

X. RESPONSE TO COMMENTS**A. LIST OF COMMENTS RECEIVED**

The following agencies and members of the public have prepared comments on the Draft EIR:

Federal, State and Local Agencies		
1	State Clearinghouse Letter of April 18, 2008	1400 Tenth Street Sacramento, CA 95814 Contact: Terry Roberts
Agencies		
2	Coast Unified School District Letter of April 17, 2008	1350 Main Street Cambria, CA 93428 Contacts: Dianne Brooke and Pamela Martens
Private Organizations and Non-Profit Groups		
3	Cambrians for Preservation of Open Space Letter of March 17, 2008	P.O. Box 1561 Cambria, CA 93428 Contact: Norman Fleming
4	Central Coast Little League Board Email of April 12, 2008 (with attached letter dated April 9, 2008)	P.O. Box 722 Cayucos, CA 93430 Contact: Karen McManus
5	Friends of the Fiscalini Ranch Preserve Represented by Remy, Thomas, Moose and Manley, LLP Letter of April 17, 2007	455 Capitol Mall, Suite 210 Sacramento, CA 95814 Contact: Andrea K. Leisy
6	Greenspace – The Cambria Land Trust Letter of April 16, 2008	P.O. Box 1505 Cambria, CA 93428 Contact: Richard Hawley
7	LandWatch San Luis Obispo County Letter of April 17, 2008	(address not provided) Contact: Cynthia Hawley
General Public		
8	Don Canestro Email of April 17, 2008	393 Ardath Drive Cambria, CA 93428
9	Claude Albanese Letter of March 17, 2008	3121 Wood Drive Cambria, CA 93428

General Public		
10	Jan Alexander Letter of March 24, 2008	(address not provided)
11	Adolph Atencio Email of April 17, 2008	445 Warwick Street Cambria, CA 93428
12	Elizabeth Bettenhausen Letter of April 17, 2008	345 Plymouth Street Cambria, CA 93428
13	Lorena Border Letter of March 21, 2008	427 Arvin Street Bakersfield, CA 93308
14	Arthur Boxman Email of April 13, 2008	(address not provided)
15	Jim Brownell, Ph.D. Email of April 16, 2008	(address not provided)
16	Sharon and Duane Budge Comment Form received April 17, 2008	1420 Spencer Cambria, CA 93428
17	Jo Ellen Butler Letter of April 17, 2008	329 Cambridge Cambria, CA 93428
18	Matthew Bryant Email of April 14, 2008	(address not provided)
19	Charlotte Dareshori Letter of April 15, 2008	585 Drake Cambria, CA 93428
20	Michelle and Ted Fowler Letter of April 15, 2008	2201 Wilton Drive Cambria, CA 93428
21	Karen Garton Email of April 16, 2008	1175 Kenneth Drive Cambria, CA 93428
22	Gail Green Email of March 20, 2008	(address not provided)

General Public		
23	Lynne Harkins Letter of April 17, 2008	P.O. Box 606 Cambria, CA 93428
24	Bob Johnson Email of April 14, 2008	(address not provided)
25	Vern Kalshan Letter of April 17, 2008	440 Kerwin Street Cambria, CA 93428
26	Jennifer King Email of April 17, 2008	2390 Pineridge Drive Cambria, CA 93428
27	Victoria Krassensky Email of April 16, 2008	(address not provided)
28	Lynda Layton (letter not dated)	3261 Pine Street Cambria, CA 93428
29	George Leclercq Email of April 15, 2008	1911 Ogden Drive Cambria, CA 93428
30	Patricia Laubacher (letter not dated)	575 Leighton Street Cambria, CA 93428
31	D.R. Miller Comments received April 17, 2008	P.O. Box 72 San Simeon, CA 93452
32	Jan and Earl Moon Email of April 17, 2008	(address not provided)
33	Stephen Mull Email of March 20, 2008	5068 Nottingham Cambria, CA 93428
34	S and J Mulroony Letter of April 17, 2008	2536 Wilcombe Drive Cambria, CA 93428
35	Jill Quinn Email of April 13, 2008	(address not provided)

General Public		
36	Galen Rathbun, Ph.D. Letter of April 17, 2007	P.O. Box 202 Cambria, CA 93428
37	Raul Sandoval Email of April 16, 2008	(address not provided)
38	Robert and Ann Ray Email of March 23, 2008	(address not provided)
39	Olivia Redwine Email of April 17, 2008	1131 Ellis Avenue Cambria, CA 93428
40	Joyce Renshaw – Draft EIR Comments Form Form dated April 17, 2008	1790 Ogden Drive Cambria, CA 93428
41	Joyce Renshaw – Email Email of April 17, 2008	1790 Ogden Drive Cambria, CA 93428
42	Ken Renshaw (comments not dated)	1790 Ogden Drive Cambria, CA 93428
43	Amanda Rice Email and Letter of April 17, 2008	2220 Ardath Drive Cambria, CA 93428
44	Wayne Ryburn Email of April 6, 2008	(address not provided)
45	Bill Schassberger Email of April 13, 2008	(address not provided)
46	Chris and Jacquelyn Seaberg Letter of April 16, 2008	2165 Wilton Drive Cambria, CA 93428
47	Bill Seavey Email of March 16, 2008	(address not provided)
48	H.L. Stephey Email of April 6, 2008	665 Evelyn Court Cambria, CA 93428

General Public		
49	Donald Thomas Email of April 13, 2008	6576 Buckley Drive Cambria, CA 93428
50	Jim Webb Letter of April 15, 2008	1186 Hartford Street Cambria, CA 93428
51	Mary Webb Letter of April 15, 2008	1186 Hartford Street Cambria, CA 93428
52	Peter Whitman Email of April 16, 2008	3171 Rogers Drive Cambria, CA 93428
53	Anne Winburn Letter of April 13, 2008	2890 Burton Circle Cambria, CA 93428
54	Warren Wolfe Letter of April 8, 2008 (addressed to The Cambrian)	1920 Sherwood Drive Cambria, CA 93428
55	Claudia Harmon Worthen Email of April 11, 2008	(address not provided)
56	Lauren Younger – Draft EIR Comment Form (form not dated)	2159 Wilton Drive Cambria, CA 93428
57	Lauren Younger – Letter Letter of April 17, 2008	2159 Wilton Drive Cambria, CA 93428
58	Don Canestro Email of April 17, 2008	393 Ardath Drive Cambria, CA 93428
59	Tamara Corbet Letter of May 22, 2008	(address not provided)
60	Bob Kasper, Maureen Kasper Letter of May 5, 2008	4766 Windsor Boulevard Cambria, CA 93428

The letters of comment are given in the above order with the responses following the individual letters. Letters of comment are reproduced in total, and numerical annotation has been added as appropriate to delineate and reference the responses to those comments. The pages of the letters have been re-numbered to conform to the page sequence of this section.



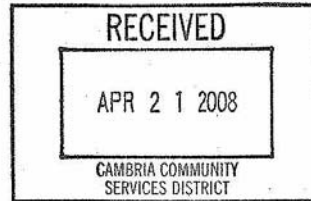
ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

April 18, 2008



O: CD
C: TAR
fs

Connie Davidson
Cambria Community Services District
P.O. Box 65
Cambria, CA 93428

Subject: Fiscalini Ranch Preserve
SCH#: 2006051092

Dear Connie Davidson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on April 17, 2008, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

1.1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2006051092
Project Title Fiscalini Ranch Preserve
Lead Agency Cambria Community Services District

Type EIR Draft EIR
Description The proposed Public Access and Management Plan and Community Park Master Plan consists of implementation of the adopted East West Ranch Management Plan and Easement (April 24, 2003) and proposed Community Park Master Plan (Firma, 2007). The Master Plan includes improvements to trail systems, restoration and erosion control projects, and a community park including sports fields, court area, community center, parking, and restrooms.

Lead Agency Contact

Name Connie Davidson
Agency Cambria Community Services District
Phone (805) 927-6223 **Fax**
email
Address P.O. Box 65
City Cambria **State** CA **Zip** 93428

Project Location

County San Luis Obispo
City Cambria
Region
Cross Streets Highway 1 and Cambria Drive
Parcel No. 013-101-013, 086; 013-121-025, 026; 013-131-038; 023-411-022
Township 27S **Range** 8E **Section** 26 **Base** MDB&M

Proximity to:

Highways State Highway 1
Airports
Railways
Waterways Pacific Ocean, Santa Rosa Creek
Schools Cambria Middle School
Land Use Open Space, Recreation

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 3; Department of Parks and Recreation; Native American Heritage Commission; Central Valley Flood Protection Board; Department of Fish and Game, Region 4; Department of Water Resources; Department of Conservation; California Coastal Commission; California Highway Patrol; Caltrans, District 5; Air Resources Board, Transportation Projects

Date Received 03/04/2008 **Start of Review** 03/04/2008 **End of Review** 04/17/2008

Note: Blanks in data fields result from insufficient information provided by lead agency.

1. State Clearinghouse

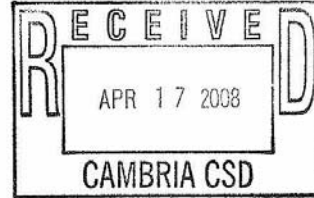
- 1.1 Comment noted regarding submittal of Draft EIR to state agencies. No changes to the EIR are necessary.

COAST UNIFIED SCHOOL DISTRICT

1350 Main Street, Cambria, CA 93428
(805) 927-3880 ■ FAX (805) 927-0312

April 17, 2008

Connie Davidson
Cambria Community Services District
PROS Commission
By Email (cdavidson@cambriacsd.org) and
By FAX: 805/927-5584



Dear Ms. Davidson and Commission Members,

I am writing on behalf of the Coast Unified School District Governing Board, Staff, and students. The District would like to courteously emphasize that additional/new community playfields are required for Cambria citizens. Physical and recreational activities are critically important for the health and well being of youth and other age groups. The County and CCSD should be responsible for providing adequate recreational facilities.

2.1

Like all other public school districts in California, the primary responsibility of Coast Unified is to provide and fund academic and related athletic and sports instruction to students in grades K-12. The District for many years has shouldered the responsibility for providing playfields for very worthwhile community youth organizations and other groups because of the lack of such space in Cambria. This has been accomplished with no financial support from the County or CCSD.

We respectfully state that it is not appropriate to suggest that Coast Unified should remain responsible as noted above and/or that additional and more extensive District funds be diverted from the educational program for increased playfield related upkeep such as equipment, landscape supplies, water, and personnel time for activity scheduling. In fact, our fields cannot continue to sustain the current level of use. In most cases, due to the lack of alternative playfields in Cambria, the demand does not even permit adequate down time for maintenance and improvement of the District's fields.

Coast Unified believes and strongly requests that additional non-District playfields and other recreational space be identified and funded immediately. Two additional requests are: 1) The County and CCSD (PROS) should provide financial assistance to Coast Unified School District for the costs incurred by community use of our fields. 2) CCSD should proceed forward with the plan to provide non-potable water to Santa Lucia and other sites as appropriate.

Your attention to this matter is greatly appreciated.

Sincerely,

Dianne E. Brooke, President
CUSD Board of Trustees

Pamela Martens
Superintendent

Facilities: PROS Commission

2. Coast Unified School District

- 2.1 Comment noted that the Coast Unified School District (CUSD) considers that it is not appropriate for the CUSD to be responsible for public recreational facilities. The CUSD requests reimbursement if the school fields are to be used for public recreational purposes. Within its water master planning (refer to Task 3: Recycled Water Distribution System Master Plan, July 2004), the CCSD developed a recycled water distribution plan that included plans for irrigating the old Cambria Grammar School (currently used as CUSD offices) and the Santa Lucia Middle School, as well as the new Cambria Grammar School. During construction of the Cross Town Trail, and in anticipation of such a future need, a reach of six-inch diameter purple pipe was also installed from Windsor Boulevard to Cambria Drive on the west side of Highway 1. As part of its earlier 2004 planning, the capital cost to complete the recycled water system was estimated at \$5.5 million (in terms of 2002 valued dollars). The CCSD is attempting to resolve the issue of funding for the project, and remains open towards collaborating with the CUSD on potential grant applications and similar ventures that would allow such a system to be funded.

CCSD - Comments

TO: ~~CALIFORNIA COASTAL COMMISSION~~
~~Santa Cruz, CA~~

3/17/08

SUBJ: EIGHTEEN ACRES OF CAMBRIA'S EAST
RANCH PROPOSED FOR DEVELOPMENT

The subject property is the East portion of the East-West Ranch in Cambria, California formerly known as the Phillips Ranch. The land is located off Rodeo Grounds Rd. close to Cambria's Main Street. In November 2000, the land was acquired by the American Land Conservancy and people of Cambria. The Conservancy deeded the property to the Cambria Community Service District to preserve its natural resources. The District then negotiated with the County of San Luis Obispo to have the property zoned as Recreation.

3.1

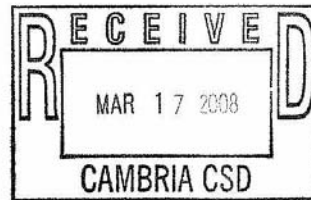
The intent of the District is to use the property for a sports field to include softball diamonds, soccer fields, basketball courts, bleachers, picnic areas, barbecue pits, parking lots, toilets and a community center. This entails removal of trees and native habitat.

Previously, in the process of acquiring this land, the District recorded a set of Covenants, Conditions and Restrictions (CC&R'S) as well as a Memorandum of Understanding to preserve the natural resources of this land plus the entire East portion of the East-West Ranch, now known as the Fiscalini ranch.

Cambrians for Preservation of Open Space need your assistance in stopping the proposed project, and in maintaining this area as an important open space. It is close to homes and businesses at the edge of town. It borders the Santa Rosa Creek, a trout stream which runs through Cambria.

Sincerely,

Norman Fleming
Cambrians for Preservation of Open Space
PO Box 1561
Cambria, CA 93428



Hand-delivered

3. Cambrians for Preservation of Open Space

- 3.1 Comment noted that the CCSD negotiated with the County of San Luis Obispo to have the property zoned as Recreation. The CCSD recorded a set of Covenants, Conditions, and Restrictions (CC&Rs) and a Memorandum of Understanding to preserve the natural resources of the Fiscalini Ranch Preserve (FRP). No changes to the EIR are necessary.

Connie Davidson

From: Cambria Palms Motel [cambriapalmsmotel@charterinternet.com]
Sent: Saturday, April 12, 2008 6:08 PM
To: Connie Davidson
Cc: Tracey & Doug Nelms; Brian Machado; Cari Thomas; Dan Chivens; Michelle Lilley; Mike Garcia; Sherry Molnar; Steve Kniffen; Steve Maffioli
Subject: Sports park for kids

To Connie Davidson of the CCSD,

4.1

See attached document from the Central Coast Little League Board.

Sincerely,
Karen McManus
Secretary, CCLL

4/16/2008



Central Coast Little League
P.O. Box 722
Cayucos, CA 93430

April 9, 2008

To Connie Davidson, CCSD:

The Central Coast Little League Board would like to express its support for the proposed Sports Park in Cambria. There is an obvious shortage of fields on which to play in Cambria.

4.2

Sincerely,

CCLL Executive Board

4. Central Coast Little League Board

- 4.1 Comment noted about attached document from Central Coast Little League Board; no changes to the EIR are necessary.
- 4.2 Comment noted regarding support for the proposed Sports Park in Cambria (East FRP). No changes to the EIR are necessary.



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REMY, THOMAS, MOOSE and MANLEY, LLP
ATTORNEYS AT LAW

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CHRISTOPHER J. BUTCHER

BRIAN J. PLANT
OF COUNSEL

April 17, 2007

VIA FACSIMILE & REGULAR MAIL
(805) 927-5584

Connie Davidson, Project Manager
Cambria Community Services District
P.O. Box 65
Cambria, CA 93428

Subject: Draft Master Environmental Impact Report for the Fiscalini Ranch Preserve
(SCH #: 2006051092)

Dear Ms. Davidson:

These comments are submitted on behalf of the Friends of the Fiscalini Ranch Preserve (FFRP),¹ holder of the Conservation Easement over the Fiscalini Ranch Preserve (Ranch). FFRP is a 501(c)(3) nonprofit land trust and a chapter of the Foundation for Small Wilderness Area Preservation. The mission of the FFRP is to protect and maintain the conservation and natural resource values of the Ranch by limiting the use of the property to the enjoyment of its open space values through passive recreation with the exception of the Community Park Area for which active recreation is allowed. We have reviewed the Draft Master Environmental Impact Report (MEIR) for the proposed Fiscalini Ranch Preserve Public Access and Management Plan and Community Park Master Plan (the "Project") and find significant inconsistencies between the proposed Project and the Public Access and Resources Management Plan adopted in 2003 for the Ranch ("Management Plan"). We also have grave concerns about the

5.1

¹ / FFRP was formerly known as the North Coast Small Wilderness Area Preservation (NCSWAP).

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inadequacy of the Draft MEIR under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et. seq.)

5.1 (cont'd)

As explained more fully below, if implemented, the proposed Project would substantially reduce the Ranch's unique and valuable environmental qualities, including its scenic beauty, its undeveloped natural space, and other important natural resource values. Thank you for your anticipated consideration of the significant issues and concerns raised in this letter. We look forward to your response.

I. Background

The Draft MEIR provides little by way of background on the history and acquisition of the Ranch. (See Draft MEIR, p. III-8.) To better inform the public and decisionmakers of the unique and important function the Ranch fulfills in Cambria, as well as CCSD and FFRP's roles in preserving and restoring the Ranch, the following brief history is provided.

5.2

The Fiscalini Ranch and much of what is now Cambria was once part of the large Phelan Ranch. The underlying Rancho Santa Rosa Spanish Land Grant covered the Cambria area during California's time as a Spanish colony, reaching miles up and down the Central Coast. Over the years, it was broken up and sold to become the large holdings of dairy and ranching families. Thousands of acres of the land grant came under the ownership of the Phelan family before becoming fragmented. Some tracts were sold for development, while others, including the Ranch, remained forest or open range.

Around the turn of the century, the heavily forested Ranch was chain-dragged and burned to clear the land for cattle grazing. Only 70 acres of rare Monterey Pine survived and still crown the Ranch ridge. The Fiscalini family bought the 400+ acres that would become the Fiscalini Ranch Preserve in the early 1900s. In the 1980s, the Fiscalinis sold the Ranch to the Rancho Pacifica developers after its property taxes soared due to the budding subdivisions growing up around the property in a horseshoe shape.

Rancho Pacifica Development intended to build thousands of homes, a resort hotel and a golf course with man-made lakes and aerial gondolas on the property. Alarmed at the scale of the plans for the property, the community organized as Friends of the RanchLand to protest the development. After years of trying to gain approval for its plans, Rancho Pacifica Development went bankrupt and the property was sold at auction in 1993 to an offshore corporation, the Foundation, Ltd.

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The Foundation, Ltd. planned to develop over 600 units on the property, including commercial and industrial development. In response, Friends of the RanchLand raised thousands of dollars and hired the Environmental Defense Center to fight the proposed development. Through considerable effort, the Friends of the RanchLand and the Environmental Defense Center succeeded in bringing the proposed development to a standstill over water issues and the destruction of trails.

The developers requested the local water district to annex the Ranch so that the development could not be denied water. Development seemed unavoidable. Fortunately, however, the American Land Conservancy, a land trust in San Francisco, responded to a letter of inquiry and agreed to help. The American Land Conservancy agreed to take the project with one condition – that a local group would be available to put their deal together and help with fundraising. The developers added a condition that the local group could not be the Friends of the RanchLand and requested \$11.1 million for the property with a deadline of one year.

The Los Osos-Baywood Chapter of the Small Wilderness Area Preservation (SWAP) agreed to take the project. The Chapter mentored the new NCSWAP, which then partnered with the American Land Conservancy, the State Coastal Conservancy, local government, and members of the community to buy the land and convert it into a park and open space. Community members contributed over \$1.2 million in cash to purchase the land and the Mid State Bank made an in-kind donation to the Ranch of valuable property adjacent to the Ranch. The addition of the bank's former's property raised the size of the new park to just under 440 acres. It also completed a requirement for a \$4 million local contribution to the purchase, allowing the State Coastal Conservancy to purchase the Ranch. It is through this purchase that CCSD holds fee-title to the Ranch.

The terms of the sale required CCSD to prepare a Management Plan and conservation easement agreement and to appoint a conservation easement holder for the Ranch. As noted, FFRP holds the Conservation Easement over the Ranch. The purpose of the Conservation Easement is to assure that the conservation and natural resource values of the Ranch are preserved, and/or restored and to prevent any use and activity on the Ranch that will impair or interfere with the Ranch's resource values.

In granting FFRP the Conservation Easement, CCSD conveyed to FFRP the rights (among others) to "preserve and protect the conservation values of the [Ranch]" and to "prevent any activity on or use of the [Ranch] that is inconsistent with the purpose of [the Conservation Easement] and the Management Plan." The Conservation Easement

5.2 (cont'd)

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Cambria Community Services District
April 17, 2008
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requires CCSD to use the Ranch only in a manner consistent with the Management Plan. (Conservation Easement, Paragraph 5 (Permitted Uses and Activities)).

5.2 (cont'd)

The adopted Management Plan is the result of an extensive year long interactive effort to synthesize the community's and the funding conservation agencies' overall vision and objectives to preserve the Ranch as a natural scenic property while allowing passive use with multiple trail access. The overarching vision of the Management Plan is to protect the Ranch from further alteration and to provide guidelines for restoration and protection of the Ranch's sensitive natural resources and special status species. Although the proposed Project purports to implement the Management Plan, as detailed below, there are several important inconsistencies between the Management Plan and the proposed Public Access and Management Plan and Community Park Master Plan described in the Draft MEIR.

Further, much of the proposed Project is inconsistent with the underlying vision of the Conservation Easement and Management Plan, which is to "ensure that public access is maintained in balance with *minimum* disturbance to, and protective of, sensitive natural habitats and unique scenic and cultural resources." (Management Plan, p. 5, italics added.) Pursuant to the terms of the Conservation Easement, and in recognition of the extent of resources and multi-party collaboration that went into years-long acquisition and Management Plan process, CCSD should modify the proposed Project to be fully consistent with the Conservation Easement and Management Plan. Doing so will best promote the conservation values of the property, that CCSD, FFRP and other stakeholders recognize to be "important to the spiritual sustenance, well being, fullest human experience of people young and old, both in the present and future generations." (Conservation Easement, Declaration D.)

5.3

II. Inconsistencies with the Conservation Easement and the 2003 Management Plan

The proposed Project would contradict or otherwise frustrate several of the preservation and conservation requirements of the Conservation Easement and the 2003 Management Plan. The proposed Project would also run counter to the spirit and intent of the community and conservation agencies in acquiring the Ranch property, entering into the Conservation Easement and adopting the Management Plan so as to ensure public access with minimal disturbance to the environment.

5.4

FFRP respectfully requests CCSD to modify the proposed Project to be fully consistent with the Management Plan and Conservation Easement, as required by the deed of easement. Doing so would enable CCSD and FFRP to manage the Ranch in a

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Cambria Community Services District
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manner that minimizes human impacts on the Ranch's unique natural environment while still allowing visitors recreational opportunities to experience the Ranch, as envisioned in the Conservation Easement.

5.4 (cont'd)

Because the inconsistencies are not identified in the Draft MEIR, we note them here. Notably, each issue identified below raises important environmental concerns beyond inconsistency with the Conservation Easement and 2003 Management Plan. The problems listed below equally pertain to CEQA's information disclosure requirements and the duty to avoid or substantially reduce, to the extent feasible, a project's significant environmental effects on the environment.

5.5

A. Amplified Noise

Paragraph 5 of the Conservation Easement (through Exhibit E) expressly prohibits the use of amplified sound. (Management Plan, Exh. E, paragraph 12.) The Draft MEIR's stationary noise analysis of the East FRP suggests that CCSD plans to allow amplified sound, stating, "any amplified sound (e.g., loudspeaker, game announcers, etc.), should be designed so as not to point in a direction that is directly into a residential area. All loudspeakers and amplification of sound should point directly into the interior of the park and the volume should be limited to the immediate area of the event." (Draft MEIR, p. V-214.)

5.6

Mitigation Measure N/mm-4 should be amended to *prohibit* amplified sound consistent with the Conservation Easement and Management Plan. Notably, CCSD is not permitted to amend the Management Plan to allow amplified sound because doing so would contradict the Conservation Easement. (Conservation Easement, paragraph 4.1.)

Even if the Conservation Easement did not prohibit amplified noise, amplified noise should not be permitted because it would interfere with the quiet and contemplative atmosphere of the Ranch and result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. In light of the uniquely peaceful and meditative setting the Ranch provides, Mitigation Measure N/mm-4 would be ineffective at minimizing noise disturbances to Ranch visitors because it would permit speakers to face the interior of the park, thereby interfering with park visitors' enjoyment of the Ranch.

Because the Draft MEIR does not provide quantified noise projections of the effectiveness of the proposed mitigation, there is no substantial evidence to support the Draft MEIR's less than significant impact conclusion from noise. To ensure noise impacts of the Project to receptors in the vicinity remaining less than significant,

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Cambria Community Services District
April 17, 2008
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including impacts to visitors to the interior of the park, the Final MEIR should delete any reference to amplified sound being part of the proposed Project.

5.7 (cont'd)

B. Water Supply

As correctly noted by the Draft MEIR (p. V-229), the Management Plan prescribes that “[n]o new water supplies for District purposes will be developed on the Ranch.” (Management Plan, p. 47.) As also correctly explained by the Draft MEIR, CCSD presently has inadequate water resources to serve future customers and an inadequate water distribution system for fire suppression. (Draft MEIR, p. V-235.) Indeed, there are currently over 600 applicants for CCSD residential water on the CCSD water services wait list. (Draft MEIR, p. V-233.) Further, since 2001, CCSD has placed a moratorium on water permits until new water sources may be found. The CCSD should therefore exercise considerable caution before approving any project that would place additional demand on CCSD’s already over-impacted water supply. The CCSD should not approve any project, such as the proposed Project, which would result in an unavoidable adverse impact to water supply. Instead, CCSD should adopt a project alternative, such as Alternative A (Reduced Project), which avoids the significant water supply impacts that would be caused by the proposed Project as identified in the Draft MEIR.

5.8

Although the Draft MEIR estimates that the proposed community park would require approximately 30-acre feet of water per year, the Draft MEIR expressly declines to identify a water source for the Project, stating that “[a]t this time, the [water] sources to be used for the project have yet to be formally established.” (Draft MEIR, p. V-229.) The Draft MEIR should either identify a water source or CCSD should adopt an alternative that does not require water supply which cannot be met through its existing supplies. As proposed, the Draft MEIR impermissibly defers this analysis. (*Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 33 Cal.App.4th 144 [reasonably foreseeable impacts must be analyzed in first tier documents].)

5.9

Instead of identifying a water source for the Ranch, the Draft MEIR briefly identifies three water supply alternatives and a synthetic turf alternative. For the reasons discussed below, the water supply analysis is insufficient to satisfy CEQA’s informational mandate. CEQA’s informational demands are particularly important with respect to the proposed Project’s water supply impacts because, as noted, CCSD does not have sufficient water to meet its current demands, much less the additional demands of this Project. Further, there is no substantial evidence that a water supply will actually materialize to serve the Project. Therefore, CCSD should adopt an alternative to the

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Project, such as Alternative A (Reduced Project), that would not result in a significant and unavoidable water supply impact.

5.10 (cont'd)

Recently, in the case *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412 (*Vineyard*), the California Supreme Court addressed the degree of uncertainty tolerated under CEQA for land-use planning projects. Although the proposed Project is not a large land use planning project, as was the project at issue in *Vineyard*, the principles articulated in *Vineyard* are apposite in that the Draft MEIR proposes that the Project would use water for which an adequate supply cannot be clearly ascertained. Further, the fact that CCSD is unable to meet its current water supply demands render sufficient information on water supply especially vital to informed decisionmaking. Moreover, because the EIR is a Master EIR, subsequent project approvals considered to be within the scope of the Master EIR will not need further environmental review. Therefore, the Master EIR stage of the approval process may be the only opportunity in which CCSD has to consider whether adequate water supplies will be available and the impacts of providing water to the Project. (See Cal. Code Regs., tit. 14 (CEQA Guidelines), § 15177.)

5.11

The *Vineyard* court articulated four principles of analytical adequacy of EIRs for projects for which there is uncertainty surrounding project water supply. The third principle articulated by the court is of particular relevance to the proposed Project: “[T]he future water supplies identified and analyzed must bear a likelihood of actually proving available; speculative sources and unrealistic allocations (‘paper water’) are insufficient bases for decisionmaking under CEQA. An EIR for a land use project must address the impacts of likely future water sources, and the EIR’s discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water’s availability.” (*Vineyard, supra*, 40 Cal.4th at p. 432.) The Draft MEIR is deficient under this principle because the potential water supplies identified in the Draft MEIR are speculative and do not bear a likelihood of actually becoming available. Moreover, the Draft MEIR fails to provide an adequate discussion of the *impacts* of the proposed water sources on the environment.

5.12

1. On-Site Wells as Water Supply

The Draft MEIR states that “existing wells on the ranch could be used to provide water for irrigation and for potable uses.” (Draft MEIR, p. V-238.) The Management Plan, however, requires existing wells to remain for monitoring and grazing purposes – and not as a source of water supply. (Management Plan, p. 47.) Further, the abandoned well used for the Fiscalini Ranch operations must be capped for public safety purposes.” (*Ibid.*) There is no evidence that the abandoned well is safe and should not be capped.

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Before CCSD may use the on-site wells as a source of water supply, CCSD must amend the Management Plan and obtain the State Coastal Conservancy Project Manager's approval. (Management Plan, p. 65.) CCSD may not use the wells until the Management Plan has been amended. Because no application to amend the Management Plan has been proposed, there is no indication CCSD would be able to use onsite wells as a source of water supply.

5.14

Even if the Management Plan were amended to allow use of the onsite wells, the Draft MEIR does not contain evidence that the wells would be able to supply the Project's near and long-term water supply. The draft EIR acknowledges that the old pit well is unlikely currently suitable for use and that the domestic well on the East FRP may not be operational, and if it were, a pump fitting in its casing would be limited to less than 100 gallons per minute. The Final MEIR should provide additional information about whether these two wells could actually supply water to the Project. If the wells cannot be used for water supply, the Final MEIR should not identify the wells as potential water supply sources.

Nor does the Draft MEIR provide substantial evidence that the irrigation well near Highway 1 (27S/8E-27G1) or the Rancho Pacifica well (27S/8E-27H2) would actually be able to meet Project water supply demands. Instead, the Draft EIR defers analysis of the use of these wells to a later date. (Draft MEIR, p. V-238 ["If [the irrigation well near Highway 1] is to be considered as a source of irrigation water, a pumping test for stream flow interference would be required"; "Water quality testing would be required for the Rancho Pacifica well] to determine the suitability of the water for domestic uses."].) CEQA prohibits such deferred analysis. (See *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692.) A revised and recirculated MEIR is required if CCSD attempts to move forward with the Project as proposed.

5.15

Moreover, the Draft MEIR's discussion of impacts associated with the use of the on-site wells fails to fulfill CEQA's informational mandate because it does not meaningfully advise decisionmakers or the public of the environmental effects of the use of on-site wells. (*Sierra Club v. State Bd. of Forestry* (1994) 7 Cal. 4th 1215, 1236-1237.) Instead, the Draft MEIR defers study and mitigation of these potential effects, a practice prohibited under CEQA. (See *Sundstrum v. County of Mendocino* (1988) 202 Cal.App.3d 296.) For instance, with respect to the Rancho Pacifica well, the draft MEIR states, "[a]dditional testing of this well and the other wells on the FRP would be helpful in determining the impacts of pumping on streamflow." (Draft MEIR, p. V-238.) Please provide information on the impacts of pumping on streamflow and other environmental constraints in the Final MEIR so that CCSD, San Luis Obispo County and the public may

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be made aware of the Project's potential environmental effects and so that these effects may be minimized or avoided.

5.16 (cont'd)

2. Alternative of Using District Water Supply Wells

Based on the Draft MEIR's discussion of the use of District water supply wells, there would be no basis for CCSD to conclude that District wells are a viable option to supply Project water supply. The Draft MEIR notes that due to contamination constraints, since 2001 there has been only one Santa Rosa Creek Valley well in operation – and this well has only produced a maximum of 160 acre-feet per year. (Draft MEIR, p. V-240.) Because the proposed Project would utilize over 1/5 of this well's annual supply, it is unlikely a viable source of water supply for the Project, particularly in light of the fact that CCSD cannot meet its existing water demands.

5.17

Further, the State Water Resources Control Board only allows production from lower Santa Rosa Creek Valley wells to 260 acre-feet between May 1 and October 21 and 518-feet per year. As CCSD is unable to issue new intent to serve letters, and there is a long waiting list for residential water users, it seems unlikely that 30 acre-feet a year of groundwater can be supplied using lower Santa Rosa Creek Valley wells, especially without harming existing water users.

Furthermore, as with the analysis of the use of on-site wells, the Draft MEIR fails to provide a discussion of the impacts of using these wells on the environment. The Final MEIR should include a discussion of the impacts of using CCSD wells as water supply for the Project.

3. Desalination Alternative Water Source

The Draft MEIR states that “[a]t this time, the desalinated water option is in the planning stage, and actual implementation is considered speculative.” (Draft MEIR, p. V-241.) As such, CCSD should not consider desalinated water as a realistic source of water supply for the proposed Project. Would desalination be feasible?

5.18

4. Recycled Water as an Alternative Water Supply Source

The Draft MEIR notes that the timeframe to complete CCSD's recycled water distribution system is estimated to take approximately three to four years. (Draft MEIR, p. V-242.) Notably, a Master EIR may only be relied upon for five years (Pub. Resources Code, § 21157.6) and therefore CCSD would only have a limited time window to

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implement this option. How likely is the recycled water to be available to meet the Project's anticipated demand on top of CCSD's current and pending water demands?

5.19 (cont'd)

Further, the recycled water would only be used for irrigation. If the recycled water alternative supply source is adopted, how would the Project's potable demands, including drinking fountains and water for restroom sinks, be met?

5.20

C. Signage

The Management Plan provides that the objective of signage at the Ranch "is to state rules without a negative directive and without creating visual clutter." (Management Plan, p. 32.) Because a signage plan for the proposed Project has not yet been designed, it is unclear from the Draft MEIR whether the proposed signs would be consistent with the signage objective of the Management Plan. To best fulfill CEQA's informational goals, the Final MEIR should include a signage plan.

5.21

Mitigation Measure AES/mm-6 (Draft MEIR, p. 139) should be modified to require signage plans to be submitted to and approved by FFRP prior to application for land use and construction permits. Modifying the mitigation measure to give FFRP approval authority over the signage plans would be consistent with the FFRP's rights under the grant of easement, which allow it to prevent any activity on the Ranch that is inconsistent with the purpose of the Conservation Easement and Management Plan, including the preservation of natural scenic resources. (Conservation Easement, paragraph 3 (Rights of Grantee), see also Conservation Easement, paragraph 2 (Purpose).)

5.22

At a minimum, the Final MEIR should provide a signage plan that identifies the size, location, material, color, and quantity of proposed signs so that CCSD, the County of San Luis Obispo and the public may consider whether the signage plans would negatively impact scenic vistas or significantly degrade the Ranch's scenic landscape. The plans should limit sign use to only those signs necessary to inform trail users of trail names and routes, what may be expected on the trail, safety, and other relevant information while minimizing visual clutter along the coast to the maximum extent feasible. (See Management Plan pp. 32-33.)

5.23

A sign every quarter-mile is not necessary for public safety. Further, signs should not be reflective so as to prevent glare. Signs should also be neutral in color to minimize visual impacts. All proposed signs must be consistent with the size requirements identified in the Management Plan. (See *Ibid.*) Consistent with the County of San Luis Obispo's Coastal Plan Policies, Visual and Scenic Resources Policy 9, signs should be

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designed to be simple, easy to read, and in harmony with the surrounding area. Without a signage plan, it is impossible to determine if the proposed Project is consistent with this criteria.

5.24 (cont'd)

III. Impacts to Southern Steelhead

The drainage plans for the proposed Project are not sufficiently detailed to determine whether there would be any impact from runoff on Southern Steelhead, a federally listed endangered species, which are known to spawn in the Santa Rosa Creek. Please provide additional information on whether and how drainage from the proposed Project would affect Steelhead. As it stands, the information provided is insufficient to allow any meaningful assessment of the project's potential impacts to Steelhead. (*Vineyard, supra*, 40 Cal.4th at pp. 447-450 [recirculation of EIR required because county's findings of no significance to migrating salmon from reduced river flows not supported by substantial evidence].)

5.25

IV. Lighting

The Project Description states that "[t]he proposed park would be open during daylight hours only, and no lighting is proposed for the fields, courts, or trail system. Limited, shielded security lighting would be installed on the community building and restrooms. (Draft MEIR, p. III-18.) The Draft MEIR's impact analysis, however, indicates that there could be lighting proposed beyond limited security lighting, stating that "[a]lthough no lighting plan or discussion is provided, it is reasonable to assume some lighting will be associated with the [community] park. . . . Night lighting on restrooms could be a noticeable visual element from off-site viewing areas. Even if raised light standards were not proposed, the atmospheric glow from security and building lighting could be an adverse visual characteristic of the park development." (Draft MEIR, p. V-143.) The Draft MEIR should consistently describe whether lighting is proposed beyond limited security lighting on the community building and restrooms. (See *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 183.)

5.26

Because the proposed park will be open only during daylight hours (Draft MEIR, p. III-18) there is no need to allow parking lot lights or restroom lights after daylight. Therefore, night-lighting should not be part of any lighting plans prepared pursuant to AES/mm-11. Because there is currently no lighting in the area, any addition of lighting would conflict with the character of area and should not be permitted. (See County of San Luis Obispo General Plan Land Use Element and Local Coastal Plan – North Coast Planning Area, Chapter 4, § 6 (D).) To the extent that night lighting is deemed necessary for public safety, mitigation measure AES/mm-11 should be modified to require any

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proposed night-lights to have motion sensors to minimize the duration of their impact and thereby avoid a significant aesthetic impact from light and glare.

5.27 (cont'd)

V. Community Center Building

The project includes a community center building, the size of which is unidentified. (Draft MEIR, p. III-21.) Because the size of the community center building has not been determined, it is impossible to determine the aesthetic and other impacts of the center, including light and glare impacts and interference with scenic resources.

5.28

Further, the community center building is not necessary to provide the community with meeting/recreational facilities. For instance, the Vets Hall, the Joselyn Senior Center, the Old Grammar School, the YMCA Teen Center, the Grammar, Middle and High schools are available for community meeting/recreational uses. Further, meetings and events may be held at various churches, including the Santa Rosa Catholic, St. Paul's Episcopal, and Baptist churches. Camp Ocean Pines also includes four meeting rooms and the kitchen is available for various functions.

5.29

There is no need to clutter the Ranch with unnecessary development and infrastructure, that could result in further growth inducing impacts by bringing more visitors to the park. If the Community Center were built, it would almost certainly be used at night, adding lighting impacts from the building itself and safety lighting required for night use. AES/mm-11 (Draft MEIR, p. V-143) would not necessarily mitigate impacts associated with lighting the Community Center because that measure does not prohibit the San Luis Obispo Department of Planning and Building from approving construction permits if significant aesthetic impacts are identified. The mitigation measure should be modified to require that if a significant visual impact is identified, measures, such as blackout shades and motion sensors, must be implemented to reduce lighting impacts to a less than significant level.

Alternative A (Reduced Project) should be the preferred alternative, particularly because no significant and unavoidable water supply impact is identified with that alternative. At a minimum, the preferred alternative should not include a Community Center. Contrary to the Draft MEIR's assertion, such an alternative would *not* be inconsistent with the Management Plan because the Management Plan only identifies a community center as one of the recreational facilities that *may* be included in the community park. (Management Plan, p. 15.)

5.30

A Community Center is not required. More importantly, it is not needed to adequately serve the existing and future needs of the community.

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The Conservation Easement, for example, prohibits development of areas to provide seating or to otherwise facilitate gatherings of more than 25 persons without FFRP's concurrence. (Conservation Easement, paragraph 3.1(c)(vi).) FFRP does not concur with the Community Center as proposed.

5.30 (cont'd)

VI. Parking

The Draft MEIR does not provide sufficient detail to analyze the environmental effects of the addition of new parking spaces. The Draft MEIR does not specify how many parking spaces are proposed at each location identified in Figure III-6. It is impossible for decisionmakers and the public to evaluate the aesthetic, biological, and other environmental effects of the proposed parking without knowing where and how many parking spaces are proposed and how big the development footprint would be. Please provide this information in the Final MEIR as well as information on the environmental effects of the proposed parking plans and recirculate this information for additional review and comment.

5.31

The fact that the EIR is a Master EIR does not negate the necessity to sufficiently describe a proposed project, including subsequent stages of the proposed project. (Public Resources Code, § 21157 subd. (b); CEQA Guidelines, § 15176.) If the MEIR does not sufficiently describe proposed parking, future parking plans would not be eligible for streamlined environmental review. (Pub. Resources Code, § 21157.1; CEQA Guidelines, § 15177.)

5.32

Although the Management Plan would allow parking on the West FRP, the intent has always been to keep parking off the Ranch except for the community park area on the East FRP and the staging area on Highway 1. As the Draft MEIR concludes, "[d]evelopment of parking areas on the West FRP would potentially affect sensitive biological resources, cultural resources, resulting in potentially significant impacts to these resources." (Draft MEIR, p. V-159.) The plans should be modified to only allow parking off the Ranch except for the community park area. Parking on the West FRP should be limited to the staging area next to Highway 1.

5.33

Moreover, parking on the Ranch appears inconsistent with the environmentally sensitive habitat areas (ESHA) protection provisions of the California Coastal Act (Pub. Resources Code, § 30000 et seq.). San Luis Obispo County's current Land Use Plan maps much of the western portion of the Ranch as Terrestrial Habitat ESHA. Coastal Act section 20340 prohibits any significant disruption of habitat values, and limits development within ESHA to be sited and designed to prevent significant degradation,

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and be compatible with the continuance of the habitat. Disturbing presently undisturbed land in the West FRP would not be compatible with the continuance of the habitat. (See *Douda v. Cal. Coastal Com.* (2008).159 Cal.App.4th 1181, 1182, 1201 [California Coastal Commission may unilaterally designate environmentally sensitive habitat areas and thereby prevent development.])

5.34 (cont'd)

The Draft MEIR provides an inadequate discussion of the impacts of parking lots in the West FRP on riparian habitats, including impacts of runoff from the parking lots. Coastal Act section 30231 provides that the biological productivity of coastal waters, streams, wetlands, estuaries, and lakes must be maintained and, where feasible, restored. This is to be achieved by, among other means, controlling runoff, preventing substantial interference with surface water flow, and maintaining natural buffer areas that protect riparian habitats, and minimizing alteration of natural streams. Please provide information in the Final MEIR regarding the impacts of parking on the West FRP to riparian habitat, including all feasible mitigation measures.

5.35

Mitigation measure TC/mm-4 would require parking areas to be located to avoid all wetlands, drainages, special-status plant species, and culturally sensitive areas. There are extensive wetlands at the southern terminus of the Bluff Trail (Windsor Boulevard South) where parking is proposed. Therefore, parking should not be allowed at this location. At the very least, a wetlands delineation must be prepared and the CCSD must consult with the U.S. Army Corps of Engineers.

5.36

Additionally, it should be noted that the ADA parking at the north end of the Bluff Trail already exists and the current ADA parking is off-site at the south end of the Bluff Trail, not the Marine Terrace Trail, as stated in the Draft MEIR. (Draft MEIR, p. V-158.)

5.37

Generally, parking plans should be designed to afford the fullest protection of the Ranch's scenic and natural resources. As the Management Plan's statement of purpose notes, "[t]he importance of protecting [the Ranch] property lies in the opportunity for the public to experience a unique and coastal environment while safeguarding the various animal and plant communities it offers, including sensitive and endangered species. It is the overall philosophy of the Plan to allow the public to experience [the Ranch's] natural resources in a safe and reasonable manner while protecting and restoring the more sensitive and valuable habitats of the Ranch." (Management Plan, p. 4.) To best achieve the Management Plan's goal to safeguard the animal and plant communities existing on the Ranch, parking should not be allowed on the ranch except in the community park area and the Highway 1 staging area on the West FRP.

5.38

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VII. Biological Resources

The information included in the Draft MEIR’s Biological Resources chapter appears to be out-of-date. It appears that the preparers of the Draft MEIR made only one field study to analyze the proposed Project’s impacts on biological resources and based most of the chapter on old EIRs. To the extent that the information contained in the previous EIRs no longer reflects reality (e.g., the existing environment from which potential effects of the proposed Project must be measured under CEQA), field studies should be performed to fill informational gaps. Otherwise, the MEIR lacks substantial evidence supporting its impact analysis. (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2007) 158 Cal.App.4th 1336 [Air Quality Dist. should have used existing emissions as a baseline for evaluation, rather than permitted emissions].)

5.39

Additionally, Saint’s daisy (*Erigeron Sanctarum*), a special status species, has been found in the forest on the Ranch. Table V-5 should be modified to include the Saint’s daisy and whether CCSD intends to obtain a 2081 permit from DFG.

5.40

VIII. Project Description

“An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles, supra*, 71 Cal.App.3d 185, 183, italics original.) It is “[o]nly through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal ... and weigh other alternatives in the balance.” (*Id.* at pp. 192-193.)

5.41

Here, as noted, the Project Description is not consistent throughout the Draft MEIR with respect to lighting plans. Additionally, as discussed below, it is unclear whether the Creek to Ridge Trail is part of the Project. Further, we understand that the pump station that is planned to be demolished and relocated outside Santa Rosa Creek floodplain (Draft MEIR, p. III-22) and the cell tower (Draft MEIR, p. III-15) are independent projects and not part of the proposed Project. While these projects are relevant to the cumulative impacts discussion, it is misleading to include them in the Project Description.

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IX. Creek to Ridge Trail

The Creek to Ridge trail is treated inconsistently throughout the Draft MEIR. For instance, it is shown as abandoned in the project summary (Table II-1); but elsewhere it is described as part of the proposed Project. (See e.g., Draft MEIR, pp. V-16, V-89 (Bio Impact 2), V-106 (Cult. Impact 1); V-109 (Cult Impact 5).) The shifting project description makes it impossible to determine what the impacts of the proposed Project would be based on whether the trail is in or out.

5.42

If the Creek to Ridge trail is part of the project, why does the Draft MEIR not analyze its aesthetic impacts and impacts associated with unauthorized entry and the potential for growth inducement? The Final MEIR should analyze these impacts. Based on the visibility of the Marine Terrace Trail/Emergency Road, the proposed Creek to Ridge trail would likely be glaringly visible from Highway 1, from other parts of the Ranch and the neighborhoods behind much of the East FRP. If the Creek to Ridge trail is part of the Project (which we request it not be), the Final EIR should include a visual impact study of the trail. Without such a study, it is impossible to determine whether the visual impacts of the Creek to Ridge trail could be avoided or reduced to a level of insignificance.

5.43

In analyzing impacts of the Creek Ridge trail, the preparers of the MEIR should keep in mind that unauthorized vehicles have used the existing Creek to Ridge trail and it is reasonably foreseeable that more unauthorized vehicles will enter the park if the Creek to Ridge trail is improved.

5.44

Further, as noted in the Draft MEIR, erosion already occurs along the existing volunteer trail within the alignment of the proposed Creek to Ridge trail. Construction and use of the proposed Creek to Ridge trail could accelerate hillside erosion rates. Rather than building bridges or boardwalks across wet boggy areas of the trail (Draft MEIR, p. V-26 (Geo/mm-4), which would interfere with scenic view, it would be better to remove the Creek to Ridge trail from the Project. Even if vehicle access is unauthorized, there are no enforcement measures to ensure unauthorized vehicles would not enter the park.

5.45

Development of the Creek to Ridge trail would go against the spirit of the Conservation Easement in that it would create unnecessary harm to the environment and allow vehicle access. As noted, the better alternative would be to not include the Creek to Ridge trail as part of the Project so it can be left as a natural footpath.

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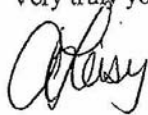
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* * *

FFRP respectfully requests CCSD honor its commitment to allowing public access while continuing to preserve and protect the Ranch's conservation and natural resource values to the fullest extent possible. Please do not hesitate to contact me if you have any questions or concerns regarding the content of this letter or require further clarification. We look forward to your response and our clients remain willing to meet with CCSD in an attempt to positively resolve these concerns.

5.47

Very truly yours,



Andrea K. Leisy

cc: Jo Ellen Butler
Marian King
Dan Carl, Coastal Commission
Tim Duff, State Coastal Conservancy

- 5. Friends of the Fiscalini Ranch Preserve - Represented by Remy, Thomas, Moose and Manley, LLP**
- 5.1 Comment noted regarding the mission of the Friends of the Fiscalini Ranch Preserve and their concerns over the adequacy of the Draft EIR. No further response is necessary.
- 5.2 Please refer to Section III.C.1 (Site History) of the Final EIR. The Final EIR has been amended to include additional background information about the project site and site history.
- 5.3 Comment noted regarding the underlying vision of the Conservation Easement and Management Plan, which is to “ensure that public access is maintained in balance with *minimum* (italics added by the responder) disturbance to, and protective of, sensitive natural habitats and unique scenic and cultural resources.” The objectives of the *East-West Ranch Public Access & Resource Management Plan* are listed in Section III.B of the EIR. The comment includes the statement that the proposed project should be fully consistent with the Conservation Easement and *East-West Ranch Public Access & Resource Management Plan*. The *East-West Ranch Public Access & Resource Management Plan* includes the vision statements along with further detail with regard to uses for both the East FRP and the West FRP, including the components as listed in the project description. Please note that the *East-West Ranch Public Access & Resource Management Plan* includes allowable uses for both the portions of the Ranch, including hiking on designated trails, bicycling on designated trails, dogs on leashes on any trail with a dog park allowable on the East FRP, *Active Recreation* (italics added by the EIR consultant) allowed only within the designated Community Park area on the eastern portion of the FRP, other Regulated Uses (as described on page 13 of the Management Plan) and Prohibited Uses (as described on page 14 of the Management Plan). It is the EIR consultant’s understanding that the vision statements as given in the plan are fully upheld in the remainder of the *East-West Ranch Public Access & Resource Management Plan*, and were adopted by the CCSD in 2003. Therefore, the uses as given in the Project Description are consistent with the *East-West Ranch Public Access & Resource Management Plan*, since the *East-West Ranch Public Access & Resource Management Plan* is part of the project.
- 5.4 Comment noted with regard to the commenter’s judgment that the Proposed Project as outlined in the *East-West Ranch Public Access & Resource Management Plan* and Chapter III of this Draft EIR contradicts or otherwise frustrates several of the preservation and conservation requirements of the Conservation Easement and the 2003 *East-West Ranch Public Access & Resource Management Plan*. The FFRP is requesting the project be fully consistent with the *East-West Ranch Public Access & Resource Management Plan*. Refer to response to comments 5.6 (regarding amplified noise), 5.8 and 5.14 (water supply), and 5.21 through 5.24 (signage).
- 5.5 Refer to response to specific comments regarding inconsistency below.

- 5.6 Refer to Section V.I.6.d (Residual Impacts) of the Final EIR. Amplified sound shall be prohibited at the community park. Mitigation measure N/mm-3 has been amended to require prohibition of loudspeakers and amplified sound.
- 5.7 Please refer to Section V.I.6.d (Residual Impacts), which notes that “Implementation of the proposed redesigned project and mitigation measures listed above would minimize potential noise impacts; however, the hourly 50 decibel threshold at the residential property boundary with the FRP would be exceeded during the maximum use of proposed sports fields, resulting in a potentially significant, adverse impact, Class I.” Refer to response to comment 5.6, which references an amendment to mitigation measure N/mm-3, which would prohibit loudspeakers and amplified noise.
- 5.8 The commenter did not continue the statement within this *East-West Ranch Public Access & Resource Management Plan* discussion on page 47 [46], that goes on to state that “[a]ccess to water service for Ranch operations may be provided through the existing water system.” This section also goes on to state that “[a] new water line for fire flow purposes may be installed by CCSD on the West Ranch to link Park Hill and West Lodge Hill neighborhoods. Any future location will need to avoid sensitive habitats and resources.” The referenced water line across the West FRP has been constructed and is currently in operation, following adoption of an Initial Study/Mitigated Negative Declaration. Comments are also noted that the CCSD presently has inadequate water resources to serve future customers and an inadequate water distribution system for fire suppression; that a moratorium on water permits are in force until new water sources are found, and that the CCSD should exercise caution before approving any project that would place additional demand on the CCSD water supply.

Please note that mitigation measure WS/mm-2 requires that the Master Plan “shall not be implemented unless sufficient water supply is determined to be available.”

- 5.9 Please refer to Section V.K.5.a. of the EIR, which identifies potential water sources, and identifies potential impacts associated with each proposed identified option. As noted in the EIR, the CCSD does not currently have a source of water supply to serve outstanding commitments. As proposed, implementation of the Community Park Master Plan would require a decision by the CCSD to allot water to serve the project. The CCSD adopted a Water Master Plan in September 2008, implementing water conservation programs, implementing a build-out reduction program, and pursuing tests to develop water supply facilities and improvements in lieu of increased groundwater pumping or no new net increase in water use (refer to Section V.K.2. of the EIR). CCSD water master planning included recycled water for purposes of serving the proposed community park. An expanded discussion of the recycled water option has been added to the EIR for clarity (refer to Section V.K.5.a.(4) of the EIR). The EIR discloses information about these water sources, in addition to disclosing information about water sources on the Fiscalini Ranch Preserve. Reasonably foreseeable impacts associated with the use of these identified water supplies are identified in the EIR (refer to WS Impact 1, WS Impact 2, WS Impact 3, WS Impact 4, WS Impact 5, and WS Impact 6).

