

## **6.0 Other CEQA Considerations**

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## **6.0 OTHER CEQA CONSIDERATIONS**

### **6.1 LONG-TERM IMPLICATIONS OF THE PROJECT**

Pursuant to CEQA Guidelines Section 15126.2, this Section analyzes short-term uses of the environment and the maintenance and enhancement of long-term productivity. This section analyzes a variety of construction-related and operational impacts occurring at the local level. During Project grading and construction, portions of surrounding uses may be temporarily impacted by dust and noise. Short-term soil erosion may also occur during grading. There may also be an increase in vehicle pollutant emissions caused by grading and construction activities. However, these disruptions, if they occur, would be temporary and would be reduced to less than significant levels through compliance with the *County of San Luis Obispo Coastal Zone Land Use Ordinance* (CZLUO), the recommended mitigation measures, and the San Luis Obispo (SLO) County-issued Emergency Coastal Development Permit, which included conditions mitigating these impacts.

Project operations could create long-term environmental consequences associated with a transition in land use. The Project's subsequent long-term effects may impact the physical, aesthetic, and human environments. Long-term physical consequences of development may include increased noise from Project-related stationary (mechanical) sources, hydrology and water quality impacts, increased energy and natural resource consumption, and alteration of the onsite visual environment.

### **6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED**

According to CEQA Guidelines Sections 15126(c) and 15126.2(c), an EIR is required to address any significant irreversible environmental changes that would occur, should a proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(c):

*".....uses of nonrenewable resources during the initial and continued phases of the Project could be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely, Primary impacts and, particularly, secondary impacts [such as highway improvement which provides access to a previously inaccessible area] generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."*



The Project involved the consumption of limited, slowly renewable and non-renewable resources. This consumption occurred during the construction of the SWF and will continue during construction of the Project modifications and throughout the facility's operational lifetime. Project construction required a commitment of resources including: building materials; fuel and operational materials/resources; and the transportation of persons and goods to and from the Project site. Project construction required the consumption of resources that are non-replenishable or that would renew so slowly as to be considered non-renewable. These resources include the following construction materials: aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil were also consumed to power construction vehicles and equipment.

The resources committed during Project operations would be similar to those currently consumed within the community of Cambria. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, and fossil fuels. The Project would not create a demand for water, rather it is a water supply project. Fossil fuels represent the primary energy source associated with both Project construction and ongoing operations; thus, existing finite supplies of natural resources would be incrementally reduced. The Project's energy requirements, nonetheless, represent a long-term commitment of essentially non-renewable resources. Refer also to [Section 6.4, \*Energy Conservation\*](#), for further discussion concerning the consumption of energy caused by the Project.

Potentially harmful chemicals typical of water treatment projects, including those associated with reverse osmosis treatment, are used and stored on the Project site. These chemicals are used in small quantities, and are handled, stored, and disposed of in accordance with the manufacturer's instructions and the established regulatory framework. Compliance with such regulations protect against a significant and irreversible environmental change resulting from the accidental release of such chemicals.

In summary, Project construction and operation result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which may limit the availability of these particular resource quantities for future generations or for other uses during the life of the Project. However, continued use of such resources would be on a relatively small scale in a regional context. As such, although irreversible environmental changes would result from Project implementation, such changes would not be considered significant.

### **6.3 GROWTH-INDUCING IMPACTS**

CEQA Guidelines Section 15126(d), *Growth Inducing Impact of the Proposed Project*, requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. This



section analyzes potential growth-inducing impacts, based on the criteria outlined below, as suggested in the CEQA Guidelines. In general terms, a project could foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

- Removal of an impediment to growth (e.g., establishment of an essential public service and provision of new access to an area);
- Foster economic expansion or growth (e.g., changes in revenue base and employment expansion);
- Foster population growth (e.g., construction of additional housing or employment-generating land uses), either directly or indirectly;
- Establish a precedent-setting action (e.g., an innovation, a change in zoning and general plan amendment approval); or
- Develop or encroach on an isolated or adjacent area of open space (being distinct from an in-fill project).

Should a project meet any one of the above-listed criteria, it could be considered growth inducing. The Project's potential growth-inducing impacts are evaluated below against these criteria.

It is noted that the CEQA Guidelines require an EIR to "discuss the ways" a project could be growth-inducing and to "discuss the characteristics of some projects that could encourage...activities that could significantly affect the environment." However, the CEQA Guidelines do not require that an EIR predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur. The answers to such questions require speculation, which CEQA discourages; see CEQA Guidelines Section 15145, *Speculation*.

