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Cambria Community Services District  
Cambria, California 93428  
Comments on request for CEQA Categorical Exemption  
GEO - Technical Hydrological Project  
Hearst State Beach/ Santa Rosa Creek/Lagoon

January 5, 2010

The Cambria Community Services District (CCSD) is planning a Geotechnical and Hydrological study/project at Hearst State Santa Rosa Creek Beach and Lagoon adjacent to Cambria's Shamel County Park. CCSD has prepared a resolution to the effect that the project is exempt under the *California Environmental Quality ACT* (CEQA). The CCSD is relying on the following CEQA exemption:

**CEQA Categorical Exemption 15306. Information Collection**

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

(Geotechnical Investigation is being proposed as part of a larger project called "desalination" for Cambria.)

However according to the controversial CCSD's certified Water Master Plan the **district has approved and adopted desalination** as their preferred supplemental water source. The district has acquired funding for the desalination project through the federal Water Resources Development Act (WRDA) and additional funds through recent federal stimulus funding. Therefore, this geotechnical investigation *IS* part of a study leading to an action which a public agency *HAS* approved, adopted and is trying to fund. I believe the entire desalination and geotechnical investigation project needs a project level Environmental Impact Report in order to satisfy the requirements of the California Coastal Act.

I rushed to write comments (**comments in red**) quickly for this January 5, 2010 "Special Meeting" which was called with very little notice to the highly interested environmental community. Below are my quick comments regarding the true nature of this investigation and the possibility of serious and major disturbances to environmental resources that may be caused by this activity. Without a full blown EIR Cambrians cannot know the full impact to the ecosystem and critical habitat at this site. There are far too many unanswered questions in this document for directors to consider an exclusion of environmental review. For years, Cambrians have been promised a minimum of an "environmental assessment" of this proposed activity by the CCSD. To suddenly suggest an exclusion to an environmental assessment at this late date (and during the holidays when people are traveling) and not adequately describe all the species and habitat affected in this area is outrageous.

For just these few reasons stated below, Resolution 01-2010 should NOT BE ADOPTED today by the CCSD. I urge you to vote "NO" to this resolution. In addition this board should insist on a complete environmental review of these activities under CEQA.

Sincerely,

Mary Webb  
Cambria

### 3.1.1 Topographic and Hydrographic Surveys

The nearshore survey will be conducted by conventional surveying techniques utilizing a Topcon electronic total station and an **HP 200LX data logger in conjunction with an extendible (6 meters [m]) range pole** and prism assembly to make trigonometric measurements from control points established onshore to points along the profile lines. The Topcon will be utilized in the fast tracking mode to acquire shots to the swimmer (Rodman) rapidly. This will be critical to collecting data in the surf zone where it will be possible to hold the range pole assembly stationary for only a brief moment. (I believe this activity alone will be clearly visible from Scenic Highway One. On such short notice I have not been able to take photographs of the rest of the site from Scenic Highway One, but believe the activities will be clearly visible to tourists all along highly popular Moonstone Beach Drive, where most of our hotels and motels are located.)



### Example of 6 METER BEAM (this one has a wind turbine on top)

All onshore work will be performed with the intent of **avoiding impacts** (impacts cannot be avoided that are not sufficiently described in this document) to the beach environment during site exploration in accordance with permits and Best Management Practices (BMPs). All study-related activities and equipment will be used in a manner that maintains continuous lateral access along the beach. Permits required for the field exploration will be maintained onsite at all times during site exploration.

### 3.1.2 Test Holes



The advancement of up to 10 test holes using the rotosonic drilling method will be performed to develop a depth to bedrock contour map, collect continuous core samples of the beach sediments, compile detailed logs, maintain photographic records of the exploration operations and, at the appropriate time, destroy the completed wells in accordance with permit conditions. Exploration at each site will be performed by Prosonic Corporation, a California licensed C-57 driller approved by the County of San Luis Obispo. The test holes will be advanced vertically to depths ranging from 50 to 150 feet, limited by the depth to bedrock at each site.