- 5.10 Chapter V.K of the EIR satisfies CEQA’s informational mandate specific to water supply because the analysis discloses information specific the current conditions (lack of available water supply), identifies alternative sources of water that the CCSD is currently investigating as described in the Water Master Plan and summarized in the EIR, and identifies the potential impacts associated with the use of identified alternatives. As noted in the EIR, the CCSD must develop supplemental sources, or implement improved technologies to provide water for the community, and approve to allot water for development of the Community Park prior to implementation of the park.
- 5.11 Please refer to Section V.K.5.a. (Residual Impacts), which notes that “[p]hysically, water is available to serve the project; however, based on the current water moratorium and outstanding service commitment list, implementation of the project and use of CCSD water sources would be considered significant, adverse, and unavoidable, Class I, until alternative water supply resources are established by the CCSD. Use of water for the community park may reduce aquifer levels such that the CCSD could not support existing or proposed uses.” This determination identifies that water supplies are not currently available, pending identification of an alternative source of water to serve the CCSD (existing and pending customers). Further, please refer to WS/mm-2, which states that “prior to CCSD Board approval of the Community Park Master Plan, if onsite wells are proposed for the water source, the CCSD shall conduct additional tests on each proposed well to determine flow rates, capacity, and quality of water. Based on the results of water quality tests, methods of treatment shall be identified. The Master Plan shall not be implemented unless sufficient water supply is determined to be available.” The CCSD may consider approval of the project, but is restricted from developing the project until additional sources of water are determined.

With regard to *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007), the Draft EIR identified the water sources needed for build-out of the Master Plan; assessed the environmental impacts associated with providing water for the project; identified alternative water sources; identified the likely (reasonably-likely or reasonably foreseeable) yields of future water from identified sources; consulted with water agencies to determine their ability to serve the project (in this case, the CCSD is the water agency); determined the cumulative demands on the water supply system (currently a moratorium); disclosed shortcomings in the water supply; identified mitigation measures to reduce water demand associated with the Master Plan; and identified water supply as a significant unavoidable adverse impact that cannot be mitigated given the existing conditions. Given CEQA requirements and SB 610 and SB 221 requirements, CEQA does not require a guaranteed water supply at the time of Master Plan approval. Should the CCSD wish to continue with the proposed project as identified in the EIR, or one of the alternatives being considered, the CCSD would have to adopt Findings and a Statement of Overriding Consideration.

- 5.12 The EIR meets the principles identified in the Vineyard case as follows:
1. CEQA’s informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to the problem of supplying water to a proposed land use project.

Rather, decision makers and the public must be presented with sufficient facts to evaluate the pros and cons of supplying the amount of water that the project will need.

Please refer to Section V.K.5.a. of the EIR, which identifies potential sources of water supply. Options for consideration by the CCSD include on-site well(s), the existing system, and alternatives identified in the Water Master Plan (2005) including desalination and recycled water. The EIR notes that “based on the permitting delays to date and the CCSD’s water planning calling upon the use of recycled wastewater effluent for irrigation, this analysis does not consider seawater desalination for future park irrigation” and the recycled water option is assessed in the EIR. These options are not considered speculative because they are identified in the Water Master Plan, and are considered options for water supply for the community of Cambria, including the proposed community park (refer to expanded Section V.K.5.a.(4) of the EIR). These options are not considered “paper water” since the CCSD has not yet allocated water to serve the community park, and would not likely be able to do so until supplemental or alternative community-wide water supply sources are identified and in place.

2. An adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years. While tiering may be used to defer the analysis of certain details of the later phases of long-term projects, simply stating that information will be provided in the future does not satisfy CEQA’s demand for meaningful information. Rather, an EIR for a planned land use project must assume that all phases of the project will eventually be built and will need water, and must analyze, to the extent reasonably possible, the impacts of providing water to the entire project.

The EIR includes an assessment of the total water demand for the project, and considers options to provide water for the whole project.

3. The future water supplies identified and analyzed must bear a likelihood of actually proving to be available; speculative sources and unrealistic allocations (e.g. “paper water”) are insufficient basis for decision making under CEQA. Rather, an EIR for a land use project must address the impacts of likely future water sources, and the discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water’s availability.

We concur that this principle is specifically relevant to the proposed project, due to the current lack of available water supply to serve the community (including the proposed project), and physical and regulatory constraints associated with development of supplemental water supply. Chapter V.K. of the EIR identifies alternative sources of water that the CCSD is currently investigating as described in the Water Master Plan currently under consideration, and identifies the potential impacts associated with the use of identified alternatives. As noted in the EIR, the CCSD must develop supplemental sources, or implement improved technologies to

provide water for the community, and approve to allot water for development of the Community Park prior to implementation of the park. While implementation of these alternatives will require further study by the CCSD, and review and approvals granted by appropriate regulatory and responsible agencies (i.e., County of San Luis Obispo, California Coastal Commission, Regional Water Quality Control Board), the future water supplies identified in the EIR are not considered speculative or unrealistic because the CCSD is actively pursuing implementation of these methods. But, since the water supplies being pursued by the CCSD are not firm (in other words, they have not been implemented to date), they cannot be relied upon to meet the proposed project needs. Section V.K.5.a. of the EIR includes a discussion of potential impacts resulting from identified feasible water sources, including impacts to stream flow, impacts to special-status biological habitats, high salinity levels, and the effect on existing wells and water users. Furthermore, the EIR clearly identifies that allocation of existing water supply sources would result in a significant, adverse, and unavoidable impact, and discloses that the timeframe of actual development of alternative sources to serve the community (including the proposed project) are uncertain.

4. Even if a full discussion leaves some uncertainty regarding actual availability of the anticipated future water sources, CEQA requires some discussion of possible replacement sources or alternatives to the use of the anticipated water, and of the environmental consequences of those contingencies.

This principle is also very applicable to the proposed project, because there is some uncertainty regarding implementation of the Water Master Plan and development of alternative sources of water. As described above, the EIR identifies potential alternatives and discloses potential impacts based on available information.

- 5.13 The EIR has been amended to correctly note that on-site wells could provide a source of non-potable water, and includes a citation from the *East-West Ranch Public Access & Resource Management Plan*.
- 5.14 As is correctly noted in this comment, if the CCSD elects to use riparian rights by pursuing testing of and improvements to existing on-site wells, an amendment to the *East-West Ranch Public Access & Resource Management Plan* appears to be necessary. This information has been clarified in the EIR to disclose that if the CCSD elects to pursue use of on-site wells for non-potable water supply, the CCSD would be required to amend the *East-West Ranch Public Access & Resource Management Plan*, which would require approval by the CCSD General Manager, Friends of the Fiscalini Ranch Preserve, and State Coastal Conservancy Project Manager. Such an approval would require further study of the on-site wells to ensure that Santa Rosa Creek, down-stream habitats, and species dependent on such aquatic habitat are not adversely affected.
- 5.15 The EIR identifies these wells as a potential source of water supply for the Community Park, and appropriately acknowledges that additional information and study would be necessary prior to the CCSD designating these wells as the source of water for the

- Community Park. The EIR also identifies performance standards for the studies, including standard tests demonstrating adequate flow and water quality to meet standards for irrigation, avoidance of stream flow impacts. Note that the Draft EIR recommends a reduced project alternative that could be developed without the use of additional water resources, by using alternative design methods such as artificial turf, compost toilets and drought-tolerant landscaping.
- 5.16 The EIR notes that use of on-site wells may affect streamflow in Santa Rosa Creek (refer to WS Impact 3). As the commenter notes, the associated mitigation measure requires further study to determine the actual affects should this source of water be used for the proposed project; however, the measure also includes a performance standard that requires demonstration of avoidance of streamflow impacts, and requires that use of the wells shall not be permitted if streamflow impacts would occur. Additional language has been added to the EIR to clarify this performance standard.
- 5.17 Refer to Section V.K.5.a.(2) of the EIR, which states that “[u]se of CCSD wells is constrained by the potential for residential and fire flow shortages, contaminants, and special-status biological habitats (Residual Impact).” It also notes that “Implementation of mitigation would reduce the project’s demand for water supply; however, based on the existing deficiency of water resources to serve the outstanding connection list, impacts associated with the use of on-site wells for water supply would be considered significant, adverse, and unavoidable, Class I. Therefore, until the CCSD has developed alternative sources of water, using District water wells is not recommended as a water source.”
- 5.18 As noted in the EIR, future use of desalination water to serve the community of Cambria, including the proposed project, is not precluded (refer to Section V.K.5.a.(3) of the EIR). The EIR has been updated to reflect the CCSD’s continued exploration of the desalination option for community water supply (refer to Section V.K.5.a.(3) of the EIR).
- 5.19 Please refer to response to comment 5.9, and an expanded discussion of potential water supply options provided in Section V.K.5.a.(4) of the EIR. The recycled water master plan would be further analyzed and implemented as a subsequent project assessed in the *Program-level EIR for the CCSD Water Master Plan*.
- 5.20 Comment noted regarding the recycled water only being used for irrigation. The CCSD has a variety of alternative approaches it could apply to offset the potable water needs associated with drinking fountains and restroom sinks. Such measures may include the use of water conservation offsets through retrofitting existing connects in the community, bottled water vending machines, and the use of hand sanitizers. For the proposed project and until recycled water is available, the water demand could be eliminated by the use of portable or pit toilets, as noted in EIR mitigation measure WS/mm-1. This measure has been supplemented to identify the use of hand sanitizers to avoid the use of water for restroom sinks.
- 5.21 Please refer to Section V.F.5.d. of the EIR, which includes a mitigation measure providing guidelines for development of signage on the preserve (refer to AES/mm-5).

- While a signage plan is not currently specifically proposed, signage would comply with the Management Plan, which provides standards regarding size and materials of ranch signage, and with the guidelines provided by the mitigation measure. Guidelines include a requirement for natural or naturally appearing materials, low reflectivity, visual compatibility, minimum size necessary to achieve purpose, and placement in the least visibly obtrusive location. In addition, the signage plan would be developed by the CCSD and FFRP, in consultation with the Fire Chief.
- 5.22 The mitigation measures has been amended to include the following language: “The proposed signage plan shall be developed by the CCSD and Friends of the Fiscalini Ranch Preserve, and incorporated into the Management Plan prior to submittal to the County” (refer to Final EIR AES/mm-5).
- 5.23 Please refer to response to comment 5.21. Proposed signage would be consistent with the *East-West Ranch Public Access & Resource Management Plan*.
- 5.24 As noted in the EIR, based on consultation with the previous Fire Chief, mile markers on each designated trail were recommended to assist with emergency response (Putney, 2006) (refer to Section V.L.5.a.(1) of the EIR). All signage would be reviewed and approved by the current Fire Chief to ensure consistency with any updated guidelines and policies. Guidelines are recommended for signage consistent with the recommendations in your letter; please refer to response to comment 5.21 and AES/mm-5 of the Final EIR.
- 5.25 Please refer to Section V.D.6. of the EIR, which includes a discussion of potential impacts to special status species and their habitats. As noted in Section V.B.6.a. of the EIR, the project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site”. In addition, mitigation measure HYD/mm-2 requires implementation of best management practices including “a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff”. Implementation of these measures would protect water quality, and subsequently aquatic habitat for steelhead and other aquatic species. Section V.D.6.c. of the EIR has been amended to reference Chapter V.B. (Hydrology) of the EIR, and clarify that based on implementation of these identified mitigation measures, steelhead would not be significantly affected by implementation of the proposed project.
- 5.26 Section V.F.6.e. has been clarified to note that proposed lighting would include shielded security lighting on the bridge, parking areas, restrooms and community building. Lighting would be limited to security lighting, which would only be activated by detected motion.
- 5.27 The additional lighting would be minimal, and would not “create a new source of substantial light or glare which would adversely affect day or nighttime views in the area”. While consistency with the Coastal Zone Land Use Ordinance would require shielded lighting, a mitigation measure has been added to the EIR to ensure that security lighting will be shielded, and to require motion sensors on security lights (AES/mm-11 of the Final EIR): “Upon application for land use and construction permits from the County

- for the community park, the CCSD or its designee shall provide a security lighting plan showing shielded fixtures and the use of motion sensors. Exterior lighting shall be limited to security lighting on the community center restrooms, bridge, playground, and parking area. All exterior lighting shall be shielded and directed to the ground. All exterior lighting shall not be directed towards the sky, a structure wall, or towards the property boundary.”
- 5.28 The size and architectural design of the community center is not yet determined. The EIR has been amended to identify performance standards for the development of architectural plans ensure mitigation of potential impacts, including the following: the proposed design shall include elements consistent with the rural character of Cambria; colors and materials shall consist of earthtone, muted colors consistent with surrounding natural vegetation, and; roof materials shall be non-reflective (refer to AES/mm-10 of the Final EIR). As noted in the EIR, most of the park facilities would not be seen from off-site locations. The community center would be developed in the eastern portion of the FRP, within the community park area, and due to the location would not interfere with any scenic viewsheds.
- 5.29 Please refer to response to comment 5.27 and 5.28. Justification for the need of a project component is not required as part of an EIR; however, this issue will be considered by the CCSD Board.
- 5.30 The EIR notes that “while removal of the community center is not consistent with the project objective to provide a community recreation center, this alternative is acceptable for consideration because it is feasible that a community center could be established elsewhere within the community of Cambria” (refer to Section VI.D.2. of the EIR). This alternative would result in significant, adverse, and unavoidable impacts to water supply, as noted in Section VI.D.2.a. of the EIR: “Implementation of the Reduced Project Alternative A would not reduce or create additional impacts in the following issue areas: ...water supply.” This point has been clarified to ensure public understanding the analysis of this alternative. Comment noted that the FFRP does not concur with the community center as proposed. The EIR covers the “worst-case” project as proposed by the CCSD, including a proposed community center. It will be decision of the CCSD whether to continue with a proposed community center, and such a project would be subject to further environmental review prior to implementation.
- 5.31 The description of parking areas within the Fiscalini Ranch Preserve is based on the adopted *East-West Ranch Public Access & Resource Management Plan*, which did not provide specifics regarding size and space allocation of parking areas. The parking areas have not been designed. Note that the Master EIR process, as explained in CEQA Guidelines, Section 15176(b) indicates that there shall be a description of subsequent projects including information addressing various issues. Table II-1 of the Draft EIR Summary Section II, provides a list of subsequent projects, identifying the project, kind, location, intensity, and estimated capital outlay (defined as a capital outlay or capital improvement program, or other scheduling or implementing device that governs the submission and approval of subsequent projects). Parking areas are noted as a

subsequent project and would be subject to further environmental review prior to implementation.

Based on further review of onsite parking on the West FRP, including consultation with Friends of the Fiscalini Ranch Preserve, the EIR has been amended by removing the mitigation measure which would have required onsite parking (refer to Section V.G.5.d of the EIR). The intention of the measure was to provide a maximum of four parking areas, and would require mitigation to address potential secondary impacts to biological resources. Removal of this mitigation would avoid noted secondary impacts. As clarified in the Final EIR, implementation of alternative transportation methods (i.e., bicycle, carpooling, public transit), and consistent public education programs would minimize nuisance and land use conflicts at trailhead locations. In addition, the alternative that considered onsite parking is considered rejected, due to noted inconsistencies with the *Management Plan*, and substantial evidence that FFRP would not support an amendment to the *Management Plan* that would allow implementation of this alternative (refer to Section VI.C.1.b of the Final EIR).

5.32 Please refer to response to 5.31 above.

5.33 Refer to response to comment 5.31 above.

5.34 Draft EIR TC/mm-4 identified performance standards to avoid significant impacts to biological and hydrological resources, including avoidance of sensitive habitats, unpaved surfaces, erosion control measures, and site restoration. This measure has been deleted based on further communications between the CCSD and FFRP (refer to response comment 5.31).

5.35 Please refer to response to comments 5.31 and 5.34 above.

5.36 Please refer to response to comments 5.31 and 5.34 above.

5.37 The EIR has been clarified to note that ADA parking is provided at the northern terminus of the Bluff Trail (refer to Section V.G.5.d. of the Final EIR). Officially designated ADA parking is not currently provided at the southern terminus of the Bluff Trail.

5.38 Comment noted with regard to parking plans designed to afford the fullest protection of the Ranch's resources. Comment also noted that commenter recommends that parking not be allowed on the ranch except in the community park area and the Highway 1 staging area on the West FRP. Please refer to response to comments 5.31 and 5.34.

5.39 Please refer to Chapter V.D. of the EIR. Biological field surveys were conducted on the Fiscalini Ranch Preserve February, May, and June of 2005. Based on additional information provided by local biologists in the area, the Biological Resources existing setting discussion has been supplemented by this additional information (refer to Section V.D.2., Table V.D.-5, and Table V.D.-6 of the Final EIR).

- 5.40 The EIR has been amended to include Saint's daisy, which is a California Native Plant Society (CNPS) List 4 species (refer to Section V.D.2. and Table V.D.-5 of the Final EIR). Section 2081 of the California Endangered Species Act is applicable to State listed threatened and endangered species. Saint's daisy is not a State listed threatened or endangered species; therefore, this permit requirement does not apply.
- 5.41 Chapter III (Project Description) of the EIR has been clarified to explain that the project consists of the following: *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan. As noted in the EIR, the *East-West Ranch Public Access & Resource Management Plan* and the associated environmental document (Mitigated Negative Declaration) was adopted by the CCSD on April 24, 2003. The plan included a variety of elements, which are summarized in the project description of the EIR, including a telecommunications (cellular) facility, and a general concept for the community park area. The Community Park Master Plan, which will be under consideration by the CCSD Board, includes the pump station because this project affects the design of the Community Park Master Plan. It is also noted in the EIR that while the telecommunications facility and pump station are included in the *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan, applications for these projects were pursued independent of consideration of the Fiscalini Ranch Preserve Master EIR. The EIR has been updated to note that the wireless telecommunications facility application was denied, and a facility is no longer proposed as a subsequent project. The CCSD proposes to revise the Master Plan to remove this component (refer to Section I.G., Section III.D.1.c., and Section III.D.2. of the EIR).

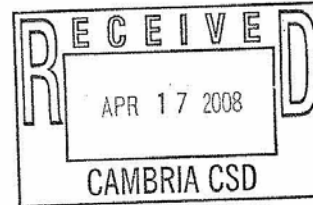
Additional language has been added to Chapter III of the EIR to further clarify the "project" and these other projects. In addition, language has been added to clarify that an EIR is required on the *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan because current County planning area standards require a "Master Development Plan" and associated EIR prior to development on the Ranch.

- 5.42 The Creek to Ridge Trail is included in the current *East-West Ranch Public Access & Resource Management Plan*; however, the CCSD is no longer considering improvements (other than maintenance) to the Ridge Trail or the Creek to Ridge Trail as subsequent projects.
- 5.43 The Creek to Ridge Trail was analyzed in the EIR, in addition to all other trails proposed in the *East-West Ranch Public Access & Resource Management Plan* (refer to Section V.F.5.c. of the EIR for aesthetic resource analysis). As described in the project description (Chapter III of the EIR), as proposed, the Creek to Ridge Trail would be used for equestrian, hiking, and biking uses and would not induce growth.
- 5.44 Based on consultation with the CCSD Ranch Manager, there are locked gates at both entrances to prohibit unauthorized vehicle use on the FRP. No changes to the EIR are necessary.

- 5.45 Please refer to mitigation measure GEO/mm-3, which requires implementation of soil stabilization and erosion prevention measures, including but not limited to the use of water bars. Please refer to mitigation measure AES/mm-4, which includes design guidelines for bridges and boardwalks to minimize potential aesthetic impacts to less than significant. Please refer to response to comment 5.44 regarding unauthorized vehicles.
- 5.46 Please note that the Creek to Ridge trail was included in the adopted *East-West Ranch Public Access & Resource Management Plan*. To exclude it would be misleading to the public. The Draft EIR notes that it is the intent of the CCSD to abandon further improvements to this trail, as noted in the updated list of subsequent projects.
- 5.47 Comment noted with regard to the CCSD honoring its commitment to allowing public access while continuing to preserve and protect the FRP. No changes to the EIR are necessary.



Cambria Community Services District
 Attn: Mr. Robert C. Gresens, P.E
 Connie Davidson
 1316 Tamson Drive, Suite 201
 Cambria, California 93428



Hand-delivered

April 16, 2008

Re: Comments on the DRAFT Master Environmental Impact Report for the Fiscalini Ranch Preserve SCH # 2006051092

Dear Connie and Bob:

Attached to this cover letter please find comments from Greenspace-the Cambria Land Trust on the Environmental Impact Report for the Fiscalini Ranch.

It was unfortunate that the preparer's of the EIR were limited to a narrow view of reasonable development on the east ranch. The public deserves a broader approach to parks and an analysis of reasonable options to consider.

Many on our past and present board of directors participated in acquiring the ranch for open space and permanent protection. We comment on all aspects of the ranch in view of these important principles.

Best wishes,

Richard Hawley

CC: Coastal Conservancy; the Coastal Commission

Attachment: Comments on the DRAFT Master Environmental Impact Report for the Fiscalini Ranch Preserve SCH # 2006051092

6.1

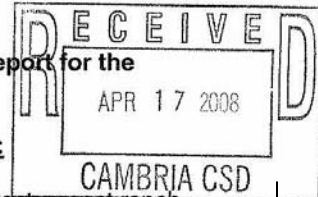
RICHARD HAWLEY
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**Comments on the DRAFT Master Environmental Impact Report for the
Fiscalini Ranch Preserve SCH # 2006051092**



General comments on potential development to the West Ranch:

The document does not analyze migratory songbird impacts on the west or east ranch. The document fails to analyze species of birds known to exist on the ranch. For instance, the burrowing owl was never included. 6.2

The document fails to analyze the positive and/or negative impacts of potential cattle grazing or other grazing activity as it pertains to native vegetation and non-native vegetation, fuel reduction, and coastal prairie ecosystem. 6.3

The document fails to analyze the effects of no grazing on native and non-native vegetation as it pertains to the conversion of historic grasslands to forbs and other vegetation thereby diminishing coastal prairie habitat and sensitive species dependent on mega-fauna browsing. 6.4

The document fails to identify the potential navigation impacts to migratory birds as it pertains to microwave activity from communications installations. 6.5

The document fails to analyze the impact of mushroom collectors and other activity that may adversely influence the viability of mycorrhiza with soil compaction on expanded trail systems and on increased use of existing trails. 6.6

The document fails to analyze or list the array of fungi species on the ranch and address the potential impact to these species. 6.7

General comments on potential development on the East Ranch:

Items that are identified as “to be determined” must be included in the cumulative analysis of all development scenarios otherwise the document is flawed. The public has seen conceptual design scenarios, parking areas, and other development associated with the “to be determined” identifiers; therefore this document must analyze potential impacts. 6.8

Items that are identified as park paths and trails must be further described to determine whether the path and trail a road. The document states some trails to be 16 feet wide and nearly a mile in length. If traffic is allowed, the impacts must be identified as to any intent to connect this roadway to any other existing road or new road identified in any planning document, pending document, or “to be determined” scenario. The document must identify whether the trail or path is elevated in any manner that acts like a levee, dike, or impediment to the natural flood plain function of Santa Rosa Creek and, if so, analyze whether the infill is consistent with all appropriate ordinances, policies and laws and identify the environmental consequences of that activity. 6.9

6.10

<p>The document fails to analyze the increased flood potential upstream from the proposed development in the 100 and 500 year flood plain. The document does not consider the increased runoff and potential bottleneck of evacuated water from the project.</p>	<p>6.11</p>
<p>The document does not adequately analyze the impacts of reducing the function of a floodplain by placing fill material to elevate roads, parking areas, paths and trails, sports fields, buildings and other infrastructure nor does the document offer adequate mitigation to these conditions. The document does not address the upstream flood effects this development will cause by decreasing the natural flood plain functions of Santa Rosa Creek.</p>	<p>6.12</p>
<p>The document does not adequately address point source pollution generated by the proposed development.</p>	<p>6.13</p>
<p>The document does not analyze the current condition of the CCSD facility nor the County facility as it pertains to toxic spills, or other environmental contaminates known to occur at maintenance yards that store fuel and hazardous material and waste. The CCSD has been on the site for nearly half a century so contaminates likely exist in the area of a potential park.</p>	<p>6.14</p>
<p>Further, the east ranch housed a manufacturing area that built parts for aircraft during the 1960's and early 1970's. The document fails to analyze potential contaminants on these locations.</p>	<p>6.15</p>
<p>The state purchased this property with water rights. The document fails to identify how many acre feet of water belong to the property. The people of the state of California purchased the property to protect natural resources. The document does not analyze the water rights on the property or how to protect the water rights for the benefit of the natural resources contained therein.</p>	<p>6.16</p>
<p>The document fails to analyze the impact of development to the carrying capacity of the underlying aquifer.</p>	<p>6.17</p>
<p>The document does not analyze the impacts to the natural function of flood plains as it pertains to suggested and pending development, flooding upstream, and potential damage to existing infrastructure.</p>	<p>6.18</p>
<p>The document fails to properly analyze noise conditions beyond the property line boundaries and fails to analyze noise traveling upslope to neighborhoods not adjacent to the proposed project.</p>	<p>6.19</p>
<p>The document fails to analyze the cumulative noise levels from existing noise producing facilities such as the Cambria Pines Lodge and other visitor serving facilities that have the capacity to amplify noise in the project canyon.</p>	<p>6.20</p>

The document fails to address the impact of hundreds of feet of channelized underground drainage, the point of evacuation of the pipes, and the point source pollution of concentrated water outlets. | 6.21

The document fails to analyze the cumulative impacts to ALL lighting issues in the east and west village. Light pollution cannot be mitigated unless there is a net loss of existing light pollution. | 6.22

ENVIRONMENTAL SETTING

C. Consistency with Land Use Plans and Policies

The document is not consistent with plans and policies as noted on page IV-5: | 6.23

Construction of private communication facilities on lands designated as Environmentally Sensitive Habitat Areas (ESHA) is not an allowable use with the current general plan or with general plan amendments approved by the California Coastal Commission.

The document is not consistent with plans and policies of the Local Coastal Plan, the Coastal Act and federal flood plain polices on depositing material in a natural flood plain and alteration of natural functions of flood plains. | 6.24

The document is not consistent with plans and policies related to biological viability to Santa Rosa Creek as it pertains to development that increases contaminants, fertilizers, and other constituents known to be deadly and harmful to protected and non-protected aquatic dependent species known to inhabit Santa Rosa Creek. | 6.25

The document is not consistent to plans and policies related to channelizing natural waterways and eliminating percolation of water of ground water recharge. | 6.26

The document is not consistent with point source pollution standards and mitigation. | 6.27

The document is not consistent with plans and policies because the site in not obligated to contain a facility that harms the natural functions of a flood plain. The document fails to provide alternatives consistent with plans and policies that encourage the protection of flood plains, riparian habitats, and all life forms within the 100-foot buffer area of any waterway while still providing ample passive recreational opportunities. | 6.28

The document is not consistent with plans and policies that create adverse public safety conditions as in bottlenecks for ingress and egress flow into purposefully designed high use public facilities. The document does not analyze projects that create fewer impacts on transportation. | 6.29

The project is not consistent with plans and policies with reducing greenhouse gases as it encourages vehicular traffic from other parts of the county. | 6.30

The document is not consistent with plans and policies because the proposed project is larger than the existing population needs. | 6.31

This document is not consistent with plans and policies that eliminate prime farmland from future production. | 6.32

The document is not consistent with plans and policies pertaining to artificial light pollution. There is net increase in light pollution. | 6.33

V. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. Geology and Soils

The east ranch is prime farmland. Conversion of prime farmland to non-conforming uses does not justify the permanent net loss of prime farmland in the county. The east ranch was recently used for grazing but was used for row crops in recent history, too. | 6.34

This document did not analyze projects like community organic gardens as consistent uses on farmland that may prove less damaging as the proposed alternative. | 6.35

B. Hydrology

The document does not adequately address hydrology issues raised on page 1, 2, and 3 of our response to this EIR thereby negating cumulative impacts and mitigation measures. | 6.36

The document does not analyze project alternatives or properly identify project alternatives that would have less impact on hydrology. | 6.37

C. Agricultural Resources

See soils discussion | 6.38

D. Biological Resources

The document does not analyze the impacts of the project on the east ranch as to increased nutrients, fertilizers, chemicals, and other constituents that the proposed urban park might have on animal, amphibians, reptiles and fishes in Santa Rosa Creek and the creeks flood plain habitats. Consequently, identified mitigation is negated. | 6.39

The document does not analyze the permanent impacts to breeding and nesting habitat areas for turtles, California Red-legged Frog and other animals and reptiles. | 6.40

E. Cultural Resources

Greenspace-the Cambria Land Trust
 Comments on the Draft Master Environmental Impact Report – Fiscalini Ranch
 April 16, 2008

Cultural resources must never be disturbed for any reason on land specifically purchased to protect ALL resources. Projects cannot be mitigated and therefore abandoned. | 6.41

F. Aesthetic Resources

Light pollution is not mitigated to zero unless a like amount of existing lights in the surrounding area are eliminated. | 6.42

G. Transportation and Circulation

See detailed comments on page 2 and 3 of this document. | 6.43

H. Air Quality

Vehicle trips from points outside the Cambria URL generated specifically to access the park project are not consistent with efforts to reduce greenhouse gases, vehicle trips, or the intent of AB 32. The document does not address the air quality issues by comparing less damaging alternatives. | 6.44

I. Noise

See comments on page 2 and 3 of this document. | 6.45

J. Hazardous and Hazardous Materials

See comments on general comments on the East Ranch | 6.46

K. Water Supply

See comments on pages 2 and 3 | 6.47

Irrigating proposed turf on the East Ranch by pumping recycled water for miles using energy better used for more urgent needs is not rationale. The carbon foot-print of this exercise is not mitigatable. Water is a resource worthy of respect and foolishly dumping it on turf is not in the best interest of conservation. Converting the 30-acre feet of water for human consumption as in irrigating crops and for drinking, is a superior use of a resource. This is not sound water management when less water consumptive alternative project exists. | 6.48

L. Public Services and Utilities

The document does not adequately analyze all potential project alternatives even though eliminated from public scrutiny by the CCSD. This creates inadequate analysis of viable alternatives that eliminate most of the environmental burden the proposed East | 6.49

Ranch proposal places on the east ranch. The mitigation identified in this section is inadequate.

6.49 (cont'd)

VI. ALTERNATIVES ANALYSIS

The limited vision of the proposed east ranch project eliminates sound management of resources and, by the project stated nature, causes damage to the environment. The allowable uses dictated by the CCSD hamstrings project alternative options and is likely not in compliance with CEQA guidelines intended to protect the resources of California or give the public a clear vision of options. Therefore, the document cannot analyze options to lessen impacts.

6.50

6. Greenspace – The Cambria Land Trust

- 6.1 Comment noted with regard to the EIR being limited to a narrow view of reasonable development on the East Ranch. Note that the EIR addresses the adopted *East-West Ranch Public Access & Resource Management Plan* and proposed Community Park Plan. This plan covers a proposed community park on the East Ranch.
- 6.2 Please refer to Section V.D.5., which identifies potential impacts to nesting birds: “Proposed construction and maintenance activities, and subsequent recreational uses have limited potential to impact riparian and wetland resources, sensitive plant and animal species, native habitats, and nesting birds.” Please refer to Section V.D.5.c.(2), which includes an impact analysis specific to nesting birds. BIO/mm-25 (in the Final EIR) has been amended to clarify that this measure is applicable to use of heavy equipment. Please refer to Table V-6 in the EIR, which includes burrowing owl as a species which “could occur on the site,” and identifies all other nesting birds as protected and potentially occurring on the Fiscalini Ranch Preserve. Presence of burrowing owl was not documented during biological surveys; however, the EIR acknowledges that this species could be present. As noted by public comment, this species has been observed on the Fiscalini Ranch Preserve.
- 6.3 The EIR notes that “[g]rassland habitat has been disturbed by historic grazing and other uses” (refer to Section V.D.2.c.(1)(a) of the EIR). The *East-West Ranch Public Access & Resource Management Plan* notes that grazing may be used as a vegetative management tool, provided activities comply with specified guidelines including avoidance of sensitive environmental and restoration areas, periodic assessment, and development of a prescriptive program. The EIR has been amended to reference these guidelines, and clarify that significant impacts would not occur (refer to Section V.D.5. of the Final EIR).
- 6.4 The proposed project includes grazing activities as an allowed use for vegetative management.
- 6.5 Based on review of documentation published on the U.S. Fish and Wildlife Service Division of Migratory Bird Management website, “most radio frequency (RF) signals have no effect on avian orientation, with the exception of tracking radars [Beason, 1999]. Pulsed microwave signals resulted in changes in the rate of spontaneous activity of neurons in the avian brain. Whether these changes resulted in behavioral effects (e.g., disorientation) is unknown (Semm and Beason, unpublished data in Beason 1999). While some have suggested the need for further RF research on birds, the literature does not support this suggestion (Bruderer and Boldt 1994; Bruderer et al. 1999)” (<http://www.fws.gov/migratorybirds/issues/towers/abcs.html>). As noted in Section III.D.1.c. of the EIR, the application for the wireless telecommunications facility was denied, and this proposed use will not be included in the Master Development Plan.
- 6.6 The expanded trail system will serve to reduce overall soil compaction within the FRP by focusing previously random travel patterns into defined pathways. Existing trails are already compacted and will not be significantly affected by increased usage. Activity by mushroom collectors is most likely a minimal amount of off-trail traffic, and the

- expanded trail system will further decrease the amount of off-trail travel necessary to find mushrooms. No significant increases in soil compaction, or adverse effects to mycorrhiza are anticipated as a result of the proposed project.
- 6.7 Please refer to response to comment 6.6.
- 6.8 The EIR analyzes the potential impacts associated with all proposed actions included in the *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan. Please refer to response to comments 5.31 and 5.41 above for a description of the use of subsequent projects in Master EIRs.
- 6.9 Please refer to Table III-3, which identifies the use limitations for each trail. Please refer to Section III.2.a.(4) of the EIR, which describes the proposed access plan for the East Fiscalini Ranch Preserve. Access improvements are limited to the Community Park area, including Rodeo Grounds Drive, and emergency access road to connect to Piney Way. All other traffic on the East Fiscalini Ranch Preserve is limited to emergency vehicles.
- 6.10 Please refer to Section V.B.6.a. and V.B.6.b. for a discussion of drainage and flooding effects. Proposed paths would not be elevated, and would allow for the sheetflow of storm and floodwaters similar to existing patterns. Section V.B.6.a. has been expanded to clarify that implementation of the project would generate an additional 2.27 cfs of stormwater runoff during a two-year storm event. This additional runoff would be managed by a bioswale, and existing swale, prior to sheet flow into the creek. As noted in the EIR, the proposed project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site; nor will it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control.” Based on the preliminary grading and drainage plans, the proposed Community Park Master Plan appears to be consistent with applicable ordinances, plans, and policies.
- 6.11 Please refer to Section V.B.6.b. for a discussion of flooding effects, and response to comment 6.10 above. As described in the EIR, floodwaters would sheetflow across the site. As described in the EIR, stormwater runoff would sheetflow across the fields, be directed towards vegetated swales, filter through rip-rap, and continue to sheetflow towards Santa Rosa Creek. This drainage pattern is similar to existing conditions.
- 6.12 Refer to response to comments 6.10 and 6.11 and Section V.B.6.a. of the EIR.
- 6.13 Please refer to mitigation measure HYD/mm-2 in the EIR, which includes the following requirement addressing the potential for pollutants within the watershed to contaminate Santa Rosa Creek: “The bioswales (or similar method) shall include best management practices to avoid erosion and scour, and shall include a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff.” In addition, supplemental language has been added to the Hazardous Materials section of the EIR (Section V.J.6.a. of the EIR) to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated

- Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR). IPM provides site specific, pro-active solutions to potential pest problems, reduces the risk of pesticide resistance, and would reduce the need for chemicals during operation and maintenance of the project.
- 6.14 Please refer to Section V.J.2.f.(1) of the EIR. There are no known significant quantities of hazardous materials at the existing CCSD and County facilities.
- 6.15 Based on review of site aerials dating to 1970, an airplane manufacturing facility was not noted on the East Ranch (Mark Hurd Aerial Surveys, July 15, 1970). Upon review of the aerial, ranch structures and water facilities are located near Santa Rosa Creek, near the proposed location of the community park on the East Ranch. The remains or left-over trash, canisters, or materials were not been noted by CCSD staff, or during site surveys covering the East and West FRP. Documentation of such a facility is not noted in the known history of the FRP.
- 6.16 Please refer to Section V.K.2.b for a discussion of historic water rights. Use of the riparian right would be dictated by the State Water Resources Control Board decision regarding CCSD diversions of riparian waters (Decision/Order 1624). Please refer to mitigation measure WS/mm-4, which requires that the use of on-site wells (use of riparian water rights) shall avoid affects to stream flow, and subsequently natural resources that depend on the existing stream flow.
- 6.17 Please refer to Section V.K.2.a. of the EIR. This section includes a discussion specific to existing water supply and demand, and identifies a significant, adverse, unavoidable impact resulting from the current lack of water supply, and the proposed project's adverse effect on the aquifer (WS Impact 1) and potentially adverse effects to streamflow and aquatic species (WS Impact 2). Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria.
- 6.18 Please refer to response to comments 6.10 and 6.11. Please refer to Section V.B.6.a and V.B.6.b for a discussion of drainage and flooding effects.
- 6.19 The noise analysis is conservative, and considers thresholds at the property boundary. The document also identifies a sphere of effect, where noise would exceed allowable thresholds (refer to Section V.I.6.d. of the EIR). A significant, adverse, and unavoidable impact specific to the project's estimated noise generation is identified (refer to N Impact 3).
- 6.20 Ambient noise measurements were obtained onsite, which include noise generated by all other uses in the area. The major source of noise in the area is Highway 1. Noise generated by Cambria Pines Lodge and other visitor-serving uses including business in the downtown core generate noise; however, based on noise measures and quantified predictions of noise levels documented in the EIR, the project's contribution to the cumulative level of noise would be less than significant.

- 6.21 The EIR analyzes potential hydrology impacts, and determined impacts to be less than significant. Please refer to response to comments 6.10, 6.11, and 6.13. Language to the EIR has been added to clarify that use of the proposed bioswale would decrease the velocity of storm water runoff, and allow water to percolate into the underlying soils. Riprap features would slow the velocity of water, which minimizes the potential for erosion at the discharge point (refer to Section V.B.6.a).
- 6.22 Please refer to response to comments 5.26 and 5.27, and Section V.F.6.e. of the Final EIR. Cumulative light impacts are assessed, and based on implementation of mitigation measures, the project would not significantly contribute to cumulative light pollution in the area.
- 6.23 The CCSO is no longer including a telecommunications facility as a subsequent project. The EIR has been updated to reflect this change (refer to Section III.D.1.c of the EIR).
- 6.24 Please refer to response to comment 6.10 and Section V.B.6.b of the EIR.
- 6.25 Based on preliminary grading plans, stormwater would filter through bioswales, and would sheetflow across natural ground, and would not be directly discharged into Santa Rosa Creek. Use of bioswales will slow the velocity of stormwater, and allow water to percolate into the underlying soil. In addition, implementation of mitigation measures including Integrated Pest Management, best management practices, and installation of pollutant filters would minimize the potential for pollutant presence in stormwater.
- 6.26 The proposed project does not include channelization of waterways. Stormwater would sheet flow across the field, and would flow in similar patterns, and would not be restricted from percolating into the underlying aquifer, and associated riparian underflow.
- 6.27 Please refer to response to comment 6.13.
- 6.28 Please refer to response to comments 6.10 and 6.11. No significant, adverse, and unavoidable impacts are identified related to flooding, riparian habitats, aquatic habitats, and associated species.
- 6.29 Please refer to Section V.G. of the EIR (Transportation and Circulation). Based on the traffic analysis prepared for the EIR, the proposed project would not result in significant delays on affected roadways. The EIR does include a reduced project alternative (Alternative B), which would reduce traffic trips (refer to Section VI.D.3 of the EIR).
- 6.30 As noted in the EIR, while the proposed project would generate localized trips in the immediate vicinity of the park, a case can be made that the trips attributed to the proposed project are not all new trips. Instead, because Cambria's existing recreation facilities do not meet the needs of the community, trips to the proposed project may already be occurring, as residents travel to local schools, neighboring communities, or regional facilities to access soccer fields, trails, and other facilities. In addition, the proposed project and recommended mitigation measures include standards for alternative

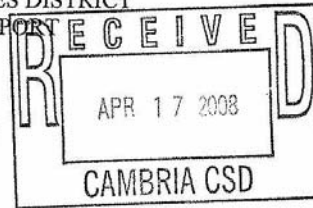
- transportation, including use of the existing transit and trolley system, and encouraging bicycle use. The Fiscalini Ranch Preserve and proposed Community Park are central to the community, which may also reduce current trip generation within the County (refer to Section V.H.5.c. of the EIR).
- 6.31 The proposed project intends to serve existing and future demands for recreational opportunities.
- 6.32 As noted in Section V.C.2.d. of the EIR, the Miramel sandy loam soil type generally is considered Prime Farmland by the CDC; however, the designation does not apply to the soils on the East FRP due to the fact that no agricultural activities have taken place in the last four years, one of the criteria for an area to be designated as Prime Farmland by the CDC.
- 6.33 Please refer to responses to comments 6.26 and 5.27.
- 6.34 Please refer to response to comment 6.32.
- 6.35 The proposed project does not preclude this use. Farming not considered in the identified alternatives because not consistent with objective to provide active recreation.
- 6.36 Refer to response to comments 6.10 and 6.11.
- 6.37 Please refer to responses to comments 6.10, 6.11, and 6.28.
- 6.38 Please refer to response to comment 6.32.
- 6.39 Please refer to response to comment 6.13.
- 6.40 Please refer to Section V.D.5 and V.D.6 of the EIR for a discussion of potential impacts to special status species and wildlife. As noted in the *East-West Ranch Public Access & Resource Management Plan*, interpretive programs, educational pamphlets and signage, and proposed restoration programs would protect and improve sensitive habitats and associated species. Based on implementation of such practices adopted by the CCSD upon adoption of the *East-West Ranch Public Access & Resource Management Plan*, no additional measures are considered necessary.
- 6.41 Please refer to CULT/mm-1 and CULT/mm-5, which require avoidance unless other environmental constraints cannot be avoided. Adoption of this measure does not preclude the CCSD's consideration of trail abandonment.
- 6.42 Please refer to response to comment 5.27.
- 6.43 Please refer to response to comment 6.29.

- 6.44 Please refer to response to comment 6.30. No significant, adverse, and unavoidable air quality impacts are identified; however, reduced project Alternative B would result in fewer traffic trips, and subsequently less emissions due to transportation-related sources (refer to Section VI.D.3 of the EIR).
- 6.45 Please refer to response to comments 6.19 and 6.20.
- 6.46 Please refer to response to comments 6.13, 6.14, 6.15, and 6.25.
- 6.47 Please refer to response to comments 6.16, and 6.17.
- 6.48 Comment noted with regard to the commenter's views on using recycled water for irrigating turf on the East Ranch. No changes to the EIR are necessary.
- 6.49 As noted in Chapter VI of the EIR, a range of reasonable alternatives was considered in the EIR. Based on the CCSD's primary objective to provide active, multi-use fields within the Community Park, the EIR notes rejection of alternatives that were considered, but do not meet this primary objective.
- 6.50 Please refer to response to comment 6.49. The EIR alternatives analysis does identify alternatives to the project that would avoid potentially significant, adverse, and unavoidable impacts, and notes that such alternatives would not be consistent with a primary objective of the proposed project.

COMMENTS ON THE CAMBRIA COMMUNITY SERVICES DISTRICT
 DRAFT MASTER ENVIRONMENTAL IMPACT REPORT
 FOR THE FISCALINI RANCH PRESERVE

Submitted by
 LANDWATCH SAN LUIS OBISPO COUNTY

Prepared By
 Cynthia Hawley, Attorney



LandWatch of San Luis Obispo County is a California public benefit 501(C)(3) nonprofit corporation interested in, among other things, preservation and protection of natural and cultural resources on the coast of San Luis Obispo County. On behalf of LandWatch San Luis Obispo County, thank you for the opportunity to review, and submit these comments on, the Draft Master Environmental Impact Report for the Fiscalini Ranch Preserve (DEIR) for the Cambria Community Services District.

7.1

We have identified numerous serious deficiencies in the DEIR. These failures do not fully satisfy the requirements of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) . Our analysis has led us to conclude that the DEIR must be revised and recirculated to the public for additional review.

The Master EIR is premature because the Master Development Plan it purports to analyze does not exist.

7.2

An Environmental Impact Report is a description and analysis of significant environmental effects of a defined project and a discussion of ways to avoid or mitigate those effects that must be considered by a public agency before it approves or disapproves a project. CEQA applies to “a discretionary action by a public agency that may cause a physical change to the environment” (*CCR 15378; Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 1.3; emphases added*)

7.3

The “project” that the District hopes will be approved by the County of San Luis Obispo is the Master Development Plan for the Fiscalini Ranch Preserve. (p.III-23) However, there is no “Master Development Plan” in existence at this time and no application for a coastal development permit for any Master Development Plan has been submitted by the District. The public has not reviewed a Master Development Plan to which the DEIR applies. There is no proposed discretionary action that describes physical changes to the environment before the Cambria Community Services District, the County of San Luis Obispo, or the public.

Various documents – what one must assume are separate elements of a Master Development Plan – exist and are identified in the Master EIR including:

1. adopted *Public Access and Management Plan*
2. proposed *Community Park Master Plan*
3. adopted *East West Ranch Management Plan and Easement*

It is impossible for the public and the decision makers to know, analyze, make findings and form conclusions about the impacts of a project that is not in existence. The chapters must be integrated into the whole Master Development Plan in order for decision makers and the public to know the impacts of the project as a whole. To comply with CEQA, the Master Development Plan must describe “the whole” project that may result in a physical change to the environment. (14 Cal. Code of Regs. 15378(a); Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 12.18) What is provided is a list of chapters from which nothing more than a piecemeal understanding of impacts can emerge.

7.4

The lack of a fixed and defined Master Development Plan translates directly into inadequate project descriptions. The “project description is the sine qua non of an informative, legally adequate EIR.” (*County of Inyo v City of Los Angeles* (1977) 71 CA3d 185; CCR 15124; Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 12.14)

Until the Master Development Plan, defined as a whole, is produced and adopted by the District, the project elements are not fixed and there is no fixed project description to which an environmental review can produce meaningful analyses of identified impacts. There is no “project” to which the Master EIR can be attached. Public disclosure and informed decision making are impossible without an adopted, integrated Master Development Plan on which an environmental analysis can be based.

The District has put the cart before the horse – it attempts to analyze the environmental impacts of a Master Development Plan before the Master Development Plan itself is completed and adopted. The CCSD must produce the Master Development Plan and then analyze the impacts of the Master Development Plan. Therefore, the EIR and these comments are necessarily limited to an analysis of the impacts of a series of discrete projects as they are described in the DEIR.

The purpose of a master EIR is frustrated because there is no Master Development Plan.

7.5

“A master EIR is an EIR that evaluates broad issues such as cumulative impacts, growth-inducing impacts, and irreversible effects, to the greatest extent feasible, so that the environmental review of subsequent projects or approvals can be substantially reduced. (Pub. Res. Code sections 21156-21157.1; Cal. Code of Regs. Sections 15175-15179; Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 15.18)

It is impossible to achieve the purpose of the master EIR to provide a broad evaluation of cumulative impacts, growth inducing impacts, and irreversible effects of a Master Development Plan before the Master Development Plan is provided. In this case, since the Master Development Plan is not available, the subject if the EIR is a series of separate projects, unmerged into a whole. Without a description of the cumulative impacts of the whole master plan – all of the trails, all of the roads, all of the parking lots, all of the signs, all of the lights, all of the buildings, the sports field, the cell towers, the traffic –

there is no information about the combined impacts of the whole from which the decision makers and the public can draw conclusions about cumulative impacts, growth inducing impacts, and irreversible effects of the whole project on which such.

7.5 (cont'd)

If the District wants to avail itself of the advantages of a Master EIR process, it must provide the public and the decision makers with a Master Development Plan as the basis and then produce a proper Master EIR.

The DEIR makes inappropriate conclusions that specific projects will have less than significant impacts on the environment.

7.6

The level of detail of an EIR should correlate with the type of action being evaluated. A more general analysis is appropriate for an EIR that evaluates proposed land use policies and planning documents. (*Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 13.20*) Accordingly, the master EIR is to provide for analyses of broad policy or planning issues such as cumulative impacts, growth inducing impacts, and irreversible effects. (*Supra §11.37*) The master EIR is appropriate where the project consists of a number of smaller individual projects to be carried out in phases, as with the Fiscalini Ranch Preserve Master Development Plan. CEQA requires that an agency abide by the rule of reason and the level of the discussion should be sufficient to serve CEQA's purpose of for informed public decision making.

But here, the District calls the EIR a Master EIR but does not provide the level of analysis appropriate for a Master EIR. The analyses of cumulative and growth inducing impacts are minimal. The discussion of growth inducing impacts takes up less than a page and analyses of cumulative impacts are discussed only within the context of discrete impact areas. Since the whole project has not been described yet as discussed above, there is no identification and discussion of the cumulative impacts of the whole project.

Less than a page is dedicated to significant irreversible changes and within those sentences there is no identification or discussion of the significant irreversible changes that will occur as a result of the project as a whole. There is no discussion of the irreversible changes that will occur as a result of the destruction of riparian and wetland habitats and species including endangered species on the East Ranch. There is no discussion of the irreversible changes to scenic values and habitat values that will result from the development of the proposed wireless communication facility on the West Ranch. There is no discussion of the irreversible changes the overall project will cause to existing night lighting, existing noise levels, existing aesthetic values, traffic, parking, etc.

7.7

Instead, the EIR's nearly 500 pages is devoted to description and analyses of the specific projects within the broad (upcoming) Master Development Plan and unsupported conclusions related to the levels of impacts of those specific projects. Thus, it is unclear what the EIR is meant to be. The public is told that it is a Master EIR even though the Master Development Plan that it purports to analyze is not compiled and the EIR itself

7.8

focuses on the individual specific projects within the East and West Ranches with pronouncements as to the significance of project-specific impacts.

7.8 (cont'd)

The “no project” alternative is not analyzed pursuant to CEQA.

The purpose of analyzing the “no project” alternative is to give decision makers information needed to compare the impacts of approving the project with the impacts of not approving the project – the impacts of environmental status quo. California Code of Regulations Section 15126.6(e)(1) requires that “[T]he specific alternative of ‘no project’ shall also be evaluated along with its impact.” Section 15126.6(e)(2) requires the analysis of the “no project” alternative to include a discussion of the existing conditions at the time that “would be reasonably expected to occur in the foreseeable future if the project were not approved.

7.9

At section 15126.6(e)(3)(B), the CEQA Guidelines require the “no project” analysis to include the “no project consequence”. Where disapproval of the project will result in “predictable actions by others” such as “the proposal of some other project”, that predictable other consequence should be discussed. The Guidelines do not say that the discussion should be limited to that consequence. The District, however, limits its “no project” alternative discussion to a prediction that the entire development will ultimately occur and will in any case result in the same or similar environmental impacts with no need to analyze an actual “no project” alternative of existing environmental conditions.

The DEIR improperly concludes that, since the proposed project is consistent with current planning documents, it is certain to proceed at some time and “no project” at this time would “result in similar physical effects” when it is later approved. (p. VI-7) This prediction does not take into account that the East Ranch is not currently zoned for sports facilities proposed for that area and that the proposed sports facility and the West Ranch wireless communications facility are highly contested projects in the community.

7.10

It is far from “a predictable action” that a disapproval of the proposed East Ranch urban sports fields and the proposed wireless communication facility as separate projects or as elements of the upcoming Master Development Plan will result in later approvals of the same projects. The DEIR offers no reasonable basis for such a conclusion. Consistency with land use plans is not the only criteria for approval and does not guarantee that the ultimate discretionary decision will allow a development – and a later discretionary decision related to permit approval and environmental review of a previously denied project permit is not by any means “predictable”. These decisions are discretionary by definition and by law are to be based on facts in the record including facts related to environmental impacts.

7.11

There is significant public opposition to the development of the East Ranch sports facility and the wireless communication facility and significant information exists to show that these project elements would have severe negative environmental effects. If the entire Master Development Plan was denied because of the detrimental effects of the sports facility and wireless communications facility, the more predictable “no project”

7.12

consequence would be a later approval of the Master Development Plan without these features and the EIR should provide a “no project” analysis consistent with this outcome.

7.12 (cont'd)

In *Planning and Conservation League v Department of Water Resources (83 Cal. App. 4th 892 (2000))*, the court clarified the purpose evaluation of the “no project alternative”. It states:

7.13

A no project description is nonevaluative. It provides the decision makers and the public with specific information about the environment if the project is not approved. It is a factually based forecast of the environmental impacts of preserving the status quo. It thus provides the decision makers with a base line against which they can measure the environmental advantages and disadvantages of the project and alternatives to the project. (Emphases added)

In *County of Inyo v City of Los Angeles (124 CA3rd 1 (1981))*, the court stated that the no project alternative comparing the proposed project with preproject conditions is necessary to assess advantages of terminating the proposal. (*Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 15.18*) (Emphases added)

By avoiding proper evaluation of the “no project alternative” the District failed to provide decision makers and the public with factually based forecast of the impacts of preserving the status quo – an analysis which is beyond the scope of a simple listing of existing conditions. The District failed to provide decision makers and the public with the base line of specific information about the environment related to, for example, the area of the East Ranch proposed for the sports facility and in the area of the West Ranch at the site proposed for the wireless communications facility. The description of the environmental settings does not provide any such base line information related to, among other things, habitat, species, soils, view sheds, types and intensities of noise, types and intensities of night light suitable for a comparative analysis.

