall retain County approved engineer to prepare Traffic Management Plan and Road Restoration Plan for submittal to County and City Departments of Public Works.</p>	<p>Prior to issuance of construction permit.</p>	<p>CSD in coordination with County of SLO Public Works and City of Morro Bay Public Works Departments.</p>
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# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

	<p>following: RRP should address the following:</p> <ul style="list-style-type: none"> <li>• A video or photo log of the proposed construction route roads to establish baseline (before construction) conditions of the pavement and adjacent shoulders.</li> <li>• Identify the current Pavement Condition Index (PCI) of the construction route roadways.</li> <li>• Identify a procedure for addressing public complaints in a timely manner on public roads due to construction related traffic operations.</li> <li>• Identify a procedure for timely response to repair damage to public roads during construction including but not limited to, pothole repairs, edge of pavement repairs, and shoulder repairs.</li> <li>• Identify a procedure to restore public roads to a condition equal to or better than pre-construction conditions prior to final permit closeout.</li> </ul>			
<b>Impact</b>	<b>Mitigation Measure</b>	<b>Compliance Verification</b>		
		<b>Method</b>	<b>Timing</b>	<b>Responsible Party</b>
<b>Visual</b>				

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

<p><b>Impact VIS 2:</b> The construction of the pipelines in approximately a ½ mile segment from the Coastal Zone boundary at Toro Creek west to SR 1 and then north along SR1 will result in a disturbed ground surface that could be visually adverse.</p>	<p><b>Mitigation Measure VIS-1:</b> To mitigate post-construction disturbed soil on the pipeline trenches in the Coastal Zone, the applicant shall prepare and implement an approved restoration plan that uses native seed species and is consistent with Coastal Plan policy 30.</p>	<p>CSD plans shall show implementation of seeding in prescribed areas.</p>	<p>Prior to Building Permit Issuance</p>	<p>CSD and County of San Luis Obispo Department of Planning and Building.</p>
<p><b>Impact VIS-3:</b> The proposed project would result in a short term but significant impact on visual resources until the proposed screen planting grows to an extent to substantially screen the WRRF. This impact is significant can be mitigated to less than significant.</p>	<p><b>Mitigation Measure VIS-2:</b> To mitigate short-term impacts on visual resources until planting matures, a final landscaping plan shall be prepared for the project site consistent with the preliminary landscape plan evaluated in the EIR and approved by the County prior to building permit issuance. The landscape plan shall emphasize native plant materials and shall include sufficient planting to screen views of the project from Toro Creek Road. The planting shall be designed to achieve substantial screening of the WRRF within 7 years.</p>	<p>CSD to retain consultant to prepare plan for submittal to County.</p>	<p>Prior to Building Permit Issuance</p>	<p>CSD and County of San Luis Obispo Department of Planning and Building.</p>
<p><b>Impact VIS-4:</b> The Project will add a new source of substantial light or glare which would adversely affect nighttime views in the area, a significant but mitigable impact.</p>	<p><b>Mitigation VIS-3:</b> To mitigate potentially significant impacts from a new source of substantial light or glare which would adversely affect nighttime views in the area, a final lighting plan shall be prepared and implemented for the WRRF. The plan shall include proper shielding, proper orientation, and minimum height standards to achieve safe light levels on the ground. All lighting fixtures shall be shielded so that neither the lamp nor the related reflector interior surface is visible from adjacent properties. Light hoods shall be dark-colored.</p>	<p>CSD to retain consultant to prepare plan for submittal to County.</p>	<p>Prior to Building Permit Issuance.</p>	<p>CSD and County of San Luis Obispo Department of Planning and Building.</p>
<p><b>Water Quality</b></p>				
<p><b>Impact WQ-3:</b> The Proposed Project could result in significant construction-stage erosion and sedimentation impacts until site grading and preparation reached the stage that the proposed spill</p>	<p><b>Mitigation Measure WQ-1:</b> To mitigate impacts identified in Impact WQ-3 related to construction stage erosion and sedimentation, the Project will be required to comply with the General Permit including but not limited to compliance with 1) the State General Construction Activity Permit, as most recently modified by the State Water Resources Control Board (SWRCB),</p>	<p>CSD retain engineer to prepare SWPPP for submittal to County.</p>	<p>Prior to Building Permit issuance.</p>	<p>CSD and County of San Luis Obispo Department of Planning and Building.</p>
<p style="text-align: center;"><b>Impact</b></p>	<p style="text-align: center;"><b>Mitigation Measure</b></p>	<p style="text-align: center;"><b>Compliance Verification</b></p>		
		<p style="text-align: center;"><b>Method</b></p>	<p style="text-align: center;"><b>Timing</b></p>	<p style="text-align: center;"><b>Responsible Party</b></p>

# Cayucos Sustainable Water Project Mitigation Monitoring Reporting

<p><b>Impact WQ-3</b> con't containment basin is functioning to capture all site runoff This is a significant but mitigable impact.</p>	<p><b>MM WQ-1</b> con't and 2) County standards under the Stormwater Ordinance Title 19 chapter 19.09, ensuring that construction-related sediment or other contaminants that could adversely affect receiving water would be reduced to a less-than-significant impact.</p>			
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