## **BUILDOUT REDUCTION PROGRAM**

The 2008 CCSD *Water Master Plan Program EIR* (WMP PEIR) includes a comprehensive discussion and presentation of regulatory provisions that introduces a Buildout Reduction Program (BRP) as a key implementation tool to respond to growth-related issues and concerns for Cambria. WMP PEIR Section 5.13, *Population, Housing and Growth*, provides a detailed assessment of the regulatory conditions set forth under local, regional, and state agencies, and consistently references programming that responds to buildout of Cambria. WMP PEIR Section 5.13 provides a nexus of the regulatory setting to an analysis of impacts related to the potential for growth-inducing impacts and presents a framework for a BRP, which is ultimately referenced as Mitigation PHG-1.



With mitigation, no unavoidable significant impacts related to population, housing, and growth were identified, and appropriate and applicable findings were adopted by the CCSD Board of Directors (Board) in support of WMP PEIR certification. As discussed in [Section 2.0, Introduction and Purpose](#), this SEIR is tiering from the WMP PEIR (CEQA Guidelines Section 15152), which has been incorporated by reference, and which includes an analysis of potential growth-inducing impacts (CEQA Guidelines Section 15126), in support of the conclusion of less than significant impact. Those findings are consistent with the findings for this project level analysis.

## BUILDOUT REDUCTION PROGRAM UPDATE, 2016

Since adoption of the BRP and certification of the WMP PEIR, a substantial number of lots have been retired through a variety of methods. In accordance with PEIR Mitigation Measure PHG-2 (requiring progress reporting), the CCSD has continued to track and record merger activities from 2007 and into 2016. The Voluntary Merger Program has been monitored over that time period and information is available at the CCSD office and on the CCSD website. [Table 6-1, CCSD Lot Retirement Program at a Glance](#), provides an overview of lot mergers and retirements through Summer 2016.

**Table 6-1  
CCSD Lot Retirement Program at a Glance**

Means of Retirement	# APNs	Notes
Voluntary Mergers	788	Reported by SLO County Department of Planning and Building
TDC Program	140	Land Conservancy of San Luis Obispo County, Legal Parcels transferred to CCSD
Retired by Conservancy	24	Greenspace, The Cambria Land Trust (35 acres)
Retired by CCSD	51	21 Acres
Fiscalini Ranch Preserve		440 Acres

Source: Buildout Reduction Citizens Committee, July 26, 2016.

Moving into the Spring of 2016, the CCSD initiated discussion with the Land Conservancy of San Luis Obispo County (LCSLO) to reactivate the LCSLO Lot Retirement Program in Cambria. The LCSLO has a long history dating back to 1984 concerning the acquisition of parcels in Cambria to protect Monterey pine forest habitat, primarily using revolving loans and grants from the California State Coastal Conservancy. LCSLO lot retirement history includes 110 lots, which were retired as part of the 2002 and 2006 transfers, and another 52 that were transfers as a part of the CCSD’s Board action by Resolution on March 24, 2016.

In addition to retirement of those 162 lots, the CCSD’s other active programs to reduce the number of buildable lots in Cambria have resulted in a significant reduction over the years. Under the CCSD Voluntary Merger Program, and as referenced in [Table 6-1](#), 788 lots have been merged through 2016. In addition, whenever a single-family residential position is transferred, pursuant to CCSD Municipal Code Section 8.04.010 (which can consist of transferring active meters, as well as positions on wait lists), all lots on the parcel receiving the position must be



merged, and the parcel from which the position is transferred, or an alternate parcel, must be restricted from receiving any future water service in perpetuity and is thereby effectively retired from development (reference CCSD Municipal Code Section 8.04.100). The CCSD also suggests lot mergers during review of proposed remodels when it appears that lots within designated Legal Parcels may not have been under one ownership during its formation process, or when more than one Legal Parcel is being considered to accommodate a proposed remodel.

As noted, the CCSD has had a successful long-term partnership with LCSLO that is an important component of the *San Luis Obispo North Coast Area Plan* (NCAP) supplemental water supply standards. With the transfer of 52 lots in March 2016, the LCSLO Lot Retirement Program is active and moving forward. The renewed partnership can be a way to jointly identify and pursue grants and other funding sources to acquire, retire development rights, and maintain lots in the future.