No such comparisons of the environmental effects of the proposed sports facility and wireless communications facility are made with the environmental conditions as they are and the effects of preserving the status quo as required. Thus there is no assessment of the advantages of terminating those elements of the proposed (upcoming) Master Development Plan or of denying those separate projects.

7.14

The DEIR fails to disclose, analyze and apply relevant available information related to project description and impacts.

7.15

Again, the “project description is the sine qua non of an informative, legally adequate EIR.” (*County of Inyo v City of Los Angeles (1977) 71 CA3d 185; CCR 15124; Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 12.14*) When the project description omits known project elements, it may fail to disclose impacts related to those elements and defeat the purpose of CEQA to provide for informed environmental decision making. Where the CCSD decides to limit the scope of analysis to exclude possible project elements, it must provide evidence or

rationale in the record that supports that decision. (*Kings County Farm Bureau v City of Hanford (1990) 221 CA3d 692; Practice Under the California Environmental Quality Act, CEB, Kostka and Zischke, 1st ed., 2003 update, section 12.5*)

7.15 (cont'd)

Throughout the document, the DEIR fails to disclose, analyze and apply relevant available information related to project descriptions and impacts. Examples follow.

7.16

The DEIR fails to disclose the fertilizers and chemicals to be used in operation and maintenance of the proposed sports facility and fails to identify the impacts of chemicals on creek habitat and species. The proposed development for the East Ranch is sited on flood plane and riparian areas of Santa Rosa Creek. Drainage from the park will flow directly into the creek. At page V-225 the DEIR states that operation and maintenance of the community park may require the use of hazardous materials including fertilizers and “other chemicals” While turf management is well known and it is known what chemicals may be necessary for operation and maintenance of the park, the DEIR fails to identify what chemicals will be used. At page III-18 the DEIR describes drainage from the park being discharged directly into Santa Rosa Creek but fails to discuss and fails to identify any potential impacts the chemicals including fertilizers may have on riparian habitats, plants, and animals including known protected species such as red legged frogs, steelhead, and tidewater gobies.

The DEIR fails to disclose and analyze the impacts of the loss of habitats and species that will be caused by the development of planned sports park. The discussions of “Riparian and Wetland Habitat Impacts”, sensitive wildlife, and sensitive plants and native terrestrial habitats related to the East Ranch are limited to a discussion of construction activity-related impacts. There is no description, identification of impacts, and analysis of the long term impacts of the loss of the existing riparian and wetland habitats to the species including endangered plant and wildlife species in the area. In addition, the mitigation measures relied upon are those devised for the West Ranch and not for the flood plane and creek of the East Ranch. The conclusion that the impacts due to construction will be less than significant is not supported by data in the record.

7.17

The DEIR improperly makes ultimate findings that the specific projects within Master Development Plan will have “insignificant impacts” on the environment.

7.18

Throughout the document, the DEIR makes unsupported ultimate findings that projects within the Master Development Plan will have “insignificant impacts” on the environment. Since the Master Development Plan is not yet available for public review, there is no approved project description. Without the project description, it is impossible to identify impacts and impossible to make findings as to the levels of significance of any impacts.

The DEIR makes the improper finding that the impacts of the wireless communication facility would be less than significant with mitigation. The wireless communications facility proposed for the West Ranch pine forest is sited and designed. The height, size, and siting of all structures including two cell towers, five buildings, fencing, and access road and the need for electrical generators during power outages are designed and known.

7.19

The area to be graded and the vegetation to be removed are known. None of this is included in the DEIR. Instead the wireless communication facility is inappropriately separated out for piecemeal environmental review within a negative declaration. Neither the negative declaration for wireless communication facility nor the DEIR describe road improvements that will be required for all weather vehicle access to the facility. Importantly, neither document provides a proper analysis of project site alternatives.

7.19 (cont'd)

On page V-89, the discussion of sensitive plants and native terrestrial habitats states that “the Public Access and Management Plan is general in nature, and specific grading/site disturbance boundaries are currently undetermined.” This section states that botanical studies to determine the species present and the nature of the disturbance would be done after the site was selected and the grading was designed. In spite of these unknowns, the DEIR states in BIO Impact 2 that implementation of trails has the potential to have significant impacts on a number of plants including sensitive species known to be in the area.

7.20

These constraints – not knowing exactly where the grading will occur, the nature of the grading, or the plant species that would be affected – make it reasonably infeasible and impractical to define specific mitigation measures at the Master EIR level before the specific project is approved.

7.21

It is nonsensical and improper to make a baseless finding at the Master EIR stage that the unknown impacts of undefined grading to unknown plants at as-yet-to-be-decided sites will be mitigated to a level of insignificance by unknown mitigation measures. All broad assumptions related to project impacts should be treated as significant for purposes of certification of the Master EIR and approval of the Master Development Plan.

7.22

The DEIR makes the improper finding that the impacts of lighting and other features of the proposed East Ranch sports park would be less than significant with mitigation. At page V-143 the DEIR states that there is no lighting plan for the park and that the extent of visibility of park features such as the community center, rest rooms, maintenance buildings and other structures “would depend mostly on their location, height and color”. The observation is made that these unplanned lights and structures could be out of character with the setting and resulting adverse visual impacts to the community.

7.23

Based on a future visual impact assessment after the project is planned the unsupported and impossible conclusion is made that the lighting and structures proposed for the park would be considered less than significant with mitigation. Here, there is no final plan and no mitigation measure, only a future assessment of impacts. Because the success of the future assessment is uncertain, the CCSD cannot with any reasonable certainty determine at this point that significant negative visual impacts will not occur or will be sufficiently mitigated such that the impacts would be insignificant. Where, as here, it is not feasible to define specific mitigation measures before a project is approved, the approving agency should commit itself to devising and implementing mitigation measures at the proper time after approval to prevent negative impacts. But in this case, the project impacts should be treated as “significant” at project approval. (*Sacramento Old City Association v City Council of Sacramento* (1991) 229 Cal. App. 3rd 1011)

7.24

The description of improper findings described above is offered as an example and is applicable to the DEIR as a whole. The District should not make project-specific findings that impacts on the environment are less than significant at the Master EIR phase. Where analyses of project-specific impacts are appropriate, these impacts must be assumed to be as significant until the specific projects are fully designed in phases within the approved Master Development Plan.

7.25

Dated: 4-17-08


Cynthia Hawley

7. LandWatch San Luis Obispo County

- 7.1 Comment noted that LandWatch is a non-profit corporation. No changes to the EIR are necessary.
- 7.2 Please refer to response to comment 5.41 regarding the project description.
- 7.3 Please refer to amendments in the EIR, which clarify that the project consists of the *East-West Ranch Public Access and Management Plan* and Community Park Master Plan.
- 7.4 Please refer to response to comments 5.41 and 7.3. The whole of the action consists of the identified plans. The Master Development Plan will be the application submitted to the County of San Luis Obispo for consideration, and will consist of the East-West Ranch Public Access and Management Plan and Community Park Master Plan. These two plans consist of numerous actions, which are considered subsequent projects; therefore, a Master EIR was prepared to recognize that the project would be implemented as funds become available to take action, and to assess the impacts of each project element and as a whole. The CCSD Board will consider the Master EIR when making a decision regarding the Master Development Plan.
- 7.5 The EIR assesses the project as a whole. The EIR impact analysis section within each resource chapter is organized to identify project-wide impacts and impacts specific to a particular activity identified in the *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan. The cumulative effects of the proposed project are identified in the Cumulative Impacts section within each resource analysis chapter, including identified applicable mitigation measures and a determination of significance.
- 7.6 Refer to response to comment 7.5 above. Cumulative impacts are assessed based on the affected resource, and where the project would significantly contribute to a cumulative effect, such impacts are identified. As noted in Chapter VII, the proposed project would not result in growth inducing impacts.
- 7.7 Please refer to Chapter VII of the Final EIR, which has been amended to include additional discussion of irreversible changes resulting from the implementation of the *East-West Ranch Public Access and Resource Management Plan* and Community Park Master Plan.
- 7.8 Please refer to response to comment 7.3. The EIR provides a description of subsequent projects identified in the *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan, and identifies the potential impacts associated with such projects, to the degree information is available. Where the cumulative effects resulting from implementation of all identified subsequent projects would occur, such impacts are identified.
- 7.9 The “no project” alternative is essentially implementation of the *East-West Ranch Public Access & Resource Management Plan*, because it has been adopted by the CCSD.

- 7.10 The East Ranch is currently within the Recreation land use category, which allows active recreation. Planning area standard language specific to the Fiscalini Ranch Preserve include “outdoor sports and recreation” as an allowed use. The planning area standards do not include telecommunications facilities as an allowed use within the Open Space land use category. It is reasonably foreseeable that development of the Fiscalini Ranch Preserve would occur pursuant to the adopted *East-West Ranch Public Access & Resource Management Plan*, and consistent with the *North Coast Area Plan* (2008) in the long-term.
- 7.11 The basis of the conclusion is the prior adoption of the *East-West Ranch Public Access & Resource Management Plan*, and the County General Plan, which specifically note that an active community park would be constructed on the East Ranch. Refer to response to comment 7.10. We concur that actual County approval of these applications is discretionary. The “no project” analysis has been expanded to address environmental effects in the event proposed plans, or development consistent with the County General Plan, does not occur (refer to Section VI.D.1 of the Final EIR).
- 7.12 Please refer to Section VI.D.1 of the Final EIR, which includes an expanded analysis of the “no project” alternative.
- 7.13 Please refer to Section VI.D.1 of the Final EIR, which includes an expanded analysis of the “no project” alternative.
- 7.14 Please refer to Section VI.D.1 of the Final EIR, which includes an expanded analysis of the “no project” alternative.
- 7.15 The project description includes all available information regarding subsequent project (refer to Chapter III).
- 7.16 Please refer to response to comment 6.13. As noted in the EIR, no direct storm drain pipe outfall to the creek is proposed. Stormwater would sheetflow prior to entry into the creek.
- 7.17 Implementation of the proposed project would not result in the loss of riparian or wetland habitats. Potential long-term impacts to the aquatic habitat within Santa Rosa Creek have been clarified in Section V.D.6.c. of the EIR.
- 7.18 Please refer to response to comment 5.41 and 7.1.
- 7.19 The proposed telecommunications facility was considered and denied approval, and has been removed from the subsequent projects list by the CCSD.
- 7.20 Please refer to Section V.D. of the EIR, which notes that seasonal botanical surveys and wildlife surveys were conducted in February, May, and June of 2005. Section V.D.5.b. of the Final EIR has been clarified to note that while biological surveys were conducted for the Fiscalini Ranch Preserve, including seasonal floristic surveys, additional surveys

- will be required upon consideration of subsequent projects to ensure avoidance and appropriate implementation of mitigation measures.
- 7.21 Please refer to response to comment 7.20. Proposed mitigation measures are feasible and practical because the measures identify requirements for further study, guidelines for protection of identified resources, identification of known required regulatory permit considerations, and performance standards.
- 7.22 Please refer to response to comment 7.21. While specific grading plans are not available, the EIR analysis was able to consider the approximate location of proposed trail alignments, and the proximity to known special-status plant occurrences. Mitigation measures include guidelines and performance standards, which would be implemented upon consideration of the subsequent project.
- 7.23 Please refer to response to comment 5.27, and AES/mm-11 in the Final EIR. A mitigation measure has been added to the EIR to ensure that security lighting will be shielded and directed to the ground, require motion sensors on security lights, and to prohibit light directed towards the sky, a structure wall, or towards the property boundary. These standards are known measures adopted by the County of San Luis Obispo to minimize the potential for light pollution. The size and architectural design of the community center is not yet determined. The EIR has been amended to identify performance standards for the development of architectural plans ensure mitigation of potential impacts, including the following: the proposed design shall include elements consistent with the rural character of Cambria; colors and materials shall consist of earthtone, muted colors consistent with surrounding natural vegetation, and; roof materials shall be non-reflective (refer to AES/mm-10 of the Final EIR).
- 7.24 Section 15176 of the CEQA Guidelines states that a Master EIR shall include “[a] description of potential impacts of anticipated projects for which there is not sufficient information reasonably available to support a full assessment of potential impacts”. Specifically identifying the potential impacts of the community center is not feasible; however, identification of guidelines and requirements of further study upon subsequent project review is provided in the EIR.
- 7.25 The EIR preparers are unsure as to the definition of the word “finding” made in this comment letter. The EIR does not contain findings as identified by CEQA, Guidelines Section 15091. The Master EIR is an informational document prepared according to the guidelines for a Master EIR. The CCSD is the lead agency and will make findings prior to certification of the Final Master EIR. The CCSD will make two sets of findings, the first set will specifically state how the CCSD has responded to the significant effects identified in the Master EIR; the second set will be the “statement of overriding considerations.” The CCSD will be required to refrain from approving projects with significant environmental effects when there are “feasible alternatives or mitigation measures” that can substantially lessen or avoid those impacts. Note that the Master EIR process is a streamlining process and covers a broad analysis of the various related projects that make up the *East-West Ranch Public Access & Resource Management Plan*

and Community Park Plan. Where there is not detailed information, the Master EIR only addresses that which it can address given the available information. The Master EIR process allows for subsequent projects to be identified, and these need not be identified by name. Table II-1 provides a list of subsequent projects covered under this Master EIR. As these subsequent projects move forward in the design and planning process, they will be reviewed against the Master EIR. If the Master EIR does not contain sufficient information to evaluate environmental effects of the final design of the subsequent project, then additional environmental review will be required prior to approving the subsequent project.

Dear CCSD,
 I am writing to comment on the East FRP EIR. I am writing as a Cambria homeowner/landlord, father of 2 young children and a manager of 500 acres of land on the coast just to the south of Cambria. 8.1

The studies used to identify the recreational needs of the Cambria Community were done in 1988 before the Cambria Grammar School was in place. The EIR does mention the new grammar school facilities. Has there been a recent study that demonstrates an excess demand for the facilities currently available? Has the possibility of a use agreement with Camp Yeager allowing community use of their facilities been investigated? 8.2

Would/could expansion of recreational fields near Coast Union High School be considered an alternative to meet the community’s recreational needs? 8.3

The EIR does emphasize that water is a limiting factor in the development of the recreational fields on the East Ranch site. This is one of many reasons that Alternative B is more appealing. 8.4

The description and data supporting the effectiveness of bio swales to mitigate the impacts of the runoff from the fields is lacking. The quantity and types of fertilizers and herbicides needed to keep fields green should be described. Is there a saturation point for the bio swales, so that additional nitrates, phosphates and herbicides would then runoff into the Santa Rosa Creek? This could relate to water saturation as well as the ability of the swale’s soils and plants to contain/reduce contaminants. More details are needed to properly assess the potential impacts to Santa Rosa Creek and its listed species. 8.5

Current county parks Shamel and Lampton Cliffs are mentioned in the EIR. County Parks funding seems to always be at risk. They are not able to maintain the vegetation at Lampton Cliffs. How will maintenance of the new fields be funded? 8.6

One reason for this concern is that if planted fields are not properly maintained the grasses can expand into native habitats as invasive weeds. An example of this is *Festuca arundinacea*, a common lawn grass that can dominate areas when it is allowed to go to seed and expand into natural areas. I am aware of this specific species as it is an invasive weed on the ranch I manage. I did not notice that the potential impact of recreational field grasses expanding into native plant areas was addressed. 8.7

Thanks for accepting my comments.
 Best of luck with the decision making process.

8. Don Canestro

- 8.1 Please refer to the comment letter (comment letter 2) submitted by the Coast Union School District (CUSD), which includes the following statement: “it is not appropriate to suggest that Coast Unified should remain responsible...and/or that additional and more extensive District funds be diverted from the educational program for increased playfield related upkeep”. It is unknown whether the CCSD has contacted Camp Yaeger to determine if they would allow community use of their facilities. Camp Yaeger is a private camp, and most likely would charge for use.
- 8.2 Please refer to response to comment 8.1, and comment letter 2 submitted by the Coast Union School District. Expansion of the fields near the high school is not considered a feasible alternative based on the CUSD’s response to this concept.
- 8.3 Comment noted that Alternative B is more appealing because of water use on East Ranch site. No changes to the EIR are necessary.
- 8.4 Section V.B.6.a has been expanded to clarify stormwater runoff effects. The existing property has a runoff rate of 19.08 cubic feet per second during a two-year frequency storm event. Assuming the paths and parking area are pervious (i.e., more permeable than asphalt but less pervious than soil), the proposed project would increase the runoff rate by 2.27 cubic feet per second (approximately 14 percent). Proposed impervious surfaces would account for 0.14 cubic feet per second in runoff (less than one percent). The runoff from the 52 acres or property to the south of the East FRP have a runoff rate of 50 cubic feet per second. The runoff from the community park would be discharged into the proposed bioswales, through riprap, and into a natural swale overland towards Santa Rosa Creek. Based on review by the EIR hydrologist, the effects of runoff would be less than significant.
- 8.5 Please refer to response to comment 6.13 and mitigation measure HYD/mm-2 in the EIR, which includes the following requirement addressing the potential for pollutants within the watershed to contaminate Santa Rosa Creek: “The bioswales (or similar method) shall include best management practices to avoid erosion and scour, and shall include a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff”. In addition, supplemental language has been added to the Hazardous Materials section of the EIR (Section V.J.6.a of the EIR) to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR). IPM measures include practices to avoid or minimize the use of chemicals that potentially affect water quality, and including on-going monitoring.
- 8.6 Based on consultation with the CCSD, maintenance costs will be funded by the CCSD and volunteers. No changes to the EIR are necessary.

- 8.7 As is correctly noted in the response, on-going maintenance will be required for the sports fields. The potential for the invasive spread of turf grass can be eliminated by the selection of non-invasive cool season grasses, and on-going maintenance and monitoring of the natural buffer proposed around the fields.

TO: Connie Davidson

WRITTEN COMMENTS REGARDING OUR CCSD's ENVIRONMENTAL IMPACT REPORT ABOUT PLANS FOR OUR FISCALINI RANCH PRESERVE

Our Fiscalini Ranch Preserve needs to be kept AS IS with no new developments. Improve and maintain our existing trails. Continue periodic clean-up. Our Fiscalini Preserve is one of the unique public areas near homes that resembles a wilderness area. Treasure it and respect its originality and purity. The projects of the EIR will cause the loss of our Fiscalini Preserve and the gain of a "Fiscalini Park". Include a vote for keeping the Preserve or building a new park with our next water/sewer statement. Make it simple:

Transform our Fiscalini Preserve into a beautiful community park.

Maintain our Fiscalini Preserve without development.

If 51% of the votes are to maintain our Preserve, use our funds to improve and maintain our water supply/treatment/delivery systems and our sewage systems.

If 51% of the votes are to develop a new park, then build and maintain it.

9.1

Sincerely yours,
Claude Albanese
Claude Albanese
March 17, 2008
3121 Wood Dr.
Cambria, CA 93428
(805) 927-3269



9. Claude Albanese

- 9.1 Comment noted that the Fiscalini Ranch Preserve should be kept as is with no new developments, and determine by vote if the property should be a preserve or park. No changes to the EIR are necessary.

3-24-08

Dear Ms. Davidson
Every inch of the
Fiscalini Ranch is
already in good use.
It is a Preserve.
They MUST leave it
alone!

10.1

Thank you.

Paul Alexander
Cambria



10. Jan Alexander

10.1 Comment noted to leave the Fiscalini Ranch alone. No changes to the EIR are necessary.

Connie Davidson

From: Adolph Atencio [aatenciojr@sbcglobal.net]
Sent: Thursday, April 17, 2008 6:00 PM
To: Connie Davidson
Subject: Comments on MEIR

My comments are as follows:

My impression of the MEIR is that it was very hard to read. I was often confused when the word "project" was used since it seemed to change context quite often. I would suggest that the report try to use simple language instead of engaging in games.

11.1

The report doesn't give much credit to the Conservation Easement which is the parent document of the management plan and takes p residence regardless of the intent of the "project".

11.2

The Coastal act is also missing in action. CC W !0b was a staff recommendation to the CC to modify the submitted Local Coastal Plan for the Fiscalini Ranch Preserve. It' contents should have been reviewed by the EIR group. The Local Coastal Plan for FRP was passed with those Staff recommendations by the CC.

11.3

Sincerely

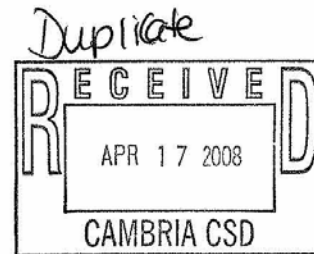
Adolph Atencio
445 warwick St
Cambria, CA 93428

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Adolph Atencio
445 warwick St
Cambria, CA 93428

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.0/1383 - Release Date: 4/17/2008 9:00 AM

11. Adolph Atencio

- 11.1 Please refer to response to comment 5.31. Chapter III (Project Description) of the EIR has been clarified to explain that the project consists of the following: *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan.
- 11.2 Comment noted with regard to the Conservation Easement. No changes to the EIR are necessary.
- 11.3 The County of San Luis Obispo Local Coastal Plan (LCP) documents, including the North Coast Area Plan and Local Coastal Plan, Cambria and San Simeon Acres Community Plan, Coastal Policies, and Coastal Zone Land Use Ordinance consist of the implementation documents for the Coastal Act. These plans and policies are addressed in the Consistency with Plans and Policies section of the EIR. The EIR has been updated to reflect the August 2008 adoption of the updated *North Coast Area Plan*.



MEMO

DATE: April 17, 2008

TO: Connie Davidson, CCSD consultant

FROM: Elizabeth Bettenhausen *Elizabeth Bettenhausen*

SUBJECT: Draft Master Environmental Impact Report for
the Fiscalini Ranch Preserve

Accompanying this memo is my review of the above mentioned document. I hand delivered it today to the CCSD office, after e-mailing a copy to you as well.

12.1

Elizabeth Bettenhausen

345 Plymouth Street

Cambria, CA 93428

805.927.0659

elizabeth1b@charter.net



Elizabeth Bettenhausen 345 Plymouth Street Cambria, CA 93428

review of
DRAFT MASTER ENVIRONMENTAL IMPACT REPORT
FISCALINI RANCH PRESERVE [DMEIRFRP]

1. Wireless telecommunication facility

a. In the Cultural Resources chapter, the proposed towers are mentioned on p. V. 108. The final sentence reads, "Based on the significant [*sic*] of these resources, implementation of a Phase III data recovery program and construction monitoring were [*sic*] recommended to mitigate impacts to archaeological resources to less than significant."

12.2

In Chapter VIII. MITIGATION MONITORING PROGRAM, implementing "Phase III data recovery program and construction monitoring" is **not** listed as mitigation of the negative environmental effects wireless telecommunication towers will have on cultural resources.

- i. Therefore, to whom was the recommendation made?
- ii. What legal authority does the recommendation have?
- iii. How will monitoring of the recommended actions take place?

b. The 2003 study of environmental impact on cultural resources was done by Clay Singer. The study, *Phase II Archaeological Investigations for the Cingular Wireless Project* (Singer, 2003), was done for one of the corporations that wants to place the wireless telecommunication facility on the Fiscalini Ranch Preserve.

12.3

Public evaluation of this study is not possible, because it is not available to the public for review.

- i. Who paid for the study?
- ii. Are representatives of the Salinan and Chumash nations allowed to review the study?
- iii. Have representatives of the Salinan and Chumash nations reviewed the study?

- c. On page V – 100 reference is made to Senate Bill 18. However, no mention is made of consulting with the Salinan nation or the Chumash nation about the wireless telecommunication towers. Only “trail realignments and educational signage are mentioned.” Therefore, the necessary consultation with Native American nations is legally incomplete.

12.4

- d. The Chapter on Biological Resources makes no mention of the wireless telecommunication towers facility proposed for placement within the western section of the Fiscalini Ranch Preserve. The environmental impact of this project on biological resources is not even considered. Why?

Given that the Monterey Pine Forest is an Environmentally Sensitive Habitat Area, and given that the wireless telecommunication facility is proposed to be placed within the Monterey Pine Forest, why is no analysis made of the environmental impact of such an action? On this issue the DRAFT MASTER ENVIRONMENTAL IMPACT REPORT for the FISCALINI RANCH PRESERVE is **wholly insufficient**.

12.5

12.6

- e. In the Chapter on Aesthetic Resources, p. V-134, the impact of the “wireless telecommunication facilities” depends on “a comprehensive visual impact assessment” given to the County of San Luis Obispo Department of Planning and Building “[u]pon application for land use and construction permits. However, the judgment is already and prematurely made: “*Residual Impact With implementation of mitigation, Class II.*”

12.7

- f. In the contractual Easement for the Fiscalini Ranch Preserve, Revised 04/23/2003 Revised 6-25-03, “Permitted Use” L. reads “Construction of a telecommunications tower on the Cell Tower Area, more particularly described in Exhibit C, in a manner permitted in the Management Plan.”

However, “Prohibited Use” b. reads “The use or lease of the Property for residential, commercial, retail, industrial or mining purposes. The establishment of any for-profit or non-profit visitor-serving commercial or retail uses, including without limitation, commercial recreational uses.”

The permitted use and the prohibited use are mutually exclusive. So, the environmental impact of the wireless telecommunication facilities is impossible to judge.

12.8

g. The geology mitigation **GEO/mm-6** reads: “Upon application for land use and construction permits from the County of San Luis Obispo for a wireless telecommunications facility, the CCSD or its designee shall retain a County-approved, qualified geologist to prepare a site-specific, subsurface investigation regarding liquefaction potential. Based on the results of the investigation, the facility shall be constructed appropriately to minimize this hazard.”

12.9

What electrical elements would be in the wireless telecommunications facility? How is the connection between liquefaction potential and fire potential included in the required investigation?

h. What is the effect of the proposed wireless telecommunication facility’s electromagnetic radiation (radio frequency energy or radiation) on Monterey Pine Forest and inhabitants, especially birds, including but not limited to the peregrine falcon?

12.10

2. Other Concerns

I mention here some of the other concerns that I am unable to explore in detail, given the deadline of April 17, 2008, and its proximity to the deadline of April 14, 2008, for the public review of the Draft EIR for the CCSD’s Water Master Plan.

12.11

a. No alternatives to increased on-site or off-site adjacent parking are mentioned or analyzed. Expanding the mass transit system and service and using already available parking at Shamel Park would be preferable to increasing the available parking at the two FRP entrances off Windsor and the one off Huntington. Increased air and noise pollution and imposition on residential areas would be avoided.

b. The purpose and proposed uses of a community center in east FRP are not described.

12.12

c. An analysis of alternative sites for a regional park(s) within Cambria should be included. This should include cooperative community planning with the school district.

12.13

12. Elizabeth Bettenhausen

- 12.1 Comment noted with regard to commenter's review being attached to letter; no changes to the EIR are necessary.
- 12.2 This comment references section V.E.2.b.(1)(a) of the EIR, which has been amended to clarify that the County of San Luis Obispo included mitigation measures to minimize potential impacts to archaeological resources, including construction monitoring. This measure was adopted by the County Planning Commission upon approval of the proposed telecommunications project and adoption of a Mitigated Negative Declaration prepared for the land use permit for the facility. The mitigation measure was recommended by County Planning Staff, and adopted by the County Planning Commission. The applicant (Cambria Community Services District/Friends of the Fiscalini Ranch Preserve) are required, pursuant to this measure, to ensure submittal and implementation of a monitoring plan, and submit monitoring reports to the County of San Luis Obispo Environmental Coordinator's office.
- 12.3 The applicant for the telecommunications facility paid for the study. The study is held in a confidential file at the County of San Luis Obispo Environmental Coordinator's office. Salinan and Chumash representatives, in addition to the general public, are not permitted to review such confidential reports.
- 12.4 Senate Bill 18 does not require consultation with Native American tribes for land use development projects.
- 12.5 At the time the Draft EIR was prepared, the County of San Luis Obispo was established as the CEQA lead agency for the telecommunications project. The telecommunications project has independent utility under CEQA, since it can proceed independent of other actions being considered in the Master EIR. The land use application was subsequently denied, and the CCSD is no longer proposing to locate a telecommunications facility within the FRP. The EIR has been updated to reflect this change (refer to Section III.D.1.c of the EIR).
- 12.6 Please refer to response to comment 12.5.
- 12.7 Please refer to Section V.F.5.a. of the EIR, which notes that a "project-specific visual impact assessment was prepared for the [telecommunications facility] project." As noted in response to comment 12.5, the land use application for the telecommunications project was subsequently denied, and the EIR has been updated to reflect this change (refer to Section III.D.1.c of the EIR).
- 12.8 Comment noted with regard to contractual easement language regarding the telecommunications facility; please refer to response to comment 12.5 above.
- 12.9 As previously proposed, electrical elements would include a connection to a power source, and a generator. The evaluation considers the potential for liquefaction to occur

during a seismic event, causing damage to the facility, and potential harm if persons are near the facility. Potential fire impacts would be addressed by the standard requirements for fuel reduction near all structures. Please refer to response to comment 12.5 above.

- 12.10 Please refer to response to comment 6.5.
- 12.11 Please refer to mitigation measures TC/mm-1, TC/mm-2, and TC/mm-3, which identify alternative transportation measures, including use of biking and pedestrian walkways, and coordination with the trolley service. The CCSD does not have the authority to expand the mass transit and trolley system; however, the *East-West Ranch Public Access & Resource Management Plan* includes a recommendation to expand the trolley service to serve the Fiscalini Ranch Preserve, and coordination with the County regarding parking at Lampton Park and Shamel Park.
- 12.12 As noted in Table III-2 of the EIR, the community center would be an active public facility for recreational use. The community center is expected to serve the diverse needs of the Cambria area, including meetings and gatherings (refer to Section III.D.2.a.(3) of the Final EIR).
- 12.13 Please refer to comment letter 2, submitted by the Coast Unified School District, which includes the following statement: “it is not appropriate to suggest that Coast Unified should remain responsible...and/or that additional and more extensive District funds be diverted from the educational program for increased playfield related upkeep.” In defining feasibility of alternatives, the CEQA Guidelines state: “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.” (CEQA Guidelines Section 15126.6(f)(1)). Identification of an alternative site for the community park is not feasible based on the lack of public land under the jurisdiction of the CCSD. In addition, please refer to the Final EIR for the Cambria Middle School. This EIR evaluated alternative school sites on every available parcel of sufficient size for a school in Cambria regardless of ownership. Most of the sites were excluded because of environmental reasons, principally wetlands. The East FRP, identified as the Rodeo Grounds, was one of the sites and it was excluded for a school, not a park. Based on this alternatives analysis, there are no other properties with suitable size and topography that would be suitable for a community park, and that would avoid or reduce identified significant adverse impacts.

TR
CD
F/S

3/21/08

Cambria CCSD
P.O. BOX 65
CAMBRIA, CA. 93428



DEAR SIR:

In regards to the Master Plan for Fiscalini Ranch Preserve, please include where the funding for such projects is coming from. Such funding should not come from our water bill. If the funding is coming from our property tax bill, we should be able to vote on it.

Your news articles in the Cambrian newspaper never mention where the funding for such projects is coming from.

13.1

Sincerely:

A handwritten signature in cursive script that reads "Lorena R. Border".

Lorena Border
427 Arvin St.
Bakersfield, Ca. 93308

13. Lorena Border

- 13.1 Comment noted regarding funding, that if funding is coming from water bill or property tax bill, the commenter wishes to have a vote. No changes to the EIR are necessary.

Connie Davidson

From: Art Phillips [aphillips@vanguardrecords.com]
Sent: Sunday, April 13, 2008 9:19 AM
To: Connie Davidson
Subject: Fiscalini Ranch

Dear Connie Davidson,

It was one of those perfect Cambria days, and we took the dogs on the upper Fiscalini Ranch so they could run it out. We cut back down to the beautiful new bench and rested a while, taking in the beauty of the Ranch and the ocean. When I think about the proposed parks, sports courts, dog park (thought we had a lovely dog park) and additional parking that would have to be built in Marine Terrace, it sickens me. When we attended the early fundraisers and proudly displayed a sign in our yard, it said OPEN SPACE FOREVER. That's what we love about The Ranch - the chance to appreciate our special place on the Central Coast in a natural setting. I've got nothing against parks and picnic areas - but not on an open preserve. I understand trails have to be maintained. But sports courts? Please. Not on our Ranch.

14.1

Sincerely,

Arthur Boxman
Cambria

4/16/2008

14. Arthur Boxman (Art Phillips)

- 14.1 Comment noted regarding sports courts on East FRP. No changes to the EIR are necessary.

Connie Davidson

From: Jim Brownell [jbrownell@mac.com]
Sent: Wednesday, April 16, 2008 8:55 PM
To: Connie Davidson
Cc: Mary Webb
Subject: Fiscalini Ranch EIR

Comments on the DRAFT Master Environmental Impact Report for the Fiscalini Ranch Preserve SCH # 2006051092\

My major concern with the Fiscalini Ranch Preserve EIR is with the construction of a private communication facility on the "PRESERVE". This project is most frequently referred to as the "Cell Towers". As I understand it this project actually consists of two cell towers, a nearly 3/4 mile all weather road and five service buildings for the towers commercial users. As a development in a natural preserve it is not consistent with the vision of many Cambrians. In an informal survey many thought the towers would be OK, but had real concerns with the road and buildings.

15.1

The cell phone communication system is based on rapidly changing technology. Reports in January of a new sale of a greater bandwidth for use in communications indicated that in the near future the need for cells would b reduced by a factor of ten.

I do not think hat we should sacrifice the integrity of our PRESERVE for income from a project that is most likely to be temporary.

The EIR fails to address a multitude of issues that include the impact on Santa Rosa creek, the resident native plant and animal populations, i.e. the endangered steelhead in the stream of the Ranch, the removal of grazing on vegetation; traffic, loss of prime agricultural land to non agricultural use, accelerated soil loss with vegetation disturbance, to name a few.

15.2

James Brownell, Ph. D.
Professor of Soils, emeritus

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.519 / Virus Database: 269.22.13/1378 - Release Date: 4/15/2008 9:12 AM

4/17/2008

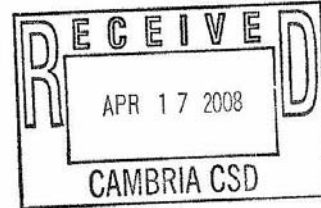
15. Jim Brownell, Ph.D.

- 15.1 Comment noted regarding objections to telecommunications tower on West Ranch. The telecommunications project is no longer proposed; please refer to response to comment 12.5.
- 15.2 Please refer to Sections V.B.6.a, V.D.5, V.D.6 of the EIR, and Section V.J.6.a of the Final regarding potential impacts to Santa Rosa Creek, aquatic habitats, and aquatic special-status species including steelhead. Please refer to response to comment 6.3 regarding proposed grazing activities (which would be limited to vegetation management). Please refer to Section V.G. of the EIR for a discussion of potential traffic impacts. Please refer to response to comment 6.32 regarding prime agricultural soils. Please refer to Section V.A.5.a., V.A.5.b, V.A.5.c, and V.A.6.a of the EIR for a discussion of potential erosion and sedimentation impacts.



CAMBRIA COMMUNITY SERVICES DISTRICT

COMMENTS ON THE DRAFT EIR



Please make your comments below on the following issues:

- Content of the EIR.
- Methods on how environmental issues are analyzed.
- Potential Alternatives to the project.
- Potential mitigation measures that would avoid or reduce environmental issues.

RE: EAST RANCH

Comments: The environmental impacts of the proposed park are detrimental on all levels:

1. It abuts residential neighborhoods & the Bluebird Inn. The noise from the multiple playing fields & other activities would adversely affect these neighbors.
2. The plan includes 146 parking spaces. The traffic impact of excessive traffic (146 vehicles) congealing on Burton Drive will create traffic jams & a dangerous situation on a vulnerable stretch of the road where injury-related accidents have already occurred (as well as liability issues). In an emergency situation, there is no
3. The water that would be required for rest rooms & to irrigate the playing fields, even if non-potable, would tax an already overburdened water supply system.
4. Runoff from oil drippings from vehicles, dog excrement & turf fertilizer into the creek would be detrimental to wildlife & the health of the creek.

Given that surveys of the community overwhelmingly indicate that they want open space & not playing fields; that the rallying cry for people to contribute to the purchase of the ranch was "Open Space Forever"; & that returning the \$500,000 to the County would be a bargain compared to the cost of development & ongoing maintenance of the proposed park, we are totally opposed to the East Ranch being used for active recreation.

alternatives exist from the property

16.1
16.2
16.3
16.4
16.5

Name: Sharon & Duane Budge Email:
Address: 1420 Spencer
City: Cambria State: CA Zip: 93428

With the success of the joint agreement between the school district & CSD re: the tennis facilities, additional playing fields could be located on school grounds where parking is already available & we would not be duplicating facilities.

Please check if you would like to receive any future information regarding this EIR. submit comments via email, send to: cdavidson@cambriacsd.org

16. Sharon and Duane Budge

- 16.1 Please refer to V.I.6.d of the EIR regarding stationary noise impacts generated by the proposed park and affecting adjacent noise-sensitive land uses.
- 16.2 Please refer to Section V.G. of the EIR (Transportation and Circulation). Based on the traffic analysis prepared for the EIR, the proposed project would not result in significant delays on affected roadways. As described in Section III.2.a.(4) of the EIR, emergency access is proposed via a connection to Piney Way.
- 16.3 Please refer to Section V.K. of the EIR (Water Supply), which identifies a significant, adverse, and unavoidable impact to water supply. Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria.
- 16.4 Please refer to mitigation measure HYD/mm-2 in the EIR, which includes the following requirement addressing the potential for pollutants within the watershed to contaminate Santa Rosa Creek: “The bioswales (or similar method) shall include best management practices to avoid erosion and scour, and shall include a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff”. In addition, supplemental language has been added to the Hazardous Materials section of the EIR (Section V.J.6.a of the EIR) to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR).
- 16.5 Please refer to comment letter 2 submitted by the Coast Unified School District.

April 17, 2008

Connie Davidson, Project Manager
 Cambria Community Services District
 P.O. Box 65
 Cambria, CA 93428

Re: Draft MEIR, Fiscalini Ranch Preserve

Thank you for the opportunity to read and comment on the Draft Master EIR for the Fiscalini Ranch Preserve.

Parking

Figure II-6

The parking, as it is described in the Draft MEIR, is vague and I am uncertain as to where it is intended, on or off the FRP?

17.1

It is my recollection that when the Management Plan was produced, the parking symbols at the Ranch entrances at Windsor Blvd, north and south were meant to be offsite, at the ends of the streets. In addition, the parking proposed at the Huntington entrance was to be on the small CCSD lot leading in to the FRP property. I have requested a letter from Vern Hamilton, CCSD General Manager at the time the Management Plan was drafted, to write a letter to that effect.

General parking comments

Parking, Huntington entrance: The old ranch road, Ridge Trail, is sometimes used for maintenance and emergency vehicles and the lot on Huntington is not wide enough to allow passage if cars were parked offsite there. Plans for parking onsite do not have the detail needed in this document. I believe that the visual impacts and the traffic impacts in the neighborhood would require a more detailed environmental review, if parking were proposed here.

17.2

Parking South Windsor entrance: Parking should not be proposed on site here, as it would disturb an existing drainage area and wetland.

17.3

Parking North Windsor entrance: Additional parking should not be proposed here, as it would be restricted by an existing drainage and create visual impacts from the ocean and large parts of the FRP.

17.4

I would like to suggest a parking alternative that is a combination of the alternatives proposed in this document. This alternative would:

17.5

- Allow parking on east FRP in the proposed park area, whether or not the proposed Park Plan as it exists is approved.

- Allow parking on west FRP at the Highway 1 staging area.
- Create parking offsite at the Wastewater Treatment Plant entrance to the Santa Rosa Creek Trail.
- Provide free trolley service to entrances.
- Work with the county to allow on street parking at the south Bluff Trail entrance. This type of parking is allowed by the county at the Elfin Forest in Los Osos and Bishop's Peak in San Luis Obispo.
- Purchase off site parking to provide for future demand.

17.5 (cont'd)

Lighting

Because the FRP is to be used only during daylight hours there should be no lighting allowed on the Ranch. The San Luis Obispo Sheriff's Department provided the Crime Prevention Through Environmental Design (CPTED) in the appendices of the Draft EIR. On pg. 4, Lighting, it says to "Avoid lighting isolated areas that people should not use at night."

17.6

Trails

General comments

Trails on the FRP should provide access but more importantly should provide users with a variety of hiking experience, from walking a small dirt track to the even groomed experience provided by the Bluff and Marine Terrace Trails. The Management Plan pg. 5 states as an objective " Strive for minimum disturbance to the natural qualities of the Ranch while allowing public access". Over and over again we hear from the public to "leave the Ranch as it is". Leaving some trails as they are would provide a good range in the type of hiking trails offered the public, help maintain the natural qualities of the property and help fulfill the public mandate to leave the alone.

17.7

Creek to Ridge Trail

This project is described as abandoned in the summary but talked about as though it is a project in other places and mentioned in mitigation measures. I would like to see this remain an abandoned project and left the way it is at present. Its natural state provides hikers with an alternative to the groomed trail experience as mentioned above.

17.8

Signage

A signage plan and policy needs to be completed. This area is too vague in the Draft MEIR. Mitigation measures are generally good, but without specifics this will always be an issue. I would also like FFRP to concur with any signage, type, size, color, necessity and placement well in advance of it's creation. Non-reflective natural colored surface should be required on the back as well as the front as many signs are visible from the back.

17.9

I believe trail designation signs at all junctions and the placement of markers every 1/4 mile far exceeds the need for safety on the Ranch. No such signs are present at the San Simeon State Campground, Montana de Oro, Bishops Peak or many other trail systems. This magnitude of signage interferes with the natural and scenic experience of the Ranch. Small trail signs (defined and agreed upon in advance) at each entrance would be enough.

17.10

Community Park

It seems that many people are not against a community park but object only to certain parts of the plan. Please remember, on the noise issue, that the conservation easement states that no amplified sound is allowed on the Ranch, so any reference to amplified sound should be removed.

17.11

Would it be possible to combine alternatives on the proposed park to:

- Provide reduced playing fields (8.0 acres) and use non –potable water.
- Provide a picnic area with tables but no lawn.
- Provide trail linkages to other trails, parking, restrooms, dog park and playing fields.
- Provide 103 parking spaces.
- Provide no landscaping – leave areas natural wherever possible.
- Provide 0.58 acre Dog Park.
- Provide a restroom with drinking fountain.
- Provide no lighting, as FRP is only open during daylight hours.

17.12

Any water using and drainage issues would have to be solved before even an alternative like this could be implemented.

17.13

Biological Resources and Impacts

Gray's clover

Both *Trifolium barbigerum* ssp. *andrewsii* and *Trifolium barbigerum* ssp. *barbigerum*, have been found growing along the old ranch road along the ridge of FRP and is being studied. Classification is in the process of changing so they are referenced differently in different sources. There have been 3 colonies of *Trifolium barbigerum* found in the East Bay along with the one here. Randall Morgan, a Botanist specializing in clovers is currently studying these plants and has discovered that the *andrewsii* subspecies is genetically and morphologically distinct from others. This colony could be very important because it is an isolated occurrence and the two are growing in the same community which is unusual. Please see botanical notes submitted by D.R. Miller also.

17.14

Figure V-7

Purple needlegrass (*Nassella pulchra*) should be mapped in the area between the Wallbridge entrance and the Seaclift gulley, in approximately the area that is mapped as Cambria morning-glory, and could be mapped as a combination of the two. There is an area of approximately 10% coverage there. There are several other areas where native grasses are returning.

17.15

TABLE V-6

On page V-80 the EIR lists only suitable habitat for bird species that have been observed regularly on the Ranch including White-tailed kite (*Elanus leucurus*), Burrowing owl (*Athene cunicularia*) and California horned lark (*Eremophila americanus occidentalis*).

17.16

Please include the above comments in your consideration of the Final MEIR for the Fiscalini Ranch Preserve. These are my personal comments, FFRP is submitting separate comments, and Thanks once again for this forum to comment.

17.17

Jo Ellen Butler
329 Cambridge
Cambria, CA 93428

joellenbutler@sbcglobal.net

17. Jo Ellen Butler

- 17.1 Pursuant to the *East-West Ranch Public Access & Resource Management Plan*, proposed parking areas include the Highway 1/Cambria Drive Staging Area, Huntington Lot, CCSD Wastewater Treatment Plant/Windsor Bridge, and Windsor Boulevard ADA parking (existing). Parking is also proposed on the East Fiscalini Ranch Preserve. Section III.D.1.b.(1) has been amended to clarify that parking areas on the FRP include the Highway 1/Cambria Drive Staging Area and Windsor Boulevard ADA parking. Parking areas outside of the FRP include the Huntington Lot and CCSD Wastewater Treatment Plan/Windsor Bridge.
- 17.2 Section V.G.5.d of the EIR has been amended to include additional discussion regarding the limitations of the Huntington Lot. Based on the limitation of available information provided in the *East-West Ranch Public Access & Resource Management Plan*, we concur that subsequent environmental review would likely be necessary upon formulation of specific details. Please note that TC/mm-4 has been deleted from the EIR, based on additional consultation between the CCSD and FFRP.
- 17.3 Please refer to Section VI.D.4 of the Draft EIR. Based on a wetland delineation conducted in 2005 during analysis of the Bluff Trail project, coastal wetlands are located approximately 45 feet northwest from the southern Bluff Trail trailhead. It is feasible to avoid direct disturbance of this wetland by limiting the boundaries of the parking area to areas above the 25-foot elevation line, and no more than 30 feet from the FRP property boundary. These parameters provide limitations on the parking area to ensure avoidance of wetland areas. Short-term construction and long-term operational mitigation measures would be required, including implementation of erosion and sedimentation control plans and use and maintenance of hydrocarbon pollutant filters. Please note that the onsite parking alternative and TC/mm-4 have been deleted from the EIR, based on additional consultation between the CCSD and FFRP.
- 17.4 The parking area at the northern terminus of the Bluff Trail (and Marine Terrace Trail) is limited to ADA parking, which is currently constructed and operational. Please note that TC/mm-4 has been deleted from the EIR, based on additional consultation between the CCSD and FFRP.
- 17.5 We concur that implementation of these alternatives would help to address parking demands.
- 17.6 Please refer to response to comment 5.27, and mitigation measure AES/mm-11 of the Final EIR. This mitigation measure has been added to the EIR to ensure that security lighting will be shielded, and to require motion sensors on security lights.
- 17.7 Comment noted regarding trail use and leaving some trails as natural and to leave the ranch in its current state. No changes to the EIR are necessary.

- 17.8 The Creek to Ridge Trail is included in the *East-West Ranch Public Access & Resource Management Plan*, and was therefore included in the project description and analyzed in the EIR. The CCSD is no longer considering improvements to this trail as a subsequent project.
- 17.9 Please refer to response to comment 5.21 and Section V.F.5.d. of the EIR. While a signage plan is not specifically proposed, signage would comply with the *East-West Ranch Public Access & Resource Management Plan*, which provides standards regarding size and materials of ranch signage, and with the guidelines provided by the mitigation measure. Guidelines include a requirement for natural or naturally appearing materials, low reflectivity, visual compatibility, minimum size necessary to achieve purpose, and placement in the least visibly obtrusive location.
- 17.10 Please refer to response to comment 5.24 and Section V.L.5.a.(1) of the EIR. Based on previous consultation with the CCSD Fire Department, mile markers on each designated trail were recommended to assist with emergency response (Putney, 2006). Based on staff conversations with the current Fire Chief, minimal signage may be adequate. Please refer to PSU/mm-1, which has been amended to clarify that “signage shall be developed in accordance with the FRP signage plan, and in consultation with the Fire Chief”.
- 17.11 Please refer to response to comment 5.6 and Section V.I.6.d of the Final EIR. Amplified sound shall be prohibited at the community park. Mitigation measure N/mm-3 has been amended to require prohibition of loudspeakers and amplified sound.
- 17.12 This alternative would be feasible, and may be considered by the CCSD Board.
- 17.13 Comment noted regarding water and drainage issues.
- 17.14 Please refer to response to comment 5.39, and Section V.D.2 of the Final EIR. Based on additional information provided by local biologists in the area, the Biological Resources existing setting discussion has been supplemented by this additional information (refer to Section V.D.2, Table V.D.-5, and Table V.D.-6 of the Final EIR).
- 17.15 Please refer to response to comments 5.39 and 17.14, and Section V.D.2 of the final EIR.
- 17.16 Please refer to Table V-6 of the Final EIR, which includes a notation that white-tailed kite, burrowing owl, and California horned lark have been observed on the FRP by ranch users.
- 17.17 Comment noted regarding inclusion of comments into the Final Master EIR and that these comments are from Jo Ellen Butler.

Connie Davidson

From: Mattandmahvash@aol.com
Sent: Monday, April 14, 2008 10:58 AM
To: Connie Davidson
Subject: Re: Fiscalini Ranch

Dear Ms. Davidson:
Attached is a copy of a letter I sent to the editor of the Cambria which nicely sums up my feelings about the future of Fiscalini Ranch.
Yours truly,
Matthew N. Bryant

18.1

It's Tax Time! Get tips, forms and advice on [AOL Money & Finance](#).

4/16/2008

My family has a second home in Cambria and hopes to eventually live there year round. When we do come up, we always make it a point to take a walk on the Fiscalini Ranch where we recently noticed a sign posted at the entrance. It mentioned turning a portion of the Ranch into sports fields, parking lots, public restrooms, etc... I was taken aback. I thought the reason for purchasing the ranch was to preserve it. If this plan goes forward, you will attract people from all over the county to use these fields and change Cambria forever.

Living in Southern California we see each new project appear. In and of itself, each project was never enough to "break the camel's back" in terms of increased traffic, smog and congestion. Each project causes an almost imperceptible change in that direction, but eventually you wake up and you live in a smoggy, crowded, paved-over city like much of what you find in Southern California. Cambria is being subjected to these same pressures. The problem is politicians and bureaucrats need to justify their existence. So, they build things, dedicate things and put plaques on things. I would actually feel better to pay them to do nothing. We would all be better off.

Here's my novel idea for the whole Fiscalini Ranch: Just leave it alone. No cell towers, no sports fields – just green grass, wildlife, Monterey Pines and a blue sky.

Matthew Bryant
1890 Marlborough Lane, Cambria, CA

18.1 (cont'd)

18. Matthew Bryant

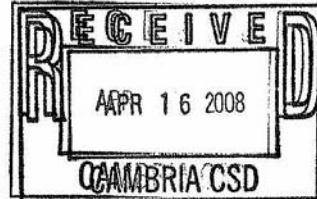
- 18.1 Comment noted regarding leaving Fiscalini Ranch alone, with no cell towers, no sports fields. No changes to the EIR are necessary.

Pg 1 of 6
plus Exhibits
A-G

Charlotte Darehshori
585 Drake
Cambria, CA 93428

April 15, 2008

Ms. Connie Davidson
Cambria Community Services District
P. O. Box 65
Cambria, CA 93428



Re: Fiscalini Ranch EIR

Dear Ms. Davidson:

Herewith are my comments on the Ranch EIR and the effects on the environment from the proposed projects:

(CEQA Guidelines Section 15064(c) states: "Public opinion is another factor to consider in the process of determining whether a project would have an adverse or beneficial effect on the environment. The lead agency shall consider the views held by members of the public in all areas affected as expressed in the whole record before the lead agency." Letters from the local newspaper "The Cambrian" are examples of public opinion which should be considered as well as comments and posts on the web site AboutCambria.Com. See attached exhibits which represent public opinion in Cambria. See comments from Claude Albanese, Anne Winburn, Steve Smith and Lynda Layton. (Exhibits A, B, C, D, & G) A Survey "2004 Parks and Recreation Survey" was sent to 3,985 citizens, and 24% (942) responded. The top 4 requested activities were: Nature Trails, Jogging trails, Lap pool, and dog park. Only 13% of the respondents requested soccer. Thus the majority of the respondents requested passive activities. The Park planners have designed a park totally opposite to community needs.

19.1

Length and Organization of the Park EIR: CEQA Guidelines 15006, 15120 and 15140, mandate that the EIR must be written in a manner that is understandable by the public, as well as the decision makers. The language is to be clear, and the information presented in an organized systematic manner, and reduced bulk. Indeed, the sheer bulk of the Ranch EIR makes it difficult for the public to identify the necessary issues and evaluate them. The information is rambling and conclusory. This document repeatedly and lengthily expounds on a topic to be commented on with regard to its environmental impact then refers the public to another lengthy document, then makes a conclusory statement, "Therefore, development of the proposed project would result in cumulative noise impacts that are considered less than significant. Class III. (Pg V-215-Noise)

19.2

The proposed Master Plan would be developed in phases, as funds become available. Page III-1, Project Description. September 10, 2007, explaining the need to raise rates: the district made the following statements relative to the revenue deficit, the District "has curtailed routine infrastructure maintenance and improvement projects. Further delays may result in system failures, operational deficiencies, and regulatory compliance concerns." (The Cambrian, Feb 21, 2008) The District continues to run significant deficits and has no funds to develop the Park as

19.3

described in its EIR, nor to pay for the maintenance which would be required as a result of the activities planned on the Preserve. **Embarking on the proposed community park projects will place the district at risk of curtailing the many on-going restoration and maintenance projects on this fragile preserve. East West Ranch Public Access and Resource Management Plan:** “The importance of protecting this property lies in the opportunity for the public to experience a unique coastal environment while safeguarding the various animal and plant communities it offers, including sensitive and endangered species. It is the overall philosophy of the Plan to allow the public to experience these natural resources in a safe and reasonable manner while protecting and restoring the more sensitive and valuable habitats of the Ranch.” (Page 4, Chapter 2) Currently there are five seasonal wetlands, a severely eroded gully called Seaclift Gully and a smaller less severely eroded gully known as the Warren/Trenton Gully. Active erosion is occurring on the proposed alignment for the Santa Rosa Creek Trail, erosion is occurring around the raised manhole in the southern-most corner of the property near Piney Way. The continued restoration and protection of the sensitive geological areas, as well as the sensitive and endangered species will be put at unacceptable risk because of the poor financial condition of the district, if the proposed project as described in the EIR is implemented.