The rotosonic method produces a continuous core sample of the sediment, which will be collected, photographed, and stored for future offsite logging and laboratory analysis. Each sample will be either 4- or 6-inches in diameter and between 3 and 5 feet long. Depending on the uniformity of the sample, a portion or the entire sample will be retained. Any sample not retained will be returned to the borehole as backfill in accordance with permit requirements. The collected samples will be brought to the surface in plastic sleeves, which will not be opened at the site, placed in protective core boxes, stored temporarily on a support vehicle, and removed from the beach at the end of each working day. Each sample will be logged offsite by a California Professional Geologist in accordance with the Unified Soil Classification System. Upon completion of drilling each test hole, the borehole will be backfilled according to this study design outline herein and raked to approximate its pre-exploration condition, in accordance with applicable permits. All construction-related trash, garbage, excess material (e.g., concrete, plastic) will be contained on the study site and removed by the end of each work day.

**Photographs will be taken before and after exploration at each site to document the return to pre-study conditions. (Vegetation has been removed along SR Creek and Windsor Dr. prior to this report. A Description of vegetation removal and photographs of the area before this vegetation was removed by CCSO crews in 2009 should be provided).**

The exploration equipment may consist of a **Morooka/PS-600 track mounted sonic drill rig**. The track mounted rig weighs approximately **37,700 pounds** and is **41 feet long total. (Which drill rig will be used? Shouldn't this be clear before a categorical exclusion is considered? Describe width of rig. Will it fit on the ramp to the beach without new construction?).** The drilling rig exerts 6.2 pounds per square inch (psi) under each rubber track, approximately one half to one third the pressure imposed by the typical life guard pickup. The rig has been modified to meet the requirements of the EPA for Tier 3 Non-road Diesel standards. Under full drilling conditions, the rig produces approximately 85 decibels (C-weighted) measured at a distance of 100 feet. The rig can travel at approximately 4 to 6 miles per hour on a beach surface.

An alternative drill rig is the **WDC/Gus Pech 400RS rubber tire sonic drill rig, an on-road vehicle**. The rubber tire **drill rig weighs approximately 51,000 pounds (Describe width and length of rig. Will it fit on the narrow ramp to the beach without new construction? There is a 13,300 pound difference between these drill rigs. Which drill rig will be used?)** The main engine of the drill unit is a truck-mounted diesel. A hydraulic powered water pump is associated with the rig.

**The support truck weighs 49,875 pounds (what is the overall affect of repeated trips on this old ramp in an very narrow passageway with this many vehicles?)** with tooling and **can** hold up

to an additional 8,000 pounds of water. **(Will this truck be weighed down even more with 8,000 lbs of water? There are too many questions left unanswered in this document.)**

Lightweight fiberglass mats approximately 6 feet by 10 feet will be used beneath the rig on the beach; one mat will be under the front of the rig and one will be under the rear of the rig. The fiberglass mats will disburse the weight of the rig, resulting in the rig exerting approximately 425 pounds per square foot. The fiberglass plates will be moved one in front of the other, or "leap-frogged," ahead of the drill rig and will not be left on the beach.

Instantaneous sound level meter results for the 400RS drill rig showed noise levels above 85 dBA up to 35 feet away from the rig during drilling operations. These levels were dependent upon the direction of the rig. The front showed the lowest levels beginning at approximately 90 dBA. The noise levels at the left and rear sides of the drill produced levels of approximately 95 dBA. Under full drilling conditions, the rig produces up to approximately 89 dBA measured at a distance of 70 feet and up to approximately 83 dBA at a distance of 140 feet. Hearing protection with a minimum noise reduction rating of 25 dBA will be required to be worn within 50 feet of the drill rig in operation. **(Noise levels alone should trigger an EIR).**

**Photo of a WDC/Gus Pech 400RS rubber tire sonic drill rig, and on-road vehicle.**



***Integration of work space between the drill rig and the rig tender.***

- ***Crane mounted on the rig tender for pipe loading, minimizing handling of drill pipe and core barrels.***
- ***Color coded pinch points.***
- ***Innovative operator and crew safety features.***
- ***Safety shutdowns.***
- ***Hydraulic rod spinner.***
- ***Integrated deck-mounted grout mixer.***

Before mobilizing the drill rig, the capacity of the ramp to support the weight will be verified and if necessary planking will be used for strengthening. **(These questions should be answered in full in an EIR).** For this study, the rig will be using either 6-inch or 8-inch-outside-diameter casing, for installation of either 4-inch or 6-inch-diameter testwell casing. A 4-3/4-inch outside-diameter casing will be advanced for installation of 2-inch diameter monitoring wells.

**A pipe trailer, or pipe rig, will be mobilized onto the beach along with the exploration rig.**



The **pipe rig** is slightly smaller and lighter than the **PS-600** and meets the same emissions standards. The support track is similarly mounted on rubber tracks and has a lighter average load, when loaded. The **support track** will be maintained in a similar manner as the **exploration rig** in accordance with BMPs.