In addition, at the March 24, 2016 CCSD meeting, the Board appointed a Buildout Reduction Citizens Committee to review and update the BRP. The Committee has been charged with reviewing and updating the BRP, which was originally developed in 2006 by the Citizens Finance Committee. The report is referenced in WMP PEIR Appendix 14.3. The Committee's efforts through summer and into fall 2016 include:

- Review and update the underlying data, including the number of undeveloped lots and the number of potential water connections;
- Review and update the efficacy and feasibility of the Program's means for retiring undeveloped Legal Parcels and recommending changes and/or new approaches; and
- Recommend any further implementation steps for the CCSD to take.

As activity on data collection diminishes, the Committee will turn its attention to the methods for retiring Legal Parcels. This will involve compiling an exhaustive list of potential approaches and resources and an update of implementation strategies. To accomplish this step, the range of opportunities include extending strategies with land conservancies, state, and county agencies, as well as other local opportunities. This could include such approaches as utilizing the CCSD's authority to acquire real property in connection with its parks and recreation activities for open space and related recreational purposes. Such lot acquisitions could, for example, potentially be funded through approval of a special tax by the electorate, in compliance with the requirements of Proposition 218. Also, while the CCSD does not have land use authority, other options, such as an open space impact fee, should be reviewed. Any fee imposed would require supporting studies and demonstration of a nexus to new development. Also, Assessment Districts should be evaluated as a funding option.





In the longer term, the Committee will transition to an oversight role. Specifically, the Committee will report, no less than annually, the progress toward retiring Legal Parcels, including funds raised and set aside for retirements and actual retirements completed. Periodically, the Committee will re-evaluate the accuracy of the underlying data, determine whether the retirement mechanisms are sufficient, and update as necessary.

The CCSD has demonstrated continued meaningful progress in reducing buildout and has committed to further review and advancement of implementation programs moving forward. The BRP remains consistent with existing regulatory policies as reasonable progress has continued with BRP implementation and no further mitigation is recommended as potential growth inducing impacts are concluded as less than significant, and thus consistent with the findings previously noted.

It is acknowledged that the CCSD remains consistent with NCAP standards pursuant to Community Wide Policy CW-4, *Limitation on Development*, and as cited in subparagraph (C)(7):

*"C. Supplemental Water Supply Standards. Any major public works water supply project to support new development within the CCSD service area shall be subject to the following approval standards and findings:*

- 7. Buildout Reduction. That reasonable progress is being made to implement a buildout reduction program within the boundaries of the CCSD."*

It is further noted that the CCSD is a limited purpose special district that provides water and wastewater services. It has no authority over land use or development permitting. The entity that has authority over land use and development permitting in Cambria is the County of San Luis Obispo, which has adopted a Growth Management Ordinance (GMO). Under the GMO, any changes to the allocation limit percentage for Cambria, based upon the existence of the Project, would require adoption of an amendment to the GMO by the County Board of Supervisors.

The CCSD completed the SWF Project out of significant concerns that it would not have sufficient water to meet the needs of its current customers. With the completion of the SWF project, the reliability of the existing supply has improved due to its ability to treat and re-use brackish water, and by providing a more efficient means of controlling the hydraulic gradient between the percolation ponds and up-gradient potable well field (refer to Section 5.5, Hydrology and Water Quality). The CCSD has also more recently completed updates to its future demand projections, based in part on more stringent conservation measures being required of any new homes on the CCSD wait list, which is referenced in Section 3.0.





## IMPACT ANALYSIS

The Project includes the operation of a Sustainable Water Facility (SWF), which requires two employees at the site daily for inspection and maintenance. The Project itself does not include any land development or housing facilities with potential to increase population; refer to [Section 3.5, \*Project Characteristics\*](#). The potential growth-inducing impacts resulting from Project implementation are evaluated below.

### Removal of an Impediment to Growth

The Project does not include any land development or new land uses that establish a new essential public service or utility/service system. The advanced water treatment plant (AWTP) was designed and constructed to treat brackish groundwater, in order to augment Cambria's potable water supply during the current epic drought and also during future droughts and dry periods by recharging the San Simeon well field aquifer to serve the existing development within the CCSD's service area. The SWF is intended to provide long-term drought protection and seasonally augment Cambria's potable water supply. The surface water treatment plant (SWTP) would treat surface water from the potable water supply storage basin or San Simeon Well SS-1 to improve the overall reliability of the CCSD's potable water supply. The Project area is already served by: essential public services (i.e., fire and police protection, parks and recreational facilities, schools, and solid waste disposal); an extensive network of utility/service systems (i.e., water, wastewater, electricity, and natural gas); and other infrastructure necessary to accommodate or allow the existing conditions and planned growth. The Project does not result in increased demands for public services or utility/service systems, or reduce or impair any existing or future levels of services, either locally or regionally, as concluded in [Section 8.0, \*Effects Found Not To Be Significant\*](#). Project implementation does not require substantial development of unplanned or unforeseen public services and utility/service systems. Therefore, the Project does not remove an impediment to growth, or foster new spatial growth, through establishment of an essential public service or expansion to a new area.