19.3 (cont'd)

19.4

The East-West Ranch Public Access and Resource Management Plan specifically prohibits Amplified Sound and Turf (see Exhibit E). Yet the park designers plan for soccer fields and will mitigate this “Noise” from the **microphones** by “aiming them away from nearby residents”. As one resident asked, “Who will monitor these activities to insure this significant noise mitigation is indeed carried out?” The **noise of the mowing** of the turf has not been adequately considered in the mitigation. The turf which is proposed for the active fields (to include soccer, little league baseball, softball and other sports activities) will also generate special needs such as mowing, fertilizing and water. The proposed park amenities include turf areas for use as athletic play fields and general community recreation. (Pg III-17 of the Draft Master EIR) The 2005 Cambria Community Plan prohibits turf grass in new development. Why would turf be included in this development when it is prohibited? **CW-12. “Prohibited Plant Materials. Non-native, invasive, fire prone and water intensive (e.g. turf grass) landscaping shall be prohibited on the entire site.”** Pg 5.11-4, Public Services and Utilities, Program Environmental Impact Report.

19.5

19.6

19.7

The Park EIR states “Upon application for land use and construction permits from the County, . . . The Master Plan shall include the installation of bike racks at selected trailheads at the boundary of the West FFRP to encourage alternative transportation.” This is a meaningless mitigation and shows an ignorance of the Cambrian topography. Pg 5.3-8 Water Master Plan states, **“Local bicycle use is limited due to the hilly terrain and difficult climbs.”** The Preserve Master Plan EIR states, “PSU Impact 4, **“The creation of new parking areas, whether planned or spontaneous, will increase the number of location and opportunities for transient camping and trespassing, possibly resulting in wildfire or other criminal activity, resulting in increased demand for services and a potentially significant impact.”**

19.8

19.9

(I) According to Ben Boer, 2006, neighborhood complaints of illegal and nuisance parking have already increased in the area, Visitor traffic is generated through the day, with a steady quantity of parked cars at each end of the trail. Thus, currently existing parking facilities are not adequate to serve the West FRP trail systems, as well as inadequate law enforcement to control illegal and nuisance parking and visitors. (Page 5.3-5 Traffic and Circulation, Water Master Plan EIR.) The FBI’s standard of adequacy is one officer per 750 persons. Our

19.10

current ratio is one deputy per 1,140. **Thus there is an existing deficiency with respect to the provision of law enforcement services in Cambria.**” (Population, Housing and Growth, Page 5.13-20 Water Master Plan EIR).

19.10 (cont'd)

(2) To further illustrate Cambria’s **inadequate law enforcement**, (Letter to the Editor, The Cambria, April 8, 2008, Tina Humphrey,) “Saturday night, vandals broke windows and painted graffiti on many of the buildings in the West Village. **A woman living in one of the lofts above Main Street called the police at 11 P.M. to report suspicious activity on her rooftop. . . the patrol cars, stretched beyond their resources again, tied up on other calls, rolled into Cambria almost Two Hours later.**” (Exhibit B)

19.11

(3) Bruce Gibson is currently proposing a \$5 million budget cut in resources that will further **cut our already limited police protection.**” (See Exhibit B) The mitigation according to The Preserve Master EIR PSU Impact 4, “Upon application for land use and construction permits from the County for the Community Park on the East FRP, the CCSD or its designee shall submit a lighting plan showing the use of security lighting on appropriate facilities, which may include restrooms and the community center. **Parking areas throughout the FRP shall be designed consistent with the County Sheriff’s Dept publication “Crime Prevention through Environmental Design”.** These areas will be unmonitored and are in a secluded area and past attempts to control crime by thoughtful lighting have not succeeded.

19.12

CEQA 15130 states: “Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the cumulative impacts of environmental impacts not only of approved projects under construction, approved related projects not yet under construction, but also unapproved projects, projects under review which may have a cumulative impact, and using all reasonable efforts to discover, disclose and discuss other related projects. **This report does not adequately address or in many cases mention the cumulative impacts of past projects, proposed current projects, plus the effects of reasonably foreseeable probable future projects...**

19.13

1. Build out Reduction Project will allow 864 new building permits, which represents an increase of approximately 23%. Population in 2005 was estimated to be approximately 6,400. After build out the population is estimated to be approximately 7,724 to 10,469. (Water Master Plan EIR)
2. Fiscalini Park would increase the number of automobile trips in surrounding neighborhoods by approximately 328 ADT, and has the potential to generate up to 728 ADT when all trail amenities are completed. The Fiscalini Master EIR, (PG V-161) states that operation of the community park would generate 973 daily trips, and 150 peak hour trips.
3. Addition of a possible police substation and additional patrolling.
4. Station No. 10 fire station requires replacement within the next eight years
5. Current road and flood control construction on Hwy 1 and Moon Stone Beach
6. Construction of a CCSD water pump station of 6,702 square feet, including an emergency generator, pipeline & access.
7. Desalination Projects
8. Additional San Simeon dwellings, both residential and commercial

“The project shall not induce growth beyond that level necessary to maintain acceptable road levels of service and circulation to protect coastal access and recreation opportunity. And provide for public safety (e.g., fire evacuation). Program Environmental Impact Report, Public Services and Utilities, PG 5.11-4 Our facilities are already below acceptable levels. (Summary of Infrastructure and Service Provider Findings.) “As is evidenced . . . , the analysis concluded that the infrastructure systems and service providers in Cambria have noted existing deficiencies, irrespective of any further development.” Page 5.13-20. (Water Master Plan)

19.14

(1) The standard for **law enforcement** is one officer per 750 persons. Our current ratio is one deputy per 1,140. **“Thus there is an existing deficiency with respect to the provision of law enforcement services in Cambria.”** (Population, Housing and Growth, Page 5.13-20.)

(2) **Currently, existing parking facilities are not adequate to serve the West FRP trail systems, as well as inadequate law enforcement to control illegal and nuisance parking and visitors. Page 5.3-5, Traffic and Circulation. (Water Master Plan)**

(3) **Emergency Medical.** **“At the current time, emergency medical service in Cambria has been considered barely adequate.”** (Population, Housing and Growth, Pg 5.13-20.) Water Master Plan

(4) **Public Services and Utilities:** **“Response times are sometimes compromised when access is constrained by parked cars, roadway deficiencies and proximity to road. Delivery zones in the East and West Village are especially problematic because delivery trucks often park in the right of way and constrict all car traffic. Public Services and Utilities Pg 5.11-7 Water Master Plan**

(5) **Traffic and Circulation: Existing Conditions:** **“Many of the streets within the Cambria URL are unpaved, too narrow, poorly maintained, and lack proper drainage facilities. Numerous local public streets do not have vertical and horizontal clearances required by current Fire Code Standard. Pg 5.3-5 (Water Master Plan)**

6). The **additional traffic** directly related to the proposed Community Park will increase the level of service categories to LOS F, considered unacceptable. The District’s plan to buy out 864 buildable lots and thus reduce the number of buildable lots is designed to “bunch” development in the areas of Marine Terrace, Park Hill and the ocean side of Cambria. This higher density is only increased by Special Projects 1, and 2, which prohibits lots in these special areas to be used for building. Those lot owners will be forced along with those included in the Buildout Reduction Project to build homes in areas already problematic because of small 2-lane collector roadways, i.e. Ardath and Burton. **“During the P.M. peak hour, roadway level of service on Highway 1, operates at LOS D, defined as near unstable with restrictions on maneuverability within traffic streams.(Main Street to Burton Drive) and LOS E defined as unstable operations with maneuverability very limited (Burton Drive to Ardath Drive.)** (PG V150, Fiscalini Ranch Master EIR.

19.15

(7) The development of 9 soccer fields, baseball fields, tennis courts, dog park, basketball courts, and parking space for 149 automobiles, children’s play area, community park building, restrooms, further increases concern for increased stormwater runoff along with the proposed projects such as the Build Out Reduction which allows 23% grown to occur in the proposed areas of high density increasing the impervious surface area with larger rooftops (allowed by the TDC program for the build out reduction development), additional rooftops, garages, paved roads, sidewalks, larger homes with less ground. The mitigation as proposed does not adequately reduce this impact, by capturing and cleaning the storm water runoff before it is dumped into the ocean. .

19.16

(8) **There is a serious failure with regard to meeting the requirements of CEQA in its analysis of greenhouse gas emission, climate change, and diesel engine exhaust emissions,** including an inventory of existing estimates of emissions sources plus a projected inventory of new greenhouse gases that can reasonably be expected to be emitted.

19.17

Long-Term Project Related Operational Emissions The Lead Agency seeks to classify the project as “less than significant long-term operational emissions, Class III impact.

19.18

(1) **Misleading statement:** “trips to the proposed project would not necessarily generate new vehicle trips but would be by local residents who travel to other facilities, thus trip lengths would be shorter than they are now due to the central location of the project.” Page V-187, Air Quality.

The Fact: Growth Inducing Impacts, Page VII-1, Environmental Analysis, “In addition, the park facilities, while being developed to meet community needs, would be used by visitors to the area and would contribute, although not significantly, to encouraging visitors to relocate to the community.” (Page VII-1) New facilities, soccer fields, baseball, basketball, etc are for the most part activities not those participated in by most local residents. (See Survey 2004) These active sports developments in the Fiscalini Preserve will draw people from other areas, adding vehicle traffic emissions both locally and regionally.

(2) **Misleading statement:** “Because the proposed project incorporates measures that allow residents to access the site via alternative transportation such as the trolley or bicycles, the proposed project is expected to result in less...operational emissions.” Page V-187, Air Quality

19.18

The Facts: “Local bicycle use is limited due to the hilly terrain and difficult climbs.” Furthermore, the trolley is used rarely and drives around mostly empty. (Operations Information from the trolley operators.)

(3) **Misleading Statement:** “because Cambria’s existing recreation facilities do not meet the needs of the community, ...residents travel to local schools, neighboring community or regional facilities to access ...other facilities.”

19.20

The Facts: The Survey of 2004 was flawed and if only the responses that accurately followed instructions were included in this survey, “82% of the survey responses would have to be eliminated.” (Appendix A, See attached) Additionally out of 3985 surveys, only 942 were returned (24%). Of the respondents only 13% wanted soccer fields. (Exhibit D)

19.20 (cont'd)

Based on the very significant negative impacts to the neighborhoods and to the fragile environment of the preserve area itself, upon which the lead agency wishes to impose this development, the District is requested to abandon the Fiscalini Ranch Preserve Master EIR as proposed and adopt the “No Active sports” alternative, as well as abandoning the future project of the community building and restrooms.

19.21

Very truly yours,



Charlotte Darehshori

Exhibits A-G

Exhibit
A

Monday, Apr 14, 2008

Posted on Thu, Mar. 20, 2008

New community park plan challenged in Cambria

Kathe Tanner

Backers of plans for a new community park in Cambria like the idea of having more places in the small town for children and adults to play. Opponents, though, worry about noise, traffic and the impact on the natural habitat along Santa Rosa Creek in the eastern part of the 430-acre Fiscalini Ranch Preserve.

Mostly opponents showed up Tuesday for a meeting to review a plan to use more than 13 acres of the preserve for ball fields, a parking lot, restrooms, playground, paths and possibly a community center, along with other amenities.

About four dozen people came to listen and comment at the public hearing on a draft environmental impact report about plans for the preserve. Nearly all who spoke had criticisms or critical questions they want addressed before the Cambria Community Services District approves the more than 500-page document.

Moses Jimenez, a supporter of the plan who coaches boys soccer, said the community needs a sports park. For those concerned about noise, he said, "What better noise than a bunch of kids or adults having fun? It won't be noise like at the 405 Freeway."

However, opponents want to keep the area natural, quiet and free of artificial lighting. And they question how the financially strapped district will pay for improvements and find water to keep the fields green.

"If there's no water to irrigate the fields and no money, then why are we doing it now?" asked Amanda Rice, chairwoman of the North Coast Advisory Council, who spoke as a private citizen.

Opponents essentially want to keep the ranch as it is and, for the most part, was in 2000 when the community and state grantors paid \$11.1 million for the 430-acre property.

San Luis Obispo County contributed \$500,000 with the condition that the district would create an area to serve the community's "outdoor recreational needs" on East Ranch.

County funds also paid for the environmental report.

'Wrong spot'

The park plan is wrong for Cambria, opponents say.

"If ever there was a park in the wrong spot, we're looking at it," said Richard Hawley, executive director of Greenspace — The Cambria Land Trust. "I think we should give the county back its \$500,000, and we'll all

save money.”

Other topics drawing comments included impacts to habitats and species; potentially significant noise from the community park; and possible parking problems and traffic situations, such as the park entrance at a 90-degree turn where a steep portion of Burton Drive meets a bridge across Santa Rosa Creek.

Even if project plans proceed, it would take years of environmental document review, planning and permitting before any of the community-park amenities could be added. It would also take a lot of money, nearly all from grants.

Fewer changes to the existing landscape are proposed for the West Ranch — a larger, trail-laced oceanfront parcel that includes a Monterey pine forest, marine terrace and bluffs and rolling hills west of Highway 1.

Most changes would upgrade or modify existing trails or create new ones, add or upgrade parking facilities and stabilize or restore the habitat.

The most controversial proposal for the 364-acre West Ranch is for two Sprint Nextel cell phone towers and support buildings, high on the ridge at the edge of the Monterey pine forest. That facility has been allowed in ranch master plans for years but is working its way through the planning process.

Enthusiasts say the towers are needed for public safety and convenience in a town where many cell phones receive signals sporadically or not at all.

Opponents say the towers would degrade what the community accomplished when it purchased the land to keep it as unspoiled open space. The California Coastal Commission, which would have to approve a tower permit, has indicated it would not allow the structures.

The issue is due back before county supervisors April 8, although a planner said Monday that he expects Sprint Nextel to request a delay.

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Exhibit B

The Cambrian April 10, 2008

newspaper is a community talking to itself.

LETTERS TO THE EDITOR

Cuts we can't afford

With budget cuts on the horizon and gas prices soaring, our lives are changing radically.

Bruce Gibson is currently proposing a \$5 million budget cut in resources that will affect our police protection on the Central Coast. While I can understand the need to "trim the fat," cutting our already limited police protection in areas like Cambria and Cayucos is beyond absurd.

Saturday night, vandals broke windows and painted graffiti on many of the buildings in the West Village. A woman living in one of the lofts above Main Street called the police at 11 p.m. to report suspicious activity on her rooftop.

As has been the case for the almost 50 years I've been in Cambria, the patrol cars, stretched beyond their resources again, were tied up on other calls, and rolled into Cambria almost TWO HOURS later.

Of course, the damage was done and the perpetrators long gone by then.

When I spoke with our local deputy about a meth incident I had information on, he said that Coast Union has one of the biggest problems of any high school in the county now.

Wake up everyone, please ... this kind of thing affects all of us and we cannot afford to make cuts in the budget that affect the protection of our families and property.

Please call or e-mail Bruce Gibson to share how you feel about the proposed budget cuts. Time is of the essence as this is in the works now.

Tina Humphrey
Cambria

Vote on proposed park

Regarding the Cambria Community Services District Environmental Impact Report about plans for our Fiscalini Ranch Preserve:

Our Fiscalini Ranch Preserve needs to be kept AS IS

with no new developments.

Improve and maintain our existing trails. Continue periodic cleanup.

Our Fiscalini Preserve is one of the unique public areas near homes that resembles a wilderness area. Treasure it and respect its originality and purity.

The projects of the EIR will cause the loss of our Fiscalini Preserve and the gain of "Fiscalini Park."

Include a vote for keeping the preserve or building a new park with the next water/sewer statement. Make it simple:

Transform our Fiscalini Preserve into a beautiful community park.

Maintain our Fiscalini Preserve without development.

If 51 percent of the votes are to maintain our preserve, use our funds to improve and maintain our water supply/treatment/delivery systems and our sewage systems.

If 51 percent of the votes are to develop a new park, then build and maintain it.

Claude Albanese
Cambria

Exhibit
C

The Cambrian
Newspaper

OPINION

'Southern Cambria'fornia'

Visit Southern Cambria — Due to the vision of the Cambria Community Services District's plan for the Fiscalini Ranch Preserve, no longer will you have that longing feeling for missing your hometown.

"Southern Cambria'fornia" now has a soccer field where you can create noise, traffic, and leave your trash and dirty diapers. Like your community soccer field, it will be closed at night, although due to no police presence and no lighting, feel free to hang out and drink your beer and then drive through the community in hopes of reaching your home.

Like your community soccer field, Southern Cambria'fornia's soccer field attracts persons from other communities who do not value quality of life expectations of the host community.

There is no expectation of slow driving, friendly smiles and waves, just hurried drivers rushing to reach their sport tournament on time. Relax and visit Southern Cambria'fornia, with expanded parking lots, public restrooms, additional trailheads; you are invited to use water without a care, trample the pristine meadows, deviate from the marked trails, drive aggressively and consume copious amounts of alcoholic beverages while visiting the soccer field.

Thanks to the CCSD you can now leave your overcrowded and resource exhausted suburban community and feel right at home in Southern Cambria'fornia.

Steve Smith
Marine Terrace

Don't park it here

I am writing to protest the future development of the Cambria Community Park.

I would like to address two of the studies in the just completed Environmental Impact Report: Noise and Water Supply.

The Environmental Impact Report states:

Potential sources of noise associated with the proposed park facilities include operation of athletic play fields and general community recreation. There will four to five turf fields, which will include soccer, little league baseball and softball.

The park also includes restrooms, a dog park, and children's playground. Vehicle access to the park will include approximately 140 parking spaces. The report states that there could be five games being played at the same time and that if this were the case that the development of the park would potentially subject existing residential areas to adverse stationary noise levels possibly above the thresholds contained within the County Noise Element.

Noise levels were measured on four different sports fields in the county and the noise levels were very close to what the County allows. None of these sports fields where noise was measured were in a residential area like the proposed Cambria Park

Letters must be signed (no pseudonyms), with the writer's address and phone number for verification.

Letters of 250 words or less are more likely to be published. Send them to Letters to the Editor, The Cambrian, 2442 Main Street, Cambria, CA. 93428. Fax: 927-4708. e-mail: cambrian@thetribunenews.com

away" as The Cambrian suggests. At least 50 houses and The Bluebird Motel surround the proposed park and the proposed park is in the middle of a bowl-like echo chamber in the middle of town. Everything is amplified.

Any noise measurement for the proposed Cambria Park should be done on the spot, as I am sure it will be much higher than in any open space playing fields that were used as a comparison. Much higher than allowable.

In addition, the report states that any amplified sound, e.g. loudspeakers, game announcers etc., should be designed so as to not point in a direction that is directly into a residential area. Who is going to control that?

The report states that development of the proposed community park would result in the generation of stationary noise levels in excess of what is acceptable resulting in a potentially significant long-term impact.

In my opinion the proposed park should not be addressed as a Cambria Community Park; it is a San Luis Obispo County Park.

Finally, in the EIR report that is titled water supply, it states the CCSD would provide water for the community park. In The Cambrian last week under the EIR for the Water Master Plan, it states that they want to reduce the use of potable water for landscaping. So let the county build a park and use CCSD potable water? Bus in leagues from around the county and have traffic jams on Burton Drive, excessive noise that will be heard all over town, pollution, disturb the wildlife? This is not what the majority of Cambrians want.

This is a nice quiet town. I moved here from Carmel and they certainly do not have an athletic park in the middle of town. This would be a disaster. Give the county their \$500,000 back and keep Cambria a peaceful village; that's the reason most of us live here.

Lynda Layton
Cambria

Exhibit
D

SUMMARY OUTLINE

4,000 Surveys sent 943 Surveys returned - - A good representation ~25%

Community participates in numerous recreation activities
93% of respondents participate in at least 1 activity

The top 5 activities respondents currently participate in – RUNNING/WALKING/JOGGING, GARDENING, HIKING, & PICNICS – have a similar ranking for the “Modest Activity” group (1 or 2 activities), the “Mainstream” group (3 – 6 activities), and the “High Activity” group (7 or more activities).

CCSD has a mandate through its Parks and Recreation Department to provide facilities and support for Cambria recreation and open space.

The most popular facility in Cambria is the East West Ranch - 85% - followed by Shamel Park, the Vets Hall, other trails, the Moonstone Beach Boardwalk, & Leffingwell Park

63% of respondents recreate in Cambria. 37% travel to Morro Bay, San Luis Obispo, etc for WALKING/HIKING, GOLF, SWIMMING, and KAYAKING.
Some of this travel is due to lack of facilities in Cambria (Golf, Swimming, tennis), while others travel for broader exposure to Walking & Hiking.

21% of respondents indicated a strong preference for expanded services

All three activity levels (Moderate, Mainstream, High Activity), were in rough agreement on the priorities for expansion

The survey listed 26 categories. 2 write-in categories (Golfing & Biking) received significant entries also.

The top 4 activities requested were NATURE TRAILS, LAP POOL, DOG PARK (the current dog park was not completed at the time of this survey), and JOGGING TRAIL/TRACK.

The request for a LAP POOL was somewhat of a surprise. CCSD needs to investigate possible solutions to this REQUEST.

Of the 26 + 2 categories requested, 13 are included in the Community Park design.
Originally, an OUTDOOR STAGE was included by dropped during public discussions
A COMMUNITY GARDEN could be included in the Park design.

NATURE TRAILS are being developed on the West Ranch as well as the East Ranch.
A short trail is planned for the Cambria Historic Center Park in East Village.
Additional trails might be developed along the upper creeks if permission is acquired.

Some field sports (SOCCER, BASEBALL/SOFTBALL) may be accommodated by the proposed field development at Santa Lucia Middle School.

ARTS & CRAFTS, AFTER SCHOOL PROGRAMS, and day camps are included in the Community Center's current program.

DAY CAMPS should be expanded through the Community Center.

HORSESHOE PITS are available at Shamel Park.

ARCHERY could be arranged through agreement with Camp Ocean Pines.

10/5/2005

9.05 Board meeting recommendation

Cambria already has lots of trails, however, we do not have a track without impediments. A track with exercise stations may be available at the Santa Lucia School if state park funding is approved.

The second largest number of respondents (27%) requested a lap pool. An aging population contains persons who are rehabilitating or protecting muscles and bones and therefore do water walking and exercising, or lap swimming as opposed to hiking. The privately owned Cambria Pines Lodge swimming pool is available on a membership basis. The pool at Shamel Park is a county-run facility and is only open in the summer months. It is not a large enough to be a lap pool.

Much of what was desired by survey respondents is included in the proposed community park design. An outdoor stage was considered but dropped during public discussions. A small community garden is available at Pocahontas Park but additional space could be provided in the community park. Nature trails are being developed on the West Ranch and the East Ranch and a short historic trail is planned for the Greenspace Creekside Reserve in East Village.

Some organized field sports (soccer, baseball/softball) will be accommodated at the Santa Lucia Middle School if a state parks grant is awarded in late 2005. Multipurpose athletic fields are planned for the proposed community park.

Horseshoe pits are available in Shamel Park.

After-school and summer programs, such as arts and crafts and martial arts, are currently offered by the Community Center. Eight weeks of day camps are also part of their program but could be expanded. The Community Center offers numerous adult programs such as arts and crafts.

NUMBER AND PERCENT OF REQUESTS FOR FACILITIES AND ACTIVITIES

	%	#		%	#
Nature Trails	49	458	Sand Volleyball	11	105
Lap Pool	27	254	Basketball(outdoor)	8	71
Dog Park	24	225	Skate Park	7	69
Jogging Trail/Track	23	215	Day Camp	7	66
Picnics	22	210	Climbing Wall	6	61
Community Garden	21	196	Horse Trails	6	61
Tennis Courts	19	182	BMX Trail	6	57
After school Programs	19	175	Martial Arts	6	55
Playgrounds	18	172	Roller-Blade	5	46
Outdoor Fitness Sta's	17	164	Horseshoe Pits	4	41
Arts & Crafts	17	159	Archery Fields	3	32
Outdoor Stage	16	151	Shuffleboard	3	32
Soccer Fields	13	126	Paint-ball	2	22
Softball/Baseball Flds	12	112			

Appendix A:

Issues with Expansion Survey Responses

Survey question four, which asked what facilities or recreational activities the respondent would like to see developed, instructed the respondent to "Please rank each of the items below with a number from 1 to 5...5 being your highest priority".

One hundred seventy-one respondents (18%) followed instructions completely.

Another 379 (40%) ranked some of the 27 items and left others blank. Most of these respondents ranked only a few items while leaving most blank.

Two hundred twenty-nine respondents (24%) completely ignored instructions and put check marks next to some items leaving others blank. The number of checkmarks varied from aaa to bbb with an average of ccc.

Finally, 153 respondents (16%) left all items blank.

There are several approaches to analyzing these responses. First, and least satisfying, is using only the responses that accurately followed instructions. That would involve eliminating 82% of the survey responses. A second option is to assume blank entries represent a respondent's lowest priority and accord those items a "one". This would permit analysis of 58% of the surveys. It would also allow numerical scores to be assigned each item by averaging the 5's, 4's, 3's, 3's, and 1's. The downside is losing results of 24% of the sample who check-marked the items.

The option chosen for analysis in this report is to consider rankings of 5 and 4 and items with a checkmark as items suggested for development or expansion by a respondent. This permits use of 100% of the survey responses. It is probably a reasonable portrayal of what respondents meant, though this may slightly understate some respondents' desires for expansion by according no weight to items ranked three.

A possible related issue would be assuming a check mark is a high ranking. This is not a serious issue because most respondents only checked a few items. While a few respondents checked a large number of items, other respondents gave as many as 24 items a ranking of 4 or 5! This issue has been addressed in the text by comparing the results of respondents who ranked only a few items with those who ranked many.

II. Survey Background

The goal of the *2004 Parks and Recreation Survey* was to gather information useful for understanding and planning recreation activities and facilities in Cambria: to learn what Cambrians do and to find out what Cambrians want.

The survey originated with Cambria's Parks, Recreation, and Open Space Commission (PROS). The final survey was developed in conjunction with the Cambria Community Services District (CCSD) staff.

Surveys were distributed with September, 2004 water bills. Nearly four thousand (3985) surveys were distributed and 942 were returned and tabulated. The response rate, 24%, is considered reasonable for a mail survey¹. Each returned survey represents a household resident in Cambria.

942
24%

Analysis of the surveys was done by the Community Center of Cambria for the CCSD. The following individuals provided effort or advice in analyzing the survey's results: Courtney Craig, Connie Davidson, Steve Figler, Heidi Holmes, Amanda Rice, Gordon Rice, John Ruml, and Robin Schaal.

Copies of this report are available for review in the CCSD office and the Cambria Public Library. Additional copies may be obtained at the cost of duplication from the CCSD (927-6223).

These survey results provide valuable information for recreation planning in Cambria. A few comments about the sample and process will help the reader evaluate the results.

- The recreation survey did not request respondent demographics
- To the extent that water bills go to owners, not occupants, of rental property, then renters' activities would be under-represented.
- Some surveys may have been returned by non-resident property owners; about a half dozen so indicated.
- Neighbors surrounding Cambria who are not water customers did not receive a survey though they may use Cambria's recreation facilities. (Surveys were available to pick up at the CCSD office but few if any people did so.)

¹ Various internet articles reported response rates for simple mail surveys of "about 20-30 percent" (Prairie Research Associates); "a usual 25%" *Maximizing the Response-Rate in Surveys May be a Mistake*, Ray and Still; "can be as low as 10 to 20%" *Evidence for Action*, Global Health Council; "On average, anywhere from a 20-40% response might be a reasonable expectation.", DataStar, Inc.

Exhibit E

3. Prohibited Uses

The following list of uses and activities are prohibited on the East-West Ranch. This includes all those uses normally prohibited by law in public places.

- Fire in any form
- Pedestrian or animal access into sensitive habitat areas
- Camping
- Motorized Vehicles (All -Terrain -Vehicles (ATV), motorized bicycles, scooters, etc.)*
- Swimming in Santa Rosa Creek
- Firearms, weapons, or animal traps
- Smoking
- Littering
- Amplified sound
- Paragliding or hang-gliding
- Remote-controlled model vehicles, e.g. airplanes
- Active sports, such as golf or baseball (With the exception of the uses planned for the Community Park)
- Planting, cultivating, or harvesting by any member of the public
- Paint ball or other combat games played in groups
- Placement of signs or banners of any kind, including political campaign signs, fund-raising signs, meeting notices, etc.
- Solicitation

B. Improvements

All physical improvements will be limited to those specified in the Plan and per the design standards, specifications, and locations herein. In general, trails and the incidental improvements on the Ranch will be sited and designed to protect views to and along the coast and other scenic areas. Views will also be considered from off-site private property development where feasible. If necessary, improvements will be screened from view by vegetation and solid fencing. Views from Hwy 1, which is a California Scenic Highway and possible future Federal American Road (Scenic Bypass), should be protected. No structures other than directional and informational signs will be installed on the Ranch along the highway corridor.

* With the exception of those vehicles allowed for Ranch management purposes as described in section A.

About Cambria | anne winburn

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Goal

Assure Adequate Enterprise Funds to Support Water and Wastewater Operations/Projects
(Finance Committee Cobin, Sanders)

Objectives

Adopt a community supported Rate Increase sufficient for Water & Wastewater Operating/Project Costs by;

- Agreeing on accounting principles and strategies for allocation of administrative overhead for developing District budget (January)
- Creating a budget for 2008/09 for public review that shows operating costs for Water and Wastewater Departments as well as reserves for Depreciation/Repair & Replacement.
- Determining the magnitude of increase (difference between budgeted needs and current rate income). (March)
- Conducting Public Forums for discussion of proposed increased rate. (March)
- Approve a 218 Letter to residents with a straight forward and clear explanation of a rate increase that adequately supports Water and Wastewater operating costs. (April)
- Approve 2008/09 Budget based on rate increase following a non protested 218 process (June)

Goal

Seek out projects that promote the health and well being of Cambria residents
(ad hoc committee Chaldecott, Cobin)

Objectives

Increase recreational opportunities and health enhancing services for Cambrians and visitors by

- Adopting the Fiscalini Ranch/Community Park EIR after public review & comment period (March)
- Directing staff to seek state and private funding to construct approved park
- Requesting the PROS Commission to gather data and submit a 2009/10 P&R Depart plan of action
- Provide for more athletic facilities for use by youths and adults
- Encouraging the Chamber of Commerce and others to jointly sponsor Community activities such as Concerts in the Park and Youth Athletics
- Working with Coast Unified School District to champion expanded After-School Youth programs and elective educational opportunities for adults

Let's look at the last goal listed: "Seek out projects that promote the health and well being of Cambria residents
(ad hoc committee Chaldecott, Cobin)

The CCSD did a recreation survey in 2004. the PROS analysis can be found here:

<http://www.cambriacsd.org/Library/Website/services/parks/PROS%20Analysis%20of%20Reports.pdf>

Here is an excerpt of the top wants, but go read the whole analysis.

"ANALYSIS OF THE 2004 PARKS AND RECREATIONS SURVEY REPORTS AND DISCUSSIONS"

By PROS Parks and Recreation Committee, July, 2005

"Requests for new or expanded services were (in order of importance):

- more hiking trails
- a lap pool
- a dog park (the survey was sent before the new dog park was opened)
- a jogging track/trail "

No where in the CCSD goals is there any reference to the Community Survey results. Further, the Conceptual

<http://aboutcambria.com/author/lenny-mom/>

04/12/2008

About Cambria | anne winburn

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plan that has been approved according to the CCSD was developed and approved a year BEFORE the recreation survey was conducted. I am a career Creative Director and let me tell you, if I paid a firm to develop a concept plan and got approval on that concept BEFORE I took a user needs survey, I would be FIRED!! What objectives and direction was the firm given to design to?

I have to assume they were given the following direction, as stated on the CCSD web site:
http://www.cambriacsd.org/cm/Services/Parks_and_Recreation/community%20park%20project.html

“Community Workshops”

To date, four community workshops have been held to identify Cambria’s recreational needs at the community park. Attended by numerous local organizations, students and parents, the initial workshop on October 22, 2003 identified a list of miscellaneous activities and facilities desired by the community. A second meeting held on December 7, 2002, consisted of a site tour of the park property and a workshop that further narrowed community recreational needs. The top two priorities identified at this workshop were athletic fields and a multi-purpose community center.

Two additional public hearings were held in 2003 to obtain input on the Draft Conceptual Plan of the community park”

I would like to see the documentation of these meetings that justify the objectives: “The top two priorities identified at this workshop were athletic fields and a multi-purpose community center.” This is not reflected in the most recent rec survey of the community.

CCSD Objective under their health and recreation goal says:
 “Directing staff to seek state and private funding to construct approved park ”

My questions are these:

-How can our community afford this Park project, as envisioned by the CCSD, especially in view of the fiscal problems we are facing?

-how can CCSD “staff seek state and private funding to construct approved park” when there is no FINAL APPROVED PARK DESIGN PLAN? As far as I can tell, the CONCEPT of a community park was approved, not a Final DESIGN INSTALLATION PLAN. this is one of the big points that lost Main Street to the lights. Be very careful of this terminology.

http://www.cambriacsd.org/cm/Services/Parks_and_Recreation/community%20park%20project.html
 “In May 2003, a Conceptual Park Plan was approved by the Parks, Recreation and Open Space Commission (PROS). It was submitted to the CCSD Board of Directors at its November 20, 2003 Board meeting. The proposed plan indicates development of 17.5 acres of The Fiscalini Ranch Preserve/East.”

-How can an EIR be done accurately without a Final Design and Installation plan?

http://www.cambriacsd.org/cm/Services/Parks_and_Recreation/community%20park%20project.html
 “Community Park Project The CCSD is currently working with consultants to develop an Environmental Impact Report (EIR) and Master Development Plan (MDP) for the Fiscalini Ranch Preserve. When the draft EIR is completed in Spring 2007, a public hearing will be set to present findings and obtain public input.”

-Are the top requests for new or expanded service being addressed in the Park Conceptual plan or the EIR? In other words, do the goals and objectives for the design of a Cambria community park meet the solicited, surveyed and stated NEEDS of the community? It appears there is a complete disconnect between the objectives of the CCSD and the community as it relates to the Development of the Open Space.
 The CCSD states the need as follows:

<http://aboutcambria.com/author/lenny-mom/>

04/12/2008

Exhibit F

“DECLINING youth population in Cambria” CA Dept of Education

Published by anne winburn on February 6, 2008 under [Back Story](#)

Enrollment figures for the last ten years show a DECLINING youth population in Cambria. [click here for chart](#)

On their web site, the CCSD states the need for the sports multiplex:

“The Need

Cambria has a major deficit in parkland and recreational opportunities, particularly for its growing youth population. Local school facilities are maximized for athletic activities and there has been a sharp increase in soccer, baseball and other sports requiring additional playing fields. See Community Park FAQs for more information. The County owned Shamel Park is far too small to support a population of more than 6,000.”

According to the California Dept. of Education, THERE IS NOT A GROWING YOUTH POPULATION in CAMBRIA. THERE IS A DECLINING YOUTH POPULATION in CAMBRIA.

Why does the CCSD claim that there is a growing youth population when the state says there is a DECLINING Youth population?

California Department of Education Web site:

<http://dq.cde.ca.gov/dataquest>

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http://www.cambriacsdsd.org/cm/Services/Parks_and_Recreation/community%20park%20project.html

“The Need Cambria has a major deficit in parkland and recreational opportunities, particularly for its growing youth population. Local school facilities are maximized for athletic activities and there has been a sharp increase in soccer, baseball and other sports requiring additional playing fields. See Community Park FAQs for more information. The County owned Shamel Park is far too small to support a population of more than 6,000.”

I have to ask: What growing youth population? Even in the PROS analysis of the Rec Survey they say that :

“Some organized field sports (soccer, baseball/softball) will be accommodated at the Santa Lucia Middle School if a state parks grant is awarded in late 2005. Multipurpose athletic fields are planned for the proposed community park.”

Muti purpose athletic fields were wanted by no more than 13% of respondents surveyed.

Why are we pursuing them in design development?

The current direction of the park development seems to be completely out of touch with our community demographics, as laid out in Frank's post. And in this week's Cambrian, there is a story about the State cutting funds and CLOSING STATE PARKS due to budget cuts.

SO, WHO WILL DEFINE CAMBRIA'S FUTURE?

[Anne Winburn]

Submit
G

About the "Community Park"

Published by anne winburn on March 19, 2008 under [CCSD, Fiscal Responsibility](#)

What a great turn out, last night at the PROs meeting with the community on the Community Park EIR. The new designers of the park..."FIRMA" were there to present, answer questions and take in feedback, along with the PROs board and a couple of CCSD Board members and staff. The plan is beautiful and top notch professional.

HOWEVER, I HAVE SOME CONCERNS. Some new information for me as a result of attending the meeting was the discovery that:

- **FIRMA, the new design firm, was never given the results of the 2004 CCSD PROs (Parks, recreation and open space committee of the CCSD) survey.** [read here](#) nor the PROs summary outline of the survey results, [read here](#).
- **With direction from CCSD, FIRMA** has been designing to someone's personal interest decision to mandate a sports multiplex extravaganza. Based on the hard data that is available to date and contained herein, the multiplex that is being developed does not match the solicited and stated recreational needs/wants of the community.
- **The Project was to be a community park, to meet the needs of the community** of Cambria and also to be enjoyed by residents of and visitors to SLO county. The official terms of the agreement between the County and the CCSD for development of a community park can be [read here](#).

EXCERPT: In 2003, The CCSD was " seeking to purchase certain property known as the East/West Ranch to preserve for open space preservation and public recreation use and intends to set aside approximately 50 acres of said property as a community park serving the recreational needs of Cambria." The desired outcome by the County in exchange for \$500,000 is "the district and the county and its residents will have the benefit of increased outdoor recreation facilities.

- **I am afraid a lot of community money has been spent** on design development without relevant and on-target design objectives. *To remedy that*, I suggest the design objectives be reviewed and amended by the community before any more design work is paid for. I don't know exactly how much has been spent. Perhaps someone can find that out.

While the intent of the agreement between the County and the CCSD was, I am sure noble and generous; the project has escalated to one that is:

- Largely off base from the stated recreational needs of the community
- Does not design to the demographics of the community
- out of scale with our small community
- Fraught with "Significant, adverse, and unavoidable environmental impacts" on every environmental category

NEED FOR MORE SOCCER FIELDS There was one speaker who stated that there are not enough soccer fields for the 7 soccer teams (not sure if that includes adults and children) that exist in Cambria. That is a lot of soccer teams for Cambria.

- Where do those 7 soccer teams play now?
- Are they allowed to use sports fields at the three different schools in Cambria? If not, why not?
- Can sports fields be added where some already exist like at schools or even a church, for instance? (utilize existing parking, bathrooms, etc)
- Is there anywhere in San Simeon that could handle the addition of Soccer fields? What about somewhere at San Simeon State Campground?

IN CLOSING I have received many calls and drop-ins from people in the community who feel similarly. We will get together to discuss all of this soon. If you would like to get together with a group to discuss possible strategies to stop this heinous and blatant over-development of our environmentally sensitive open space please e-mail me or call me. I am in the Book. Thank you.

Sphere_Related_Content

Joint Use Agreement between County and CCSD for Acquisition of Community Park

Published by anne winburn on March 16, 2008 under [CCSD](#)

Download a PDF of the Agreement between the CCSD and the County regarding the acquisition of the East West Ranch (now known as Fiscalini Ranch Preserve).

The county contributed \$500,000 toward the purchase of the ranch and this is the agreement CCSD made with the county to get the money. Below are some excerpts from the contract, signed by Vern Hamilton as general manager.

Joint Use Agreement

BETWEEN THE Cambria Community SERVICES DISTRICT AND THE COUNTY OF SAN LUIS OBISPO FOR ACQUISITION OF CAMBRIA COMMUNITY PARK

This Agreement is made this a day af may 2003, between the CAMBRIA COMMUNITY SERVICES DISTRICT ("DISTRICT"), a public entity in the State of California and the COUNTY OF SAN LUIS OBISPO ("COUNTY"), a public entity in the state of California, with reference to the following facts*

1. The DISTRICT and COUNTY are authorized under the authority Of the California Government Code, Section 6500 et, seq., jointly to provide any services for which each might individually be responsible.
2. The DISTRICT is seeking to purchase certain property known as the East West Ranch to preserve for open space preservation and public recreational use and intends to set aside approximately 50 acres of said property as a community park serving the recreational needs of Cambria. as shown oil Exhibit A, "East West Ranch" attached hereto and incorporated herein; by reference.
3. The DISTRICT and COUNTY have determined a need for additional public recreational facilities within the unincorporated community of Cainbria and both desire to made accommodations for such needs,
4. The DISTRICT and COUNTY believe a joint effort to finance the purchase of a site for such outdoor recreational facilities rather than to provide separate and less appropriate facilities would be in the best interest of bothe entities and the citizens within the DISTRICT and the COUNTY as a whole.
5. The DISTRICT will have the benefit of additional outdoor recreational facilities, which might otherwise be beyond the ability of the district to purchase without the COUNTY's finanacial contribution.
- 5, The COUNTY and its residents will receive the benefit of increasd outdoor recreational facilities for children and adults at a considerable savings and viability than if the COUNTY were to undertake such a project at its own expense.

NOW, THEREFORE, in consideration of the foregoing, and the other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties agree as follows:

.....

SECTION II- Terms of the Agreement

This agreement shall be in effect for a period of 5 years, unles earlier terminated pursuant to the provisions of the Agreement. The term shall commence upon the execution of this Agreement by both the COUNTY and the DISTRICT. During the period of this agreement the DISTRICT agrees to complete the purchase of the East West Ranch and begin the planning and development process of an approximately 50 acre portion of said Ranch as a community park for use by all residents of the COUNTY under the same conditions and costs as it provides such services to residents of the DISTRICT.

SECTION VI - Default

.... Should the District fail to successfully acquire the East West Ranch or be able to provide an approximately 50- acre community park site resulting from said acquisition, the DISTRICT shall return all COUNTY contributed funds.

19. Charlotte Dareshori

- 19.1 Comment noted regarding public opinion as a factor to consider in the process of determining whether a project would have an adverse or beneficial effect on the environment. Note that public opinion is a value judgment and not necessarily based on environmental assessment. Therefore, public opinion is not an environmental issue to be addressed in an EIR. Public opinion can be considered by the decision makers along with other issues when approving or denying a project.
- 19.2 Comment noted with regard to length of EIR and being rambling and conclusory. The EIR is prepared in accordance with CEQA Guidelines and bases conclusion on the environmental analysis.
- 19.3 Comment noted with regard to development of the Master Plan in phases. The EIR covers a Master Plan and as such includes various subsequent projects as outlined in Table II-1. Comment also noted about cost of maintenance. Maintenance costs will be reviewed by the CCSO based on estimated capital outlay as outlined in Table II-1. The costs would be determined at the time of implementation.
- 19.4 Comment noted regarding allowing the public to experience a unique coastal environment and need for continued restoration and protection of sensitive resources. The Master EIR evaluates protection of sensitive resources. Refer to response 19.3 above regarding finances.
- 19.5 Please refer to response to comment 5.6 and the amendment to mitigation measure N/mm-3, which would prohibit loudspeakers and amplified noise.
- 19.6 The noise generated by turf mowers ranges from 75 decibels for electric mowers, to 90 decibels for gas-powered mowers. Operation of mowers would contribute to the identified significant and adverse impact resulting from the generation of stationary noise. The EIR has been amended to clarify this information; please refer to Section V.I.6.d. of the Final EIR. Mitigation measure N/mm-3 has been amended to require avoidance of gas-powered turf mowers, and encouragement of the use of electric mowers for turf maintenance.
- 19.7 According to the County of San Luis Obispo Planning Department, turf grass is not prohibited, because this standard applies to landscaping, not active recreation sports fields. Sports fields are not considered landscaping, as defined by the County (Martha Miller, May 8, 2008).
- 19.8 Comment noted. It can reasonably be expected that some park users will use bike racks, which would reduce some traffic trips and parking demands.
- 19.9 Comment noted with regard to potential for increase in transient camping; no changes to the EIR are necessary.

- 19.10 Please refer to Section V.J.2.d. of the EIR, which notes that the current ratio is 0.64 deputies per 1,000 citizens (San Luis Obispo County Sheriff; June 2006).
- 19.11 Comment noted regarding criminal activity; no changes to the EIR are necessary.
- 19.12 Please refer to response to comment 5.27. A mitigation measure has been added to the EIR to ensure that security lighting will include motion sensors on security lights (AES/mm-11 of the Final EIR) to further discourage persons from accessing the park during nighttime hours.
- 19.13 Section 15130, subsection (b)(1)(B) authorizes a lead agency to limit its analysis of probable future projects to those which are planned or which have had an application made at the time the NOP is released. If additional projects are identified later, they may be addressed during completion of the Final EIR.
- 19.14 Comments noted with regard to deficiency in law enforcement officers, emergency medical service and emergency response times. These comments are directed to Cambria at large and not to the specific project, but it appears that the commenter is making the point that the proposed project would increase the deficiencies. Please refer to Section V.L of the Master EIR for an evaluation of the proposed project with respect to Public Services and Utilities. Impacts are considered less than significant with implementation of mitigation measures.
- 19.15 As discussed in Section V.G. of the EIR, the proposed project would not significantly degrade road levels of service. The intent of the proposed project is to protect coastal access and provide recreational opportunities. The proposed *East-West Ranch Public Access & Resource Management Plan* includes public safety policies (refer to Chapter 8), and the proposed plan provides for emergency access on both the East and West FRP. The EIR acknowledges that illegal behavior on public lands, and increased out-of-area visitors may increase the number of responses by the local fire and sheriff's departments (refer to Section V.L.5.a. of the EIR). The EIR identifies a potential impact associated with the lack of designated parking facilities for the West FRP (refer to TC Impact 2 of the EIR). We concur with statements regarding the deficiency of emergency response times. In addition the public safety policies identified in the *East-West Ranch Public Access & Resource Management Plan*, the EIR includes mitigation to reduce the potential demand for emergency services and improving the ability for service provider response by reducing the potential for fire, implementing adopted crime prevention standards, providing adequate signage on the FRP, and identifying suitable areas for emergency access.
- 19.16 Please refer to Section V.G. of the EIR for an analysis of transportation and circulation impacts. Implementation of the proposed community park would not result in a level of service (LOS) F on affected roadways.
- 19.17 Please refer to Chapter III for an updated description of proposed project elements. Please refer to response to comment 6.10 and Sections V.B.6.a and V.B.6.b of the EIR.

As noted in the EIR, the proposed project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site; nor will it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control.”

- 19.18 As noted in Section V.H.4. of the EIR, based on consultation with the San Luis Obispo County Air Pollution Control District (APCD), the APCD recommended that they include qualitative rather than quantitative assessments of the potential air quality impacts. The EIR recognizes that implementation of the project would result in the generation of air pollutants (including GHG) including short-term construction emissions and long-term operational emissions, and identifies mitigation measures to reduce potential effects. Section V.H.5.d. has been added to the EIR to clarify the GHG emissions anticipated from the proposed project, and reference mitigation measures that would reduce the generation of GHG.
- 19.19 The proposed community park would be used by both local residents and visitors; however, these trips will be redirected from other locations. Current trips generated by Cambria residents to locations outside of the community would be reduced, due to the proximity of the proposed park to the urban core. Air quality impacts resulting from traffic trips are not limited to the specific project location; the effects occur at a regional, or basin-wide level.
- 19.20 While human behavior is not within the control of the CCSD, it is reasonable to expect that providing alternative transportation opportunities would be met with some response, particularly upon implementation of educational and public outreach programs, as identified in the *East-West Ranch Public Access & Resource Management Plan* and EIR (refer to mitigation measure TC/mm-3).
- 19.21 Comment noted with regard to the public survey taken in 2004 as being flawed. No changes to the EIR are necessary.
- 19.22 Comment noted that commenter wishes the CCSD to adopt the “No Active Sports” alternative. No changes to the EIR are necessary.

To: Cambria Community Services District
 Subject: Comments on Draft EIR for Fiscalini Ranch Preserve – Proposed East Ranch Community Park
 Date: April 15, 2008

From: Michelle & Ted Fowler
 2201 Wilton Drive – PO Box 119, Cambria, CA 93428
 (805) 927-3211
 E-mail address: ratfink@prodigy.net
I would like to receive any future information regarding this EIR.

The "Parks and Recreation Element of the San Luis Obispo General Plan" document (PRE), dated 12/19/06, makes reference in numerous locations, including the "Parks Goal, Objective and Policies – Goal #1" section 2.1, to providing "parks which are aesthetic and consistent with community needs".

The PRE also repeatedly notes that issues such as long-term maintenance being adequately accommodated for, serving a good mix of users at a reasonable cost, providing reasonable buffers between existing uses and the new park facilities in order to reduce impacts, and the use of "joint use opportunities" when available.

While the proposed East Ranch Community Park plan, as illustrated in the proposed plans, EIR and other information currently available to the public, may address and fulfill some issues, it appears, in our opinion, that the project might be out of the scope, in terms of size and actual need, of our small community of Cambria.

As residents of Cambria for almost 8 years now, we love this community, its residents, and the life style we all enjoy as a result of living here. Two years ago, we purchased a house which is probably the closest residence to the proposed community park. Our property line ends where the park begins. We purchased the property for its beauty, serene location, and direct access to wild life and the natural environment, but also knowing that there were plans in the works for the community park.

We'd be lying if we said that we welcome with open arms the idea of multiple soccer and baseball games going on simultaneously, and 100's of park users and parked cars in this beautiful and peaceful location, but we also realize that Cambria is a community of different personalities, with different ideas about the enjoyment and utilization of our unique and natural surroundings.

We've also lived on Park Hill, and realize that tiny Shamel Park cannot provide all the sporting recreation that may be desired by Cambria residents either, but maybe it's time to explore other options before we construct baseball diamonds, just to be sure?

We are grateful to those residents who "share their space" with us, such as those folks who live at either side of West Ranch, who contend with those of us who park in their neighborhoods and walk close to their houses in order to access the West Ranch trails, as well as the folks who live close to Shamel Park, with all its many different activities and uses.

However, we feel as though our sentiments and reservations about the proposed East Ranch Community Park Plan are shared by many people, both residents who live close to the park site, as well as numerous other residents who simply enjoy the current state of the Rodeo Grounds area, or those who simply question the scope fiscal responsibility of the proposed project.

20.1

It's not our intention to deny the right of any person to an afternoon of soccer, baseball or a good old fashioned "day in the park", but we are concerned about a solution that's beneficial and responsible to all Residents.

20.1 (cont'd)

Is this the right project, at the right time, for Cambria? It seems a valid question to be further explored and discussed, perhaps with more focus, within the community.

The following questions and comments come to our minds when considering the proposed Community Park, in terms of both environmental and financial responsibility:

20.2

Environmental impact on wild life and natural surroundings of the area

The East Ranch area is currently abundant with plant and wild life.

Not a day goes by when we don't have either deer, raccoon, fox, coyote or a bob cat stroll through our property, not to mention the numerous varieties of bird species which life in the surrounding trees, as well as the redeveloping fish population in Santa Rosa Creek. They all "live and work" in the area, and we "share our space" with them (even though it's sometimes a drag to share our rose bushes with the deer), but they enhance the surroundings and appreciation of our Central Coast community.

Once this project is developed, it will forever change the habitat of the East Ranch area, no matter how much environmental mitigation and planning and "best intentions" goes into the project.

- Impact of human presence, as well as disturbed and loss of wildlife and plant habitat.

- Grading, manipulation of wetland and field areas, erosion into Santa Rosa Creek. There is a rather large area of "wet land" in the park area. As one speaker at the meeting noted, is it really wise to fill that seasonal "wetland marsh" in with dirt, and impact the natural flow of rain, water runoff from the canyon, the water table and the creek in order to build a dog park and a softball diamond?

20.3

- Water & chemical use on sporting fields- The use of "recycled" or non-potable water sources is a great idea, but what are the costs of developing and maintaining this watering system? It seems as though turf sports fields probably need a great deal of watering, not to mention chemical fertilizers. What are the impacts of the runoff into the creek and ultimately the ocean, as well as the presence and absorption of such chemicals into the ground and ground water, as well as the wildlife food supply and habitat?

20.4

Also, water use of the building facilities, such as restrooms, water fountains and the proposed community center will have impact on our potable water supply, which as we are all painfully aware of, is in short supply and high demand.

20.5

- Noise impact on adjacent residential neighborhoods – both human and wildlife "neighborhoods" The area is essentially a "box canyon", and all noise echos tremendously. The EIR provides information on the study conducted on current noise levels, provides data on acceptable noise levels, as well as projected noise levels, when the park is functioning. It sites noise as a "Class I Impact", with significant, adverse and unavoidable long-term impact.

20.6

Having attended the March 18, 2008 PROS meeting, the slide show presentation by The Morro Group indicated that amplified sound, in the form of a loud speaker / P.A. announcement, was NOT part of the plan.

20.7

However, the EIR specifically mentions "noise levels", and states that "any amplified sound (e.g. loudspeakers, game announcers, etc.) should be designed so as not to point into a residential area", and rather be pointed "directly into the interior of the park".

20.7 (cont'd)

A speaker at the meeting brought up a point of park patrons using radios and the like, which is a valid point. The noise, in general, of a hundred people enjoying the park will, while great, still have impact.

Given the location, amplified sound or not, we wonder whether the potential effect of the canyon setting was actually taken into consideration, with respect to the "noise study"?