In order to transport the soil samples off the beach, and to be able to transport staff offsite in the case of an emergency, **a mid-sized four wheel-drive truck will be on the beach**. The truck will be similar to the trucks used by beach lifeguards (e.g., Toyota Tacoma). The use of a truck will minimize the total number of trips on and offsite to transport samples, as compared to an ATV. The truck will be maintained in a similar fashion to the exploration equipment and will only be moved as necessary for the above purposes. The truck will be removed from the beach each night.



Toyota Tacoma on the beach

### 3.1.3 Test Wells

(Test Wells are construction on the beach and should require an EIR. Project test wells are structures/development under current codes. They will be installed on a narrow strip of beach bordered by the adjacent Monterey National Sanctuary and Santa Rosa Creek Lagoon, and the Cambria State Marine Conservation Area. All activities are located on **Critical Steelhead Trout habitat** at the very mouth of Santa Rosa Creek).

Upon completion, or during the course of the exploration program, up to three test wells and up to six small diameter monitoring wells may be installed. The test wells will either be installed directly within a test hole, or within a subsequent hole located approximately 5 feet from a test hole. Each test well will be installed within an 8-inch-diameter borehole. Each test well will consist of 6-inch Schedule 40 PVC casing with PVC wire-wrapped screen, the depths of which will be selected based on the subsurface conditions encountered at each location. Each well will be naturally gravel packed; that is no sand or gravel will be installed surrounding the well screen. At the surface, the well will be completed in accordance with California Well Standards Bulletin 74-90 and local County of San Luis Obispo Environmental Health Department permit conditions.

Up to two small diameter monitoring wells may be installed adjacent to each test well, for a total of up to six monitoring wells. For each monitoring well, the rotosonic drilling method will drill a 4-<sup>3</sup>/<sub>4</sub>-inch-diameter borehole without sample collection, inside of which a 2-inch-diameter Schedule 40 PVC monitoring well will be placed. Each monitoring well will be screened at similar depths to the adjacent test well and sealed in a manner similar to the test wells. In each test well and monitoring well, pressure transducers will be installed, which will be capable of recording water level and temperature data at regular intervals. The transducers will consist of In-Situ Level Troll 500 (photo) or 700 transducers (or similar), capable of recording 100,000 or 350,000 data records, respectively. Each recording will consist of a pressure and temperature reading, likely recorded at an interval of a single reading per hour. The transducers are designed to withstand the pressures and water quality expected throughout testing. The transducers will be small diameter (less than <sup>3</sup>/<sub>4</sub>-inch) and powered with a 3.6 volt lithium-ion battery.

In order to pump 100 to 150 gpm from each test well, a 5- to 6-inch-diameter submersible pump will be installed in each test well. The electric pump will be rated between 15 and 20 horsepower and powered with a generator. The discharge from the pump column will be conveyed to the surface using a rigid 2- to 3-inch PVC or steel pipe. At the wellhead, a

totalizing flowmeter will be installed capable of recording the instantaneous flow rate (in gpm) and the total amount of water that has flowed through it. The flow rate will be regulated with a 4-inch butterfly valve. A sample port consisting of a 3/4-inch hose bib will be available at the wellhead for collection of water-quality samples.

Discharge piping from the well will be installed and will consist of 2- to 4-inch flexible, lay-flat hose directed from the wellhead to the beach away from the surf zone. At the discharge, the hose will be fitted with a bag filter to decrease flow velocity and erosion of the beach. The bag filter will also decrease sediment load and turbidity of the produced water. The bag will be utilized until such time as turbidity is reduced to 50 NTU or less, the level which is typically required as the daily maximum turbidity for discharge.

### 3.1.4 Aquifer Testing

Aquifer testing will be performed to estimate the hydraulic properties of the aquifer below the beach. Aquifer testing will include a step drawdown test to assess well capacity and efficiency, a 72-hour constant discharge test, and depth-dependent salinity profiles.

Following well installation, each test well and the adjacent monitoring wells will be developed by surge block, pumping and surging, or airlift development techniques. The pumping development of each test well, along with a short-term step drawdown test, will provide an estimate of the pumping rate for the long-term aquifer tests. Short-term step drawdown tests will consist of pumping at up to four discharge rates of between 20 and 150 gallons per minute (gpm) for up to 4 hours per step. Up to 8 hours of recovery will follow step drawdown testing. The anticipated rate of discharge from the test well during the constant discharge test will likely be in the range of 100 to 150 gpm. Up to 12 hours of recovery will follow constant discharge testing. Water levels will be observed and recorded throughout aquifer testing.