Project implementation does not require the installation and/or construction of transportation improvements to accommodate Project traffic, as access is already provided by an existing roadway network.

Further, the Project's potential to remove an impediment to growth was considered in the WMP PEIR. As described above, the CCSD's BRP mitigates the WMP's potential (and consequently the Project's potential) for growth-inducing impacts (i.e., the increased water supply, availability, and reliability). Compliance with the BRP is required by WMP PEIR Mitigation Measure PHG-2. The BRP's overall goal is to retire and/or merge potential building sites in Cambria to reduce water demand. As such, BRP implementation serves as a tool to cap the maximum number of potential water service residential connections (4650, as discussed in [Section 3.0](#) of this EIR) within the CCSD service area. The water supply associated with the Project is needed to meet



water demands during drought conditions and improve overall water supply reliability. The Project implements the facility improvements identified within the WMP and does not modify the development limitations established in the BRP. Development in Cambria is also subject to review (through SLO County's established development review process) for consistency with Title 26 (Growth Management Ordinance). Therefore, the Project does not remove an impediment to growth and/or foster spatial growth through the provision of new access to an area.

### **Foster Economic Expansion or Growth**

The Project's improved reliability, in combination with the benefit of improved conservation, could result in economic expansion and/or increase in the revenue base through taxation, sales or other finances. Economic growth associated with implementation of the proposed facilities was considered and addressed in the WMP PEIR, which has been incorporated by reference to this SEIR.

The CCSD has continuously enforced very stringent water conservation requirements and executed Demand Management Measures (DMM). Additionally, Cambria's Water Use Efficiency Plan (adopted February 28, 2013) recommendations further updated the CCSD's conservation efforts. More recently, the CCSD has completed updated demand projections based in part on more stringent measures being required of any new homes built from the existing CCSD wait list (see [Section 3.0](#)). These projections show that demands can be held in check based upon using the pre-drought, 2012 production as a starting point, and continuing through buildout of the CCSD wait list. Therefore, with a continuing updated conservation program, including more stringent requirements on any new home constructed off the CCSD wait list, in combination with the SWF project's improved reliability and water use efficiency, the community would be able to return to its pre-drought quality of life, while still meeting State reduction targets.

Therefore, when considered in combination with an updated conservation program, the Project is considered growth inducing with respect to fostering economic expansion. It is further noted that the Water Master Plan PEIR concluded that with implementation and mitigation incorporated, growth inducing impacts were less than significant. The proposed project would not result in new/greater growth inducing impacts than previously concluded in the Water Master Plan PEIR.

### **Foster Population Growth**

A project could induce population growth in an area, either directly (e.g., by proposing new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure). The Project proposes to add to infrastructure related to potable water production. In combination with an updated conservation program, the Project may foster a population increase as a result



of homes being built pursuant to the CCSD's wait list which is a part of the maximum of 4650 units. Additional growth considerations would be subject to the following:

- *SLO County Growth Restrictions.* The CCSD does not have any authority over growth and land use. The entity with authority over land use and development permitting in Cambria is the County of San Luis Obispo, which has adopted a Growth Management Ordinance (GMO). Under the GMO the current "allocation" of new units (i.e., "growth") in Cambria is currently set by ordinance at zero (0 percent). Therefore, any increase in growth for the area is subject to approval by the County Board of Supervisors.
- *Lifting of SLO County Growth Limits Requires CEQA Review.* SLO County's current 0 percent growth limitation will remain in place until 2018. Any action at that time to relax the growth limit would be subject to CEQA review separate from this SEIR.
- *Limitations on CCSD Water Sales Outside Urban Reserve Line (URL).* Under a municipal ordinance (Measure P) enacted by Cambria residents in 2006, the CCSD is barred from serving customers outside of the Cambria's URL. This precludes the use of water from the Project for any new development of open space, agricultural property, or other raw land.

Population growth was analyzed in the WMP PEIR, which included the finding and required mitigation to adopt a buildout reduction program that the CCSD has been and will continue to implement. Potential growth-inducing impacts are also assessed based on a project's consistency with adopted plans that have addressed growth management from a local and regional standpoint. As concluded in the WMP PEIR, implementation of the WMP would result in less than significant growth-inducing impacts with mitigation (BRP) incorporated. With mitigation incorporation, the proposed project would not result in new/greater growth-inducing impacts than previously anticipated in the WMP PEIR.