- *Traffic congestion and air quality impact, and what would be the biggest parking lot in Cambria.*

20.8

- *Safety concerns* – Even though the park would maintain "daylight hours", this may not diminish the fact that it will be accessible 24 hours a day, and has the potential to be taken advantage of. I don't believe we currently have adequate resources to enforce a park curfew, nor do we want to impact law enforcement services with "park police squad" duties. While the plan does not include field lighting, and offers only "safety lighting" around bathrooms and buildings, what if loitering and vandalism becomes a problem on the park grounds. . . will we be faced with lighting the entire park to solve the problem? That would be a shame, on many levels.

20.9

Fiscal impact of a new Community Park project

- *Does this plan fit with what the community wants, needs and can support?*

20.10

- *Determination of "community need" or desire for such facilities* - The current park plan seems to focus on the sporting field aspect of recreation, which somewhat bypasses the "order of importance" as to what was expressed on the results of the July, 2005 "Analysis of the 2004 Parks and Recreation Survey Reports and Discussion" document.

- *Is this the best use of community, county and state funds?*

Information on the project states that "grants and other funding sources will be explored" and that "at this time, no resources are authorized from the CCSD general fund for park development activities", and that SLO Country contributed \$500,000 towards the acquisition and development of the ranch land, with the intention of developing some type of parks and recreation project.

However, the PRE document refers to the fact that, in most cases, the responsibility of long-term maintenance is the responsibility of the "other agency", such as the community service district.

California state, county and local funds and budgets seem to be in a much different position than they were a few years ago, when the Community Park vision and planning sessions first go underway, and we wonder if the current "state of the state" and other community resources has been readdress since the plan's first inception several years ago?

- *Has the potential for "Joint Use Agreements" with and or all of the 3 local operating schools and Old Grammar School been adequately pursued?*

Page 40 of the PRE document, under the "Funding Acquisition and Development" heading, makes reference to "Joint Use Agreements" between the county and other public agencies as having been utilized to provide new recreational facilities through the sharing of development and maintenance expenses. The PRE specifically sites that partnerships between the San Luis Costal and the Lucia Mar School Districts have produced playgrounds and soccer fields available for use by both schools as well as the general public.

It seems that exploring all options of utilizing, developing and improving existing facilities and locations, such as sports fields at these schools, especially those options which may be beneficial not only for the general public's recreational needs, but also an arrangement which might be beneficial to the schools themselves, might be a "fiscally responsible" as well as "mutually agreeable" option to all involved.

We assume that, as with the rest of the local, county and state budgets, the school district's budget is tight as well. Perhaps this is an opportunity to better utilize, improve and develop existing resources, to the benefit of the school district and the students, as well as all Cambrians?

We realize that there are limitations to facilities located at schools, for safety and other reasons, and that the 1st priority of the fields and facilities at schools should remain to its student body. However, we all know that schedule of the school year does leave several months available for other use potential. It seems like a very viable solution for at least some of recreational items

- Proposed new Community Center building – Perhaps the other community-type facilities Cambria currently has, such as Vets Hall, The Jocelyn Center and The Youth Center, might not be the most ideal fit for all community activities, but still, they are available and seem to be well utilized and organized, for the most part.

Perhaps re-exploring a more "reuse and recycle" approach to the project is worthwhile, by enhancing and reutilizing some facilities which are already in place, such as school grounds, makes more sense now than it did several years ago.

We appreciate the opportunity to comment on this project, and be involved in the community process.

20.10 (cont'd)

20. Michelle and Ted Fowler

- 20.1 Comment noted referencing the Parks and Recreation Element of the San Luis Obispo General Plan goals and objectives. Comments also noted regarding opposition to active recreation at East Ranch. No changes to the EIR are necessary.
- 20.2 Refer to Section V.D.6.a. and V.D.6.b. in the EIR.
- 20.3 As noted in Section V.B.6.a. of the EIR, the project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site.” The floodplain would continue to operate similar to existing conditions, and floodwaters would sheet flow across the site. Storm and floodwaters would percolate through the turf and bioswales, into the underlying riparian subsurface flow. Section V.B.6.a has been expanded to clarify stormwater runoff effects.
- 20.4 The cost of recycled water is being evaluated by the CCSD. This option is one of many being considered by the CCSD to provide a future water supply for the proposed Community Park. Please refer to response to comment 6.13, and mitigation measure HYD/mm-2 in the EIR, which includes the following requirement addressing the potential for pollutants within the watershed to contaminate Santa Rosa Creek: “The bioswales (or similar method) shall include best management practices to avoid erosion and scour, and shall include a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff.” In addition, supplemental language has been added to the Hazardous Materials section of the EIR (Section V.J.6.a of the EIR) to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR). IPM provides site specific, pro-active solutions to potential pest problems, reduces the risk of pesticide resistance, and would reduce the need for chemicals during operation and maintenance of the project.
- 20.5 Comment noted. Mitigation is proposed to avoid the need for potable water for these uses, such as use of pit toilets or portable restrooms and use of hand sanitizers (refer to mitigation measure WS/mm-1 in the Final EIR).
- 20.6 Comment noted that EIR determines that Noise is a Class 1 impacts; no changes to the EIR are necessary.
- 20.7 Refer to Section V.I.6.d of the Final EIR. Amplified sound shall be prohibited at the community park. Mitigation measure N/mm-3 has been amended in the Final EIR to require prohibition of loudspeakers and amplified sound. Please refer to response to comment 6.19.
- 20.8 Please refer to Section V.G. and Section V.H. of the EIR for a discussion of transportation and circulation, and air quality impacts.

- 20.9 Please refer to response to comment 5.27, and mitigation measure AES/mm-11 of the Final EIR. This measure has been added to the EIR to require motion sensors on security lights. The intent of the motion sensors is to limit nighttime lighting in the park, and to avoid attraction to the site.
- 20.10 Comment noted with regard to fiscal effect. CEQA does not require an EIR to evaluate financial impacts. Fiscal effects are to be evaluated along with environmental effects by the CCSD at the time of project approval or denial.

Connie Davidson

From: Karen Garton [karen.garton@sbcglobal.net]
Sent: Wednesday, April 16, 2008 8:00 PM
To: Connie Davidson
Subject: The Fiscalini Ranch Preserve

Dear Cambria CSD,
I would like to see the Fiscalini Ranch Preserve remain undeveloped. I believe any development on the preserve sets a dangerous precedent. One development could lead to another. I hope the ranch can remain as wild and natural as possible. Let's protect our water supply by not introducing development that could lead to polluting run off. Also noise, traffic, and loss of vegetation are the antithesis of a naturally preserved area. Thank you for taking my comment.
Karen Garton
1175 Kenneth Drive
Cambria, California 93428
(805) 927-0930

21.1

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4/17/2008

21. Karen Garton

- 21.1 Please refer to response to comment 6.13 regarding stormwater runoff and the use of Integrated Pest Management strategies to minimize the use of chemical treatments.

Connie Davidson

From: snggreen@sbcglobal.net
Sent: Thursday, March 20, 2008 12:49 PM
To: Connie Davidson
Subject: New Park Plan

The original "Park Plan" was 4 courts.

The Cambria Tennis Club worked with CCSD to take 2 of those courts and place them at the High School. This gave the school 6 courts. This helped the girls/boys tennis teams get more schools to come our courts to play matches.

Working with the school and CCSD the Tennis Club was able to get the 6 courts open for the public and tourists to play any time on all 6 courts during the day or night except when the school teams have a match or practice. All the courts are in use at some time every day.

Those at CCSD know these 2 courts cost \$100,000 each. The Tennis Club pays for maintenance of all 6 courts, port-a-potty and lights with volunteer help from members of the club.

The Tennis Club and the school have been working together to keep skate boarders off the courts. We continue to call the Sheriff's department for help.

The "Park Plan" still shows 2 courts to be built. In my opinion that space would be best used for a "Real" skate park for our kids like the one in Morro Bay. This should keep the skate boarders off the courts at the High School, as well as side walks, parking lots and businesses.

Thank you

Gail Green

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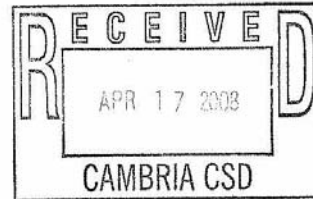
22.1

4/16/2008

22. Gail Green

- 22.1 Comment noted regarding the tennis club use of school courts. Commenter requests that a skate park be placed at the Community Park in lieu of tennis courts. No changes to the EIR are necessary.

Submitted by 4/17/08
Lynne Harkins/L.Harkins @charter.net
PO Box 606
Cambria



Public Comment on the
Draft Master EIR for
Fiscalini Ranch Preserve

As an open space public acquisition, the Preserve is not served by several components of this DEIR. 23.1

The cell tower proposed for the west part of the Preserve is at odds with the spirit of the place and with the legally appropriate zoning for this area as Open Space. Additionally, the FCC regs that are alluded to in this report are not consistent with recent research findings which signal that a more cautionary approach should be taken with regard to human and other life forms' exposure to electromagnetic radiation. 23.2

"2) Wireless Telecommunication Facilities According to the Federal Communications Commission (FCC), wireless telecommunication facilities emit a form of electromagnetic radiation known as radio frequency (RF) energy or radiation. FCC rules require transmitting facilities to comply with RF exposure guidelines. The RF exposure guidelines established by the FCC are designed to protect the public health with a very large margin of safety. For all frequency ranges at which FCC licensees operate, §1.1310 of the FCC's rules establishes maximum permissible exposure (MPE) limits to which people may be exposed. These limits have been endorsed by federal health and safety agencies such as the Environmental Protection Agency (EPA) and the Food and Drug Administration (FDA)."

Is CCSD not bound to uphold the highest standards for public health and safety based on the most recent evidence?

Furthermore, how do you deal with/justify the vastly increased fire danger posed by a cell tower facility that would bring electricity into the forest and then, by federal law, have to maintain back up generators that would require storage/transport of highly flammable fuels onsite? 23.3

In addition to the cell tower site would there not be a defensible space requirement of clearing 100' in all directions-creating a permanent large scarring of this forest preserve? 23.4

After the installation of all this expensive equipment, what recourse will CCSD/the public have if the private entities insist, for example, that they need night- lighting for security? 23.5

LM Harkins1of 4

<p>Will their business interests not likely offer other conflicts with the environment, wildlife and free public access to the land? Are we vulnerable to litigation down the road perhaps?</p>	<p>23.6</p>
<p>How is this beautiful open space enhanced or benefited by the installation of an urban-scale telecommunications complex?</p>	<p>23.7</p>
<p>Isn't the legal standing of this review subject to question/compromise because of the lack of alternatives and comparative analyses of impacts?</p>	<p>23.8</p>
<p>There are other reasons to question the completeness of this review.</p>	<p>23.9</p>
<p>Can a review that draws on only 3 field days in 3 different seasons of 2005 be adequate to consider the complexity, vibrance and needs of the "biological resources" in the Preserve? That's about 1.5 hr per 100 acres during the 3 seasons of field observation. Does that reflect adequate knowledge and concern for the creatures, especially those with special status?</p>	<p>23.10</p>
<p>Is it not fair to conclude that the omission of the presence of some CA bird species of special concern from this review is grounds for questioning the thoroughness and soundness of the biological assessment it offers?</p> <p>(Birds with CA special status on bluff/upland that were missed-Northern Harriers, Short-eared Owl, Peregrine falcon, Golden Eagle (all the other raptors are protected -red tails/red shouldered/kestrels/great horned/barn owls/the merlins the migrate thru For other migratory bird that for sure passes through for rest and seed feeding on slopes, there's the long-billed curlew. Lots of the smaller songbirds pass thru up in trees and I believe all swallows are federally protected-the cliff swallows nest on bluffs.)</p>	<p>23.11</p>
<p>This brings into relief the concern that the line between the west ranch and the east ranch is a an artificial, imposed human construct that wildlife does not acknowledge. The same wondrous creatures that are on the west Preserve travel through and forage on the east side of the Preserve. Yet the DEIR largely deals with the east part of the Preserve as if it were not biologically connected to the west part.</p>	<p>23.11</p>

LM Harkins 2of 4

From the DEIR;

6. EAST FRP – IMPACTS AND MITIGATION MEASURES a.
HAZARDOUS MATERIALS Operation and maintenance of the community park may require the use of fertilizers and other chemicals for landscape and park maintenance. Prior to operation of the community park, the CCSD would be required to file a Hazardous Materials Business Plan with the County Environmental Health Division. The plan would identify the quantity and storage methods proposed by the CCSD. Based on implementation of this requirement, potential impacts related to hazardous materials would be less than significant. HM Impact 3 Operation and maintenance of the community park may require the use of hazardous materials, potentially resulting in public exposure. HM/mm-3 Prior to operation of the community park, the CCSD shall submit a Hazardous Materials Business Plan to the County Division of Environmental Health. Residual Impact With implementation of mitigation, this impact would be considered less than significant with mitigation, Class III. “

23.12

Here’s a central reason to look very carefully at what recreation opportunities the East Ranch can rightly be expected to furnish. POISONS would be a necessary part of changing this open, wildlife corridor into an urban sports complex. Poison is integral to the creation and maintenance of the “turf” that is used for sports fields. Liability concerns over irregularities in field contours means that all burrowing creatures must be exterminated and, of course, the poisons that they ingest enter the food chain. Blood thinners used for rodent kill also cause slow, ugly deaths in the predators that eat them. Great Blue Herons, Red Tail Hawks, Red Shouldered Hawks, White-Tailed Kites, Great Horned Owls or Barn owls, coyotes, bobcats, gray fox and mountain lions-all are vulnerable to the excruciating end that comes from internal bleeding from ingesting tainted prey.

Are we ready as a community to vist death and destruction on our resident wildlife and their habitat in order to simulate an urban park environment with playing surfaces that are largely antagonistic to other species?

Then there are the ill effects of the chemical fertilizers and herbicides for turf maintenance. With Santa Rosa Creek so close by, don’t the dangers from run off and unintended consequences need to be looked at far more carefully now-in this review-before this sports park idea advances further.?

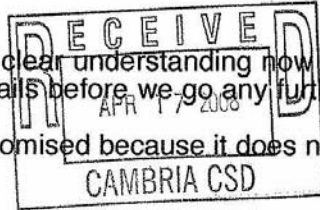
23.13

Is “ kicking the can down the road” by saying:

“Prior to operation of the community park, the CCSD shall submit a Hazardous Materials Business Plan to the County Division of Environmental Health. Residual Impact With implementation of mitigation, this impact would be considered less than significant with mitigation, Class III” an acceptable evasion of the purpose of an EIR?

23.14

LMHarkins 3of 4



Don't we need a clear understanding now of what a sports center entails before we go any further? 23.15

Is this EIR compromised because it does not offer a more ample analysis of impacts? 23.16

For instance, glyphosphate-containing weedkiller (round-up and generics) is widely used and was advertised as "biodegradable" and therefore non-toxic to all but its target weeds. But research has shown problems with it: 23.17

Fish, amphibians and aquatic invertebrates are more sensitive to glyphosate due to differences in toxicity between the salts and the surfactants used in glyphosate-containing products. The toxicity is increased with higher water temperatures, higher concentration and pH. 23.18
 This toxicity can have a devastating effect on endangered species. In Australia, guidelines state that most glyphosate-containing products should not be used in or near water because of their toxic effects on all aquatic species.
<http://www.ecwa.asn.au/info/glyphosb.html>

Are products such as this-which are routinely used in maintaining sport turf - appropriate near Santa Rosa Creek with its endangered steelhead and red-legged frog etc.? 23.19

What are the possible ill-effects on young, developing children? Why is there no reference in this review to the possible environmental downside of urban park maintenance practices? 23.20

In summary, don't we need the fullest possible understanding of the ramifications of introducing urban elements; telecommunications towers, as well as high-maintenance, unnatural landscapes into the sensitive habitat that remains in our midst in the form of this wonderful Preserve? 23.21

This DEIR does not provide the level of information that the public needs to make an informed decision about the long-term well-being of the Preserve.

23. Lynne Harkins

- 23.1 Please refer to response to comment 6.23. The current (August 2008) County planning area standards do not permit construction of a telecommunications facility on the West FRP. The County of San Luis Obispo Planning Commission adopted a Mitigated Negative Declaration for the proposed project, which was appealed; subsequently the land use application was denied, and the project is no longer proposed for inclusion in the Master Plan (refer to Section III.D.1.c of the EIR).
- 23.2 Please refer to response to comment 23.1 above.
- 23.3 Please refer to response to comment 23.1 above.
- 23.4 Vegetative clearance requirements are determined by the Cambria Fire Department, and are necessary to reduce fuel loads around structures, such as residences. Fuel reduction measures do not require removal of all vegetation; measures require a reduction in highly flammable vegetation.
- 23.5 Please refer to response to comment 23.1 above.
- 23.6 The FRP is held in trust for the public to ensure free public access. Please refer to response to comment 23.1 above regarding the telecommunications facility.
- 23.7 The intent of the proposed telecommunications facility was not to enhance or benefit the open space; however, the County routinely requires “stealth” design of telecommunications facilities (such as on buildings or use of synthetic trees) to reduce the visual effects of these facilities. Please refer to response to comment 23.1 above.
- 23.8 Please refer to Section VI of the EIR, which identifies potential alternatives to the proposed project, considering identified objectives. The alternatives section focuses on minimization of identified significant impacts and provides a comparative analysis of each identified impact.
- 23.9 Please refer to response to comment 5.39, and Section V.D.2, Table V.D.-5, and Table V.D.-6 of the Final EIR). Additional information received from local biologists familiar with the FRP has been incorporated into the EIR. In addition, it should be noted that biologists have conducted numerous field investigations associated with other projects, and this information has been either included by reference or from sitings of listed species have been included in the California Diversity Data Base. As information becomes available regarding listed species sitings on Fiscalini Ranch, the body of knowledge regarding use of the area can be updated.
- 23.10 Please refer to response to comment 5.39, and note that where the surveys did not result in a documented occurrence of the species, the EIR considers the potential for the species to occur at some time on the FRP. The determination of impacts and mitigation measures

- apply to species documented by the EIR biologist, and species with the potential for occurrence in equal measure.
- 23.11 The EIR considers biological resources present within entire FRP, and provides information regarding species observed or potential present within habitats identified on the West FRP and East FRP.
- 23.12 Please refer to response to comment 6.13, and Section V.J.6.a. of the Final EIR. Supplemental language has been added to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR).
- 23.13 Please refer to response to comment 6.13.
- 23.14 Please refer to response to comment 6.13. This mitigation measure notes the requirement to store and manage hazardous materials consistent with existing regulations to avoid contamination and spill.
- 23.15 Refer to Section III.D.2.a.(1) of EIR for a description of the proposed sports fields.
- 23.16 The EIR assesses potential impacts based on the availability of information.
- 23.17 Comment noted with regard to glyphosphate-containing weedkiller. No changes to the EIR are necessary.
- 23.18 Please refer to response to comment 6.13. Non-toxic options are available for turf management. For example, herbicides such as “Aquamaster” are approved by the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Army Corps of Engineers, and California Department of Fish and Game for uses within or near surface water.
- 23.19 Please refer to response to comment 6.13 and Section V.J.6.a. of the EIR, which identifies potential impacts and mitigation measures specific to the use and storage of hazardous materials.
- 23.20 Please refer to response to comment 6.13. While legal use of pesticides and fertilizers are not known to result in significant adverse effects to park users, implementation of Integrated Pest Management (IPM) would reduce the use of chemicals, and would reduce the potential for adverse effects.
- 23.21 Comment noted regarding level of information needed to make an informed decision about the Preserve. No changes to the EIR are necessary.

Connie Davidson

From: karenjohnson42@charter.net
Sent: Monday, April 14, 2008 7:18 PM
To: Connie Davidson
Subject: EIR Fiscalini Ranch preserve

In regards to the EIR for the Fiscalini Ranch Preserve;
- I strongly oppose the building of lighted or unlighted baseball/soccer fields along with a parking lot and public restrooms.
-I support a walking and bike riding trail since this activity lends itself to the type of community we are in the public's eyes. Visitors come here to hike and ride while looking at the ocean and forest views. They can play soccer or baseball in their home town. Our kids can play at our local schools.
-Please, not another dog park. I can't believe we spent the money on the first one considering we're a rural area and most dog parks are in metro citys. The ranch is already open to dogs.
-Having just moved here from Bakersfield, I hope we don't make the same mistakes they did. They just added another new park. They found they had to double their cleanup and police visits to the park due to the amount of trash after every weekend. A close watch is now in effect due to the number of drinkers the park attracts.
-Why can't we leave well enough alone and leave our beautiful community the way it is and the way visitors would like it to stay.
-We already have enough water problems, and an overly staffed and bureaucratic CCSD.
-Let's not turn Cambria into another typical California city.
Bob Johnson
Cambria resident

24.1

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24. Bob Johnson

- 24.1 Comments noted regarding opposition to active sports fields and a dog park at the Community Park and support for walking and bike trails. No changes to the EIR are necessary.



04/17/2008 16:20 8059275380

VERN KALSHAN

PAGE 01/01

VERN KALSHAN

ATTORNEY, Bar No. 48078

440 Kerwin Street

Cambria CA 93428-4491

Telephone 805/927-1222

Facsimile 805/927-3380

805-927-5584

Fax

TO: East Fiscalini Ranch Active Recreation Park EIR

DATE: APR 17 2008

SUBJECT: Comments

Dear Services District,

The site is the home of many ground mammals evidenced by pot holes that I have seen on the surface of the proposed playing fields.

25.1

How will the animals be removed an if poison is used how will this be toxic to all wildlife life in Santa Rosa Creek ?

Very truly yours,

Vern Kalshan
Vern Kalshan

1 pages including this cover sheet

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25. Vern Kalshan

25.1 Please refer to response to comment 6.13.

Connie Davidson

From: Jennifer King [jenking@charter.net]
Sent: Thursday, April 17, 2008 5:31 PM
To: Connie Davidson
Subject: Proposed development of East Ranch

4/17/08

Dear Ms. Davidson,

Here's what I think we should do with the land: Nothing. Absolutely nothing. Why?

First of all, the proposed amenities are redundant on services and activities already readily available in our town.

We already have a playground. My kids are 6 and 9 years old. We have been to that park several days each week, every week, for the past 9 years and we have NEVER found it so full that we couldn't jump in and have fun with everybody else. To the contrary, many times we've found ourselves the ONLY occupants of a beautiful, nearly-new play structure on a gorgeous sunny afternoon and wondered why on earth the place wasn't teeming with people!!! By no means is that playground overstretched; it fits our town's needs perfectly.

We already have a dog park. We don't need another one. I've driven by the existing park many hundreds of times. It's never been full to capacity! There are usually three or four cars there, a handful of people, and there is absolutely no reason to create a second dog park.

We already have a multi-use court. It's called every paved street in Cambria. If I want to play basketball I can just swing on down to the teen center and shoot a few hoops. If I want to rollerblade I just snap on my skates and find a flat street. If I want to play tennis I can bat the ball at the high school; I've been down there countless times to play on weekend afternoons, and never once have I had to wait for a court. If I want to play handball or practice my tennis swing solo, I can use the high school facilities for that.

We already have plenty of places to play soccer. Shamel Park serves the purpose for the general public and the grammar school serves that purpose for the kids' leagues. My family and I have used Shamel park thousands of times in the decade we've lived here and never once has it been so full of people that you couldn't find a space to kick the soccer ball on some part of that vast, grassy lawn.

We don't need another "community center"; we already have the Teen Center, the Jocelyn Center, the Village Theater, the Vet's hall, the library, and the Cambria Grammar School Multipurpose Room. We don't need any more structures.

More importantly, I oppose the plan on the grounds that the impact it would have on that sensitive parcel of land is too great. The Rodeo Grounds area is a beautiful, simple, quiet destination for folks who like to walk cambria's wooded trails to look at Anise Swallowtail caterpillars and butterflies, pick black-rasberries, look for Monarchs in the Eucalyptus groves and contemplate nature in one of the few quiet spaces left in the central part of our town. Building a parking lot and paving the access road in that location will impede groundwater uptake, create off-point motor oil runoff sources (which will immediately impact the water quality in Santa Rosa Creek), and will increase traffic and its concomitant noise in an already-congested area of town.

Those of us who lived here and participated in the movement to acquire the ranch several years ago from the southern california developers who owned did so IN ORDER TO RETAIN IT AS OPEN SPACE, keep it accessible, and prevent it from being built on. We made our efforts and financial contributions in an effort to PREVENT development of the land, not to facilitate it! Using part of the ranch for these so-called "enhancements" is a complete betrayal of the intent of those Cambrians who supported and contributed to the land's purchase. If the "County" actually insists that we use the money it chipped in for constructing these "amenities", let's reimburse the "County" and free ourselves of that ridiculous obligation.

4/18/2008

26.1

26.2

26.3

Sincerely,

Jennifer L. King
2390 Pineridge Drive
Cambria, CA 93428
805-927-1643

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4/18/2008

26. Jennifer King

- 26.1 Comment noted regarding doing nothing with the land. No changes to the EIR are necessary.
- 26.2 Refer to response to comments 6.10, and Section V.B.6.a. of the EIR. Based on the EIR analysis, the proposed project would not significantly impede groundwater recharge. Mitigation measures are recommended to ensure avoidance of pollutants in stormwater runoff, including implementation of best management practices, use of bioswales, and long-term Integrated Pest Management strategies (refer to HYD/mm-2 and HM/mm-4 in the Final EIR). We concur that the proposed project would generate traffic and noise, as identified in the EIR.
- 26.3 Comment noted regarding retaining the property as open space. No changes to the EIR are necessary.

Connie Davidson

From: Victoria K [p0tter46@yahoo.com]
Sent: Wednesday, April 16, 2008 9:24 AM
To: Connie Davidson
Subject: Fiscallini Ranch

Dear Ms. Davidson,
I am writing in regards to the planned development of the East/West, Fiscallini Ranch in Cambria.

Ms. Davidson, had I known at the time of my many hours of volunteering and hundreds of dollars in efforts to save this Ranch from development that in fact development was the future of this land, I would never have given any support.

Private enterprise on public lands is corrupting the original idea of preserving this ranch. The EIR for the cell tower is environmentally incomplete, and the actual need for this "service" is truly a doubt.

This town does not need an "entertainment" field. Soccer fields, lap pools and the like are a huge drain on a town where water is in high demand. Ms. Davidson, this is a pristine land, please help us to keep it so. Thank you for your time.
Victoria Krassensky

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27.1

27. Victoria Krassensky

- 27.1 The County of San Luis Obispo Planning Commission adopted a Mitigated Negative Declaration for the proposed telecommunications facility, which was appealed; subsequently the land use application was denied, and the project is no longer proposed for inclusion in the Master Plan (refer to Section III.D.1.c of the EIR). Comments noted regarding the demand for water supply.

CONNIE DAVIDSON
CCSD

I would like to address the Environmental Impact Report that was just completed on the proposed Cambria Community Park. I would like to address two of the studies. Noise and Water Supply.

28.1

The Environmental Impact Report states:

Potential sources of noise associated with the proposed park facilities include operation of athletic play fields and general community recreation. The active uses on athletic fields include soccer, little league baseball, softball and other sports activities. Court uses include sand volleyball, basketball and tennis. There will four to five turf fields. The park also includes restrooms, a dog park, and children's playground. Vehicle access to the park will include approx. 140 parking spaces. There could be five games being played at the same time. The report states that if this were the case that

Future development of the park would potentially subject existing residential areas to adverse stationary noise levels possibly above the thresholds contained within the County Noise Element. -Noise levels were measured on four different sports fields in the county and the Noise Levels were 56.2 to 66.3. None of these sports fields were in a residential area. The maximum hourly daytime stationary noise standard for a residential land use is 70. This park is not tucked away as the Cambrian suggests. Many houses and The Bluebird Motel surround the proposed park and the proposed park is in the middle of a bowl like echo chamber. - in the middle of town. Everything is amplified. Any noise measurement should be done on the spot, as I am sure it will be much higher than in any open space playing fields that were used as a comparison. In Addition the report states that any amplified sound e.g loudspeakers, game announcers etc. should be designed so as to not point in a direction that is directly into a residential area. Who is going to control that? The report states that development of the proposed community park would result in the generation of stationary noise levels exceeding acceptable thresholds at the property line of adjacent existing sensitive land uses, resulting in a potentially significant long-term impact. The proposed park is not a Cambria Community Park; it is a San Luis Obispo County Park. The County owns the land. Finally in the EIR report that is titled Water Supply it states The CCSD would provide water for the community park. In the Cambrian last week under the EIR Water Master Plane it states that they want to reduce the use of potable water for landscaping. So let the County build a Park and use CCSD potable water? Bus in leagues from around the County and have traffic jams on Burton, Noise that will be heard all over town, pollution, disturb the wildlife. No one moved to Cambria to have this happen. This is a nice quite town. This would be a disaster. Give the County their \$500,000 back and lets have some peace.

28.2

28.3

28.4

28.5

Lynda Layton
3261 Pine St.
Cambria, Ca.
93428

Fiscalini Ranch Preserve Master EIR

Noise

I. NOISE

Noise is a complex physical phenomenon that varies with time, geographic location, proximity to the source, and duration of the noise event. The effects of noise are considered in two ways: how a proposed project may increase existing noise levels and affect surrounding land uses; and how a proposed land use may be affected by noise from existing and surrounding land uses. The following section discusses the fundamentals of sound and noise measurements, describes the existing noise environment of the project site, provides federal, state, and local noise guidelines and policies, and evaluates potential noise impacts that would be encountered at the project site due to development of the proposed project. Mitigation measures have been incorporated where an identified noise impact would exceed a defined regulatory threshold. Karl Mikel, Environmental Engineer with Morro Group and County approved acoustical consultant, has prepared this section of the EIR, it is intended for use by the County of San Luis Obispo (County) and other interested parties as part of the Environmental Determination for the proposed project.

1. REGULATORY SETTING

Noise is regulated at the federal, state, and local levels through regulations, policies, and/or local ordinances. Local policies are commonly adaptations of federal and state guidelines, based on prevailing local conditions or special requirements.

a. FEDERAL POLICIES AND REGULATIONS

The Federal Noise Control Act of 1972 §2 [42 U.S.C. 4091] states the following:

(a) The Congress finds (1) that inadequately controlled noise presents a growing danger to the health and welfare of the Nation's population, particularly in urban areas; (2) that the major sources of noise include transportation vehicles and equipment, machinery, appliances, and other products of commerce; and (3) that, while primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce control of which require national uniformity and treatment.

(b) The Congress declares that it is the policy of the United States to promote an environment for all Americans free from noise that jeopardizes their health or welfare. To that end, it is the purpose of this Act to establish a means for effective coordination of Federal research and activities in noise control, to authorize the establishment of Federal noise emission standards for projects distributed in commerce, and to provide information to the public respecting the noise emission and noise reduction characteristics of such products.

b. STATE POLICIES AND REGULATIONS

1) California Government Code

The contents of *County Noise Element* and the methods used in their preparation have been determined by the requirements of §65302 (f) of the California Government Code and by the

Draft Master EIR

V-191

Fiscalini Ranch Preserve Master EIR

Noise

transportation sources. Table V-31 shows the ranges of noise exposure that are considered to be acceptable, conditionally acceptable, or unacceptable for various land uses.

In **acceptable** noise environments, development may be permitted without requiring specific noise studies or specific noise reducing features.

In **conditionally acceptable** noise environments, development should be permitted only after noise mitigation has been designed as part of the project, to reduce noise exposure to the levels specified by the following policies. In these areas, further studies may be required to characterize the actual noise exposure and appropriate means to reduce it.

In **unacceptable** noise environments, development in compliance with the policies generally is not possible.

TABLE V-27
Land Use Compatibility for New Development near Transportation Sources

Land Use	Exterior Noise Exposure, Ldn or CNEL (dB)					
	55	60	65	70	75	80
Residential	Acceptable, no mitigation required	Acceptable, no mitigation required	Conditionally Acceptable, Mitigation required	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible
Bed and Breakfast, Hotel Motel	Acceptable, no mitigation required	Acceptable, no mitigation required	Conditionally Acceptable, Mitigation required	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible
Schools, Libraries, Museums, Hospitals, Churches, Nursing Homes, Public Assembly	Acceptable, no mitigation required	Acceptable, no mitigation required	Conditionally Acceptable, Mitigation required	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible
Outdoor Sports, Playgrounds, Recreation	Acceptable, no mitigation required	Acceptable, no mitigation required	Conditionally Acceptable, Mitigation required	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible
Offices	Acceptable, no mitigation required	Acceptable, no mitigation required	Conditionally Acceptable, Mitigation required	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible	Unacceptable, mitigation may not be feasible
Note: Bold type denotes land uses proposed for the Fiscalini Ranch Preserve Management Plan and Master Plan. Source: County of San Luis Obispo General Plan Noise Element, 1992						

In addition to the above policies, the *County Noise Element* identifies specific outdoor activity area and interior noise thresholds for transportation and stationary noise sources. These thresholds are discussed further in Section 3, Thresholds of Significance, below.

Draft Master EIR

V-193

Fiscalini Ranch Preserve Master EIR

Noise

2. Noise levels shall be reduced to or below the noise level standards in [Table V-33] where the stationary noise source will expose vacant land in the Residential Rural, Rural Lands, and Commercial Retail to noise levels that exceed the standards in [Table V-33].

The allowable hourly daytime stationary noise standard for a residential land use is 50 dBA, while the maximum is 70 dBA Leq. The hourly nighttime stationary noise standard for a residential development is 45 dBA, while the maximum is 60 dBA Leq (refer to Table V-33). In this instance, the community park is considered a stationary noise source, which may generate noise affecting the adjacent noise-sensitive use, which is residential.

TABLE V-33
County of San Luis Obispo Stationary Noise Standards

Level	Daytime (7 am-10 pm)	Nighttime (10 pm-7 am)
Hourly average level (Leq) dB	50	45
Maximum level (Max) dB	70	65
Maximum level, dB-impulsive Noise	65	60

Source: County of San Luis Obispo General Plan Noise Element, 1992.

3) Existing and Cumulative Noise Impacts

The County Noise Element includes the following policies used to identify acceptable noise exposure, potential noise impacts, and guidelines for when mitigation is required.

Policy 3.3.6 states "The County shall consider implementing mitigation measures where existing noise levels produce significant noise impacts to noise-sensitive land uses or where new development may result in cumulative increases of noise upon noise sensitive land uses. Significant noise impacts result in an increase of 1 dBA to the existing environment."

4) Construction Noise

Construction noise from development of the project could have significant noise impacts on adjacent noise-sensitive land uses. In general, the grading phase of project construction tends to create the highest noise levels because of the operation of heavy equipment. Construction noise would be a short-term impact for the different development phases of the project. Generally, other than limiting exceptionally noisy activities to certain times and days of the week, the County currently has no noise threshold for temporary construction related impacts; however, noise reduction plans can be implemented on a case-by-case basis as warranted. In the event that significant noise would result due to a long-term construction project, or unique situations where significant short-term noise impacts are identified, a noise reduction plan can be required as a condition of project approval.

Draft Master EIR

V-203

Fiscalini Ranch Preserve Master EIR	Noise
<p>project information. These types of land uses within the park would be classified as stationary noise sources and subject to Policy 3.3.5 of the <i>County Noise Element</i>.</p>	
<p>The 25-acre park site includes 17.5 acres of developed and active recreational uses and 7.5 acres of open space. Potential sources of noise associated with the proposed park facilities include operation of athletic play fields and general community recreation. The active uses on athletic fields could include soccer, little league baseball, softball, and other sports activities. Court uses include sand volleyball, basketball, and tennis. The park also includes restrooms, a dog park, and children's playground. Vehicle access to the park will be off of Rodeo Grounds Road and Burton Drive. Hikers typically reach East FRP from volunteer trails in the East Lodge Hill neighborhood. Other bicycle and pedestrian access will be from Burton Drive and from connections to the Cross Town Trail and Santa Rosa Creek Trail. The park athletic facilities are not intended for active use after dark and the park plan does not include field or court lighting.</p>	
<p>a. <u>EAST FRP - SHORT-TERM CONSTRUCTION RELATED NOISE</u></p>	
<p>Construction noise would differ among the various phases of park development, depending on the particular construction activities, working hours, and the numbers and operating lengths of the equipment used. During the initial phases of construction, it is estimated that most of the construction noise would be limited to grading and earthwork operations, which would only affect the residences located along the boundaries of the project site for a short period of time.</p>	
<p>Development of the proposed project would create temporary increases in the ambient noise level during construction in close proximity to residential areas; therefore, mitigation would be required for short-term construction-related impacts.</p>	
N Impact 3	<p>Development of the proposed project would expose existing sensitive residential receptors surrounding and on the project site to temporary construction-related noise impacts, resulting in a potentially significant, direct, short-term impact.</p>
N/mm-3	<p>Upon application for construction permits from the County of San Luis Obispo, the CCSD or project developer shall submit a Noise Reduction Plan prepared by a qualified acoustical consultant for review and approval by the County Planning Department. The Noise Reduction Plan shall include but is not limited to the following standards:</p> <ol style="list-style-type: none"> a. Limit all phases of construction to the hours of 7:00 AM to 9:00 PM Monday through Friday as required by County ordinance; b. Regular notification of all existing and future residences within 1,000 feet of the site boundary concerning the construction schedule; c. Shield especially loud pieces of stationary construction equipment; d. Locate portable generators, air compressors, etc. away from sensitive noise receptors; e. Limit grouping major pieces of equipment operating in one area to the greatest extent feasible;
Draft Master EIR	V-209

Fiscalini Ranch Preserve Master EIR

Noise

d. EAST FRP - STATIONARY NOISE – AFFECT ON ADJACENT USES

Certain land uses within the park would be classified as stationary noise sources and subject to Policy 3.3.5 of the *County Noise Element*. Future development of the park would potentially subject existing residential areas to adverse stationary noise levels possibly above the thresholds contained within the *County Noise Element*. Although the exact noise level cannot be determined at this time, the addition of various sports fields, tennis and/or basketball courts, or any other type of outdoor use constructed within the proposed park boundary can be estimated by comparing similar noise measurements from other area parks and sports fields within the County.

In order to determine potential stationary noise levels that may result from usage of the various sports fields at the park, noise monitoring was conducted at several locations throughout the County for both youth and adult sporting events. Table V-36 documents the one-hour Leq for several types of these events. When multiple events were occurring at the same time, the noise was measured at approximately equal distances from home plate of either game, or between the center of the fields in case of the soccer. Table V-36 represents a reasonable range of the “worst-case” estimated one-hour Leq noise levels that could be expected at the community park for various types and intensity of events.

**TABLE V-36
Measured Sporting Event Noise Levels**

Measurement Type	Number of Games Measured	Noise Levels Leq (dBA)
Adult COED Softball (Paloma Creek, Atascadero)	2	59.0
Adult COED Softball (Barney Schwartz, Paso Robles)	3	66.3
Youth Girls Softball (Traffic Way, Atascadero)	2	63.0
Youth Boys Soccer (Del Rio Elementary, Atascadero)	1	56.2

Note: The measurements provided above are meant to provide a “reasonable” range of anticipated noise levels that could be expected at the proposed park site.

If the measured noise events in Table V-36 are approximated as a point source and combined, an estimate can be made of the “overall” noise level that could be expected if five of these events were occurring simultaneously within the proposed park. Approximating the center of the park as the noise source, and adding the noise sources from Table V-36 logarithmically, a reasonable estimation of the combined effects of maximum park usage was determined. As noted in the Transportation and Circulation section of this EIR, available parking capacity would limit operation of the turf area to four games; however, estimating noise generated by five games provides a reasonable worst-case scenario in the event that the turf area, multi-use court pad, and other park facilities are in use.

Draft Master EIR

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Fiscalini Ranch Preserve Master EIR	Noise
<p>The result of the simulated point source noise estimate is 67.4 dBA at a distance of approximately 100 feet. Considering that sound attenuates for various reasons such as distance, topography, and vegetation, and the site is considered a "soft" site, it is estimated that noise would attenuate approximately 7.5 dBA per doubling of distance for an at-grade alignment.</p>	
<p>For analysis at the proposed project location, it was presumed that four youth soccer and one baseball/softball/little league game would be occurring simultaneously, for a total of five games. Using the measured values as seen in Table V-26, an estimated noise level of 65 dBA Leq would be expected at a distance of 100 feet from the center of these events. Using presumed attenuation rates for doubling distance, there would need to be approximately two doublings of distance to attenuate 15 dBA.</p>	
<p>The daytime outdoor noise threshold for stationary sources is 50 dBA Leq measured at the property line of the receiving land use. At a distance of approximately 400 feet from the simulated at-grade point source, noise levels would be approximately 50 dBA if all five events were occurring simultaneously. <u>Based on this assessment, any residential property line closer than 400 feet from multiple occurring sporting events may be affected by these activities.</u> Nearby residences are located approximately 350 to 400 feet to the south and southwest of the proposed multi-use sports fields. Nighttime usage of the park is not proposed and nighttime noise impacts are not expected to occur.</p>	
<p>Outdoor noise mitigation would need to be implemented for portions of the surrounding residential areas to help reduce noise levels caused by stationary sources from sporting events in the proposed park area. When mitigation must be applied to satisfy the policies contained in Chapter 3.3 of the <i>County Noise Element</i>, the following mitigation measures shall be considered and preference shall be given, where feasible, in the following order:</p>	
<ul style="list-style-type: none"> • Site layout, including setbacks, open space separation and shielding of noise-sensitive uses with non noise-sensitive uses. • Acoustic treatment of buildings. • Structural measures: construction of earthen berms or noise barriers. 	
<p>Due to the configuration and large amount of undeveloped area within the park area, requiring setbacks or using open space separation is the most effective form of noise mitigation, precluding the construction of berms or sound walls. A minimum developmental setback would be required for effective noise reduction between the proposed sports fields and the outdoor activity areas of the existing residences to ensure intermittent noise levels would be under the maximum of 70 dBA (maximum) or 50 dBA Leq (hourly) for a stationary noise source. Locating active recreation facilities at least 400 feet from the perimeter park boundary would accomplish two things: first, an adequate setback distance would be achieved, and second, at a 400-foot distance these facilities would be at a much lower elevation than surrounding residential areas. After accounting for slope and subsequent elevation drop to the north and east, new park facilities would adequately be "tucked" into the existing landscape, providing additional natural shielding of future noise resulting from usage of the facilities. Based on the size and width of the parcel proposed for the community park, implementation of a 400-foot setback from the property boundary is not feasible for all proposed sports fields. A physical separation of approximately</p>	
Draft Master EIR	V-2/3

Fiscalini Ranch Preserve Master EIR

Noise

350 to 400 linear feet, 40 to 60 vertical feet, and natural vegetation is located between the proposed active recreational areas and existing residences.

Upon completion of the technical analysis for this section of the EIR, the CCSD revised the proposed community park design to locate the baseball/softball field in the northeast corner of the multi-use sports field area to increase the distance between these types of activity (which tend to generate noise levels louder than soccer) and the residential property line. In addition, any amplified sound (e.g., loudspeakers, game announcers, etc.), should be designed so as to not point in a direction that is directly into a residential area. All loudspeakers and amplification of sound should point directly into the interior of the park and the volume should be limited to the immediate area of the event.

N Impact 4

Development of the proposed community park would result in the generation of stationary noise levels exceeding acceptable thresholds at the property line of adjacent existing sensitive land uses, resulting in a potentially significant long-term impact.

N/mm-4

Upon application for a Development Plan/Coastal Development Permit from the County of San Luis Obispo, the CCSD shall incorporate the following operational standards into the *Community Park Master Plan*:

- a. Any amplified sound (e.g., loudspeakers, game announcers, etc.), should be designed so as to not point in a direction that is directly into a residential area. All loudspeakers and or amplification of sound should point directly into the interior of the park.
- b. The volume of any amplified event should be limited to the immediate area of the event and shall not exceed a maximum noise level of 70 dBA as measured from the property line.

Residual Impact Implementation of the proposed redesigned project and mitigation measures listed above would minimize potential noise impacts, however, the hourly 50 decibel threshold at the residential property boundary with the FRP would be exceeded during the maximum use of proposed sports fields, resulting in a *potentially significant, adverse impact, Class I*.

7. CUMULATIVE IMPACTS

As Cambria's population increases, the number of residences will increase, as will the infrastructure, the amount of traffic, and the number of stationary sources. Subsequently, the overall ambient noise level will also increase. The CCSD has proposed a Build-out Reduction Program to reduce the build-out capacity of the community, which would involve the retirement of lots within the community. Few or no homes will be built due to water shortage and infrastructure limitations in the near future.

This relationship generally holds true for most any situation or area of the County. Cumulative noise related impacts could be thought of in this way, as an areas population grows, so will the incremental sound pressure level, and the noise environment will increase accordingly.

Draft Master EIR

V-214

<i>Fiscalini Ranch Preserve Master EIR</i>	<i>Noise</i>
<p>However, noise impacts are mitigable, and reasonable measures exist to address future noise related impacts caused by development of the surrounding area. Although the proposed project and everyday community usage would incrementally raise the ambient daytime noise levels in close proximity to the park site, it is not expected to significantly contribute to the cumulative increase in noise levels. In addition, implementation of project-specific noise mitigation would reduce the project's contribution to increased noise levels in the immediate area. Therefore, development of the proposed project would result in cumulative noise impacts that are considered <i>less than significant, Class III</i>.</p>	
<i>Draft Master EIR</i>	V-215

Fiscalini Ranch Preserve Master EIR

Water Supply

K. WATER SUPPLY

This section was prepared by Cleath & Associates based on available published water supply information and the proposed project water demands. The proposed project site consists of two main areas: the West FRP and the East FRP. Based on the *Public Access and Management Plan*, actions on the West FRP would be limited to trail improvements and amenities, habitat restoration, signage, and parking areas. Water demand would be limited to dust control and minor irrigation, and would not require construction of infrastructure. Proposed actions on the East FRP would include a community park including sports fields, restrooms, and a community center, which would require a water source for both domestic and irrigation purposes. This EIR section focuses on the potential water supply demands and options for the East FRP.

The CCSD would provide water for the community park project on the East FRP from one of several potential sources. At this time, the sources to be used for the project have yet to be formally established. The *Public Access & Resource Management Plan* states that "No new water wells will be installed on the Ranch [Fiscalini Ranch Preserve (FRP)]". Existing wells will remain for monitoring and grazing purposes. The abandoned well used for the Fiscalini Ranch operations must be capped for public safety purposes." In addition, the plan states that "no new water supplies for District purposes will be developed on the Ranch [FRP]." Cleath & Associates re-evaluated the existing water supply facilities to determine if water resources can be protected while utilizing these facilities and sources for the proposed project, including the proposed park as shown in the Master Development Plan.

The proposed project could be served by historic water sources formerly serving the property or by CCSD water sources. CCSD current and potential water sources include the existing water sources in Santa Rosa Creek Valley and San Simeon Creek valley, the development of treated wastewater for non-potable use, and the potential development of desalinated water. This EIR section describes these alternatives, and addresses potential impacts that could result from the use of identified options.

1. REGULATORY SETTING

a. FEDERAL POLICIES AND REGULATIONS

1) Safe Drinking Water Act of 1974

The Safe Drinking Water Act implemented by the Environmental Protection Agency is the primary federal regulation controlling drinking water quality. The Safe Drinking Water Act grants the EPA the authority to establish and enforce guidelines for the achievement of minimum national water quality standards for every public water supply system serving 25 people or more.

The Act was originally implemented in 1974 with significant revisions in 1986. The Act originally set standards for 83 individual constituents, including pesticides, trihalomethanes, arsenic, selenium, radionuclides, nitrates, toxic metals, bacteria, viruses, and pathogens. The 1996 amendment to the Act made some significant changes, most of which resulted in more stringent application of control technology. The amended Act also adopted a more rigorous schedule for amending the Disinfectants/Disinfection By-Products Rule and the Enhanced Surface Water Treatment Rule, both of which took effect in 1998.

Draft Master EIR

V-229

28. Lynda Laylon

- 28.1 Please refer to response to comment 6.19. The noise analysis is conservative, and considers thresholds at the property boundary. The document also identifies a sphere of effect, where noise would exceed allowable thresholds (refer to Section V.I.6.d. of the EIR). A significant, adverse, and unavoidable impact specific to the project's estimated noise generation is identified (refer to N Impact 3).
- 28.2 Please refer to response to comment 5.6 and Section V.I.6.d of the Final EIR. Amplified sound shall be prohibited at the community park. Mitigation measure N/mm-3 has been amended to require prohibition of loudspeakers and amplified sound.
- 28.3 The Fiscalini Ranch Preserve is owned by the CCSD.
- 28.4 As noted in Section V.K. of the EIR, a variety of potential water supply options are identified, including the use of non-potable water. Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria.
- 28.5 Please refer to Section V.G. (Transportation and Circulation); no significant traffic impacts would occur. Please refer to response to comment 5.6 regarding noise. Please refer to Sections V.H. (Air Quality) and V.J. (Hazards and Hazardous Materials) for discussion of potential pollutants. Please refer to Section V.D. (Biological Resources) for a discussion of impacts to wildlife.

Connie Davidson

From: GTL [gtl@myyellowstone.net]
Sent: Tuesday, April 15, 2008 2:22 PM
To: Connie Davidson
Subject: Comments about Plans for the Fiscalini Ranch

April 15, 2008

Connie Davidson
Cambria CSD

Dear Ms Davidson,

I am staunchly opposed to any development of the East (or West) sections of the Fiscalini Ranch. I want both sections to remain as they currently are. No playing fields, parking lots, swimming pool, tennis courts, bathrooms, nor other buildings should be built on the "East" Ranch. Give the county back the money it donated, plus interest if necessary, so that Cambria may break it's "commitment" to build a community park. (I have no doubt that the deficit would be readily replaced by donations.) When considering the total price paid (\$11M) to acquire the ranch, the \$500K the county donated is far too measly a sum for such large mandate. Please do not allow Cambria be overtaken by the hordes of "visitors" that will flock here to use the ranch's new "facilities," upsetting our peace and tranquillity with more traffic and noise.

29.1

No lighting and NO MORE SIGNS should be placed anywhere on the ranch. Too many signs have already placed on the West Ranch.

And no cell tower(s) should be built on any portion of the ranch.

Leave the entire ranch as OPEN SPACE. Too much "gentrification" has already taken place on the ranch. And throughout Cambria, for that matter.

Sincerely,

George Leclercq
1911 Ogden Dr.
Cambria, CA 93428
(805) 927-1898
gtl@myyellowstone.net

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4/16/2008

29. George Leclercq

- 29.1 Comment noted that the commenter is opposed to any development on the East or West Ranch. No changes to the EIR are necessary.

Patricia Laubacher
575 Leighton Street, Cambria, California 93428

Dear CCSD-

As a concerned citizen of Cambria,
please maintain our Fiscalini
Preserve without development.

30.1

Sincerely,
Patricia Laubacher

30. Patricia Laubacher

- 30.1 Comment noted that commenter wishes to maintain Fiscalini Preserve as is. No changes to the EIR are necessary.

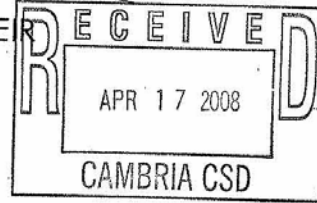


CAMBRIA COMMUNITY SERVICES DISTRICT

927-1035 fax to Miller

fax 927-4615 Elizabeth at work

COMMENTS ON THE DRAFT EIR



Please make your comments below on the following issues:

- Content of the EIR.
- Methods on how environmental issues are analyzed.
- Potential Alternatives to the project.
- Potential mitigation measures that would avoid or reduce environmental issues.

These plants favor elevation above 2000' in Santa Lucia Range.

Comments:

This EIR is well done for the ^{small} amount of time spent on plants and habitat. The few plants of high concern which were missed or seen only occasionally are offspring summer flowering is Pseudotsuga gaidneri spp gaidneri and Eriogonum sanctarium. These both live in and near the Monterey pine forest.

I do not believe TRITELIA IXOIDES spp COOKII should be considered on suitable habitat list, and SAVICULA MARITIME should be considered on suitable list as it grows in like conditions

Also - GALIUM HARDHAMIAE grows only in association with ^{on} Sargent cypress trees and above 1200' elevation so is not likely for this setting ^{Arroyo De la Cruz}

The CALOCHORTUS OBISPOENSIS is very restricted in its distribution and all occurrences are south of Moss Bay region, so this should be considered not likely to occur here.

ALLIUM HICKMANII grows in like habitat near Arroyo Dela Cruz and is possible for this west ranch area

In conclusion I feel that the grass land, bluffs and forest of the western ranch should be viewed as fragile and of high concern to management and preservation

31.1

31.2

Name: D.R. Miller Email: Address: P.O. BOX 72 City: SAN SIMEON State: CAL Zip: 93452

Please check if you would like to receive any future information regarding this EIR.

To submit comments via email, send to: cdauidson@cambricsd.org

DR MILLER PG 2

o An over view of ranch eco systems o

The grass lands on the west ranch have a high mix of native perennial grasses and because of this they should be views as an area of concern.

Below is a listing of the grasses (native) growing on west ranch slopes.

- Bromus carinatus
- Agrostis pallens
- Danthonia californica
- Nassella pulchra
- Nassella lepida

- Hordeum brachyantherum ssp. californicum
- Distichlis spicata
- * Deschampsia elongata
- Elymus glaucus
- Leymus condensatus

* This grass is listed on page V-70 but I have yet to see it on the ranch at all

the forest areas have ~~the~~ ^{four} notable associated of high concern in addition to the Monterey pines themselves.

