

CALIFORNIA COASTAL COMMISSION

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



January 19, 2024

Annaliese Torres
180 North Ashwood Avenue
Ventura, CA 93003

Subject: Coastal Development Permit (CDP) Application Number 3-23-0904 (Central Coast Blue)

Dear Ms. Torres:

We received the above-referenced CDP application that you submitted on December 20, 2023. The proposed project includes the construction of an advanced water purification facility in the City of Grover Beach with associated infrastructure including injection wells, monitoring wells, pipelines, and a pump station. We have reviewed the materials that you have submitted to date and are in need of additional information to adequately analyze the proposed project for Coastal Act conformance. Towards this end, we are unable to file this application until the following is submitted:

- 1. Proof of Applicant's Legal Interest in the Property:** The submittal materials include proof of Applicant's interest in 930 Huber Street (APN 060-543-016) and the property immediately to the south (APN 060-543-007). However, please submit a copy of any of the following to demonstrate the Applicant's legal interest in all the properties listed in Attachment 1 Table 2, excluding pipelines located in public right of way: a current tax bill, recorded deed, lease, easement, or current policy of title insurance. Please indicate if you are still perfecting the applicant's property interest for any of these sites and where you are in that process. Additionally, please provide a support letter from San Luis Obispo County for work occurring in the County right of way, including indicating whether the County intends to issue the required encroachment permits. Please note that the CDP will be conditioned to provide proof of permission (e.g. encroachment permits) for all work located in rights-of-way.
- 2. Plan Set:** Please submit a complete plan set including plans for the monitoring wells. Additionally, page 36 of the plan set (Attachment 2) is labeled "Injection Well 4 (future)". Please clarify if this is the proposed plan set for injection well #4 or provide updated plans for this project component.
- 3. Hazards Reports:** Please submit a copy of an up-to-date engineering report which includes a coastal engineering analysis for the project area and addresses the effects of future sea level rise within the expected lifetime of the project. At a minimum, the report must assess the normal and maximum tidal surges, wave conditions (including maximum expected wave height), storm conditions, and the effects of future sea level rise within the expected lifetime of the project. This report shall analyze various sea level rise scenarios and identify whether each project components can be relocated, and identify the trigger

for relocation, or identify whether the project component can be designed in a way to account for sea level rise. The report shall evaluate all project components located at the SSLO WWTP and all other components that may be threatened by sea level rise during the lifetime of the development, including pipelines. Additionally, please identify and describe why project components are required to be located in the 100-year and 500-year flood hazard zones. We have provided a similar study prepared for the PureWater Soquel Project to the extent that is useful as a model.

4. **Construction Plan and Best Management Practices:** Please be aware that we will require submission of a Construction Plan and Best Management Practices prior to commencement of construction. Again, I have enclosed an example of a construction plan required by the Commission for the PureWater Soquel project as an example.
5. **Appendix D (Declaration of Posting) and Posting Notice:** Please fill out the enclosed “Notice of Pending Permit” forms and post and maintain the notices where they will be conspicuously visible to the public including, at a minimum, at 980 Huber Street, Grover Beach, at the location of each injection well and monitoring well, and at the City Hall of the project’s local governments (i.e. Grover Beach and Pismo Beach, and at the County Board of Supervisors building). All notices: (a) must be weatherproofed (e.g., laminated or otherwise covered in plastic) in the event of inclement weather; such weatherproofing must not make the notices difficult to read; and (b) must be posted at a readable height (i.e., three to five feet or so) against a solid background at least as large as the notice (e.g., an 8½" x 11" piece of plywood attached to a stake); and (c) in both Spanish and English. Once the notices are posted, please submit a graphic showing all notice locations (in site plan view), and please submit photographs of such notices keyed to the site plan. All of the notices must remain posted as described until the Commission makes a decision on the proposed project. Any notices that become unreadable or are missing (for whatever reason) must be immediately replaced. When the site has been posted, please complete the enclosed Appendix D (Declaration of Posting), and return this completed form to our office. Please note that additional posting may be necessary when this item gets closer to being scheduled for a hearing in front of the Commission. Please provide written evidence that you will commit to such posting when and as directed in the future.
6. **State Parks/City/County Beach:** According to the project description, construction activities will occur at the County of San Luis Obispo’s Coastal Dunes RV Park and Campground and Oceano Campground. Please submit evidence that San Luis Obispo County agrees to allow its property to be used to access the project site during the duration of construction, and for future maintenance of these components.
7. **Other Permit Approvals:** Please provide verification of all other necessary permits, permissions or approvals applied for or granted by other public agencies such as the Army Corps of Engineers, California Department of Fish and Wildlife, California Department of State Parks, Regional Water Quality Control Board, County of San Luis Obispo etc., or evidence that no such approvals are necessary from these agencies.