Based on the information above, previous hydraulic conductivity studies at Santa Rosa Creek Beach conducted by Fugro in 2008, and an assumed hydraulic conductivity for the coarsegrained sediments of 100 feet per day, the steady-state-cone-of-depression at 50 feet from the pumping well is estimated to be less than 1 foot, which is within the range of tidal influence. The aquifer test data will be analyzed using AquiferWin32 software to determine well efficiency, hydraulic conductivity, and coefficient of storage. The analysis will include water-level corrections for density differences due to salinity and the influence of tides.

The generator to be used for aquifer testing will be capable of producing up to three-phase, 220 volt power to the test pump. The **generator** will either be operated from a nearby adjacent parking area with a **length of cable temporarily laid on the beach or be mobilized onto the beach. (Will this cable also be removed and replaced twice a day?)**

Depending on the size of the generator to be used, it will either be transported by hand or by an ATV. All maintenance, transportation, and operation BMPs related to equipment will also apply to the generator.

### 3.1.5 Study Access

Access to the beach will be via the concrete emergency-vehicle access ramp at Shamel Park. All equipment will enter and exit the beach from this ramp, accessible on the landward (northeast) side by a gravel access road, which runs parallel to the beach to a parking area. As noted above, before mobilizing the rigs, the **capacity of the ramp to support the weight will be verified**, and if **necessary planking will be used for strengthening. (If the capacity of the ramp to support all this weight is not sufficient, this means a new ramp may have to be constructed. How much support will it take? Where is the documentation for this possible construction? Where are the described impacts for constructing a ramp on the beach? Will the plans be halted to get permits for construction for this ramp? How wide is the Shamel Park ramp? The equipment proposed is wider than the ramp can accommodate. On page 2 of the document it is stated that** “No construction of an access ramp or use of a crane for vehicles to access

the beach – The Santa Rosa Creek site already has a vehicle access ramp that can be used for the investigation. The geotechnical investigation proposed at San Simeon would have required either the construction of an access ramp or the use of a crane to get vehicles onto the beach.” **This is contradictory. )**

Once the equipment is on the beach, it will move to the individual sites by the most direct route. The distance from the farthest sample point (Sample 1) to the access ramp is less than 900 feet. Access to all sites **will not require the crossing of Santa Rosa Creek or any water body** and will generally follow the shoreline near the topographic high in the area around the mouth of the Creek. **(Activity will take place mid-Feb to Mid March of this year. This is rainy season and water flow downstream from SR Creek will be increased all along this area. The Creek changes patterns with increased flow and runs along Shamel Park straight to the ocean. See page 28 of your packet for photo of SR Creek. The water does not curve toward Moonstone Beach Dr. after a significant rain event. There is no way to predict that crossing the creek or any water during this testing time frame will not be necessary. )**

### **3.1.6 Staging**

All equipment will be removed from the beach each night. The exploration equipment, vehicles, trailers, and any supporting equipment will be stored either in the parking lot adjacent to Shamel Park each weeknight (Monday through Thursday) **(This is public parking- surely this will not be allowed by the Coastal Commission as it violates the coastal act for public access)** or the Cambria Community Service District’s maintenance yard. During weekend nights (Friday, Saturday, and Sunday nights), the equipment may be moved to the Cambria Community Service District’s maintenance yard. **(For 30 days traffic will be driving over the narrow Windsor Bridge, and in and out of a public park - Shamel Park, driving on the beach, driving along the sandspit, at least twice per day for each vehicle. The exploration equipment, vehicles, trailers, and any supporting equipment will be stored somewhere else in Cambria each night. The equipment is described as being a 4 wheel drive Toyota Tacoma, a Pipe Rig, the Tracks for the Pipe Rig, a 51,000 pound or a 37,000 pound sonic drill rig, a support truck weighing 49,000 pounds, trailers and an ATV will be traveling in and out 2 times per day for 30 days? It is beyond belief to claim this traffic escalation in a sensitive habitat area will result in no impacts to the beach, to the public park, to the sand spit, to the narrow bridge on Windsor and to the environment? What consideration has been taken for the residents of Park Hill in Cambria? A special meeting called in less than one week with same day notice in our local paper does not require enough notice to these residents who will be deeply affected by these traffic patterns each day. Other agencies concerned about impacts to the environment have not been noticed by the CCSD. Friends of the Elephant Seal, the Otter Project among a few.)**