- Rosa spithamea
- Silene laciniata
- Perideridia gairdneri ssp. gairdneri
- Erigeron sanctarum

Other plants that favor the open slopes of the western side of ranch that are on rare and endangered list are as follows:

- Calyptegia subacaulis ssp. ~~obispoensis~~ episcopalis
- Castilleja densiflora ssp. obispoensis
- Clarkia prostrata (not yet listed)
- Cirsium occidentale var. compactum
- Eschscholzia californica var. maritima

A local plants of highly restricted distribution that grows only along the ridge trail on western ranch and is of very high concern is

Trifolium barbigerum var. andrewsii

This plant population is very ~~precious~~ ^{precious} and should be fully protected
- this according to RAYDY MORGAN of Santa Cruz

31. D.R. Miller

- 31.1 Please refer to response to comment 5.39, and Section V.D.2 of the Final EIR. Based on additional information provided by local biologists in the area, the Biological Resources existing setting discussion has been supplemented by this additional information. We appreciate your comments based on your knowledge and frequent presence on the Fiscalini Ranch Preserve. We elected to remain conservative, and have not made amendments to the species you indicated are not likely present (*Deschampsia elongate*, *Tritelia ixioides* ssp. *cookie*, *Galium hardhamiae*, and *Calochortus obispoensis*).
- 31.2 We concur that that the Fiscalini Ranch Preserve (FRP) should be maintained and preserved, consistent with the approved plans and policies for the FRP.
- 31.3 Please refer to response to comment 31.1.

Connie Davidson

From: Jan Moon [4moons@charter.net]
Sent: Thursday, April 17, 2008 10:19 AM
To: Connie Davidson
Subject: ranch

Dear Connie & Board Members,

I'm writing in support of the proposed East Fiscalini Ranch. I'm the past President and Board Member of the CYAA, and Board member of Little League. This was a period for over 10 years. In that time period, myself and my husband coached T-Ball, Coach Pitch, Little League, Junior High Football, Basketball and Soccer. We know from first hand how much usage was and is needed for playing fields for our community.

My biggest challenge in organizing these sports, was to find field space to accommodate all the teams with games and practices, plus trying to coordinate with the High School Teams which gets priority.

The High School has been very generous in letting all the Recreational groups use their facilities. they have taken on this burden but in exchange they get very wore athletic field that need repair work. When I hear people against the park say "just use the High School" I don't think they realize how many people actually use these fields and what constant usage tears these fields up and the maintenance required for the maintenance staff of The High School. The CYAA tries to make their fees affordable for our youth's family, but the High School has to charge for maintaining the facilities, in result CYAA must raise their fees. Shamel park has turned into a year round soccer field, another reason for needed space.

Some people want to keep the land in it's natural state and leave it alone. We have the West Ranch that has been kept in it's natural state and open for everyone, and it's huge. I've also heard of people comment on the noise issue of the new park. The old Cambria Grammar School was there for many years. Did anyone complained then? If someone complains about kids playing, people laughing and enjoying the outdoors in our town, I feel sorry for them.

I think of a beautiful park open for actives of all ages for our community is a wonderful idea that we should all embrace. We are in total support of the Park and Thank You for all your hard work trying to accomplish this.

Jan & Earl Moon

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32.1

4/17/2008

32. Jan and Earl Moon

- 32.1 Comment noted regarding support of the proposed plans for East Ranch. No changes to the EIR are necessary.

Objection to development of the Fiscalini Ranch Preserve

Page 1 of 2

Connie Davidson

From: Steve Mull [srmull@earthlink.net]
Sent: Thursday, March 20, 2008 10:53 AM
To: Connie Davidson
Subject: Objection to development of the Fiscalini Ranch Preserve

Connie Davidson

Cambria Community Services District

P. O. Box 65,

1310 Tamson Drive, Suite 202

Cambria, CA 93428

Ms. Davidson:

I am:

Stephen Mull
P.O. Box 129
5068 Nottingham
Cambria, Ca 93428
805.924.1075

I am a full time resident of Cambria, Ca. Please register my objection to "The draft environmental impact report for the Fiscalini Ranch Preserve".

I object to any development of the Fiscalini Ranch Preserve. I object to any trail improvements (as opposed to trail maintenance), any fire roads, and/or the addition of any infrastructure, of any kind, anywhere on the Ranch. I further object to the management of plant or animal species present or absent from any portion of the Ranch, for any reason.

Please stop developing the Fiscalini Ranch Preserve. I note the CCSD's mockery of the term "preserve" by this Environmental Impact Report.

Please include my comments in any official register or tally of comments to the CCSDs Environmental Impact Report.

Sincerely,

Stephen Mull

Cambria, Ca

4/16/2008

33.1

33. Stephen Mull

- 33.1 Comment noted regarding opposition to development of or improvements to the Fiscalini Ranch Preserve. No changes to the EIR are necessary.

4.17.08

Ms. Connie Davidson
CCSD
Cambria, California

Dear Ms. Davidson:

We are writing to formally express our disapproval of any plan to include cell phone towers, the buildings that might service them, and any additional roads required, at or on the Fiscalini ranch land.

Please pursue further locating alternative sites for the cell towers. The public should be able to enjoy this idyllic setting without further compromise to the preserve.

Sincerely,
S. Mulroony
James E. Mulroony

S. J. Mulroony
2536 Wilcombe Dr.
Cambria, CA 93428
805-927-2299

34.1

34. S and J Mulroony

- 34.1 Comment noted regarding opposition to telecommunications facility. The proposed land use application for the telecommunications facility was denied, and the project is no longer proposed for inclusion in the Master Development Plan (refer to Section III.D.1.c of the EIR)..

Connie Davidson

From: Jill Quinn [jqart@earthlink.net]
Sent: Sunday, April 13, 2008 4:12 PM
To: Connie Davidson
Subject: Fiscalini Ranch PRESERVE

Dear Connie Davidson,

This letter is in response to your request for comments on the Fiscalini Ranch Preserve's environmental impact report.

As I read through the proposed developments for the ranch each time I walk on the trails, I get more and more disturbed that this kind of proposal is even up for consideration. Having been a homeowner in Cambria for over 10 years and joining with other residents to buy the ranch to ensure that land as Open Space Forever, I cannot understand why that mandate is now being taken so lightly, if not dismissed entirely. A sports court, parking places, and dog park on the ranch would defy the concept and trust that we placed with you to leave that area alone. Already there are more signs of human encroachment than I ever dreamt would happen. But it is time to say enough and realize keeping that space open and unfettered is an ideal we must fight for. We already have a beautiful dog park in Cambria and plenty of other areas that can be used for sports and parking. The traffic and noise that comes with this plan is totally unacceptable. Marine Terrace has already seen so much over-building that it barely resembles the quiet, serene place it once was.

It hasn't been that long since we all rejoiced at what we had accomplished with our hard work. Please stop any further discussions regarding this misconceived and irresponsible proposal.

Thank you,

Jill Quinn

35.1

35. Jill Quinn

- 35.1 Comment noted regarding stopping any further discussions regarding the proposed plan. No changes to the EIR are necessary.



Galen B. Rathbun, Ph.D.
 P.O Box 202, Cambria
 California 93428, USA
 Home/office phone/fax: +1.805.927.3059
 Email: GRathbun@CalAcademy.org or grathbun@gmail.com

17 April 2008

Connie Davidson
 Cambria CSD

Subject: Draft EIR, Fiscalini Ranch Preserve

I have briefly reviewed the subject document and believe that it is deficient or unrealistic in terms of protecting biological resources during construction as well as from the cumulative impacts of the proposed land uses, especially related to aquatic vertebrates. By addressing and implementing appropriate changes to the draft EIR related to the following questions and comments, the document would ensure that the unique resources of our community will be protected from unreasonable construction practices and the cumulative impacts of high-intensity land use in and adjacent to creeks and lagoons. I am especially concerned about the unreasonably lax assessment of the cumulative impacts of the proposed projects, especially in association with the creek in general and specifically east of highway 101.

36.1

- The American Badger and Santa Lucia Woodrat used to be mammals of special concern to the CA Dept. of Fish and Game. Both are found on the preserve, and if they are still listed they should be addressed by the document.
- The California Red-legged frog has been found to breed in the lagoon and creek, apparently contrary to the findings of the subject report.
- For the federally listed species, I found no meaningful mention of Critical Habitat nor does the draft EIR use of information found within the appropriate (and approved) Recovery Plans assembled by the responsible federal agencies for listed species.
- In the mitigation section, why are the two agencies responsible for the federally listed aquatic species not listed as requiring consultation for any proposed developments that might impact the listed species and their habitats?
- Despite the claim that an exhaustive search of relevant literature was made, I could not find any use of the several reports and publications related to aquatic species that have resulted from the research biologists that have worked in several local creeks for nearly a decade (contact CalTrans; State Parks; Greenspace, The Cambria Trust). Perhaps I missed the citations and reference to this material, but if not, their absence suggests that the biological aspects of the EIR are incomplete and made up of rather standardized "boiler plate" text cobbled together with minimal regard for specific information about what is known about the habitat use, ecology, and status of aquatic species in our local streams.
- It is known that *Rana draytonii* and *Actinemys marmorata* (note that in the document the scientific binomials are incorrect, again suggesting a lack of

36.2

36.3

36.4

36.5

36.6

36.7

familiarity with the current biological literature) spend significant amounts of time out of our local creeks in surrounding riparian and upland habitats. If this information had been assessed by the consulting biologists correctly and thoroughly, it is incomprehensible how the conclusions in this document, as pertaining to the aquatic vertebrates, could possibly remain as currently drafted.

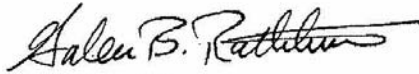
- It does not appear that the document adequately addresses the potentially serious impacts on Species of Special Concern and Listed Species in terms of heavy vehicle and human traffic, un-natural light cycles, chemical run-off into the creek from turf and parking areas, and excessive noise and disturbance that will result if intensive recreational developments of areas adjacent to the creek, and within its historical flood-plain, are undertaken.

36.7 (cont'd)

36.8

Thank you for your consideration of the above points.

Sincerely,



Galen B. Rathbun

36. Galen Rathbun, Ph.D.

- 36.1 Comment noted with regard to EIR deficiencies in terms of biological protection during construction. Please refer to the responses to specific concerns below.
- 36.2 Please refer to Sections V.D.2.b.3, V.D.2.c.(2)(b), V.D.2.c.(4)(b), V.D.5.c., and V.D.6.c, and Table V-6 of the Final EIR, which incorporates an assessment of potential impacts to Monterey dusky-footed (Santa Lucia) woodrat and American badger, which are current listed as California Species of Special Concern (SSC).
- 36.3 The EIR discloses the presence of California red-legged frog within Santa Rosa Creek (please refer to Sections V.D.2, V.D.5, and V.D.6 of the EIR).
- 36.4 Please refer to Section V.D.1.a.(3) of the EIR regarding Critical Habitat. Current regulations note that “lands containing features essential to the conservation of the California red-legged frog in unit SLO-4 are excluded from critical habitat designation under section 4(b)(2) of the Act for economic reasons.”
- 36.5 Please refer to BIO/mm-1 of the Final EIR, which has been amended to clarify that consultation with U.S. Fish and Wildlife Service and NOAA Fisheries would also be required.
- 36.6 Referenced literature includes biological studies and surveys that have been conducted on the Fiscalini Ranch Preserve, which are applicable and adequate for the EIR. As noted, where local biologists have submitted supplemental information regarding species findings, such information has been incorporated into the EIR.
- 36.7 Please refer to Section V.5.c.(2) and V.6.c.(2) which identify potentially significant impacts to California red-legged frog and southwestern pond turtle, including “trampling and crushing.” Note that trails and public access are not located in areas that are likely habitats for these species. Creek access is not being provided as part of any activities planned for the Preserve.
- 36.8 Please refer to Sections V.5.c.(4) and V.6.c.(4) which provides additional clarification regarding these long-term, operational effects.

Connie Davidson

From: Tio Raul [tioraul1@charter.net]
Sent: Wednesday, April 16, 2008 5:31 PM
To: Connie Davidson
Subject: Fisacalini Ranch

There is an ole saying: "IF IT WORKS DON'T FIX IT." At the present time the Fisacalini Ranch is working out just fine for the Cambria community. We don't need a Beverly Hills by the sea. Raul F. Sandoval

37.1

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4/17/2008

37. Raul Sandoval

37.1 Comment noted regarding the Ranch working fine. No changes to the EIR are necessary.

Connie Davidson

From: Bob Ray [robert_ray@charter.net]
Sent: Sunday, March 23, 2008 8:31 AM
To: Connie Davidson
Subject: Park Development

Please add our support for a park in Cambria that serves not only our youth but also adults that want to have a place for outdoor activities.

38.1

Thanks,
Robert O. Ray
Ann D. Ray
Cambria residents

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4/16/2008

38. Robert and Ann Ray

- 38.1 Comment noted that commenter is in support of a park at the East Ranch. No changes to the EIR are necessary.

Connie Davidson

From: Olivia Redwine [oliviaredwine@msn.com]
Sent: Thursday, April 17, 2008 4:57 PM
To: Connie Davidson
Subject: comments on EIR

Connie Davidson
www.Cambriased.org
Re: EIR for Fiscaline Ranch Preserve

Question:

Why is this plan for recreation facilities being planned on our only PRESERVE? Why not on the abandoned Grammar school grounds ... Or some other less sensitive area?

39.1

Timing this EIR for comment only three days after the Water Master Plan seems unnecessary and manipulative. Until the water plan has been worked out and the reality of an increased population (of from 7000-10,469) is eminent, it is premature to be making and paying for development of additional recreational facilities. I see both schools used appropriately and when necessary. The Park on Park Hill is also used. I do not understand the necessity of such an extensive planit at this time.

Question:

Why does CCSD not consider the Preserve to be a recreation area just as it is?

39.2

Does Yosemite or Death Valley, or Mt Tam. In Mill Valley need playing fields and dog parks? We have our own natural park and it deserves to be respected for what it is and left alone.

I moved here with the understanding that that property was to be held as a natural preserve. What an incredible town, I thought. It really values the natural state enough to leave it that way for the community. That is why other people love this town as well. It has already been defiled by putting in an inappropriate an unauthorized, paved fire road. That should have been stopped and so should these plans to turn the most magnificent piece of natural recreational land into a public park with play ground and a dog park. How ridiculous! It is already a haven where we can enjoy the quiet and expansive beauty together with our dogs. Please don't destroy it. The demographics of this town, being mostly retired folks, does not warrant another playing field for children. Any playing field with parking lots, traffic, paving, noise, unnatural wilderness activities and probably crime is totally unnecessary. Actually the children need the open spaces more than anyone. It makes us wonder who could benefit from this plan, certainly not the community. Any money spent on the Preserve should be used to pay off the Bond debt that already threatens its existence.

Question:

What is this supposed to cost?

39.3

Question:

Please explain the Bond debt. I understand CCSD had borrowed against it to fund the water system upgrade. Using that as collateral could result in our losing the property. It seems to me that every effort should be made to manage the property as a public trust rather than a commodity.

:

Question:

If The requirement of the County was for CCSCD to come up with some improvement within five years why not simply focus on some walking paths and leave it at that? Why all of this development on a place that is perfect already?

39.4

Also, if the County provides \$500,000.00 for recreation what options are there. Is returning the funds and

4/18/2008

option?

39.4 (cont'd)

Question:

Are all trail extensions and additions going to be reviewed separately for environmental impact and necessity? Reviewing them in groups does not take into consideration the unique environmental issues that need to be considered.

39.5

Question:

How does CCSD justify the traffic hazards?
Charging for parking is no answer.

39.6

Note:

I am sure that there are many more questions I would have if I could first understand the necessity of this plan. I cant get past that one distressing question: Why?

39.7

Olivia Redine
1131 Ellis Ave
Cambria, Ca93428

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39. Olivia Redwine

- 39.1 Comment noted. The *East-West Ranch Public Access & Resource Management Plan* identified a portion of the East FRP to be developed into an active recreation community park. Please refer to comment letter 2, submitted by the Coast Unified School District.
- 39.2 Comment noted with regard to leaving the FRP as a natural park without improvements; no changes to the EIR are necessary.
- 39.3 Costs are not required to be considered in an EIR. Proposed improvements would be funded by grant monies and volunteer donations. No changes to the EIR are necessary.
- 39.4 Comment noted regarding focusing improvements within the next five years to trail improvements. No changes to the EIR are necessary.
- 39.5 All proposed trail improvements are collectively assessed in the Master EIR. As required by CEQA Guidelines Section 15177: “After a Master EIR has been prepared and certified, subsequent projects which the lead agency determines as being within the scope of the Master EIR will be subject to only limited environmental review.” At the time the subsequent project is proposed, CEQA requires the lead agency to prepare an initial study on the proposal, which “shall analyze whether the subsequent project was described in the Master EIR and whether the subsequent project may cause any additional significant effect on the environment which was not previously examined in the Master EIR.” The initial study would determine whether a tiered environmental document is necessary.
- 39.6 Based on the traffic analysis report prepared for the project, no significant traffic impacts would occur.
- 39.7 Comment noted with regard to necessity of the project; no changes to the EIR are necessary.



CAMBRIA COMMUNITY SERVICES DISTRICT

April 17 -

COMMENTS ON THE DRAFT EIR

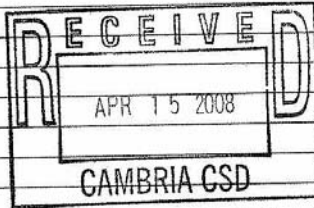
Please make your comments below on the following issues:

- Content of the EIR.
- Methods on how environmental issues are analyzed.
- Potential Alternatives to the project.
- Potential mitigation measures that would avoid or reduce environmental issues.

Comments:

I am concerned about parking on the West Ranch-Marine Terrace Entrance. In the management plan parking was meant to be off Ranch except for the Community Park area on the East Ranch and the staging area next to Highway one on West Ranch. The area where parking would be considered on West Ranch ^{as to the EIR} Marine Terrace Entrance is primarily "wet" lands and should be protected as such!

40.1



Name: Joyce Renschaw Email: jrenshaw@mac.com
 Address: 1790 Ogden Dr
 City: Cambria State: CA Zip: 93428

Please check if you would like to receive any future information regarding this EIR.

To submit comments via email, send to: cdavidson@cambriacsd.org

40. Joyce Renshaw – Draft EIR Comment Form

40.1 Please refer to response to comments 5.31 and 5.34.

Connie Davidson

From: Joyce Renshaw [jrenshaw@mac.com]
Sent: Thursday, April 17, 2008 3:01 PM
To: Connie Davidson
Subject: EIR Comment

Connie Davidson
 Project Manager
 Dear Connie Davidson

Here is one more comment on the EIR. I hope it is not too late.

The proposed Grading and irrigation of the Sports Fields will impact the drainage of the part of the West Ranch East of Highway One. This is in violation of Coastal Commission Findings.

The Coastal Commission has designated the West Ranch as an ecological protected area (July 11, 2007) regarding the "San Luis Obispo County Local Coastal Program Major Amendment No. 1-106 (part 2) Fiscalini Ranch Amendment" (CC W 10b)

A vote resulted in the CC designating the West ranch (also East ranch outside the designated recreation area (28.1 acres)) as Open Space and as an Environmentally Sensitive Habit Area (ESHA). The Coastal Act (CA) under Section 30107.5 defines ESHA as follows, "Environmentally sensitive area" means any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily or degraded by human activities and developments', and further, under CA section 30240(a) "Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas." CA 30240(b) states, "Development in areas adjacent to environmentally sensitive habitat areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habit and recreation areas." Also under CA Section 30231, "the biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies, and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams."

A vote by our supervisors still has not been taken to approve this amendment but I am sure that it will be and the Coastal Commission would probably have something to say about this problem. I feel the above would apply to the proposed grading of the East Ranch and also Parking on the West Ranch which I have already noted in a mailed response.

Thank you for letting us comment

Joyce Renshaw
 1790 Ogden Rd
 927-2202

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41.1

41. Joyce Renshaw – Email

- 41.1 The recommended parking areas, and active recreational facilities would be located outside of the Sensitive Resource Area (SRA) and Terrestrial Habitat (TH) Environmentally Sensitive Habitat Area (ESHA) designations. The environmental significance of the Fiscalini Ranch Preserve is described in the EIR, and mitigation measures are recommended to “prevent impacts which would significantly degrade those areas.” The proposed community park is located in the immediate vicinity of urban development, and the habitat on the remaining acreage of the FRP would be preserved for passive recreational use (with the exception of permitted biking trails). As discussed in Sections V.B.6.a and V.B.6.b of the Master EIR, preliminary grading and drainage plans demonstrate that storm and floodwaters would sheetflow similar to existing patterns. As noted in the EIR, the proposed project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site; nor will it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control.” Please refer to mitigation measure HYD/mm-2 in the EIR, which includes the following requirement addressing the potential for pollutants within the watershed to contaminate Santa Rosa Creek: “The bioswales (or similar method) shall include best management practices to avoid erosion and scour, and shall include a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff.” In addition, supplemental language has been added to the Hazardous Materials section of the EIR (Section V.J.6.a of the EIR) to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR). Please refer to Figure III-10 in the Master EIR; the proposed plan includes a natural buffer of approximately 50-100 feet between the creek and the sports fields, and no removal of riparian vegetation is proposed. Mitigation measure TC/mm-4 (onsite parking on the West FRP) has been deleted from the EIR, based on further communications between the CCSD and FFRP.

Comments on the Draft EIR

THIS PROJECT WOULD REQUIRE 30 AF PER YEAR OF WATER THE CCSD DOES NOT HAVE.

42.1

ON PAGE 17 OF SECTION K. WATER SUPPLY IT SAYS:

Due to the current demand for water resources, and deficient available groundwater supply to meet the demand, implementation of the proposed project including the construction and maintenance of natural turf areas would result in a potentially significant, adverse, unavoidable impact.

IF THERE IS NOT WATER AVAILABLE UNTIL CCSD FINDS A NEW WATER SOURCE, WHY IS THIS PROJECT CONTINUING?

Submitted by Ken Renshaw



Apr 14 2008
1790 Ogden Dr
Columbia 93428
k.renshaw@mac.com

42. Ken Renshaw

- 42.2 The CCSD must identify and provide a source of water for the project, or adopt mitigation measures identified to avoid the use of water supply, prior to development of water-dependent uses. Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria.

Connie Davidson

From: Amanda Rice [amanda@aboutcambria.com]
Sent: Thursday, April 17, 2008 6:03 AM
To: Connie Davidson
Subject: Fiscalini Ranch Draft PEIR Comments

Connie,

Attached is an E-version of my comments on the Fiscalini Ranch Preserve Draft PEIR. I will be bringing a paper copy to the CCSD offices later today, but thought an e-copy might be appreciated as your compile all the comments for the Final EIR. Please call or email if you have any questions.

Thank you for the time and effort you put into your work. Nearly everything I've sen with your name attached has been above what a small town could reasonably expect.

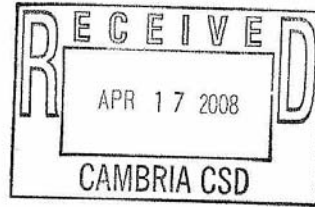
Amanda Rice
amanda@aboutcambria.com
927-4191

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43.1

4/17/2008

To: Cambria Community Services District
 Attn: Connie Davidson
 RE: Comment on Fiscalini Ranch Preserve
 Program Environmental Impact Report



April 17, 2008
 Amanda Rice
 2220 Ardath Dr
 Cambria, Ca 93428

Thank you for the opportunity to comment on the Fiscalini Ranch Preserve Program Environmental Impact Report. I've lived in Cambria for a little more than eight years and own a home on lodge hill. I love Cambria and appreciate how complex it can be to balance conservation, resources, private property rights and public infrastructure. I offer the comments as a private citizen and resident of Cambria.

43.2

1. Most of my comments on this PEIR focus on the East Fiscalini Ranch Park development. But I would first like to commend the effort to retain as much open space as feasible - especially west of highway one. And although there are many in Cambria who oppose a single stick of construction on the West Ranch, I support the proposed cell tower project - especially as recently modified. The benefits of improved coverage and a stable, consistent income for Ranch maintenance from the lease to the cell companies outweigh the cost to a small section of open space habitat. While any loss of ESHA is regrettable, the reality of population growth and the encroachment of humans into "natural habitats" is unavoidable. The impacts of the chosen location are likely the least of almost any other possible location. I will gladly support a cell tower project elsewhere and welcome the project's move if a better location is presented at the June 10 Board of Supervisors meeting. I do not consider a cell tower on the west ranch to be in conflict with the intended use for the ranch.
2. Reading the County's plan for parks and recreation in Cambria clarifies and muddies some of my understanding of the project. By SLO county standards, the park is needed. Whether it makes sense to do it now is an entirely different question. The Environmental Impacts of the community park on the east ranch - and many of the obstacles it will face financially and from resident resistance - can be reduced or even nearly eliminated by postponing the project. To pursue this alternative, the county and district would have to amend the agreement made for the County contribution of \$500,000 to extend the deadline for action on a community park.
 - a) Just as with family residences, no new park on the east ranch could be permitted until a new water supply had been assured and the connection moratorium was lifted.
 - b) The population of Cambria is closer to the population projected as the buildout
 - c) The CCSD is able to show it can realistically afford to build the park and show a plan for long-term maintenance costs. The CCSD has financial obligations for overdue maintenance and securing a more stable water supply that are currently unmet and an impending rate increase that is likely to strain residents' budgets.

43.3

There is precedent for the County and District cooperating to ensure the needs of both are satisfied. The original agreement for a community park is one example, the county reducing the building permit allocations first from 2.3% to 1% and then to 0% until July 2009 in recognition of the ongoing water supply shortage and moratorium is another example. The County can still benefit from the \$500,000 it contributed, the payoff will just take longer than the county expected. And it already saw some benefit in supporting the Buildout Reduction Program. I think this PEIR should recognize this alternative to the project, even if it is not the alternative selected.

3. The North Coast Area Plan states: "On the east side of the ranch, open areas may be suitable for active park uses at intensity in keeping with environmental constraints." (NCAP pp 4-12) As described in this EIR, the project has significant unavoidable impact on the water supply and could endanger the sensitive riparian habitat. That seems to conflict with "suitable use at an intensity in keeping with environmental constraints."

43.4

April 17, 2008
 ACR Comments on Fiscalini Ranch Preserve
 Draft Program Environmental Impact Report

4. PROJECT OBJECTIVES

The primary objectives of the project are to improve public access and opportunities on the FRP to meet the recreational demands of the community of Cambria, provide an active public recreational area in the community, implement habitat restoration activities, and promote stewardship of natural resources throughout the FRP. (Draft EIR II-1)

43.5

"Recreational demands of the community"? Whose definition is being used in this case? The County's, the CCSD's or the people themselves? A survey of the community several years ago drew quite different conclusions regarding what the community wanted for recreational opportunities. Please clarify which demands you are attempting to meet with the project. A clearer objective will allow for better interpretation of the alternatives and mitigations.

5. To maintain consistency with the WMP PEIR recently released, the number of acres of park the county considers appropriate per capita doesn't seem to support the actual number of people projected. The East Ranch Park seems out of scale for the community. I spoke briefly with a former member of the PROS commission about my concern about scale and he was of the opinion that the fields currently available at the schools were overused to the point of being damaged and dangerous. As an advocate of the importance of physical activity in the larger scheme of things - like health and well-being - he expressed his support for more opportunities for enjoying outdoor recreation that would encourage physical fitness. Yet he also expressed concern over the scale of the project.

43.6

6. The FRP EIR uses the acres per capita consistent with the NCAP of 121 acres at buildout. However, this doesn't seem proportional to the current numbers given:

43.7

Table 3-5
 Neighborhood and Community Park Status

North Coast Planning Area	Community Current Supply (Acres)	Current Need (Acres)	Estimated Need, Buildout (Acres)
Cambria	29	34	121
San Simeon Acres	0	2	4
Total	29	36	125

(NCAP pp 3-22)

A population of 6, 218 residents indicates a current need of 34 acres. How does a population of only 1,300 - 3,000 more add up to 121 acres? Table 3-4 was no help in determining the answer. I'm all for park and open space, but these numbers seem out of whack.

(The FRP EIR is simply using numbers from the NCAP, so perhaps this question is outside the scope of this commentary. But since the FRP EIR uses these numbers as a basis of justification, an explanation would be helpful.)

Table 3-4

Type of Park	Acres per 1000 people	Size range (Acres)	Service Area Radius	Access by (Street Type)	Population of Service Area
Mini-Park	0.5	0.18 - 5	0.12-0.25 mile	Local/collector	500 to 2,500
Neighborhood	1.0	5 - 25	0.25-0.5 mile	Local/collector	2,500 to 5,000
Community	5.0	25+	1-2 miles	Clctr/arterial	5,000+
Regional	15-20	200+	< 1-hr drive	Clctr/arterial	30,000+
Source: Recreation, Park and Open Space Standards and Guidelines; National Recreation and Parks Association, 1983					

(NCAP pp 3-21)

April 17, 2008
 ACR Comments on Fiscalini Ranch Preserve
 Draft Program Environmental Impact Report

- 7. I am deeply concerned about who will be leading the East Ranch development, the long term maintenance and mitigation activities, where the funds will be found and whether the scale of the project is appropriate for Cambria. I find it difficult to believe that our community would be able fully utilize the potential of the fields and supporting development envisioned in this report. The North Coast Area Plan states: "On the east side of the ranch, open areas may be suitable for active park uses at intensity in keeping with environmental constraints." (NCAP pp 4-12) As described in this EIR, the project has significant unavoidable impact on the water supply and could endanger the sensitive riparian habitat. That seems to conflict with "suitable use at an intensity in keeping with environmental constraints."

If the East Ranch active Recreational area is intended to serve as a regional park to serve the needs of the county's stated goals, the burden of this PEIR and the eventual development of active recreation should not rest on the shoulders (and wallets) of Cambrians alone. Even the most creative and successful of grant writers cannot make money appear out of thin air.

43.8
- 8. The Fiscalini Ranch Preserve would not be what it is today had the County not contributed \$500,000 toward its purchase. Clearly, the county has put its parks money where its mouth is. And the CCSD is the owner of the property. There is a complex relationship between the CCSD and the county, I'm sure, attached to the vision of Fiscalini Ranch Preserve seen by our leaders. All this background is fine - but outside the scope of the PEIR. The question that may be within the scope is whether the CCSD is the appropriate lead agency for this Project or if the County would be a more appropriate lead agency, or if in fact the two agencies must equally share the burdens and benefits of this project. Some hint is provided in the agreement between the County and the CCSD for the \$500,000 contribution. What is not clear in that document is the definition of "community park" is.

43.9
- 9. The county also outlined its vision of the Fiscalini Ranch and recognizes and supports the Vision of the approved Management Plan for the Ranch, by furthering the following objectives:
 A. Striving for minimum disturbance to the natural qualities of the Ranch while allowing appropriate public access and recreation...
 K. Providing guidance on implementation activities, including roles and responsibilities of the Cambria Community Services District and North Coast SWAP or their successor, for operational and maintenance issues, and prioritization of activities. (NCAP, pp 1-10 & 1-11)
 This PEIR does not address these issues. Again, this concern may be outside the scope of EIR commentary, but again draws attention to the lack of clarity regarding responsibility for mitigation management, both long- and short- term.
 On the website of the Friends of Fiscalini Ranch Preserve (FFRP), in recounting the history of the ranch, they state " The Cambria Community Services District holds fee-title title on the Ranch and Friends of the Fiscalini Ranch Preserve holds a protective conservation easement and a contract to eventually manage and maintain the property for the public." Their stated mission is to protect and maintain the ranch in a natural state compatible with limited passive recreation, excepting the designated area on the eastern portion that will allow active recreation. FFRP is committed to the on-going restoration and protection of the habitat, and natural and cultural features of the ranch while maintaining its historic public access.
 Friends of the Fiscalini Ranch Preserve holds the conservation easement over, and plans to manage for the public trust, a newly dedicated open space in Cambria, Ca. The organization will be responsible for monitoring the property for environmental, public-serving, and easement compliance purposes. The organization will also manage the property for the public, raise funds from public and private sources to support management expenses, and provide a forum and vehicle for public input and direction on the management of the property.
 Are these statements the CCSD and county agree with? Is FFRP a partner in this project?

43.10
- 10. The following comments are in response to Appendix B - Traffic and Circulation and by extension, the Traffic and Circulation section of the EIR.

43.11
- 10. The following comments are in response to Appendix B - Traffic and Circulation and by extension, the Traffic and Circulation section of the EIR.

43.12
- 10. The following comments are in response to Appendix B - Traffic and Circulation and by extension, the Traffic and Circulation section of the EIR.

43.13

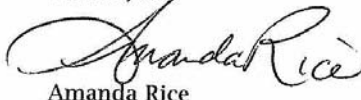
April 17, 2008
 ACR Comments on Fiscalini Ranch Preserve
 Draft Program Environmental Impact Report

- a) Page III-24 of the Draft EIR - Does this page need to be updated since the NCAP has been approved by the Coastal Commission? 43.13
- b) On page 5 of the Traffic and Circulation Appendix B it states: "County policies state that the level of service standard for the Cambria area is LOS D." Can you please clarify what this means? Surely the county doesn't have a policy that would mean our roads are only maintained at a level "near unstable operations with restrictions on maneuverability within traffic streams" 43.14
- c) Weekday trip generation estimates for the park were developed using the data from public parks that were studied by SANDAG . Weekend trip generation estimates were developed using the data published by the Institute of Transportation Engineers (' The weekend trip generation estimates assume that the park would be fully utilized with 9 soccer fields as well as the other park uses. Tables 3 and 4 show the daily and peak hour trip generation estimates for the Weekday and Summer Weekend periods. 43.15
 Is this an acceptable comparison and standard to apply to Cambria? And 9 soccer fields is significantly more than indicated in other parts of the plan This is the same kind of baseless over-estimation that the Water Master Plan EIR seems to suffer. If our final total population is restricted, this project seems oversized.
- d) Although the method of determining the number of spaces for the parking lot is clearly explain and seem logical, in light of state mandates to address reducing reliance on cars, and the number of fields and the reality of Cambria - a parking lot this size would be out of its element and unrealistic in scale - just like the park itself. 43.16
- e) The intersection of Rodeo Grounds and Burton could become hazardous and Rodeo Grounds drive itself is not in the kind of shape that would handle 145 cars per weekend day using it for long without significant impact beyond what road improvement funds would repair. Unless the contribution made to the fund was significant, I fear other roads in need of *paving* for the first time or repair from overuse during the Cambria Drive Closure and Detour will remain in bad shape as Rodeo Grounds is repaved for the 10-15% of Cambrians that would use it regularly. 43.17

I commend the work put into creating this extensive review of the potential environmental impacts of implementing these projects. Through reading the report and supporting documents, I have come to the conclusion that the East Ranch portion of this PEIR is likely poorly timed. Simply delaying any action on the Community Active Recreation portion would reduce the mitigation actions and/or reduce the severity of the Class I and Class II impacts. This alone should make it an alternative to the chosen or "no project" alternatives. The community may need the fields, but it cannot afford to take such a project on by measure of any of its resources. 43.18

I look forward to reading responses to these comments and to watching what actions are taken as we move forward.

Thank you.



Amanda Rice

2220 Ardath Dr
 Cambria, CA 93428
 805-927-4191

cc: Tammy Rudock, Joan Cobin, Bruce Gibson, Charles Lester

43. Amanda Rice

- 43.1 Comment noted regarding attached comments regarding Fiscalini Ranch Preserve Master EIR; no changes to the EIR are necessary.
- 43.2 Comment noted regarding retaining as much open space as possible; no changes to the EIR are necessary.
- 43.3 Comment noted regarding need for a park, and that it should be postponed until water supply is assured and moratorium is lifted. Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria..
- 43.4 Comment noted regarding unavoidable water impacts; the EIR preparer concurs that the current water supply situation in Cambria is an environmental constraint to the development of water-dependent uses in the proposed Community Park Master Plan. As discussed in Section V.D. of the Final EIR, mitigation measures are proposed to avoid significant impacts to riparian habitat.
- 43.5 Recreational demands of community are identified by the CCSD based on input from the community.
- 43.6 Please refer to response to comment 43.7 below.
- 43.7. Assuming a Cambria urban area build-out population ranging from 7,724 to 10,469 persons, and standards of 5.0 acres of community parks per 1,000 persons, the anticipated demand would be 42 to 52 acres. The current supply is 29 acres; therefore, at build-out, the demand would necessitate an additional 13 to 23 acres of community park space. The proposed community park would be 26.5 acres, which would include 14 acres of active recreational area, 12.5 acres of native landscape and natural areas, and approximately 2.75 acres of parking.
- 43.8 Please refer to response to comment 43.4.
- 43.9 The park is proposed to serve as a community park. Future funding sources would be determined by the CCSD, and would include grant funding and volunteer donations.
- 43.10 Please refer to Section III.D.2.a. of the Final EIR, which includes a description of a “community park”.
- 43.11 As the project applicant and lead agency, the CCSD is responsible for mitigation management in the short and long-term. The CCSD may designate a group, such as the Friends of the Fiscalini Ranch Preserve, to facilitate mitigation; however, the CCSD is required to ensure that mitigation obligations are met.

- 43.12 The CCSD is the owner of the FRP and will be the lead agency for the project's implementation. The FFRP is the easement holder for the FRP.
- 43.13 The EIR has been updated to reflect the recent adoption of the *North Coast Area Plan* (August 2008).
- 43.14 The level of service standard is essentially a threshold recognized by the County and the California Department of Transportation. When level of service, or delay time, exceeds the number designated for that type of roadway or intersection, improvements are necessary to facilitate traffic flow.
- 43.15 These standards are applicable to the type of use proposed, and traffic trips are determined based on rates per acre or field. The originally proposed plan included nine soccer fields, and has been reduced since preparation of the traffic study. Please note that Table V-14 in the EIR reflects the estimated trips that would be generated by the proposed project, which includes five fields, which is a "worst-case scenario"(the actual use of the park would be limited to four games at one time).
- 43.16 Comment noted with regard to parking as unrealistic in scale; no changes to the EIR are necessary.
- 43.17 Comment noted with regard to fear that paving Burton Road would not allow paving of other Cambria roads. The County has a procedure for road paving that would be followed regardless of the proposed park plans. Needed road improvements to affected roads would be required by the County at approval of any of the subsequent projects identified in this EIR.
- 43.18 Please note that development of the proposed community park would require permits issued by the County of San Luis Obispo. Prior to issuance of development permits from the County, the CCSD is required to identify and implement a method of water supply for the proposed project. Actual implementation of water-dependent park elements, unless mitigation measures are implemented proposing the use of materials and elements that does not require the use of water, would be delayed by this environmental constraint.

Connie Davidson

From: Slabtown1981@aol.com
Sent: Sunday, April 06, 2008 12:22 PM
To: Tammy Rudock
Cc: jcobin@charter.net; Ben Boer; Bob Putney; gsanders@nossaman.com; Connie Davidson
Subject: Fiscalini Ranch Preserve Draft Master EIR

Under Hazards & Hazardous Materials (HM) on Table 11-3 Class 11 Impacts (HM/mm-2): The potential risk of wildfire on the West FRP is to be partially mitigated by PSU/mm-6: "The Cambria CSD Fire Department shall continue to engage in annual fuel reduction activities, especially in the urban/wildland interface areas on the north and boundaries of the West FRP, as outlined in the Public Access and Resource Management Plan". FRP West fuel reduction activities by the Fire Department since 2002 have been sporadic and incomplete especially along Warren Road from Trenton west past Tipton to Victoria Way. PSU/mm-6 should not be listed as a mitigation measure unless it is to be taken seriously, adequately funded, and undertaken thoroughly and annually. Another issue not addressed under (HM) is the intrusion of unleashed dogs into private property along the West FRP Lodge Hill perimeter. This would have to be solved by a perimeter fence.

44.1

44.2

Wayne Ryburn
927-4771

Planning your summer road trip? Check out [AOL Travel Guides](#).

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4/16/2008

44. Wayne Ryburn

44.1 The CCSD would be required to implement all adopted mitigation measures.

44.2 Current FRP guidelines require dogs to be under the control of their owners at all times.

Connie Davidson

From: Bob Gresens
Sent: Monday, April 14, 2008 9:16 AM
To: Connie Davidson
Cc: Tammy Rudock
Subject: FW: Fiscalini Ranch Preserve

Please note the email below that was sent to me yesterday. Thank you.

Bob
-----Original Message-----
From: bill schassberger [mailto:bschass@gmail.com]
Sent: Sunday, April 13, 2008 9:23 AM
To: Bob Gresens
Subject: Fiscalini Ranch Preserve

Mr. Gresens,

You probably have a lot of mail to read so I'll try to be concise.

As a Director of Facilities working in the public sector, namely school districts, for almost 20 years, I can tell you that turf maintenance is expensive, and it's an ongoing expense, year after year after year. Personnel, equipment, supplies, utility costs, it really adds up. This would be a tax burden.

Why put in more fields when we already have fields at the schools? A JPA agreement with the schools for joint use, accompanied by appropriate funding, would be much less expensive and more effective. .

This plan would also locate the traffic and noise, out and away from the center of town, where most locals and tourists (\$) expect to experience our natural quiet village atmosphere.

Leave most of this area in a natural state. Mother Nature will care for it, and She works for Free !

I believe the survey of Cambrian citizens that was taken, reflected that most people wanted more hiking trails, picnic areas and the like.

Is CCSD going to ignore the wishes of it's own people and give them a tax increase instead ?

Thank You

45.1

4/16/2008

45. Bill Schassberger

45.1 Please refer to comment letter 2 submitted by the Coast Unified School District.

45.2 Comment noted with regard to leaving the Ranch in a natural state; no changes to the EIR are necessary.

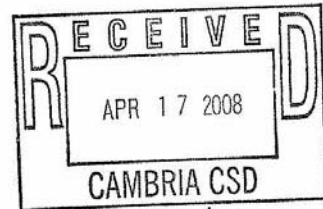
Chris & Jacquelyn Seaberg
2165 Wilton Drive ♦ Cambria, CA 93428
Ph. (805) 927-2376 ♦ Fax (805) 927-0765

April 16, 2008

Cambria Community Services District
ATTN: Connie Davidson and the Board of Directors
1316 Tamson Drive
Cambria, CA 93428

Re: Proposed Park/Sports Field

To Whom It May Concern:



Hand-delivered

As long time residents and concerned citizens we would like to comment on the proposed park/sports field area on the East Ranch at Rodeo Grounds Drive.

46.1

We own approximately six acres (APN 013-131-037) which runs from Wilton Drive all the way down to the portion of East Ranch where the proposed park/sports field is being consider for development. Our property boundary is approximately 1200 feet long where it abuts the East Ranch. Our property environment is protected by restrictions imposed by the California Coastal Commission. Our forest area that is abutted to the proposed park/sports field is literally untouched and is a protected habitat for native species of flora and fauna. For example, we have had raptors, particularly Horned Owls, nesting in our forest with their young. The raptors, along with all the other wildlife, have flourished in our protected habitat. We have spent numerous hours watching them and teaching our children to respect and admire the wildlife from a distance. Our property allows for only passive activity such as hiking, nature viewing and habitat restoration when desired.

We are firmly set against any use of the East Ranch that jeopardizes not only the protected habitat on which we live, but any other area that might also be affected. While there are many negative aspects regarding abusive use of the East Ranch Property (ie. Impacts to Santa Rosa Creek from chemicals, fertilizers, parking lot contaminant run off, litter. . . ; excessive water use, etc.), we are focused on protecting the habitat of the largest private forest abutting the East Ranch property.

46.2

We are confident that the noise alone generated from the proposed sports field/playground would be not only harmful to the native, protected habitat, of which we are stewards, but detrimental. We know that noise travels up, straight into the forest. And what about the litter? We have seen what our community does with litter after every parade.

46.3

Another issue is security. It cannot be denied that the proposed area is well hidden from normal view. Who is going to patrol and prevent it from being used inappropriately or illegally?

46.4

We have young children that love to go to the park, any park, and we have spent countless hours at our local Shamel Park and Leffingwell. We believe that what is currently provided for activity through the schools and local parks is sufficient for our community, especially since growth is at the lowest possible minimum, by community mandate. Did we not recently build a brand, new beautiful school with plenty of room for activity? Not to mention the other schools.

46.5

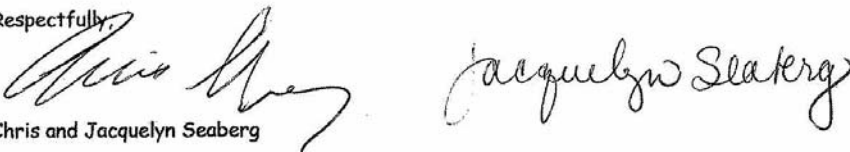
We believe that protection of this, the largest, private forest/sanctuary abutting the East Ranch and the area proposed for this project far outweighs the desire to have ANOTHER play area for kids. Because of the probable threat to our protected area, we are prepared to take any legal action possible to prevent the sports field/play area from being developed on the East Ranch. The harmful effects of such a development would be irreversible.

46.6

On a positive note, we will fully support some other possible uses for that property allowing the community to enjoy it with minimal disturbance to the habitat. For example, some reasonable uses would be an exercise circuit, equestrian use, walking paths, nature viewing areas and if necessary restrooms to support this minimal activity. Or even better, let's spend some time using the property to educate the children so they can learn the importance of its natural state. There is so much to learn on this land if people would stop to listen and watch. It would be utterly, irresponsible to allow it's natural environment to be destroyed.

We would appreciate a response to our concerns. Thank you for your time.

Respectfully,



Chris and Jacquelyn Seaberg

cc: California Coastal Commission
San Luis Obispo County Board of Supervisors

46. Chris and Jacquelyn Seaberg

- 46.1 Comment noted regarding their property; no changes to the EIR are necessary.
- 46.2 Please refer to response to comments 5.25 and 6.13 and Section V.B.6.a., mitigation measure HYD/mm-2, and HM/mm-4 of the Final EIR regarding these issues.
- 46.3 Please refer to Sections V.5.c.(4) and V.6.c.(4) which provides additional clarification regarding these long-term, operational effects including noise. The CCSD would be responsible for ensuring adequate litter collection and disposal.
- 46.4 Emergency response providers are responsible for responding to reports of criminal activity. Please note that mitigation measures are recommended to reduce the potential for crime and illegal activity, including implementation of guidelines provided by the County Sheriff's Department (refer to PSU/mm-7 and PSU/mm-8 in the EIR).
- 46.5 Please refer to comment letter 2 submitted by the Coast Unified School District.
- 46.6 Comment noted regarding East Ranch sanctuary outweighs the need for additional play area for kids, and support for some other use of the property that would allow for minimal use of the habitat, including walking paths, equestrian use, exercise circuit, and restrooms if needed to support this activity. No changes to the EIR are necessary.

Connie Davidson

From: Bill Seavey [billseavey@gmail.com]
Sent: Sunday, March 16, 2008 8:06 AM
To: cambrian@thetribunenews.com
Cc: jrogb1433@yahoo.com; Connie Davidson
Subject: Community Park

Dear editor:

Ann Winburn is right. Why isn't this new community park on the old rodeo grounds being designed based on Cambrians' responses to a recreation survey in 2004?

47.1

Here is my critique on what Cambrians said they wanted:

(1) Running/walking/jogging facilities. While we do have many trails and boardwalks already, what some of us would like, I think, is a parcours--a track like facility with exercise equipment en route and instructions.

Not everyone can or wants to take a long hike in order to get an adequate amount of exercise--and parcourses provide concentrated aerobics/isotonics.

(2) Gardening. In these times of high food prices--and possible oil shortages affecting interstate transportation--we need to have a local community garden plot. These exist all over the U.S. Even though some of us have good sized lots which have food growing potential, they may have poor soil or solar potential--and community gardens provide peer encouragement by their very nature.

(3) Lap pool. Efforts to establish an all year around lap pool at Shamel failed because raising the ongoing funds was too challenging for a small group. If there is money available for a year round pool (even a small one), it would certainly round out the recreational facilities available to us.

(4) Dog park. I know there is an existing dog park but I think it is on private land that could be sold. I am not partial to dogs but there is no question this is needed as dogs are increasingly excluded from pathways and beaches. Like community gardens, dog parks also encourage socializing and encourage responsible pet care.

Now, as to ball fields--the local schools provide those. There is no reason they cannot continue to be used by members of the community in a cost sharing arrangement (possibly) like the Cambria Tennis Club has with the high school courts. We do not need more giant expanses of grass that are water "sucks" and which need chemicals and grooming regularly. The majority of our population is over 55 and less inclined to play baseball, soccer and football--and I raised a Little Leaguer.

William Seavey
 Cambria 924-1719

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4/16/2008

47. Bill Seavey

- 47.1 Comment noted regarding the recreation survey of 2004, and what commenter thinks Cambrians wanted on the East Ranch. The survey results summary is included in Appendix A of the Final EIR.

Connie Davidson

From: stephey [stephey@charter.net]
Sent: Sunday, April 06, 2008 12:30 PM
To: Connie Davidson
Cc: Greg Sanders
Subject: Fiscalini Ranch Preserve Draft EIR

Dear Ms. Davidson,

First let me compliment you on the good work that you have been doing for the District during your tenure here. A lot of people are pleased with your professionalism and diligence. Keep up the good work!

48.1

I would like to address two issues concerning the Draft EIR that, in my opinion, are either not addressed or inadequately addressed in the Draft EIR.

The first is the issue of off-leash dogs being allowed on the Ranch. The term, "under the control of the owner at all times" (paraphrased), is rather ambiguous and open to interpretation by the dog owners. This rule has been abused on a regular basis since the opening of the Ranch. Intimidation by off-leash dogs on some members of the public could easily be corrected by requiring all dogs to be on-leash while on ALL Ranch property. A secondary, but very important benefit of this rule would be the protection of wildlife on the Ranch. This should be a given, as most reasonable people would agree that dogs and wild animals do not mix. I am sure that wildlife on the Ranch would increase somewhat, if the dogs were kept on leash.

The second issue is the presence of bicycles on the same trails that are being used by hikers/walkers. The problem is that hikers/walkers, when being approached from the rear, do not always hear and therefore are unaware, of approaching bicycles. This is a dangerous situation for both the pedestrian and the cyclist as an unanticipated movement by either party could cause serious injury. This problem could easily be corrected by requiring the bicycles to be equipped with a small bell ringing device mounted on the handlebars for easy access by the rider so that they can warn walkers of their approach.

48.2

I am not sure of the liability consequences of problems generated by either of these issues but that should be a consideration as well.

Summing up, I am not trying to ban dogs or bicycles from the ranch. I just think that the public would be better served by making the Ranch a safer, more user friendly place.

Sincerely,

H.L.Stephey
 665 Evelyn Ct.
 Cambria, CA

927-1284

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48. H.L. Stephey

48.1 Comment noted. This recommendation should be considered by all persons unable to control their pet in the presence of other persons, dogs, and wildlife; however, this measure is not reasonably enforceable.

48.2 Comment noted. This recommendation should be considered by bicyclists using the FRP for recreational activity; however this measure is not reasonably enforceable.

Connie Davidson

From: Donald Thomas [donrthoms@yahoo.com]
Sent: Sunday, April 13, 2008 4:34 PM
To: Connie Davidson
Subject: Fiscalini Ranch Preserve

Dear Ms. Davidson,

I oppose any development beyond hiking trails and fire roads.

49.1

Donald R. Thomas
6576 Buckley Dr.
Cambria

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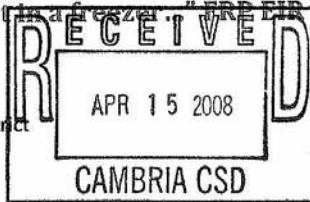
4/16/2008

49. Donald Thomas

- 49.1 Comment noted opposing any development beyond hiking trails and fire roads. No changes to the EIR are necessary.

"In the event of a steelhead take...the steelhead shall be removed from the project site and kept in a freezer." FRP EIR Mitigation Monitoring

Connie Davidson
Cambria Community Services District
P.O. Box 65
Cambria, CA 93428



April 15, 2008

Hand-delivered

Dear Connie,

Please consider the following written comments on the Fiscalini Ranch Preserve Draft EIR. These comments are first directed towards the East Ranch and the proposed 'community park' concept. As a long time local resident I was proud when the community united to purchase the Fiscalini Ranch Preserve. Keeping this beautiful open space in a natural state is a reflection of what our resident's value. The Preserve is used daily by many people and is a harmonious extension of our natural landscape. Many plans for active development of this property have been successfully resisted over the years

50.1

When local residents were surveyed regarding their preferences for recreational activities ("What do Cambrians Want?" March 2005), the answers were quite clear but not surprising. Nature trails, a place to jog, take a dog or have a picnic were emphasized along with the desire for a lap pool. Given the demographics of our community, average age 50, this collection of individual and passive pursuits, is understandable. If these are the recreational activities Cambrians want, Fiscalini Ranch Preserve is one logical venue for providing them. The FRP Management Plan was accordingly "created to reflect the desires of the community".

When the NOP was released on this EIR, public response was again quite clear. The message was to include in the plan a project description for a reduced project having "no sports fields". That is not the same as 'no project' under CEQA. This project alternative was eliminated with the following explanation: "this alternative was rejected because it does not meet the CCSD's objective to provide multi-use sports fields within a community park." What purpose is fulfilled by public comment then? If a survey of local opinions and public responses to the NOP are ignored, because it is not the alternative favored by our public servants, can this EIR be said to represent a true spectrum of alternatives?

50.2

You can imagine the surprise some residents felt when confronted with the elaborate sport complex, redundant community center and associated parking facilities proposed in the East Ranch meadow. Compounding this was the anticipated use of some 30 acre feet a year of water during our current 'water emergency'. Making matters worse, we were told that "the master plan shall not be implemented unless sufficient water supply is determined to be available." If we had this water available, would the CCSD keep 600+ lot owners on a water 'wait list' and simultaneously propose building a desalination plant? We are assured in the EIR that we are not currently using all of the water allocated to us by permit and that "the CCSD Board is the entity responsible for determining how to utilize water allocated for CCSD operational uses, such as a community park." The EIR states, "the Fiscalini Ranch/East would require water resources for athletic fields, landscaping, and restroom facilities". Then the CCSD must have determined to use our community's water for this project, how else could it proceed?