### **Precedent-Setting Action**

As discussed in Section 3.0, the Cambria Sustainable Water Facility Project is subject to various permitted conditions that addressed Project construction/operations. This SEIR further describes and analyzes the potential environmental impacts associated with general land use entitlement matters, as well as hydrology/water quality, light/glare, noise, air quality, cultural resources, and biological resources. The recommended mitigation within this SEIR, as well as conditions set forth through subsequent County permits, including a Regular CDP, and Single-Trip Transportation Permit, should not result in a precedent setting action.

Impacts in this regard were also addressed in the WMP PEIR. Adoption of the WMP established the Project site for development of the SWF. The proposed SWF, as modified and described within this SEIR, would implement the water facilities envisioned in the WMP that were analyzed



at a programmatic level in the WMP PEIR. The WMP PEIR determined that compliance with the BRP would serve as the tool to limit the maximum number of potential water service connections within the CCSD service area. As indicated in [Section 5.6, \*Land Use and LCP Compliance\*](#), the Project is compliant with the NCAP Land Use Standards and is consistent with the CZLUO, the California Coastal Act, and the Local Coastal Program and Land Use Element. Given the Project's nature (a sustainable water facility), and based upon the reasons discussed above, the Project would not result in a precedent-setting action that would induce growth.

## **Development or Encroachment of Open Space**

The Project site is situated on CCSD-owned property currently used as their San Simeon well field and effluent land disposal system site. The Project components are located entirely within this property. Therefore, the Project would not be growth-inducing with respect to its development or encroachment into an isolated or adjacent area of open space.

## **Conclusion**

Overall, Project implementation would foster population and housing growth associated with the CCSD's existing wait list but would not establish a precedent-setting action; or develop or encroach on an isolated or adjacent area of open space. The Project is considered growth inducing with respect to fostering economic expansion and growth, since it would enable Cambria businesses to return to more "business as usual conditions" resulting from more reliable/sufficient water supplies. Ultimately, the Project is considered a benefit to the Cambria community and its residents, given the community's current Stage 3 Water Shortage Emergency Condition.

The proposed Project would provide a permanent water supply facility that can be operated to meet water demands during drought conditions and improve overall supply reliability, rather than enabling unrestrained development of unplanned and unforeseen uses and services. Project implementation would not result in an unregulated amount of growth due to the BRP restrictions, and continued compliance with existing SLO County and CCSD adopted growth management policies and established SLO County provisions. Project implementation would not require substantial development of unplanned and unforeseen support uses and services.

As previously stated and re-iterated in this Conclusion subsection, pursuant to the WMP PEIR, WMP implementation would result in less than significant growth-inducing impacts, with mitigation (BRP) incorporated. With mitigation (BRP) incorporated, the proposed project would not result in new/greater growth inducing impacts than previously anticipated in the WMP PEIR.

In addition to inducing growth, a project may create a significant environmental impact if it would displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere and/or displace substantial numbers of people, necessitating the



construction of replacement housing elsewhere. Project implementation would not displace substantial numbers of existing housing or persons, as no dwelling units are currently located at the Project site. Therefore, the Project would not result in an impact with regard to the displacement of persons, housing, and businesses.

## 6.4 ENERGY CONSERVATION

Public Resources Code Section 21100(b)(3) and State *CEQA Guidelines* §15126.4 require EIRs to describe, where relevant, the wasteful, inefficient, and unnecessary consumption of energy caused by a project. In 1975, largely in response to the oil crisis of the 1970s, the California legislature adopted Assembly Bill (AB) 1575, which created the California Energy Commission (CEC). The statutory mission of the CEC is to forecast future energy needs, license thermal power plants of 50 megawatts or larger, develop energy technologies and renewable energy resources, plan for and direct state responses to energy emergencies, and—perhaps most importantly—promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code Section 21100(b)(3) to require EIRs to consider the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F of the State *CEQA Guidelines*.

State *CEQA Guidelines* Appendix F is an advisory document that assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. For the reasons set forth below, this SEIR concludes that the proposed Project would not result in this type of energy consumption and therefore would not create a significant impact on energy resources.

### 6.4.1 ENVIRONMENTAL SETTING

Energy consumption is analyzed in this SEIR due to the potential direct and indirect environmental impacts associated with the Project. Such impacts include the depletion of nonrenewable resources (e.g., oil, natural gas, coal, etc.) and emissions of pollutants during both the construction and long-term operational phases.