- 8. Public Access Closures:** Please be aware that the CDP will be conditioned to minimize public access closures during the duration of construction activities within the County's Coastal Dunes RV Park and Campground and Oceano Campground. Please identify a phasing plan for construction activities at each campground and identify how many campsites would be affected during construction.
- 9. Pipeline Routes:** The project description identifies an alternate pipeline route around the southeastern side of the Oceano airport, however other submitted materials, including the environmental justice information document, only identify the pipeline route around the northwest side of the Oceano airport. Please confirm whether one pipeline route is proposed, or if the alternate pipeline route is still proposed in this CDP application.
- 10. Dewatering Activities:** Please explain in detail why it is infeasible to dispose of all groundwater produced during well drilling activities directly into the local storm sewer. Are any dewatering activities required for the construction of the AWPf complex or the pump station at the SSLO WWTP? Please identify where any water produced during construction of the AWPf complex or the pump station will be disposed of, and the frequency of disposal during the duration of construction.
- 11. Biological Resources:** Our staff ecologist Rachel Pausch has reviewed the submittal and would like to thank the applicant for a very thorough biological review. However, there are a few clarifying questions and requests for additional information that will aid in her review, detailed below:
 - a. Please provide a table of anticipated temporary and permanent impacts to riparian ESHA and one-parameter wetlands within the coastal zone. This acreage should include all infrastructure as well as construction staging and access routes.
 - b. Please describe the type of maintenance required for pipelines and wells located in wetlands, including the nature and frequency of maintenance activities. Will the existing pipelines where the new pipelines are expected to parallel also require regular maintenance? This will determine if pipeline work within wetlands and riparian areas are permanent or temporary impacts- regular disturbance from access or maintenance would constitute a permanent impact. Permanent impacts to wetlands are mitigated at a 4:1 ratio and permanent impacts to riparian ESHA are mitigated at 3:1 assuming substantial restoration, although mitigation through habitat enhancement requires higher ratios.
 - c. Please clarify if the last record of overwintering monarchs from the Xerces Society (1989) was the last survey completed or if more recent surveys have been completed (aside from the submitted 2023 monarch survey).

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We will hold the application for six months from today's date (i.e., until July 19, 2024) pending receipt of these materials. After all of the above-listed materials have been received, the package will again be reviewed and will be filed if it contains materials sufficient for a thorough and complete review. Please note that there may be additional materials necessary for filing purposes depending upon the nature of the information provided pursuant to the above-listed materials. If all of the above-listed materials are not received within six months, CDP Application 3-23-0904 will be considered withdrawn and will be returned to you. This submittal deadline may be extended for good cause if such request is made prior to July 19, 2024. I look forward to working with you on this project. Please do not hesitate to contact me at (831) 427-4863 if you have any questions regarding the above information requests.

Sincerely,

DocuSigned by:
Sarah Macgregor
539DC7A46B334B0...

Sarah MacGregor
Coastal Planner
Central Coast District Office

Cc: Ben Fine
Justin Pickard
Michael Steele
Rob Morrow

Enclosures: PureWater Soquel CDP Construction Plan
PureWater Soquel Flood Hazards Study