50.3

Walking along Santa Rosa creek, in the East Ranch meadow proposed for the multi-use sports fields, it is striking how flat this area is. Lying in a curve of the creek channel, this plain has several small

50.4

watersheds draining into it. It is not hard to imagine this low lying flat area covered with water. It often is in winter months. When looking to develop alternative seasonal water storage plans for the community, this site was considered as a possible reservoir. The thick sediment layers, mixed with clay like most soils in Cambria, forms a catchment that allows runoff to slowly percolate into underlying ground waters. As the EIR notes, groundwater levels are close to the surface here. The area is described in the EIR as consisting “largely of the stream channel, banks, and flood plain of the creek”.

50.4 (cont'd)

To facilitate the development of multi-use sports fields, the Fiscalinin Ranch Preserve Draft EIR addresses the tendency of this area to flood, or at least be covered in standing water, by changing the contours of the meadow. It suggests adding up to one foot of soil to the eight acres of proposed fields, creating a raised section that will facilitate drainage. This will guide runoff to a bio-swale and ultimately to Santa Rosa Creek. The addition of a large volume of imported soil will sit on top of the meadow surface. While runoff will be accelerated, percolation and recharging of ground waters will be hindered. With accelerating water flows comes increased potential of moving recently applied topsoil. The potential for sediment reaching the nearby creek and lagoon are similarly increased. As the EIR notes, “proposed site alteration may affect drainage patterns and increase the potential for erosion.” It is interesting to see that in discussing the West Ranch, the EIR notes “implementation of the management plan ...would not require the use of groundwater or interfere with aquifer recharge”, but for the East Ranch all that is said is “development and maintenance of the community park...would require water resources for athletic fields, landscaping and restroom facilities.” What about groundwater and aquifer recharge?

50.5

Drainage is not the only design problem, as noted, water is a key issue. There is a “water emergency” declared by the same Community Services District that is pursuing this park plan. It is therefore a difficult problem for the EIR to solve. Looking to on-site wells as a source of water is one possibility, but the quality of water is unknown and may prove unsatisfactory. Further, the impact on nearby creek flows and lagoon levels of such pumping is unknown. The EIR does note that using this groundwater might affect well levels at Shamel Park by the Santa Rosa Creek lagoon. How could those wells be affected and not the lagoon level ten feet away? Given that this creek is a well studied habitat for many protected species, this could pose a major problem. The EIR boasts that “water resources on the Ranch will be protected just as other natural resources” and elsewhere, “no new water wells will be installed on the Ranch”. Anticipating that water will be a huge issue in developing the multi-use sports complex, the Draft EIR considers the use of recycled water for irrigating the turf areas.

50.6

The idea of turning treated waste water effluent into water that can be used for such public use purposes is gaining in popularity as treatment technologies advance. The EIR rhapsodizes that “onsite infrastructure...demonstrating how treatment of irrigation water would occur” could be added to the community park. Paying for the ongoing electricity needs of a reverse osmosis facility, even low pressure technologies, disposal of salts or other debris removed from the recycled water and pipes bringing effluent to the site all add to the rising costs of these playing fields. While using recycled water is a theoretical engineering solution to providing water, it appears to offer little practical help when the end use is watering turf for recreational purposes.

50.7

The problem of using Cambria’s precious and scarce water supply to irrigate acres of playing fields causes creative solutions to proliferate in the EIR. What started as a community purchase of Fiscalini Ranch Preserve to maintain access to open space in a natural state ends up with something quite different. The EIR notes that one way to solve the heavy use of water that turf requires is to use artificial turf. Acres of petroleum based artificial turf applied to the surface of what is now a fallow meadow, a flood relief plain, a foraging location for deer and other wildlife is a jarring juxtaposition. It is hard to imagine a demonstration treatment plant or acres of AstroTurf instead of wetlands naturally recharging groundwater aquifers.

50.8

The National Marine Fisheries Service developed a steelhead recovery program that includes some important information that might guide this process. Our local populations of south-central California coast steelhead in Santa Rosa creek are an endangered species teetering on the brink of extinction. The creek and lagoon are utilized by these fish in every stage of their life. They have been identified by NMFS as "critical habitat". In the recovery program seven major threats to the steelhead are identified. Four appear pertinent to the Fiscalini Ranch Preserve Draft EIR proposal for a large sport complex on the East Ranch.

50.9

The first major threat to the continued survival of this species, occurs when "alteration of natural stream flow patterns occur". Measuring the depth of water over time, from one season to the next, provides this information. Changes occur when more or less water is available to the creek. The proposed park plan anticipates pumping more than twenty acre feet of water a year from the water table adjacent to Santa Rosa creek. The effects of this on lagoon levels and persistence are not well understood. However, it is hard to see how pulling this groundwater out of the aquifer could help maintain current stream flow patterns. Since turf would require greater amounts of water in the driest summer months, when stream flows are at their lowest levels, the effects on water available to the creek might be profound. Water pumped from the proposed park area might have quality issues that make it unusable or requiring treatment, in which case treated water would be applied to the many acres of turf. Percolation of this water would also affect ground water levels, perhaps artificially raising creek flow. If this in turn delayed the steelhead's return to the ocean, it might doom them to slow death in a lagoon blocked by sand bars. In the Master Water Plan EIR, when discussing the effects of 450k gallons of water a day pumped to percolation ponds at San Simeon creek, it notes "it is not known how much of the approximately 450k GPD provides flow into the nearby lagoon and riparian areas". If this effect is unknown with a current operation, running at larger volumes than proposed for the park, how can the effects of the proposed park be known with any certainty? The assurance that this water will have no effect on stream flows is not supported by any evidence in the EIR.

50.10

The second threat cited in the NMFS steelhead recovery program is "any alteration to flood plains or channels" in critical habitat. Clearly the proposed park on East Ranch lies directly on a flood plain in a sweeping curve of Santa Rosa creek. The alterations proposed for this plain include over one hundred and forty parking spaces, a community center, possibly a low pressure reverse osmosis infrastructure, up to eight acres of multi-use turf covered playing fields and the effect of cars and large numbers of people compacting the site. Further, the addition of up to one foot of imported soil is a clear example of a proposed alteration to the flood plain. The effect of these alterations is unknown. But it would not be surprising to find that an area, known for flooding and standing water, once drained would impact the ultimate outfall of that drainage. When actions are proposed to aid drainage, it is not difficult to imagine that drainage would increase. If the large volume of applied soil were to be transported to the creek, channels and the lagoon would be their new home. More unsettling is language in the EIR noting that "any work within creek channels containing flowing water, a stream diversion and dewatering plan for each stream location shall be prepared and approved." These "Storm Water Pollution Prevention Plans" will include "detailed sediment and erosion control plans consistent with any required Habitat Mitigation Monitoring Plan". Since neither the SWPPP nor HMMP are spelled out, nor conditions triggering their development and implementation, do we assume there is no need for them? How are we to comment on their content or the risks that precede their development?

50.11

The third threat noted to our south-central California coast steelhead is sedimentation in the creeks and lagoons they depend upon. Water will carry a greater sediment load the faster it moves. Large surfaces draining water that formerly could pool and soak in will increase the carrying capacity of the creek. With the addition of recently applied top soils, it is not hard to imagine this material finding its way into the creek. This sediment would either flow out to sea or deposit along the creek or in the lagoon at its mouth. Creek deposition would alter channels. Lagoon settlement would make waters

50.12

more turbid, holding less oxygen while making the lagoon shallower. This in turn results in increased temperatures and evaporation which favor the growth of aquatic plants and algae. A life threatening combination for steelhead: low oxygen, easier predation and no way to the sea.

50.12 (cont'd)

The fourth threat is the "loss of estuarian habitat". Recent studies indicate that this may pose a greater threat than previously thought to future steelhead populations. It is now clear that lagoon reared fish recruit at higher levels than stream bred fish to the returning adult population. This is possibly due to their increased size and subsequent ability to survive at sea. Hence any negative impact upon this environment will have an amplified effect on subsequent steelhead populations. Pumping acre feet of water a year from groundwater less than a mile upstream from the Santa Rosa creek mouth and lagoon could hasten the evaporation of this estuary. With the use of recycled effluent or groundwater, percolating water high in nitrate concentrations from repeated applications of fertilizer are real threats. The leaching of nitrates from acres of fertilized turf less than a mile upstream and resulting algal bloom would suffocate most forms of aquatic life, including the most important segment of the steelhead population.

50.13

These four threats to our resident steelhead population deserve serious consideration. The continued existence of a species that has survived at least 10,000 years makes the need for green turf play areas seem frivolous by comparison.

After examining the proposed park complex in the East Ranch section of the Fiscalini Ranch Preserve, one cannot help wondering if such facilities currently exist. If they do, then the degree of utilization would be a key indicator of the demand for similar recreational facilities being proposed. It turns out that there are several multi use sport fields in Cambria and surrounding areas. Surprisingly, these facilities are frequently vacant and available for sports enthusiasts. Developed multi-use playing fields are located at Coast Union High School and Camp Yeager, with smaller fields at Shame! Park and grade schools in Cambria. Large lighted league level fields are conveniently located in Morro Bay and at Chorro Park, between Cambria and San Luis Obispo. Similar facilities exist in Paso Robles to our east. These locations house the teams most commonly played in league level soccer and baseball. From a fiscal point of view, a community subsidized bus might be more practical than the community park proposed for East Ranch. Utilizing low emission transportation technologies this solution would produce a much smaller carbon footprint than a plant processing wastewater into irrigation water.

50.14

The cost of the proposed park facilities would be substantial. While funding for development might be offset with grants, the source of ongoing maintenance and operational funds is not spelled out in the EIR. A grant might pay for the turf and the infrastructure to water it. Will they also be available when it is time to mow the grass? The economic impact of this massive project is well beyond the scope of current budgets and sources of income. The recently proposed and rejected rate hike, needed to bring Enterprise funds back into balance, demonstrate an electorate unwilling to accept rate hikes for water and sewerage. What evidence is there that such rate hikes would be acceptable for a play park? With the need for such facilities undemonstrated, while the desire for a multi-use playing field complex is unsupported by community sampling, the expensive design poses significant environmental threats to local endangered species. While the EIR notes that the project can be phased in over time, problems with the development of such a large scale sportsplex are not time dependent. A cursory review of Cambria would show that this community is primarily a retirement community. The average age would place most active league sports in our collective past. While not precluding the need for such facilities, our demographic makeup would suggest we at least prioritize them.

50.15

When the EIR states that "a minimum of four multiuse sports fields" must be built, how did this become the minimum? Why not one field, and then see if the community does use this resource before committing to any future additions? The three alternatives in the EIR end up with either eight acres of turf, 9.2 acres of turf, or 8.2 acres of turf. This provides an inadequate and unrealistic range of alternatives. What happened to two acres, three, four and five? Ruling out anything less than four

50.16

multiuse fields is arbitrary and shows a disregard for community sentiment as surveyed and noted in the NOP. This is not how to “describe a reasonable range of alternatives”, which is what the task in the EIR should be.

50.16 (cont’d)

A community park could be a welcome asset complimenting the spirit of the Fiscalini Ranch Preserve and meeting the stated recreational needs of Cambria. Providing enhanced nature trails for walking or jogging, access to a dog park and picnic areas, could be done in keeping with the character of the Preserve and at minimal cost. Hardscape additions, lap pools or tennis courts, could be sponsored by the groups that support their development. Let them bring the need to the attention of the community. Let their fund raising efforts demonstrate the support these proposals can engender. The current design of the East Ranch Community Park reflects the limited agenda of a few rather than the broader needs of the community that owns this property. This flawed vision should be corrected before further public monies are spent.

50.17

The following comments are directed towards that part of the Fiscalini Ranch Preserve EIR that deals with the West Ranch. In particular, the proposed construction of a cellular telephone facility on a property bought and paid for with the understanding that “Friends of the Fiscalini Ranch Preserve’s mission is to protect and maintain the ranch in a natural state compatible with limited passive recreation....” The community has been repeatedly told that new cell towers represent a safety issue of urgent import. It is disappointing to see fear being used to propel an agenda that cannot stand on its own merits. To suggest that a cell tower facility is needed in the West Ranch for reasons of security or safety is simply false with no evidence to the contrary being presented. When walking in this area locals frequently carry a cell phone utilizing a variety of service providers. Their phones can register with the providers at various locations in the West Ranch. This registration means that their location can be determined by emergency personnel and that 911 service is available. Frankly, outside of having an EMT on patrol, that is all the safety and security most people expect when going for a walk. At sea, cell phones are utilized for a variety of communications needs. Members of the local Cambria Fishing Club are now routinely carrying cell phones as part of their emergency equipment. They are often at sea off of the Fiscalini Ranch Preserve West Ranch and able to place and receive calls without an additional cell tower. This is not a matter of speculation but a simple fact that can be demonstrated repeatedly. There is no justification based on safety in this arena.

50.18

This telecommunications project is one of many that are being proposed up and down the California coast and should not be seen as unique to Cambria. It is a reflection of a growing industry not the discovery of a hole in our community’s safety net. It appears that the desire of ranch administrators to secure funding sources may have led them to contemplate violating the very spirit of the Fiscalini Ranch Preserve: providing open space access with a minimum of environmental disturbance. Cell tower infrastructure would impinge upon this community trust no matter how cleverly disguised. The support buildings, roads, fences, security lighting, electric wires and provision for alternate providers is completely at odds with preserving the Monterey pine forest and supporting environs. Other sites can serve the designs of the telecommunications industry and will once this site is eliminated. Based on industry testimony, as many as fourteen alternative sites have been identified in our area. If the industry can identify these alternatives, why is the EIR unable to name them for us to evaluate? Once again, the mandate for a “reasonable range of alternatives” is not being met. Eliminate this element from the West ranch proposal and restore the credible effort to maintain a quality of life that is the envy of many Californians.

50.19

Finally, as noted in the Fiscalini Ranch Preserve EIR, “in order for the property to remain in its current state, the adopted East West Ranch Public Access and Resource Management Plan would have

50.20

to be rescinded and land uses changed to open space..." This is what most supporters of the Preserve had in mind in adopting their mission statement: "to protect and maintain the ranch in a natural state". Eight acres of Astroturf, a recycled water demonstration project, cell towers and hundreds of sports fans cheering on their home team might not be the natural state that ranch owners had in mind.

Thank you for the opportunity to comment on the Fiscalini Ranch Preserve EIR. We are stewards of this resource and all that call it home. Let us keep the steelhead in the creek and not in a freezer.

Respectfully,



Jim Webb
1186 Hartford St.
Cambria, CA 93428

50.20 (cont'd)

50. Jim Webb

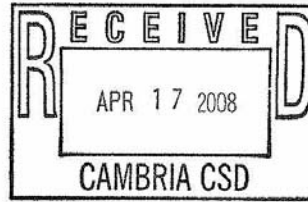
- 50.1 The CCSD developed the proposed Community Park Master Plan based on comments from the community, which included the survey.
- 50.2 As noted in Section VI.C.1, the “No Sports Fields Alternative” was considered based on public response to the Notice of Preparation; however, this alternative was rejected because it does not meet the CCSD’s objective to provide multi-use sports fields within the community park. The EIR discloses that implementation of this alternative would avoid potential noise impacts, reduce traffic trips, reduce the need for parking, and nearly eliminate the need for water resources.
- 50.3 To date, the CCSD has not determined the preferred alternative for water supply to the proposed community park. Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria. Prior to development of the community park, the CCSD is required to identify the proposed water source, or implement measures to avoid the development of water-dependent elements (such as by using artificial turf, pit toilets, or portable restrooms). In addition, prior to development of the community park, the CCSD is required to obtain permits from the County of San Luis Obispo.
- 50.4 Based on the preliminary grading and drainage plans, the community park area would continue to flood, similar to existing conditions (refer to Sections V.B.6.a and V.B.6.b of the EIR for an expanded discussion of drainage and flooding effects).
- 50.5 Please refer to response to comment 6.10, and Sections V.B.6.a and V.B.6.b of the EIR. As noted in the EIR, the proposed project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site; nor will it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control.” Please refer to Section V.K. of the EIR for a description of potential impacts to water supply, including potential effects to the underlying groundwater basin. Implementation of the project would not significantly interfere with groundwater recharge because stormwater would continue to flow across the site and percolate into the underlying riparian sub-surface flow.
- 50.6 The EIR has been clarified to note that the lagoon may also be affected (refer to Section V.K.5.a.(1) of the EIR).
- 50.7 Comment noted regarding utilizing recycled water; no changes to the EIR are necessary.
- 50.8 Comment noted. Current artificial turf technology allows for percolation of stormwater, similar to grass.
- 50.9 Comment noted regarding NMFS recovery program for steelhead and that Santa Rosa Creek is critical habitat. The proposed project was review in the EIR with regard to

- potential effects on steelhead, refer to Section V.D.5.c.2 of the EIR. Expanded discussion regarding the recovery program is included in Section V.D.1.a.3 of the Final EIR.
- 50.10 Please refer to mitigation measure WS/mm-4 of the Final EIR, which requires testing to determine whether use of such wells would have any effect on stream flow, and requires the well to be designed to avoid stream flow impacts. Further clarification of this performance standard has been added to the mitigation measure: “Use of on-site wells shall be prohibited if tests demonstrate any affect on stream-flow.” The Master EIR recognizes that further study of this potential option is necessary to address these issues, and ensure that any water supply option avoids adverse effects to the creek and protected species.
- 50.11 Please refer to response to comment 6.10, and Sections V.B.6.a and V.B.6.b of the EIR. Erosion and sedimentation control measures, and soil stabilization measures are recommended to retain soil onsite and avoid sedimentation of the creek and drainages. State Water Resources Control Board regulations require a SWPPP for all ground disturbance one acre or more (refer to Section V.A.1.a of the EIR). The SWPPP is required upon application for construction permits from the County for implementation of trail improvements and any other project requiring issuance of a County permit. A HMMP is required for any action resulting in disturbance to riparian and/or wetland habitat (refer to V.D.5.a of the EIR). These plans are prepared based on detailed grading and construction plans, and are specific to the area of disturbance and affected environment.
- 50.12 Please refer to response to comment 50.11.
- 50.13 Groundwater pumping that impacts the streamflow in Santa Rosa Creek may also have an adverse effect on the downstream lagoon. Regarding the use of nitrate fertilizers, please refer to response to comment 6.13, and mitigation measure HYD/mm-4 in the Final EIR, which requires the use of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control.
- 50.14 Comment noted regarding availability of multi-use sports fields at the schools and other parks in Morro Bay, Paso Robles and San Luis Obispo area that have soccer and baseball fields. No changes to the EIR are necessary.
- 50.15 Comment noted regarding the capital and maintenance costs of providing and maintaining the community park. No changes to the EIR are necessary.
- 50.16 The CCSO identified this objective based on the current demand for sports fields in the community. Note that the multi-use field area as proposed could accommodate one or more fields depending on the size requirements for the fields (such as for youth soccer as opposed to adult soccer). The designation of four fields is based on information regarding need for the fields as determined by the soccer leagues, and provides a

maximum design for the area; CEQA requires analysis of a worst-case conditions when evaluating impacts.

- 50.17 Comment noted that a community park could be a welcome asset complimenting the spirit of the Ranch Preserve. Trails and passive recreational amenities are included in the proposed community park plan.
- 50.18 Comment noted with regard to the telecommunications facility being a safety issue. Refer to response to comment 50.19 below.
- 50.19 The proposed telecommunications facility, which was previously under consideration by the County of San Luis Obispo, has independent utility. The County of San Luis Obispo Planning Commission adopted a Mitigated Negative Declaration for the proposed project, which was appealed; subsequently the land use application was denied, and the project is no longer proposed for inclusion in the Master Development Plan (refer to Section III.D.1.c of the EIR). It is possible that there are other alternative locations for a telecommunications facility in Cambria, but determining these locations would be speculative based on the lack of information available at this time regarding the telecommunications industry needs and location requirements.
- 50.20 Comment noted that the Fiscalini Ranch Preserve should be left in a natural state. No changes to the EIR are necessary.

Connie Davidson
 Cambria Community Services District
 P.O. Box 65
 Cambria, CA 93428



April 15, 2008

Dear Connie,

Please consider the following written comments on the Fiscalini Ranch Preserve Draft EIR. Cambria is blessed with many pristine and abundant natural resources, the highlight is a freshwater creek filled with clear water that runs from the coastal mountains to the Pacific Ocean. California Steelhead somehow manage to survive, in spite of the odds and our efforts at destroying their habitat. When I read about a proposal to use our precious resources watering nitrate laden sports fields next to this amazing riparian habitat, or tearing out a meadow to replace it with asphalt tennis courts and astro turf I just can't believe it. Who is driving this bus? It is disheartening to read this document as it will have negative, significant, irreversible and long lasting effects on Santa Rosa creek, on the wildlife and resources, and on the character of Cambria forever.

51.1

A few years ago, a gently rolling hill was bulldozed in order to build a new elementary school. Well-meaning citizens were horrified when they realized what had been approved - destruction of the view shed of scenic Highway One, glaring and out of character industrial lighting, and a promise to recycle water for the playing fields that was never fulfilled. Local environmentalists begged for a Santa Rosa Creek Watershed management plan when this construction caused the silting of Santa Rosa Creek. Unfortunately our leaders didn't have the long term vision necessary to take action on a holistic approach to the Santa Rosa Creek Watershed. The community sports park is now the next habitat degrading project proposed along the creek.

51.2

According to the MEIR The objectives of the Community Park Master Plan are as follows:

- Provide public, athletic, mixed use field space for youth and adult sports;
- Lessen the current deficiency of active recreational opportunities in the community of Cambria consistent with the County General Plan;
- Respond to community requests for additional active recreational opportunities and public use areas including a minimum of four multi-use sports fields;
- Protect sensitive coastal resources consistent with federal, state, and local guidelines;
- Provide affordable facilities to residents and visitors of all ages, including a safe and accessible community recreation center.

51.3

This destruction is justified and quantified with charts and graphs and formulas for how many acres Cambria *should have* for sports parks while ignoring the fact that *Cambria is a park*. This formula compares Cambria to other "cities" with sports parks. The reason most people live in Cambria is the fact that Cambria is not a "city" and Cambria is unique to "cities".

Every recreation survey taken of Cambria residents to date insist that the community wants more nature areas, walking, biking and hiking trails, picnic areas, and passive recreation! The community has not requested nor does it need four multi use sports fields. In light of that where did the stated objectives come from? There are fields not being used in Cambria right now as well as all the nearby areas (within a 30 minute drive) including Morro Bay, Paso

51.4

Robles, and Templeton. There is no deficiency of athletic fields in the county. It would be less expensive for Cambrians to provide a bus to send kids outside the area to play currently popular league sports. The community has not requested a community recreation center, and in fact, the existing community center, skateboard park and basketball hoops are not being fully utilized. This is one more expense the district is proposing to the citizens of Cambria that we cannot afford.

51.4 cont'd)

Environmental Impact Summary Tables

Consider that there are 41 pages of abbreviated summaries of environmental impacts and this document is considered a 'streamlined version' of an environment impact report. There are 70 Significant environmental impacts according to the document. The district is asking us to believe these negative, significant, irreversible and long lasting impacts to the environment will be magically remedied by the district when the construction permits are submitted to San Luis Obispo county. The precautionary approach should be taken to avoid all areas of Santa Rosa Creek when grading, driving, parking, or compacting soil. This habitat is irreplaceable. Please notice that there are -0 -beneficial environmental effects of this project.

51.5

Class I Impacts— There are 4

Significant environmental impacts that cannot be fully mitigated or avoided.

Class II Impacts— There are 66

Significant environmental impacts that can be feasibly mitigated or avoided. I would suggest most of these are actually Class I impacts.

Class III Impacts— There are 2

Environmental impacts that are adverse but not significant for which the decision maker does not have to adopt "Findings" under CEQA.

Class IV Effect— There are 0

An effect that would be beneficial, and would reduce existing environmental impacts or hazards.

Cumulative Impact Analysis

It is impossible to evaluate or comment upon the CEQA required EIR analysis of cumulative impacts because there is no analysis. Together, these modifications will contribute to significant increases in traffic, urban footprint and road construction, development in Monterey Pine forest, runoff and sedimentation into Santa Rosa creek, construction activities in an ESHA site, air pollution, noise and light pollution, water supply, slope failure, aesthetic damage to Highway One corridor and bluff top areas, archeological site disturbance, grading and filling near steelhead habitat, gully stabilization, hydro-modification, and increased demand on other public services. Additionally, cumulative impacts could occur as the result of this incredibly localized approach to park facilities near an historical district. None of these impacts are considered for their cumulative effect.

51.6

Cumulative impacts are acknowledged by the CCSO but are not evaluated as required by CEQA. Instead cumulative impacts are cursorily treated only within the context of an impact section. As an example, the cumulative impact of the project components may be

51.7

considered within a section such as land use, but the cumulative impact of a land use change on biological resources or water resources is not evaluated as required by CEQA.

51.7 (cont'd)

There is the acknowledgement:

“For the purposes of this EIR, past, present, and reasonably anticipated future projects will be used for the cumulative analysis (option 1 under the CEQA Guidelines, §15130). Cumulative impacts are assessed in Section V, Environmental Impacts and Mitigation Measures under each resource issue, where appropriate. The cumulative analysis for each of the appropriate issue areas is based on a list of projects provided by the County of San Luis Obispo Planning and Building Department. These projects are in various stages of planning and development and are expected to contribute to cumulative impacts in the community of Cambria. The specific environmental impacts of each individual project are not known at this time.”

51.8

When reading Section V for cumulative impacts, all that is found is a cut and paste description of the definition of cumulative requirements. There is no analysis of cumulative impacts for this development. How can the community address an environmental impact report when the *“The specific environmental impacts of each individual project are not known at this time.”* A cumulative impact evaluation - across all potential impacts -- is required.

The district and the county have a pattern of underestimating environmental concerns in similar past documents, which in many cases, leads the environmental community to move the process up to the state level. It is unrealistic to believe that these impacts to Santa Rosa Creek can be mitigated - and they are certainly not being avoided. You cannot replace the steelhead once they are killed. You cannot replace the drinking water or repair the aquifer. It is extremely difficult to repair or restore riparian habitat in a watershed once damaged. Please reconsider this plan in total.

51.9

Sincerely,



Mary Webb
1186 Hartford
Cambria, CA 93428

51.10

The following is a list of concerns I have and language from differing sources about the significance and effects of some of the proposed development on Fiscalini Ranch. There are many differences in the current NCAP and the Coastal Commission's amended NCAP, which has still not been approved by the county because of the Telecommunications Tower construction issue on Fiscalini Ranch. For lack of time I may not adequately tie these together for the general reader, but am hopeful that the agencies familiar with these documents will easily find the documents and the conflicting language.

Archaeology Taken from the NCAP document <http://www.coastal.ca.gov/slorevf.pdf> Numerous archeological sites exist in Cambria, with more than a dozen in the Lodge Hill area alone. On the single largest undeveloped property in Cambria, the East-West Ranch, numerous sites also have been identified. Much of the area along the lower reach of Santa Rosa Creek is developed and has been for decades. Areas along creeks are often likely locations of archeological sites. In the East Village, with its intensive development, any sites that may have been located on the north side of the creek, where most of the development is, have been subjected to great disturbance. The south side of the creek is less developed and could conceivably harbor additional archeological resources. This is especially the case where Santa Rosa Creek lies between the east part of the East-West Ranch and the Mid-State Bank property and between Highway One and the west part of the East-West Ranch. West Lodge Hill and the East-West Ranch have numerous sites.

Archaeology Conformance with Coastal Act

In the existing NCAP, Cambria Urban Area Communitywide standard 8A, which applies only to the East-West Ranch, requires that development not occur in areas of archeological resources, except for crossing bridges and bicycle and pedestrian paths. This requirement is carried over in the Update on page 7-62, Standard 13.C.2, applicable only to East-West Ranch. Cambria Urban Area Recreation Standard 25 contains the same language as the previously mentioned standard, but applies only to the Recreation category in the East Village (Mid-State Bank site). That standard is carried over in the Update but under Cambria Urban Area Commercial Retail Standard 8 on page 7-81. This is because the Update, is also proposing that part of the Mid-State Bank site be redesignated Commercial Retail. Neither the existing Area Plan nor the Update contain an areawide standard protecting archeological resources.

Archaeological policies and standards applicable throughout the Coastal Zone are found in other portions of the LCP, specifically in the Coastal Plan Policy document and in the Coastal Zone Land Use Ordinance (CZLUO). According to the Update EIR, two additional archeological mitigation measures, which the County would eventually apply county-wide, are being considered with the update of another, non-coastal area plan. One measure includes adding six existing policies from the Coastal Plan Policy document to the CZLUO or the Framework for Planning. It is unclear how this repetition of existing policies elsewhere in the LCP would afford any added protection to archeological resources. In any event, they are not proposed to be included in the Update.

The second archeological mitigation measure would extend the archeological protection and mitigation measures currently applied only to discretionary permits to all projects resulting in earth disturbance. These include (1) site-specific research surveys and inventory of site resources by archaeologists where existing information is not adequate or where database and professional experience suggest the presence of cultural resources; (2) implementation of a County-approval plan by the developer to avoid impacts or preserve important resources based on survey recommendations prior to project approval;

and (3) protection of sites by designating them open space, by use of easements, or other means.

51.10 (cont'd)

It must be emphasized that the mitigation measures from the EIR outlined above are not included in the Update, as standards (mandatory regulations) or as programs (nonmandatory County actions dependent on future funding, etc.). In order to be consistent with Coastal Act Section 30244, therefore, it is necessary to require systematic surveys of development sites. In particular, a new archaeological protection standard 26 should be added to the Update Areawide Standards that requires preliminary site surveys by professional archaeologists for sites proposed for development, with additional investigation if, in the professional opinion of the archaeologist conducting the survey, additional investigation is warranted (see Modification 65).

“to be consistent with Coastal Act section 30244, it is appropriate to modify East-west Ranch standard 10, Permit Requirements, to require that an application for any proposed development on any part of the East-West Ranch shall include an archaeological site survey by a professional archaeologist according to current professional and CEQA standards (see Modification 117). Standard 13.C.2 also must be modified to require that where artifacts or human remains are discovered, no development be allowed there unless there is no feasible alternative site for the development and after consultation with representatives of the Chumash as to disposition of artifacts or remains found. If the County so modifies the Update, relative to archaeology in the Cambria urban area, it can be found consistent with sections 30244 and 30250.”

Project Alternatives

Alternatives are not fully considered -there is no requirement for a minimum of four sports fields. According to the document: *Implementation of this four sport field alternative does not avoid potentially significant adverse noise and water supply impacts;*

51.11

If this plan would have proposed none or one sports field and more natural areas, and less parking , it would have been suitable for our rural area and may have been sited to avoid all impacts! The football sized field that exists at Camp Yeager is not being used. The basketball hoops at the Vet’s Hall are not being used. The Skateboard Park is not being used. Shamel Park field is rarely used. The youth should demonstrate the need for a sports park by using existing fields before requesting additional fields. The Community Center is underutilized. There is no joint use agreement to use sports fields between the schools and the district. Tennis courts already exist at the High School. Shouldn’t these fields be used before adding more?

Water Supply

There are so many awe inspiring stories of watershed protection, restoration and management in California. It should be noted that we have a watershed that has not been damaged - it is not pristine but we don’t have a lot of the problem many other watersheds have so far -we need watershed management before any construction is done in this flood plain- this is our drinking water.

51.12

The SWRCB, CCC, and other State agencies have identified four management measures (MMs) to promote the protection and restoration of wetlands and riparian areas and the use of vegetated treatment systems as means to control nonpoint sources of pollution. Wetlands and riparian areas reduce polluted runoff by filtering out runoff-related contaminants such as sediment, nitrogen and phosphorus; thus maintaining the water quality benefits of these areas is important. These areas also help to attenuate flows from higher-than average storm events. This protects downstream areas from adverse impacts such as channel scour, erosion and temperature and chemical fluctuations. Changes in hydrology, substrate, geochemistry, or species composition can impair the ability of wetland or riparian areas to filter out excess sediment and nutrients, and so can result in deteriorated water quality. The following activities can cause such impairment: drainage of wetlands for cropland, overgrazing, hydromodification, highway construction, deposition of dredged material, and excavation for ports and marinas. <http://www.coastal.ca.gov/nps/npsmmr/cammprwe.pdf>

51.12 (cont'd)

Astroturf, Tennis Courts, paving roads like Piney Way

How Urbanization Affects the Water Cycle, from the California Water & Land Use Partnership The water cycle, also known as the hydrological cycle, is the continuous exchange of water between land, waterbodies, and the atmosphere. Approximately 97% of the earth's water is stored in the oceans, and only a fraction of the remaining portion is usable freshwater. When precipitation falls over the land, it follows various routes. Some of it evaporates, returning to the atmosphere, some seeps into the ground, and the remainder becomes surface water, traveling to oceans and lakes by way of rivers and streams. Impervious surfaces associated with urbanization alter the natural amount of water that takes each route. The consequences of this change are a decrease in the volume of water that percolates into the ground, and a resulting increase in volume and decrease in quality of surface water. These hydrological changes have significant implications for the quantity of fresh, clean water that is available for use by humans, fish and wildlife. <http://www.coastal.ca.gov/nps/watercyclefacts.pdf>

51.13

Landscape Proposals

Although the permeable parking surface is preferred, there is concern the parking lot is too close to the creek. There is also concern regarding the amount of parking. If this were a nature area, rather than a sports complex, the amount of parking could be significantly reduced and located further from the banks of the creek, thereby avoiding impacts.

51.14

There are many new landscape designs that have low impact on development (LID) LID designs with nature in mind: working with the natural landscape and hydrology to minimize these changes. LID accomplishes this through source control, retaining more water on the site where it falls, rather than using traditional methods of funneling water via pipes into local waterways. Both improved site design and specific management measures are utilized in LID designs. LID has been applied to government, residential, and commercial development and redevelopment, and has proven to be a cost-efficient and effective method for managing runoff and protecting the environment. <http://www.coastal.ca.gov/nps/lid-factsheet.pdf>

Community Park Infrastructure and Public Use Facilities

I have not seen data that describes demand nor budgeted funds to build a new community center building. The existing community center building is underutilized. The community recently passed a Prop 218 rate increase protest because of overspending by the district and there is no budget at present that allows for construction of a new community center.

51.15

Trees and Forest

The existing eucalyptus trees to the east of the multi-purpose field would be removed to reduce the potential for harm to participants from falling branches and downed trees. There is no discussion about raptor habitat, or bird nesting sites. Are these trees being replaced with trees the same size? There is no way to replace habitat once lost.

51.16

According to coastal commission updates to the NCAP:

Conformance with Coastal Act

“Cambria is a special coastal community, which because of its unique character, comprises an increasing popular visitor destination. Preservation of the forest context is clearly vital to Cambria’s community character. The County has recognized that the LCP’s present policies in this regard are inadequate, and has proposed a comprehensive set of urban forestry standards in its North Coast Update submittal. These standards, contained in the Combining Designations section will provide the necessary basis for regulating future tree removal (and replacement) within the Cambria Urban area.

However, as detailed in the Environmentally Sensitive Habitat Areas (ESHA) section of these Findings, several shortcomings are evident. If corrected in accordance with the Suggested Modifications identified for the pine forest ESHA, the LCP will also appropriately protect the forest as a visual resource and therefore will protect Cambria’s community character as required by Coastal Act Section 30253(5). “

Access

Every vehicle access to this park is of major concern. The only vehicle access to the proposed sports league park, is Rodeo Grounds Drive. To reach it the visitor has three choices. (1) Exit Main St. traveling past the elementary school, down a two lane winding road past retail shops and residences (2) must exit Highway One at Burton Drive, traveling down a very narrow and winding two lane residential road, and turning sharply into oncoming retail traffic onto Rodeo Grounds Dr. This turning area is restricted by a bridge that crosses the creek so the turning area is quite small. (3) visitors exit Highway One at Cambria Drive, turn onto Main St. and then thru the retail section of old town Cambria at Burton Drive to Rodeo Grounds Drive. Are the retail businesses prepared for bus traffic, van and SUVs traffic carrying children and parents, and out of town players with the sole purpose of ‘passing thru’ old town Cambria in order to reach a sports park? I don’t envision these out of town players will be buying art glass at Seekers, tofu enchiladas at Robin’s, or staying at the Burton Drive Inn therefore wonder why they should bear the burden of increased traffic without benefit.

51.17

Rodeo Grounds drive itself is a very narrow gravel roadway, that is immediately adjacent to the banks of Santa Rosa creek where it drops down an embankment to the north, and a very steep hillside that has mudslides when it rains, to the south. It is difficult for two cars to pass each other on this road at this time. How does the district propose to allow school busses full of sports players or vans and SUV’s carrying children pass safely thru this narrow roadway? Where is the plan that changes this road from what it is today to a 25 foot wide road? The only choices available are to bulldoze the hillside or to grade and level the embankment next to the creek. Both options would be a Class I impact not listed in this document.

51.18

Scenic Highway One /Cambria Drive access

Visitors will be able to easily see the recreational activities from Highway One. Similar to current problems with tourists viewing the elephant seals, some just pull over and stop, get out and leave their cars in a haphazard way along the shoulder of the highway. I can envision vehicles suddenly braking and trying to pull over, looking for a way to drive into a park they can see, but with no obvious entrance. Where do they park? If they do manage to serve off the Highway without incident, how do they cross the road? Are we creating further confusion to drivers as they travel the side streets trying to find the entrance to this park?

51.19

Cambria Drive - is there a future road scenario happening today?

The NCAC Update states that “[t]his extension is also located in West Village and is planned to link the west side of Cambria by a fourth access point to Highway One and the downtown areas.” However, this street extension is not shown on the circulation map and the description gives no clear indication of where it would be located. As with the Piney Way extension, there is only vague future development that would necessitate this street. Therefore, the proposed extension is inconsistent with Coastal Act section 30254.

51.20

Roads, Trails and SUBSEQUENT PROJECTS

Master EIRs are somewhat different than a project EIR, and must include a description of each anticipated subsequent project that is to be considered within the scope of the Master EIR, including information with regard to the kind, size, intensity, and location of the subsequent project, and a capital outlay or capital improvement program, or other scheduling or implementing device that governs the submission and approval of the subsequent projects (PRC Section 21157(b)(2)).

51.21

The district does not have a budget that includes road building in East West Ranch at present. Are we building an additional road into East/West Ranch near the creek? Below are the trail proposals from Table II-1

Santa Rosa Creek West-All weather surface, 1,400 feet long **10 feet wide**
 Santa Rosa Creek East- 4,400 feet long and **10-16 feet wide**

No trails should be 10-16 feet wide. This sound more like a road than a trail -is it a future road? In the Coastal Commission amendment to the NCAP several road scenarios were evaluated: *Fiscalini Ranch Road, Windsor Boulevard, Creekside Drive and Piney Way*. I would ask the reader to notice that the trail identified as Santa Rosa Creek trail may become the road that is identified as Creekside Drive.

51.22

According to the Coastal Commission: *“Creekside Drive would have potential significant adverse impacts to views from Highway One across the floodplain meadows and would be subject to flooding and could exacerbate flooding by further limiting the area over which flood waters could spread. Further, construction of Creekside Drive is, according to the County, a long term, low priority development. As with the Piney Way extension, Creekside Drive would be needed to serve vague future development which is unlikely to materialize in the near future due to lack of water. Therefore, Creekside Drive is inconsistent with Coastal Act sections 30251 and 30253, which requires that hazards, in this case development in a floodplain, be minimized. Such a road would also have negative impacts on the Santa Rosa Creek riparian zone, inconsistent with Section 30240 and 30231.”*

Exits

A newly constructed 16-foot wide, all-weather, emergency access road would extend from the parking area to connect with Piney Way. **Piney Way** is also a steep hillside, dotted by residences on the edge of a hill. What plans are in place to prevent additional seasonal storm water runoff from this newly created and steep road into Santa Rosa Creek basin? See figure V-3 202 San Simeon sandy loam, 30 to 50% slope.

51.23

According the NCAP document <http://www.coastal.ca.gov/storevf.pdf>

"The Piney Way extension could provide another access besides Burton Drive between West Lodge Hill and Main Street. Extending this street would require construction on steep slopes, removal of an unknown number of Monterey pine trees, and a new crossing over Santa Rosa Creek".

Slope Failure

Earthquake-induced failure of steep slopes can occur in either bedrock or poorly consolidated deposits. The Cretaceous sandstone onsite is only moderately weathered and is cemented with generally favorable dipping beds, and is generally resistant to seismically induced slope failure; however, where it is highly fractured or where the unit contains loose, friable shale beds and it is exposed in steep slopes, the risk of rock fall during ground shaking is increased. **Rock fall hazard within the bedrock is greatest along the hillside to the south; however, these hillside slopes are heavily vegetated, reducing the rock fall hazard to a low-level hazard.** Slope failure consisting of shallow slumping and rock fall within the alluvial deposits is a significant hazard in the steep-walled stream bank located near the mobile home park.

51.24

Parking

The Highway 1/Cambria Drive Staging Area may include a parking lot and information kiosk. There are many Coastal Act policies that address construction on scenic Highway One:

51.25

Conformance with Coastal Act

The LCP Update amendment provides much-needed new Areawide Standards for Site Planning, Design, and Building. These new standards require: a 100 ft. setback distance from Highway 1; site-specific visual impact analysis for developments visible from Highway 1; location of building sites to minimize landform alteration; design review process; shielding of night lighting; prohibition of buildings, fences, signs, landscaping which would obstruct views of the shoreline; utilization of landform features to "minimize visual intrusion"; shared driveways "where possible"; prohibition of development or grading on slopes over 30%; structural design to fit hillside sites (rather than creating level building pads); and other measures to encourage new development to be sited and designed to minimize visual impacts.

However, a few shortcomings have been noted. These standards do not prohibit the creation of more "viewshed parcels." The current standards do not prohibit billboards or other large commercial signs. Therefore, neither the present LCP nor the proposed LCP amendments are wholly adequate to protect these important scenic resources. If modified to correct the noted deficiencies, however, the Central Coast Area Office North Coast Area Plan will (upon incorporation of the Update's amendments) represent a very substantial improvement over the present LCP standards, and will achieve conformance with the requirements of Coastal Act Section 30251.

Section 30214(a). *The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:*

- (1) Topographic and geologic site characteristics.*
- (2) The capacity of the site to sustain use and at what level of intensity.*
- (3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.*
- (4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.*

51.25 (cont'd)

Scenic Highway One adjacent to Santa Rosa Creek should not be used as a parking lot. It is a dangerous scenario to have people braking suddenly to pull off the Highway and try to figure out how to access the sports fields that will be clearly visible from the highway. This problem would not be as severe if the fields were not visible from the highway.

51.26

According to language in the Cambria Urban Area and San Simeon Acres Community Plan New development that occurs in the urban areas of Cambria and San Simeon Acres has the potential to adversely impact traffic levels in the rural areas outside of each of these communities. In order to ensure that the community plans are consistent with Coastal Act Section 30254, which requires that Highway One remain a scenic two-lane road, as well as to ensure that new development does not create traffic impacts that are inconsistent with Coastal Act access and recreation policies, modifications are suggested throughout the document that limit new development in accordance with these constraints.

Cellular Communications Facilities

Coastal Act Section 30240 states:

Section 30240(a). *Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*

51.27

Cell Tower construction in an Open Space area violates Coastal Act Sections 30251 and 30253, 30231, and 30240. According to the Coastal commission "Establishing cell towers in Open Space designated areas of the Ranch has the potential to disrupt environmentally sensitive habitat through construction activities, such as grading and tree removal. As proposed by the CCSD, the cell tower project will disturb approximately 7,300 square feet of ground, and involve the placement of 700 cubic yards of fill material, installation of two "monopines" (antennas designed to look like trees) that are 68 and 78 feet in height, and construction of five 160 square foot equipment shelters. The allowance of Communications Facilities on the western portions of the Ranch is inconsistent with the Coastal Act policies cited above because it will result in non-resource dependent development in Monterey pine and/or native grassland ESHA, and will result in a significant disruption of the ESHA. Moreover, allowance of Communication Facilities results in inconsistencies with Coastal Act visual and scenic resource protection policies."

Signage and Lighting

“The LCP Update amendment provides much-needed new Areawide Standards for Site Planning, Design, and Building. However, a few shortcomings have been noted. The current standards do not prohibit billboards or other large commercial signs. Therefore, neither the present LCP nor the proposed LCP amendments are wholly adequate to protect these important scenic resources. If modified to correct the noted deficiencies, however, the Central Coast Area Office North Coast Area Plan will (upon incorporation of the Update’s amendments) represent a very substantial improvement over the present LCP standards, and will achieve conformance with the requirements of Coastal Act Section 30251.”

51.28

Section 30240(b). Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Grading and Drainage

Grading the meadow near Santa Rosa Creek and installing a system of pipes and storm drains, and building roadways and parking lots may significantly alter the groundwater capabilities of Santa Rosa creek forever. Flood analysis and watershed management were supposed to be performed for Santa Rosa Creek and studies have not yet been received. Wouldn't it be prudent to perform these studies prior to grading, filling and developing the area around the creek? No watershed studies performed, yet the Cambria Dr. flood project was enacted. Was the Cambria Drive flood project an excuse for a parking lot on highway one and a new road to the park?

51.29

Coastal Act Section 30240(b). Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Coastal Act Section Section 30231. The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Coastal Act Section 30253 requires new development to minimize risks to life and property in areas of high flood hazard. The amended NCAP Update contains standards that require a drainage and erosion control plan for new development in the watershed of Santa Rosa Creek or in the West Village (7-52). The County is also proposing that development in and adjacent to the creek not be approved unless a finding is made that historic stream flows will be maintained or enhanced (7-51). More generally, flooding hazards in the North Coast area are covered by the LCP. Hazards Policy 1 requires that all new development "be located and designed to minimize risks to human life and property." Policy 3 requires a detailed geological review of development proposed in a flood hazard zone. This policy also prohibits new development within the 100 year floodplain, except for areas within the urban reserve line.

According to the Coastal Commission “neither the NCAP as modified nor the general LCP provide adequate policies for minimizing flooding hazards in Cambria. As such, the NCAP is inconsistent with Coastal Act section 30253. In particular, there is no policy guarantee that flooding will not continue to jeopardize new development that is currently not prohibited from being located in the flood plain of Santa Rosa Creek.

51.29 (cont'd)

The Update does not require any mandatory actions by the County to deal with the overall issue of flooding in West Village. Cambria Urban Area Community-wide Standard number 6(B) (pg. 7-50), which requires a finding that historic stream flows will be maintained or enhanced, does not adequately address the overall flooding problem. In order to address the requirements of section 30253, a new standard needs to be added that requires that no development, except for public services, in the mapped flood hazard area within the Cambria Urban Services Line shall be approved until a comprehensive flood analysis and management plan for the mapped flood hazard area is certified as an amendment to the LCP and is implemented.”

The purpose of the flood analysis and management plan should be to limit flooding of the West Village from Santa Rosa Creek at the southeasterly edge of the Mid-State Bank property to the Windsor Boulevard bridge. This plan should also be consistent with section 30236, which limits the alteration of rivers and streams. Finally, at a minimum, the flood analysis should assess the four strategies or alternatives described (in document) and possible improvements to the existing drainage from West Village under Highway One to the creek; and it should include an implementation timeline and identify sources of funding for necessary work. <http://www.coastal.ca.gov/slo5.html>

One of the four Coastal Commission suggestions in this document included the directive to “develop a watershed management plan (personal communication from George Gibson, County Engineering) “A Watershed management plan has not been created for Santa Rosa creek. The Coastal Commission’s stronger environmental language should be taken into consideration and implementation of the watershed management plan should be finalized.

Fuel Management

There is no reason for defensible space on the East Ranch area if nature trails and picnic areas are created rather than sports fields that butt up against the hillsides. Any construction on the East Ranch should be 100 -300 feet away from the forested areas so that no damage to ESHA occurs and few if any trees need to be cut. All development should be at least 100’ from the creek.

51.30

Fire, Landslides, and Non-coastal bluff erosion

Fire, landsliding, and non-coastal bluff erosion hazards are addressed only obliquely, if at all, in the existing Area Plan and in the NCAP Update. However, these hazards are adequately addressed in other sections of the County’s LCP, primarily the Coastal Policies document and the Coastal Zone Land Use Ordinance (CZLUO). In general, the LCP requires the following:

51.31

- a fire safety plan with all land use permit applications within urban or village reserve lines other than single family-dwellings on existing lots with fire agency approval, and with all applications for uses in the rural areas (Hazards Policy 9, CZLUO Section 23.05.082 et seq.);
- a grading permit when grading is proposed on slopes over 20 percent (Hazards Policy 7, CZLUO Section 23.05.020 et seq.);
- a sedimentation and erosion control plan when grading is proposed from October

- 15 through April 15, on slopes over 30 percent, in geologically unstable areas, and within 100 feet of a stream (Watershed Policies 8, 9, and 13, CZLUO Section 23.05.036, et seq.);
- a drainage plan for development on slopes steeper than 10 percent (Hazards Policy 8 and 9, CZLUO Section 23.05.042 et seq.);
- and geologic and soils reports for projects located in a Geologic Study Area, which includes areas subject to landslide and other areas of geologic hazards (Hazard Policy 2, 3, and 7, CZLUO Section 23.07.080 et seq.).

51.31

San Luis Obispo County Safety Element

The two primary principles of the County Safety Element (adopted December 1999) are emergency preparedness and managed development to reduce risk. The Safety Element identifies potential emergency situations and natural disasters within the County, and includes goals and policies for response during an emergency or natural disaster, and avoidance of unnecessary risk. According to this MEIR:

51.32

A tsunami is an ocean wave generated by vertical displacement of the sea floor during an earthquake, a large-scale submarine slope failure, or volcanic eruption. The maximum predicted tsunami run-up in Cambria was reported by Houston and Garcia (1978) to be nine feet for a 100- year event. The tsunami hazard for San Luis Obispo County is reported in the County Safety Element (1999), and the Tsunami Emergency Response Plan (San Luis Obispo County Office of Emergency Services, October 2005). Although a run-up estimate was not given for Cambria in the Safety Element, the hazard of tsunamis within the Morro Bay and Cayucos coastline Fiscalini Ranch Preserve Master EIR Geology and Soils Draft Master EIR V-18 approximately fifteen miles south of Cambria, was reported as being greatest for elevations within 9.5 and 24.2 feet above sea level for the 100 to 500-year events. The Tsunami Emergency Response Plan notes that "recent run-up and inundation modeling and mapping, done by the University of Southern California (USC) under contract to State OES, indicates a general potential maximum inundation elevation of 40 feet above mean sea level. However, undersea geology or bathymetry and local natural or manmade structures may alter this estimate and the county has decided to utilize an inundation of 50 feet above mean sea level for emergency planning purposes." The 2005 report identifies evacuation areas on the West FRP, extending from the Marine Terrace Trail to the ocean. A seiche is a periodic oscillation of an enclosed body of water, such as a harbor, lake, or reservoir. Because there are no harbors, lakes, or reservoirs on or near the site, the hazard related to seiche activity is negligible.

This account does not take into consideration a Tsunami event with backwater flooding into Santa Rosa Creek and up into the playing field area. Is there a Tsunami warning system? USGS predicts that California has a 98% chance of major earthquake within the next 30 years. How quickly can children and visitors unfamiliar with the area, evacuate playing fields adjacent to a creek that is flooding?

51.33

Access and traffic: I am very concerned that we are funneling vehicular traffic, kids, and visitors directly into a bowl-shaped fire and water hazard area with only one way out.

51.34

Slope stability hazards cited with no cumulative impacts.

51.35

EAST FRP - PARKING DEMAND

The proposed *Community Park Master Plan* includes 146 parking spaces within the park. This was based on the following assumptions: five fields in use; two teams per field; one referee per field; thirteen players and two coaches per team; and, four spectators per team in addition to those arriving with players. All of this significant alteration of the meadow can be avoided by constructing none or one field and no community center. Easily avoidable by lowering or eliminating the number of sports fields.

51.36

Transportation and Circulation Fees?

The FRP is located within Area C, as defined by the *North Coast Circulation Study Update Report* (2006), and the proposed project is considered "Other" development. Based on the current adopted fee structure, the CCSD is required to contribute \$403.00 per peak hour trip to the fee program. The community park would generate 63 week day peak hour trips, resulting in a total fee contribution of up to \$25,389. Actual fees would be determined by the County upon issuance of construction permits for community park elements, and would be based on the most current Road Fee Program at the time. Where is this expense item in the CCSD budget under review?

51.37

TC Impact 4 Implementation of the proposed Community Park Master Plan would result in the generation of peak hour trips, and would contribute to the cumulative generation of traffic in the area, resulting in a potentially significant impact.

Sports Fields and Water use

Using 30 acre feet per year for watering of sports fields while Cambria is currently in a 'water emergency' is irresponsible. We were told that "the master plan shall not be implemented unless sufficient water supply is determined to be available." If we had this water available, why were we rationing water and imposing strict fines on over use of water resources? We are assured in the EIR that we are not currently using all of the water allocated to us by permit and that "the CCSD Board is the entity responsible for determining how to utilize water allocated for CCSD operational uses, such as a community park." The EIR states, "the Fiscalini Ranch/East would require water resources for athletic fields, landscaping, and restroom facilities". Are we considering adding more wells and pumping Santa Rosa creek now? The EIR boasts that "water resources on the Ranch will be protected just as other natural resources" and elsewhere, "no new water wells will be installed on the Ranch". The EIR does note that using this groundwater might affect well levels at Shamel Park by the Santa Rosa Creek lagoon. How could those wells be affected and not the lagoon level ten feet away? Given that this creek is a well studied habitat for many protected species, this could pose a major problem. Anticipating that water will be a huge issue in developing the multi-use sports complex, the Draft EIR considers the use of recycled water for irrigating the turf areas.