## ELECTRICITY/NATURAL GAS SERVICES

Pacific Gas & Electric (PG&E) provides electrical services in SLO County through State-regulated public utility contracts. Over the past 15 years, electricity generation in California has undergone a transition. Historically, California has relied heavily on oil- and gas-fired plants to generate electricity. Spurred by regulatory measures and tax incentives, California's electrical system has become more reliant on renewable energy sources, including cogeneration, wind energy, solar energy, geothermal energy, biomass conversion, transformation plants, and small hydroelectric





plants. Unlike petroleum production, generation of electricity is usually not tied to the location of the fuel source and can be delivered great distances via the electrical grid. The generating capacity of a unit of electricity is expressed in megawatts (MW). One MW provides enough energy to power 1,000 average California homes per day. Net generation refers to the gross amount of energy produced by a unit, minus the amount of energy the unit consumes. Generation is typically measured in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh).

PG&E also provides natural gas services to SLO County. It is noted that the Project would not consume natural gas as all the pumps and treatment equipment are electrical. Natural gas is a hydrocarbon fuel found in reservoirs beneath the earth's surface and is composed primarily of methane (CH<sub>4</sub>). It is used for space and water heating, process heating and electricity generation, and as transportation fuel. Use of natural gas to generate electricity is expected to increase in coming years because it is a relatively clean alternative to other fossil fuels like oil and coal. In California and throughout the western United States, many new electrical generation plants that are fired by natural gas are being brought online. Thus, there is great interest in importing liquefied natural gas from other parts of the world. As of 2014, 61 percent of the electricity consumed in California was generated using natural gas.<sup>1</sup> While the supply of natural gas in the United States and production in the lower 48 states has increased greatly since 2008, California produces little, and imports 90 percent of its natural gas. Most imports are delivered via interstate pipelines from the Southwest, Rocky Mountains, and Canada<sup>2</sup>.

Electricity and natural gas service is available to locations where land uses could be developed. SLO County's ongoing development review process includes a review and comment opportunity for privately owned utility companies, including PG&E, to allow informed input from each utility company on all development proposals. The input facilitates a detailed review of all projects by service purveyors to assess the potential demands for utility services on a project-by-project basis. The ability of utility providers to provide services concurrently with each project is evaluated during the development review process. Utility companies are bound by contract to update energy systems to meet any additional demand.

## Energy Usage

Energy usage is typically quantified using the British Thermal Unit (Btu). Total energy usage in California was 7,684 trillion Btu's in 2013 (the most recent year for which this specific data is available), which equates to an average of 201 million BTUs per capita. Of California's total energy usage, the breakdown by sector is 38 percent transportation, 24 percent industrial, 19

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<sup>1</sup> California Energy Commission, Energy Almanac, California Electrical Energy Generation Total Production by Resource Type, 2016. [online]: [http://energyalmanac.ca.gov/electricity/electricity\\_generation.html](http://energyalmanac.ca.gov/electricity/electricity_generation.html) accessed July 19, 2016.

<sup>2</sup> Ibid.



percent commercial, and 19 percent residential. Electricity and natural gas in California are generally consumed by stationary users such as residences and commercial and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use.<sup>3</sup> In 2014, taxable gasoline sales (including aviation gasoline) in California accounted for 14,921,441,859 gallons of gasoline.<sup>4</sup>

The electricity consumption attributable to SLO County from 2007 to 2014 is shown in Table 6-2, Electricity Consumption in San Luis Obispo County 2007-2014. As indicated, the demand has remained relatively constant, with no substantial increase.

**Table 6-2**  
**Electricity Consumption in San Luis Obispo County 2007-2014**

Year	Electricity Consumption (in millions of kilowatt hours)
2007	1,761
2008	1,734
2009	1,702
2010	1,667
2011	1,679
2012	1,720
2013	1,758
2014	1,722

Source: Electricity Consumption by County, ECDMS (California Energy Consumption Data Management System), 2015. [online]: <http://www.ecdms.energy.ca.gov/>, Accessed July 19, 2016.

The natural gas consumption attributable to nonresidential land uses in SLO County from 2007 to 2014 is shown in Table 6-3, Natural Gas Consumption in San Luis Obispo County 2007-2014. Similar to electricity consumption, the demand has remained relatively constant, with no substantial increase.

Automotive fuel consumption in SLO County from 2007 to 2015 is shown in Table 6-4, Automotive Fuel Consumption in San Luis Obispo County 2007-2016 (projections for the year 2016 are also shown). As shown, automotive fuel consumption has declined in SLO County since 2007.