### **3.1.7 Monitoring**

Each monitoring well will be used throughout aquifer testing to monitor water levels and, after completion of aquifer testing, to monitor seasonal variations in water quality. Each monitoring well may need to remain for up to one year after installation. Each monitoring well wellhead will be secured to prevent exposure, vandalism, or damage from wave action. The wellheads will be completed below ground as a protective measure. The locations will be mapped and marked with an iron stake, which can be later located with a magnetic detector, and then buried. Burying and uncovering the monitoring wells for subsequent data retrieval will be completed by hand.

Either during pumping (dynamic) or subsequent (static) monitoring, a depth dependent survey of water quality will be performed using an ion-specific (chloride) conductivity transducer. The transducer will be lowered throughout the water column to record changes in water quality at various depths. Field water quality parameters including electrical conductivity, pH, turbidity, and temperature will be monitored at regular intervals throughout aquifer testing. Up to 10 water

samples will be collected during the aquifer testing for chemical analysis.

### 3.1.8 Removal

Upon completion of aquifer testing, each well will be removed completely by pulling the casing out of the hole with the drill rig or, to the extent practicable, will be completely removed by drilling out with a hollow-stem-auger drill rig (**Model CME 75 or CME 85**).



CME 75 HT/Angle Hollow-stem Auger Drill Rig, truck and trailer

**(A full description of the project should be detailed here. Are we pulling the casing or completely drilling out the casing with this drill rig? Describe impacts for each scenario)**

The individual casing pieces would then be sifted from the beach sand and removed. If the complete removal of test wells is impracticable, the monitoring wells will be removed by drilling out to the maximum

depth practicable. Well bores will be filled with **bentonite-cement slurry** from the bottom of the well bore to 5 feet below the lowest beach scour elevation, and native sand used to fill the remainder of the well. The surface will be sealed in compliance with County of San Luis Obispo Public Health Services permit requirements.

### 3.1.9 Schedule

The study field activities for test holes and wells installation would require up to two to four weeks to complete. These field activities are anticipated to begin as early as mid February 2010, once all permits and access agreements are in place, and will be completed by mid-March 2010. **(Rainy season water flow downstream from SR Creek will be increased all along this area. Any water flowing from rainy season discharge changes the patterns at the mouth of SR Creek where it meets the ocean. It is incorrect to state there will not be any crossing of Santa Rosa creek or other water during this testing time frame as conditions change rapidly due to storm run off.)**

All site work will be performed during daylight hours during non-holiday weekdays (Monday through Friday) for a maximum of 10 hours per day (approximately 7 a.m. to 5 p.m.). The workday may be shortened based on site conditions, including rising tides and wave run-up. All equipment will be removed from the beach before sunset of each day.

(Project location is in a particularly sensitive environment. It is on a popular state and public beach in a Scenic Resource Area (SRA) and on a threatened and endangered species creek and lagoon. Santa Rosa Creek is an anadromous fish stream which should be protected from impediments to steelhead migration and spawning. Adjacent riparian and wetland areas provide important wildlife habitat. Ground water and surface waters are linked, and maintenance of the creek habitats is essential to protect many coastal resources. These creeks support a number of declining species, such as the Tidewater Goby, Striped Garter Snake, Western Pond Turtle, Red-legged Frog, and Steelhead Trout. The Critical Habitat of Steelhead trout in Santa Rosa Creek lagoon, is curiously only mentioned ONCE in this document .)

Test wells will be removed after up to three months after the installation field activities. Monitoring activities will continue for up to one year after the initial test wells removal. **(There is no description of monitoring vehicles -how many vehicles, how much equipment, and how many trips per day for one year for monitoring?)**

### **3.1.10 Hazardous Spill Contingency Plan**

The Hazardous Spill Contingency Plan has been included as Attachment B. **(There is a history of Mercury Mine Tailings embedded deep in the soil and sand around the mouth of Santa Rosa creek. What is your plan when you unearth Mercury into the ocean? What is the plan if this Mercury is washed back up into Santa Rosa creek during a storm event? Where are the impacts described that could follow this scenario? This contingency plan lacks pertinent data and is insufficient.)**