51.38

While using recycled water is a theoretical engineering solution to providing water, it appears to offer little practical help when the end use is watering turf for recreational purposes. The problem of using Cambria's precious and scarce water supply to irrigate acres of playing fields causes creative solutions to proliferate in the EIR. What started as a community purchase of Fiscalini Ranch Preserve to maintain access to open space in a natural state ends up with something quite different. The EIR notes that one way to solve the heavy use of water that turf requires is to use artificial turf. It is hard to imagine a demonstration treatment plant or acres of AstroTurf instead of wetlands naturally recharging groundwater aquifers.

51.39

Areawide Standards/Combining Designations -- Local Coastal Plan (LCP), add new section as follows: "Standards for preventing polluted runoff impacts from non-point sources. Golf courses, driving ranges, sports fields, and similar developments characterized by intensive irrigation, fertilizer use, herbicide and pesticide applications shall be designed and located to preclude adverse impacts to streams, tidepools, rare plants, riparian vegetation and other environmentally sensitive habitats. Special attention shall be given to the impacts of polluted runoff and irrigation overspray. Unless special drainage facilities or measures are provided to direct and disperse runoff away from environmentally sensitive habitat areas, a vegetated buffer (i.e., filter strip) a minimum of 100 ft. in width shall be left between the developed sports facility and the sensitive habitat feature. Where oak root fungus is a concern, irrigation systems shall be installed and operated in a manner that will not wet the root zone of any retained oak trees.

51.39

Every construction site where the soil disturbance will exceed 0.1 acre (4,356 sq. ft.) shall be subject to a stormwater pollution prevention plan (SWPPP), which conforms to the standards for such plans established by the RWQCB (regardless of whether or not a formal SWPPP approval is required by the RWQCB).

**PERMIT REQUIREMENTS AND APPROVALS
and TABLE IV-1**

Consistency with Plans and Policies

Because the cumulative effects of this project are not being addressed the district is requesting the least amount of environmental review rather than the most prudent methods of review. It is noted that the review of the California Coastal Commission on the community park project does not appear in this section. I am concerned that the 2007 North Coast Area Plan language has still not been adopted, yet this EIR is moving forward. Telecommunications Facilities are not an allowable use in the updated NCAP. There are many other examples of outdated environmental language in the older NCAP dated 1989. I would like to be certain that the stronger Coastal Commission language that appear in the amended version of the most recent NCAP will be included in this document. <http://www.coastal.ca.gov/slorevf.pdf>.

51.40

Below is an excerpt from page 1 of the Overview of North Coast Area Plan Update and Standard of Review that describes the history of the NCAP language updates. This reasoning should apply to this document, unless there is stronger environmental language available in other plans.

51.41

The San Luis Obispo County submittal of the North Coast Area Plan Update is a comprehensive update of the standards, programs, land use map designations, combining designations, narrative descriptions and background information for the entire North Coast Planning Area. The planning area extends from the Monterey County line to four miles north of Cayucos and from just west of the ridge of the Santa Lucia Mountains to the Pacific Ocean.

The County has been working on the update of the North Coast Area Plan (NCAP) since at Least 1989. Since then, the County has conducted numerous public hearings and produced 11 volumes of administrative record. In addition, the San Luis Obispo County Board of Supervisors considered and adopted the North Coast Update once in December of 1996; and reconsidered and amended several major portions of the plan on three separate occasions: June 3, June 17, and August 5 of 1997. Between the December decision and

the subsequent hearings, the County revisited certain basic policies of the NCAP concerning the location and intensity of development along the North Coast, as well as a variety of specific standards.

In contrast to the typical LCP amendment, which is usually focused on a specific policy or set of policies, this amendment is a *comprehensive* update of the entire North Coast Area Plan. There is little in the NCAP that has not been reevaluated and amended, either with entirely new policies, or with modifications to existing policies. And although the County's update of the NCAP is not a formal Periodic Review of the County's LCP or the NCAP, the County does intend it to serve the same basic comprehensive reevaluation function, as clearly stated in the introductory statement for the NCAP submittal:

This amendment package is consistent with the Coastal Act goal of providing a process for the county and Commission to periodically review a segment of the LCP in an organized manner. *All parts of the LCP that may be directly or indirectly affected by the changes are included in this submittal* [emphasis added].¹ More generally, the County's *Framework for Planning* states that the purpose of periodic planning updates is "to review new information or conditions that affect land use policy and to review the effectiveness of policies in implementing plan goals."² As the County has suggested, a comprehensive evaluation of Local Coastal Programs, particularly Land Use policies and designations, is critically important to the effective implementation of the California Coastal Act. Land use conditions are constantly changing, unanticipated circumstances inevitably arise, and knowledge about the effectiveness of various policies necessarily increases. In the case of the North Coast Area Plan, the last comprehensive evaluation of coastal resources and appropriate policies for the North Coast was in 1982, when the staff first evaluated the plan for conformance with the Coastal Act. In the fifteen years since this review, there have been significant changes in both circumstances and knowledge about coastal resource protection along the North Coast.

These changes include:

- Increased population growth in the planning area, with significant new development and associated resource demands;
- New information concerning the limited capacities of the five major water supply creeks in the planning area;
- The listing of several endangered species, including steelhead trout and redlegged frog;
- The emergence of Pitch Canker Disease as a significant threat to the Monterey Pine Forest in and around Cambria;
- Emergence of significant new breeding colonies of elephant seals at Piedras Blancas in the early 1990s;
- Designation of the San Simeon fault as an active fault by the State Geologist in 1986;
- Designation of the Monterey Bay National Marine Sanctuary in 1992;
- Increases in the number of visitors to the North Coast, and a 110% increase in the number of visitor-serving accommodations.
- Better knowledge concerning the effectiveness of visual resource protection policies from the Commission's experience in Big Sur, just above the North

51.41 (cont'd)

51.41 (cont'd)

- Coast of San Luis Obispo;
- Significant flood events in Cambria;
- Discovery of new archeological sites;
- Significant changes in 5th amendment Takings jurisprudence;

These findings consider each of these changed circumstances, as well as others not listed here, in order to order conduct the **most comprehensive review of the NCAP** as is possible in the limited review period available.³ More important, given the magnitude and scope of these changes, as well as the fact that **15 years have passed since the last comprehensive review** of the North Coast planning area, these findings necessarily evaluate the basic policies incorporated into the plan, the appropriate land use designations in light of new information, as well as basic structural features of the NCAP. For example, the existing NCAP does not have a separate access component, as required by Coastal Act Section 30500. This policy gap is addressed in the Public Access findings. Similarly, these findings address a policy gap concerning the conversion of agricultural lands in the planning area. Where relevant, then, and consistent with the County's hope that the NCAP update is a comprehensive evaluation of the plan given changed circumstances, these findings make recommendations to address policy oversights, new insights on effective implementation, and new programmatic efforts that might improve the protection of coastal resources, consistent with the Coastal Act.

Changed circumstances are also important to evaluate because of their integral connection to the effective implementation of the local coastal policies and programs. This is particularly true in the case of natural resource changes, where new information and scientific understanding is constantly evolving. Plans and policies put in place over fifteen years ago could not have anticipated the range and complexity of resource management problems that characterize the North Coast of today.

For example, as listed above, in the case of the North Coast, at least two new species (Red-legged frog and steelhead) have been identified as threatened under the Federal Endangered Species Act. This means that the protection of the riparian zones and creeks in the North Coast is even more vital to adequate protection of coastal habitats. When coupled with the new knowledge about the limited capacities of the creeks, it becomes even more important to revisit the applicable coastal policies, and update them to account for this new resource management condition.

The emergence of the Elephant seal colony at Piedras Blancas, and the spread of Pitch Canker disease among Monterey pine forest are similar resource changes that require new analyses and policies. These are examples where both science and resource conditions have evolved (without predictability) to the point that existing policies no longer anticipate, are inadequate to address, the new resource circumstances.

Other examples listed above, and their particular relevance to the NCAP include:

- Designation of the San Simeon Fault as an active fault by the State Geologist in 1986. The State Geologist determines if a fault is active and designates a "special studies" zone along active faults. Within the special studies zone, areas of proposed development are subject to more rigorous geologic investigation than areas outside of the zone. Structures intended for human occupancy may not be

located closer than 50 feet from a fault trace within the special studies zone. Although the fault was known in 1982, the requirements of the special studies zone did not then apply. The designation of the fault as active and the establishment of the special studies zone may affect location of proposed Hearst resort development.

- Significant flood events in Cambria. Damaging flooding of the West Village of Cambria continues to occur, on average, once every four to five years. Increased development in the flood hazard area since 1982 has subjected more development to flooding. Additional proposed developments in the flood hazard area could exacerbate flooding.
- Discovery of new archaeological sites. Several large, and as yet not thoroughly investigated, archaeological sites were discovered in the San Simeon area in the early 1990's which could affect location of proposed Hearst resort development. Several additional sites on the East - West Ranch, discovered in 1994, could affect development there.

Many other changed circumstances inform this staff recommendation. Detailed discussion of these changes, and why and how they are relevant to the policy recommendations developed herein, is provided in the various Findings of this report.

Overall, these findings address whether the amended North Coast Area Plan as submitted by the County is consistent with the resource protection policies of Chapter 3 of the Coastal Act. This is the standard of review for LCP amendments according to Section 30512.1 and 30514 of the Coastal Act; and Section 13540 of Title 14 of the California Code of Regulations. As discussed herein, although the County has made considerable improvements to the NCAP, there are also numerous policies, programs, land use designations and other miscellaneous changes that are inconsistent with Chapter 3 of the Coastal Act. These findings, therefore, also present suggested modifications that would bring the NCAP into conformance with the Coastal Act (see Appendix A).

Finally, the appendix to the North Coast Area Plan contains background information relevant to the policies, programs, and other contents of the North Coast Area Plan. According to the County, this appendix was "attached to the adopted document [the NCAPU] for information and reference purposes only [and] is not meant to be part of the formally adopted North Coast Area Plan." The Commission also is not including the appendix as part of the formally adopted NCAP. Thus, the information, definitions, or other policy discussions found in the appendix do not in any way modify or take precedence over the findings and suggested modifications of the Staff recommendation herein.

51.41 (cont'd)

51. Mary Webb

- 51.1 Regarding the use of nitrate fertilizers, please refer to response to comment 6.13, and mitigation measure HYD/mm-4 in the Final EIR, which requires the use of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control.
- 51.2 The EIR identifies several mitigation measures to avoid potentially significant impacts to Santa Rosa Creek (please refer to Section V.D.5 and V.D.6 in the EIR). Please refer to Section V.K.5.a.(4) of the EIR, which has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria, including recycled water.
- 51.3 Comment noted. While Cambria is unique, it is also an urban area with a need for a variety of active and passive recreational opportunities.
- 51.4 The objectives were developed by the CCSD based on comments from the public. *The East-West Ranch Public Access and Resource Management Plan* was adopted by the CCSD after considerable public input and public hearing(s).
- 51.5 The CCSD is required to obtain permits from the County for implementation of subsequent projects described in the *East-West Ranch Public Access & Resource Management Plan* and Community Park Master Plan; therefore, milestones are identified where a permit would be necessary. Please note that no activities, aside from restoration activities, are proposed within Santa Rosa Creek and associated riparian habitat.
- 51.6 Please refer to response to comments 7.4, 7.5, and 7.6. The cumulative impact analysis for each resource area can be found at the end of each resource Section within Chapter V of the EIR.
- 51.7 Please refer to response to comments 7.4, 7.5, and 7.6.
- 51.8 The cumulative impact analysis for each resource area can be found at the end of each resource Section within Chapter V of the EIR.
- 51.9 Please refer to response to comments 7.4, 7.5, and 7.6. Mitigation measures are identified to mitigate potential impacts to less than significant, or the maximum extent feasible if the impact cannot be avoided or sufficiently reduced. The CCSD is required to implement these mitigation measures, as adopted. The CCSD also has the discretion to consider alternatives that would avoid or minimize identified significant impacts.
- 51.10 Please refer to Section V.E. of the EIR. Archaeological surveys have been conducted on the Ranch. Where a specific development, such as trail improvements, is proposed a follow-up survey is required to ensure avoidance of significant resources and construction monitoring.

- 51.11 Please refer to response to comment 50.16, and comment letter 2 from the Coast Unified School District (CUSD).
- 51.12 Wetlands within the proposed community park area would be avoided. Implementation of bioswales and filter strips would filter stormwater runoff pollutants (refer to Section V.B. of the EIR). Implementation of IPM strategies would reduce the need for chemicals to maintain landscaping and turf within the park (refer to Section V.J. of the Final EIR).
- 51.13 Artificial turf technology allows for percolation of stormwater. Based on review of preliminary grading and drainage plans would not result in a significant increase in runoff due to impervious surfaces. Percolation into the underlying riparian sub-surface flow would not be significantly hindered (refer to Section V.B. of the EIR).
- 51.14 Please refer to mitigation measure HYD/mm-2, which requires the use of hydrocarbon filters to prevent incidental pollutant runoff from proposed parking areas, and other sources of non-point pollution within the watershed. The CCSD may also consider implementation of described LID designs.
- 51.15 CEQA does not require an analysis of funding in an EIR. The proposed community park plan includes a community center; however, this center is conceptual at this point. If and when the CCSD pursues the development of a community center, further analysis of the environmental effects would be required. The proposed community center is indicated as a subsequent project under this Master EIR, as listed in Table II-1 (refer to Section II, Summary of the Draft Master EIR). The CCSD would consider funding along with environmental information when making a decision on the proposed community center.
- 51.16 Please refer to mitigation measure BIO/mm-25 of the Final EIR, which applies to tree removal and other activities that may affect nesting birds. This measure requires a pre-construction survey to verify presence or absence of nesting birds, and requires avoidance of all nesting birds. Please note that the ESHA designation applies to Monterey pine forest, and is not applicable to the eucalyptus trees. No plans to replace the trees are proposed; however the *East-West Ranch Public Access and Management Plan* includes restoration goals throughout the FRP.
- 51.17 As noted in Section V.G. of the EIR, no significant transportation and circulation impacts were identified.
- 51.18 Rodeo Grounds Drive is included in the proposed park plan, and it has been evaluated to determine carrying capacity. Road improvements and possibly intersection improvements would be required in order to implement the proposed project. There is adequate space to widen the road to meet safety standards; plans for road widening would include protection of the banks along Santa Rosa Creek. The mitigation measures as outlined in the Draft EIR related to protection of the Santa Rosa Creek corridor would apply to road improvements as well. This road has been evaluated as part of the proposed East Ranch improvements. For clarification regarding road status, the access road has been added to Table II-1 as a subsequent project.

- 51.19 As noted in Section V.F.2.c(2) of the EIR: “Because of the viewing distance and extent of intervening vegetation, the eastern portion of the East FRP where the Community Park is proposed would have reduced visibility from Highway 1”. Public information documents and online information could document the location of the park, which could minimize visitor confusion.
- 51.20 The referenced Cambria Drive extension is not proposed as part of this project. The Piney Way extension is proposed to serve the community park, upon implementation.
- 51.21 The proposed project does not include an additional road near the creek. Santa Rosa Creek West and East are proposed trails only.
- 51.22 The proposed project does not include a road in the location of the Santa Rosa Creek trail.
- 51.23 Please refer to mitigation measure GEO/mm-9, which requires restoration measures to stabilize the offsite drainage swale in the vicinity of Piney Way, and implementation of the storm-drain system described in the Community Park Master Plan Grading and Drainage Concept (Firma, 2006). The measure also requires monitoring of the hillside vegetation prior to finalizing plans for the storm-drain system.
- 51.24 Comments noted regarding earthquake –induced failure of steep slopes.
- 51.25 Please refer to Section V.F.5.g of the EIR addressing visual impacts resulting from the proposed staging area.
- 51.26 Please refer to response to comment 51.19. The Highway 1 (staging area) parking area, which currently exists as an unimproved turnout, is not proposed for access to the community park.
- 51.27 The County of San Luis Obispo Planning Commission adopted a Mitigated Negative Declaration for the proposed project, which was appealed; subsequently the land use application was denied, and the project is no longer proposed for inclusion in the Master Development Plan (refer to Section III.D.1.c of the EIR).
- 51.28 Comment noted regarding the LCP Update; no changes to the EIR are necessary.
- 51.29 Please refer to response to comment 6.10 and Section V.B.6.a and V.B.6.b for a discussion of drainage and flooding effects. As noted in the EIR, the proposed project “will not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site; nor will it create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems to control.” As described in the EIR, floodwaters would sheetflow across the site. As described in the EIR, stormwater runoff would sheetflow across the fields, be directed towards vegetated swales, filter through rip-rap, and continue

- to sheetflow towards Santa Rosa Creek. This drainage pattern is similar to existing conditions.
- 51.30 Please note that defensible space applies to structures, and would not apply to turf and pathways.
- 51.31 Comments noted with regard to the fire, landslides and non-costal bluff erosion policies in the LCP and CZLUO. These plans will be required for development identified in the proposed project as appropriate prior to issuance of permits. These plans would be provided when the proposed subsequent projects are brought forward for development. Since the proposed subsequent projects are not designed at this time, the plans would be premature and speculative at this time.
- 51.32 Comment noted regarding tsunamis; no changes to the EIR are necessary.
- 51.33 As you correctly note, and as identified in Section V.A.6.g. of the EIR, based on the *Tsunami Emergency Response Plan* (October 2005), completed by the San Luis Obispo County Office of Emergency Services, areas potentially susceptible to tsunami hazards include coastal areas less than fifty feet in elevation above mean sea level, including the East FRP. Mitigation identified in this section requires the CCSD to create a plan for evacuation based on the NWS warning guidance and the San Luis Obispo County Tsunami Emergency Response Plan.
- 51.34 Emergency access would be provided via Piney Way.
- 51.35 No significant cumulative impacts related to slope stability are identified, because this potential hazard would be mitigated at a subsequent project-specific level by identified mitigation measures and compliance with grading ordinances and regulations.
- 51.36 Comment noted. The traffic study does indicate a worst-case of five fields, and parking can be reduced by reducing the number of fields.
- 51.37 Comment noted regarding the traffic fees and we concur that the most current traffic impact fees would be used when the subsequent projects as listed on Table II-1 are brought forward for development.
- 51.38 Please refer to Section V.K. of the EIR. Water is not currently available to serve the project; however potentially feasible options for water supply are identified in the EIR. Section V.K.5.a.(4) has been expanded to clarify the potential options for potable and non-potable water supply in the community of Cambria. These options would require further study to determine the most feasible option, and to ensure that significant impacts to groundwater, streamwater flow, and environmentally sensitive habitats and species are avoided. The EIR has been amended to clarify that the lagoon may also be affected.

- 51.39 The proposed project includes drainage features including stormwater drains and bioswales. Additional mitigation has been added to require the implementation of Integrated Pest Management measures to minimize chemical use.
- 51.40 The County of San Luis Obispo is currently considering the California Coastal Commission's amendment recommendations specific to the Fiscalini Ranch Preserve. Table IV-1 has been updated to reflect the most current amendments to the North Coast Area Plan adopted by the County of San Luis Obispo.
- 51.41 Comment noted regarding the North Coast Area Plan; no changes to the EIR are necessary. This EIR includes a consistency analysis with the current North Coast Area Plan.

Connie Davidson

From: pw [petergwhitman@yahoo.com]
Sent: Wednesday, April 16, 2008 7:46 PM
To: Connie Davidson
Subject: fiscalini ranch community park

Connie Davidson

My name is Peter Whitman. I own a home at 3171 Rogers Dr.

I am against the community park for several reasons:

1. I voted for it as open space.
2. The initial costs and the ongoing costs for ratepayers.
3. According to the last US Census, the under 18 population in Cambria is declining while the largest growing group is around 50 and older. The park as proposed serves most that segment of the population that is declining.
4. I have heard one person associated with the County Park Dept, speak of this proposed park as a regional park.
5. Our CSD seems to be only able to keep abreast or our current ongoing costs by increasing rates. It makes no sense to incur additional and unnecessary costs in this environment.

Thank you for your consideration of my email

Sincerely

Peter Whitman
3171 Rogers
Cambria, CA

52.1

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now. http://mobile.yahoo.com/;_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

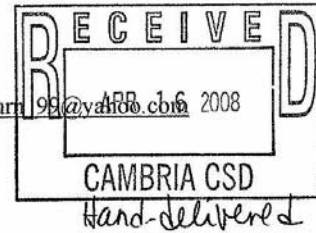
No virus found in this incoming message.
Checked by AVG.
Version: 7.5.519 / Virus Database: 269.22.13/1378 - Release Date: 4/15/2008 9:12 AM

52. Peter Whitman

52.1 Comments noted regarding being against the community park because it should be left as open space, costly, declining population under the age of 18, against regional park concept and against increasing fees and rates. No changes to the EIR are necessary.

**Comments on the Draft Fiscalini Ranch Preserve EIR to the Cambria
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from Anne Winburn 2890 Burton Circle Cambria, CA 93428 e-mail: awinburn98@yahoo.com 475.16 2008
Please send me any future information regarding this EIR



1. Objectives of the project are flawed.

The project objectives do not reflect the CCSD 2004 Community Recreation survey. The stated objective of: “providing public mixed-use field space for active recreation in the community of Cambria, focusing on providing active recreation facilities” and : “to provide a variety of active and passive recreational uses in the community park, including a minimum of four sports fields” are not based on the community recreation survey.

53.1

The project objectives do not reflect the terms of the joint use agreement between the CCSD and the County of SLO for acquisition of Cambria Community Park which states the purpose of the park is to: “preserve open space preservation and public recreation use and intends to set aside approximately 50 acres of said property as a community park serving the recreational needs of Cambria.” The District and the county will have the benefit of additional outdoor recreational facilities at a considerable savings than if either undertook such a project on its own.

No documentation has been discovered which supports the claim that active use, mixed use field space or that a minimum of four sports fields is required nor desired by the residents of the community of Cambria. The county and the CCSD have basically made these objectives up to fit the project they want to execute. It is like reverse engineering. Create the objectives after the project is decided to justify the already decided project. Further, the 2 design firms hired by the CCSD to develop this park were never given the results of the 2004 CCSD recreation survey to design to. See PROS report summary of the CCSD Recreation survey from 2004.

53.2

2. Alternative B is not environmentally superior as it does not mitigate the Class I impacts.

Fiscalini Ranch Preserve Master EIR Alternatives Analysis Draft Master EIR VI-23

CEQA §15126(d) states that the alternative section of an EIR shall “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...” §15126(d)(4) continues by stating “if the environmental superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

53.3

During preparation of preliminary environmental analysis as part of the EIR, the CCSD incorporated modifications to the proposed Community Park Master Plan by including many identified feasible mitigation measures in the revised project as described in Chapter III (Project Description). **As noted in the alternatives discussion, environmental impacts related to**

**Comments on the Draft Fiscalini Ranch Preserve EIR to the Cambria
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available water supply and proximity to noise-sensitive land uses would be unavoidable, based on implementation of a project that meets identified objectives.

53.3 (cont'd)

The EIR states that: “Based on Table VI-3 and the previous discussion, the Environmentally Superior Alternative for the East FRP is the Reduced Project – Alternative B. Implementation of this alternative would not avoid potentially significant adverse noise and water supply impacts; however, these impacts would be further minimized (compared to the proposed project with mitigation) due to the reduction in active recreational use area while meeting the objectives of the proposed project. It should be noted that the significant adverse impacts can be reduced with this alternative; but even with mitigation measures the noise threshold would be exceeded resulting in CLASS I IMPACTS “

53.4

This is an unacceptable level of impact. This alternative is not environmentally superior to the NO SPORTS FIELDS ALTERNATIVE.

This EIR understates the adverse environmental effects of noise pollution on humans, on our neighborhood, on our social structure of our neighborhood and community; both during the construction of this proposed project and after if the proposed project is completed. See the following on the adverse impacts:

53.5

noise pollution

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“**noise pollution**, human-created noise harmful to health or welfare. Transportation vehicles are the worst offenders, with aircraft, railroad stock, trucks, buses, automobiles, and motorcycles all producing excessive noise. Construction equipment, e.g., jackhammers and bulldozers, also produce substantial noise pollution.

Noise intensity is measured in decibel units. The decibel scale is logarithmic; each 10-decibel increase represents a tenfold increase in noise intensity. Human perception of loudness also conforms to a logarithmic scale; a 10-decibel increase is perceived as roughly a doubling of loudness. Thus, 30 decibels is 10 times more intense than 20 decibels and sounds twice as loud; 40 decibels is 100 times more intense than 20 and sounds 4 times as loud; 80 decibels is 1 million times more intense than 20 and sounds 64 times as loud. Distance diminishes the effective decibel level reaching the ear. Thus, moderate auto traffic at a distance of 100 ft (30 m) rates about 50 decibels. To a driver with a car window open or a pedestrian on the sidewalk, the same traffic rates about 70 decibels; that is, it sounds 4 times louder. At a distance of 2,000 ft (600 m), the noise of a jet takeoff

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reaches about 110 decibels—approximately the same as an automobile horn only 3 ft (1 m) away.

Subjected to 45 decibels of noise, the average person cannot sleep. At 120 decibels the ear registers pain, but hearing damage begins at a much lower level, about 85 decibels. The duration of the exposure is also important. There is evidence that among young Americans hearing sensitivity is decreasing year by year because of exposure to noise, including excessively amplified music. Apart from hearing loss, such noise can cause lack of sleep, irritability, heartburn, indigestion, ulcers, high blood pressure, and possibly heart disease. One burst of noise, as from a passing truck, is known to alter endocrine, neurological, and cardiovascular functions in many individuals; prolonged or frequent exposure to such noise tends to make the physiological disturbances chronic. In addition, noise-induced stress creates severe tension in daily living and contributes to mental illness.

Noise is recognized as a controllable pollutant that can yield to abatement technology. In the United States the Noise Control Act of 1972 empowered the Environmental Protection Agency to determine the limits of noise required to protect public health and welfare; to set noise emission standards for major sources of noise in the environment, including transportation equipment and facilities, construction equipment, and electrical machinery; and to recommend regulations for controlling aircraft noise and sonic booms. Also in the 1970s, the Occupational Safety and Health Administration began to try to reduce workplace noise. Funding for these efforts and similar local efforts was severely cut in the early 1980s, and enforcement became negligible.”

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From EIR:

“Three alternatives (Sports Fields Only, No Sports Fields, Passive Recreation, and Fixed Sports Fields Alternatives) were rejected for further analysis because they did not meet the objectives of the proposed project to provide a variety of active and passive recreational uses in the community park, including a minimum of four sports fields. Based on the alternatives analysis, the Reduced Project Alternative B is determined to be the Environmentally Superior Alternative for the East FRP. Implementation of this alternative would not avoid potentially significant adverse noise and water supply impacts; however, these impacts would be further minimized (compared to the proposed project with mitigation) due to the reduction in active recreational use area while meeting the objectives of the proposed project. It should be noted that the significant

53.5 (cont'd)

53.6

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adverse impacts can be reduced with this alternative; however, it does not negate the proposed project, and the proposed project can still be considered a viable alternative. “
This alternative is unacceptable due to the Class 1 rating for environmental impact from noise. The only way you will be able to mitigate the noise to a satisfactory level is if you cover the entire area with a sports multiplex building bubble. This is inappropriate outdoor recreation for this location. This project negatively impacts over 100 residences directly and adjacent to the site. This is unacceptable. The topography of the site is sloped upward ... SAME DESIGN AS AN AMPHITHEATER. The noise will be amplified UP THE CANYON, not diminished by trees and “Soft site” conditions as the EIR states. This is flawed sound engineering analysis. None of the sound studies at other sports locations were in the same topography situation. If you are on a flat field surrounded by flat earth, your analysis might fly but not in this topography at this location.

53.6 (cont'd)

“Draft Master EIR VI-11

REDUCED PROJECT – ALTERNATIVE B

The Reduced Project Alternative B does not include any changes to the *Public Access and Management Plan*. The intent of this alternative is to meet the CCSD’s objective of providing public mixed-use field space for active recreation in the community of Cambria, focusing on providing active recreation facilities, while reducing potential impacts associated with the generation of noise and traffic. This proposed alternative reduces the scope of the proposed project by eliminating 1.4 acres of multi-use sports fields and 8,400 square feet of courts. The plan includes 8.0 acres of multi-use sports fields and a 16,000-square foot court pad, in addition to other park amenities. Infrastructure would include restrooms, a storage/maintenance building, and parking. Landscaping, paths, and trails would be located within the community park, and trails would connect to the Cross-town Trail and other trails proposed on the East FRP.

a. NO EFFECT

Implementation of the Reduced Project Alternative B would not reduce or create additional impacts in the following issue areas: agriculture, hydrology, cultural resources, aesthetic resources, hazards and hazardous materials, and public services and utilities.

Draft Master EIR VI-12

f. NOISE

Implementation of this alternative would not entirely avoid potentially significant noise impacts; however, the level of noise generated during sporting events would be reduced because of the reduction in the maximum possible number of fields in operation. In addition, the sports field area could be located up to approximately 200 feet farther from residential areas, providing a greater distance for noise attenuation.

Class I Impacts—Significant environmental impacts that cannot be fully mitigated or avoided. The decision maker must adopt a “Statement of Overriding Considerations” as required under CEQA Guidelines Section 15093 if the project is approved.”

53.7

**Comments on the Draft Fiscalini Ranch Preserve EIR to the Cambria
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April 13, 2008**

3. The project is not consistent with the demographics of the community and is:

- Largely off base from the stated recreational needs of the community
- Does not design to the demographics of the community
- out of scale with our small community
- Fraught with “Significant, adverse, and unavoidable environmental impacts” on every environmental category

Our Community does not need nor want a sports multiplex.

Demographics of Cambria are outlined below by Frank DeMicco in an article he published on the aboutcambria.com web site <http://aboutcambria.com/author/frank-j-demicco>

“What is Cambria?”

Cambria is a wonderful residential, seaside community set within a Monterey Pine forest. Residents and visitors alike recognize this village as a unique jewel in the string of towns along the California coast. Approximately 6,515 full time resident Cambrians enjoy living in a small village supported by a variety of shops, restaurants, service stations and commercial businesses which meet their day to day needs. Because of its setting on the southerly tip of Big Sur - Little Sur coastline, Cambria has become a travel destination for people from all over the U.S. and abroad. The tourist influx has given rise to the construction of numerous motels, bed and breakfast inns and vacation rental houses.

Who lives in Cambria?

The 6,515 residents (US Demographics 2000) include approximately:

- 0. 1,708 persons (26.2%) 65 years and older – more than twice the National average;
- 0. 3,724 persons (57.2%) 18 to 64 years old - close to the National average;
- 0. 935 persons (12.8%) 5 years to 17 years old – two thirds the National average; and
- 0. 248 persons (3.8%) under 5 years old - half the National average.
- 0. Interestingly 1,262 persons (19.7%) 5 years and older are designated having disability status.

The U.S. statistics are:

- 0. 12.4% - 65 years and older:

53.8

**Comments on the Draft Fiscalini Ranch Preserve EIR to the Cambria
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- 0. 61.9% - 18 to 64 years old;
- 0. 18.9% - 5 years to 17 years old; and
- 0. 6.8% - under 5 years old.
19.3% - 5 years and older having disability status.”

53.8 (cont'd)

4. Noise mitigation measures are not enforceable due to lack of enforcement officers

53.9

CEQA states that “Mitigation measures must be fully enforceable through permit conditions, agreements or other legally binding instruments.”

There are no permit requirements listed in the project that could be used to enforce the mitigation measures for noise. SO that leaves County code enforcement responsible for enforcing the codes and park usage “rules”.

Bruce Gibson, county supervisor has stated that “only 6 agents in Code Enforcement. The County has a resource problem.” (See NCAC meeting minutes for source of quotes about code enforcement.)

Art Trinidad, head of code enforcement has said that “self Policing is necessary” and in response to community complaints about code enforcement: “County cannot enforce a person’s right to enjoy peace on their property. Art: one should probably sue at that point.”

“In addition, when Vacation Ordinance was implemented, the Supervisors were adamant that Code Enforcement would be enlarged to meet the needs of code enforcement and this was not done!”

County code enforcement is largely MIA in Cambria based on the experience of residents. Mitigation measures rely on enforcement and without enforcement, the mitigation measures listed in the EIR for Noise are not valid because they are unenforceable.

Based on experience with county code enforcement’s actual performance we can only conclude that there will be no code enforcement available for this proposed project, as well.

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Attachment:

<http://www.northcoastadvisorycouncil.org/news1.html>

NCAC Minutes of September 19, 2007
Mid State Bank Community Room

IX Art Trinidad: SLO County Code Enforcement

Kathy Smith: Banners in front of businesses. Art: only temporary signs allowed; no off-site signs allowed.

Vacation Rentals: County limits the # of vacation rentals-only way of controlling the numbers. Self-policing is necessary. County meets more often than in the past with the groups involved. Enforcement is very difficult. Vacation rentals need permits, property managers and a business license.

Home Occupations: County will allow businesses in homes, as long as they are quiet and non-intrusive.

Harold Light: Williamson act-questions Parking:: Code Enforcement does not deal with Parking issues, but does deal with abandonment of cars. Parking issues are dealt with by Public Works.

Single Family Residence= 1 kitchen. The number of people who live in one home is not enforceable unless unsanitary conditions are present.

Amanda suggests resident attend the Traffic Committee meeting on the first Monday of every month.

Jesse Arnold, unpermitted vacation rentals.

County cannot enforce a person's right to enjoy peace on their property. Art: one should probably sue at that point.

Cambrian resident Margol Roberts-documents her complaints and distributes packet of e-mails and correspondence sent to the County re. problem at 1987 Sherwood Drive.

Art: few residents attending who complained. Another resident says that "people are afraid to put up with retaliation" when they complain.

Resident who complains about 1987 Sherwood says "code enforcement" is worthless.

Gibson: "only 6 agents in Code Enforcement. The County has a resource problem."

Harold Light-burden of proof is on the County.

Martin Verheagh(?): Cambria resident-reads statement noting that when Vacation Ordinance was implemented, the Supervisors were adamant that Code Enforcement would be enlarged to meet the needs of code enforcement and this was not done!

Based on experience with county code enforcement's actual performance we can only conclude that there will be no code enforcement available for this proposed project, as well.

53.9 (cont'd)

53. Anne Winburn

- 53.1 Comment noted that the community park is not based on the community recreation survey; no changes to the EIR are necessary.
- 53.2 The proposed community park is part of the *East-West Ranch Public Access & Resource Management Plan*, adopted in 2003 by the CCSD. The proposed park is a public recreation use as a community park.
- 53.3 Alternative B is identified as the Environmentally Superior Alternative because it reduces potentially significant effects to the maximum extent feasible, while meeting the primary objectives of the project.
- 53.4 Comment noted with regard to Section 15126 of CEQA Guidelines; please refer to Section VI of the Draft MEIR that includes a discussion of the “no project” alternative and the identified environmentally superior alternative.
- 53.5 The EIR identifies a significant, adverse, and unavoidable impact resulting from the long-term generation of noise.
- 53.6 Please refer to response to comment 6.19. The noise analysis is conservative, and considers thresholds at the property boundary.
- 53.7 Comment noted with respect to Alternative B. No changes to the EIR are necessary.
- 53.8 Comment noted with regard to the project as it relates to the community demographics. No changes to the EIR are necessary. Note that the amenities provided in the community park would serve all of the age groups denoted in this response by providing passive and active recreational opportunities.
- 53.9 Refer to Section V.I.6.d of the Final EIR. Amplified sound shall be prohibited at the community park. Mitigation measure N/mm-3 has been amended to require prohibition of loudspeakers and amplified sound. If noise violations occur, complaints may be submitted to the CCSD.
- 53.10 Comments noted with regard to code enforcement; no changes to the EIR are necessary.

O: CD
C: F-S
TAR
Bode

April 8, 2008

Letters to the Editor
The Cambrian
2442 Main Street
Cambria, CA 93428

Demographics Don't Support "Community" Park

I join the ranks of other Cambrians who oppose the existing plans for the creation of a Cambria "Community" Park.

54.1

Let's look at the demographics in Cambria. Fully 60.1% of Cambria residents are over the age of 45. Folks over 65 comprise 26.6% of this total. Only 16.4% of local households have children under the age of 18. The *median* age of a Cambria resident is 51 years. Really now, how many of us 51+ residents are going to be playing soccer or using a children's playground? If readers don't believe these statistics, just Google "Cambria California Demographics."

Why doesn't the Cambria Community Service District be honest and call it what it is - the "San Luis Obispo North County Regional Park." One can hardly wait for the increased traffic, noise, trash and visual pollution that will surely result. Oh, let's not forget the penchant for some to imbibe in copious amounts of alcohol thereby creating the potential for accidents, "soccer dad fights", or even alcohol related deaths.

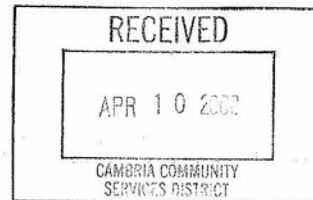
Cambria is truly a magical place. My family has either owned property and/or lived here for 46 years. Most of us didn't leave the rat race of Southern California [or elsewhere] with its attendant crime, crowds, stress and traffic to import these problems to Cambria.

I simply cannot believe this massive park multiplex with its soccer, little league baseball diamonds, dog park, children's playground, restrooms and 140 some parking spaces is what the majority of Cambrians want. Instead of boldly moving forward where few may want to go, let's vote on it.

Warren Wolfe
Marine Terrance

As required:
1920 Sherwood Drive
Cambria, CA 93428
(805) 927-5880

cc: Cambria Community Services District



54. Warren Wolfe

- 54.1 Comment noted with regard to opposition to a community park; no changes to the EIR are necessary.

Connie Davidson

From: Claudia Harmon [claudiamharmon@yahoo.com]
Sent: Friday, April 11, 2008 12:21 AM
To: Connie Davidson
Subject: Fiscalini ranch project

Dear Connie,

I have attached my letter regarding my concerns about the Fiscalini Ranch project.

Thank you for your time in reading and submitting my letter. I hope that the CCSD decides to spend our money in better ways, especially considering the pending rate hike. This is one way to keep our rates down.

Yours Truly,

Claudia Harmon Worthen

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.519 / Virus Database: 269.22.11/1371 - Release Date: 4/10/2008 12:23 PM

55.1

4/16/2008

April 10, 2008

Dear Sirs,

I have lived in Cambria for over 20 years and I am concerned about some of the things that are happening to our community.

I am writing to you concerning the proposed "Park" on East Fiscalini Ranch. The following are some of my concerns.

- Dwindling youth population | 55.2
- Wetlands hard-scape will not address an environmental way of dealing with watershed | 55.3
- Ours is an Agricultural town; we need the open space | 55.4
- We bought the land to preserve it in its natural state | 55.5
- The Latin youth population historically does not participate in helping with youth programs | 55.6
- We have the new elementary school ball fields, plus the high school which are never over-used | 55.7
- In addition, we have Shamel Park for soccer and other uses | 55.8
- The vets hall basketball hoops are rarely used | 55.9
- A walking/biking and horse path would be acceptable, look at the Ojai to Ventura path, quite nice | 55.10
- As a former chairperson for the Community Advisory Committee, I know that there is always an option for No Project | 55.11
- We have not seen any EIR reports | 55.12
- We have not had enough time to review | 55.13
- We need to preserve the quiet that we all have loved about Cambria | 55.14
- We have a teen center already | 55.15
- Who will pay for the irrigation, construction, insurance? The rate payers | 55.16
- Parking and traffic will be increased in a hazardous corner | 55.17
- "If you build it, they will light it". What guarantees will you give to avoid more of our night sky being dulled? | 55.18
- We have pocket parks in Cambria that serve the community | 55.19
- The majority of the community does not want or need more park space | 55.20

I would very much like to have your response to my letter. Please keep me informed as to the decisions that are made. Thank you for taking your time to read my letter. | 55.21

Yours Very Truly,

Claudia Harmon Worthen

55. Claudia Harmon Worthen

- 55.1 Comment noted with regard to list of concerns regarding the proposed community park; no changes to the EIR are necessary.
- 55.2 Comment noted with regard to dwindling youth population, no changes to the EIR are necessary. Dwindling youth population is not an issue being addressed in this Draft Master EIR; the proposed park provides facilities for all age groups.
- 55.3 Please refer to Section V.B.6.a and V.B.6.b for a discussion of drainage and flooding effects.
- 55.4 Comment noted with regard to agricultural use and need for open space. No changes to the EIR are necessary.
- 55.5 Comment noted with regard to leaving the property in a natural state. Note that the CCSO approved the *East-West Ranch Public Access and Resource Management Plan* after input from the public at public hearings.
- 55.6 Comment noted that “Latin youth” do not participate in helping with youth programs; no changes to the EIR are necessary.
- 55.7 Please refer to comment letter 2 submitted by the Coast Unified School District.
- 55.8 Comment noted that Shamel Park could be used for soccer and other uses. Shamel Park does not have adequate space to provide for the soccer needs of the community.
- 55.9 Comment noted that the basketball hoops at the Cambria Veterans Memorial Building are rarely used. Note that the court(s) proposed at the community park are proposed as multi-use for basketball, paddle ball or tennis.
- 55.10 Comment noted with regard to the Ventura path and acceptability of walking/biking and horse paths. These uses are part of the proposed project.
- 55.11 Comment noted regarding the “no-project” option; please refer to the Alternatives discussion, Section VI of the EIR that discusses the “no-project” alternative.
- 55.12 Please refer to the Final EIR.
- 55.13 Comment noted regarding not having sufficient time to review the EIR. Public testimony on the EIR will be taken up until the time the EIR is certified.
- 55.14 Comment noted with regard to preserving the “quiet in Cambria;” no changes to the EIR are necessary.

- 55.15 Comment noted that there is a teen center in Cambria. No changes to the EIR are necessary.
- 55.16 Budget concerns are not part of the EIR, per CEQA Guidelines.
- 55.17 Please refer to Section V.G. of the EIR; no significant transportation and circulation impacts were identified, and sight distance standards are met.
- 55.18 Please refer to mitigation measure AES/mm-11 of the EIR, which states that “Upon application for land use and construction permits from the County for the community park, the CCSD or its designee shall provide a security lighting plan showing shielded fixtures and the use of motion sensors. Exterior lighting shall be limited to security lighting on the community center restrooms, bridge, playground, and parking area. All exterior lighting shall be shielded and directed to the ground. All exterior lighting shall not be directed towards the sky, a structure wall, or towards the property boundary.”
- 55.19 Comment noted regarding pocket parks in Cambria; no changes to the EIR are necessary.
- 55.20 Comment noted that commenter judges that the majority of the community does not want or need more park space. Note that the *East-West Ranch Public Access and Resource Management Plan* was approved by the CCSD after public hearings. This plan includes a community park.
- 55.21 Comment noted with regard to notifications. The responses to comments on the Draft Master EIR are required to be given to public agencies ten days prior to certification of the document. The Final EIR, including responses to comments, is available prior to the public hearing on the Final EIR.



1. steelhead }
 2. lay down turf } ?
 how do you restore a hunting ground?

CAMBRIA COMMUNITY SERVICES DISTRICT

COMMENTS ON THE DRAFT EIR

3. no fences

Please make your comments below on the following issues:

- Content of the EIR.
- Methods on how environmental issues are analyzed.
- Potential Alternatives to the project.
- Potential mitigation measures that would avoid or reduce environmental issues.

4. parking for team & stolley

Comments: Part of the LCP is the Cambria Design Plan — a document required to be considered in the process of permitting any project. Cambria has described itself as RURAL, but the proposed park is urban in nature and the CCSD's query to all Cambrians has very low on it's list, active sports, with passive use being highest in desire by this community.

- We were asked to define ourselves & we did - rural -
 - We were asked what we wanted, we told you, but your plan doesn't reflect that.

Name: Lauren Younger Email: zolot@charter.net
 Address: 2159 Wilton Dr.
 City: Cambria State: CA Zip: 93428

Please check if you would like to receive any future information regarding this EIR.

To submit comments via email, send to: cdavidson@cambriacsd.org

56. Lauren Younger – Draft EIR Comment Form

- 56.1 Comment noted with regard to LCP and rural nature of Cambria. Regarding notes in margins of letter, please refer to Section V.D. of the EIR for an assessment of potential impacts to biological resources.

April 17, 2008
To the CCSD RE: Proposed Sports Complex

①

The land proposed to be used as a "community" park is an integral part of the biological system that keeps our town healthy. It is a unique piece of land located in the very heart of our commerce, surrounded by forest where animals protect themselves from us during the light hours and from which they emerge at night to do what we need them to do -- eat up the moles, voles, deer, mosquitoes, beetles, gnats, termites, snakes, lizards and decaying creatures. Without those predators, the job is left to us. We use poisons, traps, we spend money to hire people to do the job our fellow creatures do for us naturally, if we allow it. So, sharing is a value we need to include in the development of this land. Why? Well, the state of California says we are to protect our natural environment from inappropriate development and the land use codes detail the rules for change in a natural environment. Much of the proposed "community" park violates the intent of those codes because of a design which will inhibit water absorption into the natural underground spaces to feed the creek year-round, lights which will interrupt the hunting and mating cycles of the creatures there and loudspeakers which will disturb not only migratory birds and our regulars, but also the neighbors living just above the rodeo grounds.

57.1

After studying the EIR and random contracts between the county and the CCSD, I am left with some confusion about who this park is really for. It's called a community park in the CCSD/County contract, and it is supposed to reflect our needs. But this park was designed before anyone asked the whole community about their needs, so whose input was used to design this proposed urban sports facility with safety lights and loudspeakers, turf and raised/tamped ground levels? I asked the designer if he had seen our needs list, but he had not. It was not included in the EIR but we are assured by PROS that it will now be in the appendix, even though it was not taken into consideration during the design process. I talked to some of the adult soccer players and team organizers who also have children in sports leagues. Most would be happy with a leveled surface with the animal holes filled in. They do not need turf to play on. They also do not wish to keep the rain from being absorbed into the underground reserves which feed our creek all year long. They don't want lights and they don't want loudspeakers -- they just want practice space. Again, an urban sports complex was not what the sports teams asked for -- it's way past the needs of this community, So the question is who is this park designed for and who exactly gave the designers the input to create this huge complex. The contract between the CCSD and the County needs to be accomplished by May 29th or the CCSD will have to return \$500,000. If we level the ground and our teams use it and we put in some benches and signage and a few trails and a dog park, there should be no problem in keeping the county's contribution to open public space and a community park. That should fulfill the contract.

57.2

57.3

I am convinced we need someone to live on the park grounds as Marcia Phillips did

57.4

2

for so long. Her presence and that of her horses kept people from misusing the land. Since she passed away, neighbors above the grounds have complained of loud parties, fires and that means the predators are being pushed out by the unconscious users of this land -- us.

57.4 (cont'd)

If you put safety lights on that land, as the sheriff so desperately wants as described in the appendix of the EIR, the whole bio system will be disrupted. If you allow loudspeakers, the nesting birds and ground animals will disappear. If you allow turf, the needed chemicals to keep it green will run off into the creek and harm the steelhead that Fish and Game just made welcome with their recent creek project.

57.5

And if you allow anyone to raise the level of the land and tamp it down so that we lose water underground which feeds the creek all year long, then you are unaware of our water problems. Can we keep the \$500,000 if we grade the land and start using it as a community park? I don't think we even need big firms designing our town. We have our own engineer, our own lawyer, our own environmental manager and we have scads of educated, willing people here to create an environment suitable for soccer, baseball and dog socialization in open space. It needs to be kept as undesignated as possible -- it was purchased as open-space with the concept of a community park in the future.

57.6

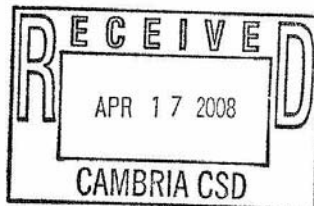
57.7

The land-use code requires that 100 feet from the middle of the creek be undisturbed from any element that might change the natural life of the critters who live there. That includes lighting, noise, runoff, etc. Our creek has withstood a small number of people wading through it, a small number of ranchers dumping into it and a small number of range animals going in and out of it. Opening this land to large numbers of people on a regular basis takes way more thought than time is allowing us in this proposal for what I believe is a county, not community, park. Also, I thought the EIR for the cross-town trail prohibited the disturbance of the wetlands where a portion of the park is designed to be. So what has changed to make it okay to do so now?

57.8

57.9

*Lauren Younger
Cambria Resident*



Hand-delivered

57. Lauren Younger – Letter

- 57.1 Please refer to response to comment 6.10 and Section V.B.6.a and V.B.6.b for a discussion of drainage and flooding effects. As described in the EIR, stormwater runoff would sheetflow across the fields, be directed towards vegetated swales, filter through rip-rap, and continue to sheetflow towards Santa Rosa Creek. This drainage pattern is similar to existing conditions. Please refer to mitigation measure AES/mm-11 of the EIR, which states that “Upon application for land use and construction permits from the County for the community park, the CCSD or its designee shall provide a security lighting plan showing shielded fixtures and the use of motion sensors. Exterior lighting shall be limited to security lighting on the community center restrooms, bridge, playground, and parking area. All exterior lighting shall be shielded and directed to the ground. All exterior lighting shall not be directed towards the sky, a structure wall, or towards the property boundary.” Please refer to Section V.I.6.d of the Final EIR. Amplified sound shall be prohibited at the community park, in addition to the entire FRP. Mitigation measure N/mm-3 has been amended to require prohibition of loudspeakers and amplified sound.
- 57.2 The conceptual design for the community park was determined by the community during public workshops and discussions facilitated by the CCSD. The survey summary results are included at the end of Appendix A in the Final EIR.
- 57.3 Comment noted; no changes to the EIR are necessary.
- 57.4 Comment noted; no changes to the EIR are necessary.
- 57.5 Please refer to response to comment 6.13 and mitigation measure HYD/mm-2 in the EIR, which includes the following requirement addressing the potential for pollutants within the watershed to contaminate Santa Rosa Creek: “The bioswales (or similar method) shall include best management practices to avoid erosion and scour, and shall include a method for filtering hydrocarbons, sediment and other potential pollutants from stormwater runoff.” In addition, supplemental language has been added to the Hazardous Materials section of the EIR (Section V.J.6.a of the EIR) to ensure that proposed methods to maintain sports field turf (i.e., use of fertilizers, herbicides, and other chemicals) consist of Integrated Pest Management (IPM) measures, including but not limited to: Cultural control, physical control, mechanical control, biological control, and limited chemical control (refer to HM/mm-4 in the Final EIR).
- 57.6 The proposed project would not interfere within groundwater recharge, riparian subsurface flow recharge, or creek flow. Section V.B.6.a has been expanded to clarify stormwater runoff effects.
- 57.7 Comment noted. No changes to the EIR are necessary.
- 57.8 Please refer to Figure III-10 in the Master EIR; the proposed plan includes a natural buffer of approximately 50-100 feet between the creek and the sports fields, and no

removal of riparian vegetation is proposed. The standards allow setbacks of less than 100 feet for uses such as paths. No structural development is proposed within the 100-foot buffer.

- 57.9 Please refer to Figure V.B.-8. No direct disturbance of wetland or riparian habitat would occur as a result of development of the community park. Activities within wetland and riparian habitat are limited to restoration.

May 22, 2008

To: Ms. Davidson, CCSD.

The Cambria Youth Athletic Association (CYAA) provides a valuable resource for organized youth recreation in Cambria. Our programs include Soccer, Basketball, Volleyball, Coach Pitch Baseball and Tee Ball. We typically serve 400 to 500 children ages 4 through 16 annually. Due to fundraising efforts all children are offered the opportunity to play on a team, regardless of ability to pay.

In providing this resource to Cambria's children, our board is very aware of the need for a community park that has active recreation facilities. Currently the school district is burdened with the sole responsibility of providing field and gym space for the youth of Cambria. Every year we negotiate field use and gym use from the district, but must stand in line behind school sports and activities before any time can be granted... The school not only has athletics vying for space, but drama and music use the gym for concerts and plays as our district has no performing arts auditorium. The impact on the schools and its resources is costly and calendaring use is frustrating for all involved. We need additional soccer, baseball, and softball fields. We need additional full size basketball courts.

The CYAA Board believes that in providing these sport programs, we are giving children a healthy after school alternative. Playing sports as a child, helps set a healthy, active lifestyle in motion. It also gives children something to do after school, rather than hanging out or cruising around town. It gets children outside, away from the television. It builds social connections with other active children. It builds confidence and strength of character, as good sportsmanship is a top priority in our programs.

The CYAA Board wholeheartedly supports a community park with active recreation facilities. We believe that this community park will help us to continue to provide organized sports for the youth of Cambria.

Thank you for your consideration on this matter,
Tamara Corbet
President CYAA

58.1



58. Tamara Corbet, President CYAA

58.1 Comment noted; no changes to the EIR are necessary.

no CD
C.F.S

May 5, 2008

Connie Davidson
Cambria Community Services District

Re: "East Ranch" park proposal

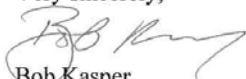
Connie-

My wife and I are two locals who want to express their desire to help work towards a successful outcome of additional baseball and soccer/football fields on the Rodeo Grounds portion of the "East Ranch". We have lived in town for 4-5 years, and have two sons, Aidan (4) and Ryan (3). We know that it is going to take 5-10 years to get this to become a reality, but we will do our part to help make it so.

59.1

Please note that we feel that the MOST IMPORTANT thing about the whole park proposal is that the community gets a few additional "places to play". We don't need lights and amplification. We need places to play.

Very sincerely,



Bob Kasper
4766 Windsor Blvd
Cambria, CA 93428



Maureen Kasper



59. Bob Kasper, Maureen Kasper

59.1 Please refer to response to comment 5.6 regarding amplified sound, and response to comment 5.27 regarding lighting.