<sup>3</sup> California State Profile and Energy Estimates, EIA (US Energy Information Administration), updated April 16, 2015. [online]: <http://www.eia.gov/state/data.cfm?sid=CA#ConsumptionExpenditures>, Accessed July 13, 2016.

<sup>4</sup> Net Taxable Gasoline Sales, BOE (California Board of Equalization), 2016. [online]: [http://www.boe.ca.gov/sptaxprog/reports/mvf\\_10\\_year\\_report.pdf](http://www.boe.ca.gov/sptaxprog/reports/mvf_10_year_report.pdf), Accessed July 13, 2016.





**Table 6-3**  
**Natural Gas Consumption in San Luis Obispo County 2007-2014**

Year	Nonresidential Natural Gas Consumption (in millions of therms)
2007	81
2008	76
2009	77
2010	75
2011	74
2012	77
2013	85
2014	77

Source: Electricity and Natural Gas Consumption by County, ECDMS (California Energy Consumption Data Management System), 2015. [online]: <http://www.ecdms.energy.ca.gov/>, Accessed July 18, 2016.

**Table 6 4**  
**Automotive Fuel Consumption in San Luis Obispo County 2007-2016**

Year	On-Road Automotive Fuel Consumption (Gallons)	Off-Road Automotive Fuel Consumption (Construction Equipment) (Gallons)
2007	155,822,385	17,837,262
2008	149,357,454	16,499,849
2009	148,340,894	15,428,309
2010	147,858,001	15,055,783
2011	144,364,827	14,723,434
2012	140,749,273	14,923,159
2013	139,958,814	14,780,139
2014	140,202,001	14,947,248
2015	139,702,566	15,367,924
2016 (projected)	139,129,467	15,575,989

Source: California Air Resources Board, EMFAC2014.



## 6.4.2 REGULATORY SETTING

The following is a description of State and local environmental laws and policies that are relevant to the CEQA review process.

### STATE OF CALIFORNIA

#### **California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24).**

Title 24, California's energy efficiency standards for residential and non-residential buildings, was established by the CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, and provide energy efficiency standards for residential and non-residential buildings. In 2013, the CEC updated Title 24 standards with more stringent requirements. The 2013 standards are expected to substantially reduce the growth in electricity and natural gas use. Additional savings result from the application of the standards on building alterations. For example, requirements for cool roofs, lighting, and air distribution ducts are expected to save additional electricity. These savings are cumulative, doubling as years go by. The 2016 standards have been approved and will go into effect on January 1, 2017. California's energy efficiency standards are updated on an approximate three year cycle.

#### **California Green Building Standards**

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2013 and went into effect July 1, 2014.

#### **Recent CEQA Litigation**

In California *Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4<sup>th</sup> 173 ("CCEC"), the Court observed that CEQA Guidelines Appendix F lists environmental impacts and mitigation measures that an EIR may include. Potential impacts requiring EIR discussion include:



1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

## 6.4.4 STANDARDS OF SIGNIFICANCE

### SIGNIFICANCE CRITERIA

In accordance with State *CEQA Guidelines*, the effects of a project are evaluated to determine whether they would result in a significant adverse impact on the environment. An EIR is required to focus on these effects and offer mitigation measures to reduce or avoid any significant impacts that are identified. The criteria used to determine the significance of impacts may vary depending on the nature of the project. According to Appendix F of the State *CEQA Guidelines*, the proposed project would have a significant impact related to energy, if it would:

- Develop land uses and patterns that cause wasteful, inefficient, and unnecessary consumption of energy or construct new or retrofitted buildings that would have excessive energy requirements for daily operation.

The impact analysis focuses on the three sources of energy that are relevant to the proposed Project: electricity, natural gas, and transportation fuel for vehicle trips associated with new development as well as the fuel necessary for Project construction. It is noted that the Project would not consume natural gas as all the pumps and treatment equipment are electrical.

## 6.4.5 ENERGY CONSUMPTION

Energy consumption associated with the proposed Project is summarized in [Table 6-5, \*Energy Consumption\*](#). As shown in [Table 6-5](#), the increase in electricity usage as a result of the Project would constitute an approximate 0.07 percent increase in the typical annual electricity



consumption in SLO County. The Project would not consume natural gas as all the pumps and treatment equipment are electrical. The increase in off-road automotive fuel would increase use in SLO County by 0.22 percent, while the increase in on-road automotive fuel would increase use in SLO County by 0.01 percent.

**Table 6-5  
Energy Consumption**

Energy Type	Project Annual Energy Consumption	SLO County Annual Energy Consumption	Percentage Increase Countywide <sup>6</sup>
AWTP Electricity Consumption <sup>1</sup>	1,227 MWh	1,722,000 MWh	0.07%
SWTP Electricity Consumption <sup>1</sup>	1,284 MWh	1,722,000 MWh	0.07%
Natural Gas Consumption <sup>2</sup>	N/A	N/A	N/A
Automotive Fuel Consumption <sup>3,4</sup>			
• Construction (Off-Road)	34,700 gallons	15,575,898 gallons	0.22%
• Operations (On-Road)	20,289 gallons	139,129,467 gallons	0.01%
Notes:			
1. Assumes the system operates continuously for six months (24 hours per day, 7 days/week).			
2. The Project would not consume natural gas as all the pumps and treatment equipment are electrical.			
3. Construction fuel consumption is based on California Emissions Estimator Model (CalEEMod v. 2013.2.2)			
4. Operational fuel consumption would occur from truck trips for RO concentrate disposal.			
5. Countywide fuel consumption is from the California Air Resources Board EMFAC2014 model.			
6. The project increases in electricity and natural gas consumption are compared with the total consumption in SLO County in 2014. The project increases in automotive fuel consumption are compared with the countywide fuel consumption in 2016.			

## CONSTRUCTION-RELATED ENERGY CONSUMPTION

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than 5 minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. There is growing recognition among developers and retailers that sustainable



construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.

The majority of the equipment that was used for constructing the SWF and that would be utilized for construction of the Project modifications would be preassembled and housed in containers. Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest in minimizing the cost of doing business.

As indicated in [Table 6-5](#), the overall fuel consumption would be 34,700 gallons, which would increase fuel use in SLO County by 0.22 percent. As such, Project construction would have a nominal effect on the local and regional energy supplies. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. A less than significant impact would occur in this regard.

## **OPERATIONAL ENERGY CONSUMPTION**

### **Transportation Energy Demand**

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. [Table 6-5](#) provides an estimate of the daily fuel consumed by vehicles traveling to and from the Project site. As indicated in [Table 6-5](#), Project operations are estimated to consume approximately 20,289 gallons of fuel per year, which would increase Countywide automotive fuel consumption by 0.01 percent. The Project would not result in any unusual characteristics that would result in excessive long-term operational fuel consumption. Fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.



## Electricity Demand

Power for the AWTP is obtained from a PG&E supplied pad mount transformer with an estimated capacity of 750 Kilovolt-ampere (kVA) at 480/277 volts, and the service is 1,200 amp. The SWTP's power demand is estimated to be 700 kVA. Power for the SWTP would also be obtained from a new PG&E supplied pad mount transformer. The estimated capacity of the transformer would be 750 kVA at 480/277 volts. The RO concentrate discharged into the four Baker tanks at the SWTP would be hauled off-site daily to the Kettleman Hills Hazardous Waste Facility (Kettleman Hills) for treatment and disposal, located approximately 85 miles northeast of the Project site. This would result in as many as eight round trips per day to Kettleman Hills.

The electricity provider in SLO County, PG&E, is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources, which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures projects will not result in the waste of the finite energy resources. PG&E currently provides electrical and natural gas services to the Project site. PG&E would continue to provide these services and are required by the California Public Utilities Commission to update existing systems to meet any additional demand.

As indicated in [Table 6-5](#), operational energy use would represent a 0.15 percent increase in electricity consumption over the current Countywide usage. The Project would not require natural gas. The water treatment equipment uses the most energy efficient technology available. The Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Additionally, the Project would not result in a substantial increase in demand or transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure.

## Conclusion

The Project consists of a sustainable water facility in response to a severe drought in the community of Cambria. The Project does not include any growth-inducing land uses that increase energy consumption in the community. Rather, the Project provides the community of Cambria a local water supply instead of relying on external sources (e.g., trucking in water or importing water) that would require significant energy consumption. The SWF operates only when necessary to augment Cambria's potable water supply during dry periods. The Project is intended to provide long-term drought protection and seasonally augment Cambria's potable water supply.



## SUSTAINABLE WATER FACILITY PROJECT



The Project is subject to compliance with all Federal, State, and local requirements for energy efficiency. As shown in Table 6-5, the increase in electricity, natural gas, and automotive fuel consumption over existing conditions is minimal (less than 1 percent). For the reasons described above, the Project would not place a substantial demand on regional energy supply or require significant additional capacity, or significantly increase peak and base period electricity demand, or cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance, or preempt future energy development or future energy conservation.