



**SAN LUIS OBISPO COUNTY
DEPARTMENT OF PUBLIC WORKS
UTILITIES DIVISION**

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MEMORANDUM

May 1, 2013

TO: Ryan Hostetter, LEED AP, Project Planner
County Planning & Building Department

FROM: Jeff Lee, PE, Project Manager
Department of Public Works, Utility Division

VIA: Dean Benedix, Utilities Division Manager
Mark Hutchinson, Environmental Division Manager

SUBJECT: DRC2012-00044 – Oceano Drainage Project
Response to appeal letter from Jeff Edwards

Purpose

The purpose of this memorandum is to provide information associated with the project appeal for your use in preparation of the Board of Supervisors staff report prior to the appeal hearing on June 4, 2013.

Response

The first several paragraphs of the appeal letter speak to Planning Department items. While we disagree with the statements regarding the project's consistency with the Coastal Zone Land Use Ordinance, LCP Plans and Policies and the adequacy of the Mitigated Negative Declaration, we will leave it to Planning staff to address those items. The following response items correspond to items identified in the attached appeal letter.

Item #1

The community of Oceano and the intersection of Highway 1 and 13th Street, in particular, have experienced periodic flooding since the inception of the community in the late 19th century. As noted in the Oceano Drainage and Flood Control Study (RMC, 2004), some of the most serious flooding in Oceano takes place along Highway 1 with one of the main locations being the intersection of Hwy 1 and 13th Street. This problem is generally caused by relatively flat topography and a lack of capacity in the drainage facilities to convey runoff south towards the Arroyo Grande Creek.

While this situation has been occurring for a number of years, the existing drainage facilities and the flat topography have not changed since the December 2010 flooding. Therefore, the drainage situation as described in the Planning Commission staff report is

occurred to clear debris from the roadway; however the existing swale and storm drain pipe under the railroad tracks is on Union Pacific Railroad property and not directly maintainable by San Luis Obispo County Public Works or Caltrans. Currently this intersection drains through the swale and pipe network towards a private drainage sump known as POVE (Pismo Oceano Vegetable Exchange) Pond. The sump captures storm water and the pond overflow crosses over Railroad Street and then drains into another private storm drain system on Railroad Street. As stated above, the infrastructure has not changed significantly since 2010 and only minor maintenance within the public right of way has been performed.

Item #2

As discussed in the text of the Planning Commission staff report (Page 1-3), the Airport property and Pismo Coast Village properties will be re-graded to provide additional on-site storage capacity and positive drainage from these already disturbed properties into the drainage infrastructure. The appellant's letter underestimates the area to be graded as "approximately five (5) acres". As shown in the "Table of Graded Areas" on Page 1-4 of the Planning staff report, the Pismo Coast Village and County Airport properties encompass approximately 12.43 acres with a maximum fill depth of twelve (12) inches.

As part of preliminary plan preparation, Earth Systems Pacific prepared a "Soils Engineering and Infiltration Test Report, Oceano Drainage Project, 13th Street at Highway 1, Oceano, California", dated March 1, 2013. In the Report, Section 6.0, Conclusions, states *"In our opinion, the site is suitable...for the proposed drainage improvements, provided the recommendations contained herein are implemented in the design and construction."*

As project implementation continues, recommendations from the Soils Report will be incorporated into the final design, permitting and construction documents. These could include construction methods to address differential settling of the sedimentation basin, over-excavation and anchoring of the basin to minimize groundwater effects and installation of best management practices where appropriate.

The project will be constructed entirely in areas that do not contain sensitive aquatic resources, and would, to a small degree, enhance riparian and aquatic habitat by reducing sedimentation and improving water quality. The project is separated from the riparian corridor along Arroyo Grande Creek by the north levee, which is approximately 15 feet high and 75 feet wide at the base. Thus, although the new sedimentation basin is located within 75 feet of the unmapped riparian ESHA (environmentally sensitive habitat area), the existing levee defines the ESHA limit physically, practically and as matter of wetland functions.

Although official land use maps do not designate sensitive resource areas (SRAs) in the vicinity of the project, there are riparian and wetland habitats that meet the applicable definitions in the Land Use Ordinance adjacent to the downstream end of the sedimentation basin. As noted within the Planning Commission staff report, these habitats currently function as a bio-filter for storm flows before they are released into Arroyo Grande Creek. This area is bordered by the airport, the north levee, and an RV storage lot. No ground-

breaking construction activities will be done in the willow riparian area. It will continue to convey drainage to Arroyo Grande Creek and provide some bio-filtering of storm flows, a function that is anticipated to be enhanced by the project since debris and sediment in storm flows will be collected in the proposed sedimentation basin, thereby reducing the need for significant maintenance within the riparian and wetland habitats. Occasional willow trimming or topping would occur to meet FAA and the Caltrans Division of Aeronautics requirements within the runway protection zone (RPZ). As part of permitting, this project proposes to include maintenance of this area as part of the project; such regular care will restore and enhance the natural functions of the wetland as envisioned by the LCP.

The project will also direct storm water away from other wetland areas not officially mapped as an SRA downstream from Highway 1. This willow dominated wetland complex lies along the northern (eastern) side of the airport and is connected to the Oceano Lagoon by existing storm drains. However, much of the runoff that flows to this area will continue to do so as the proposed project does not address the entire sub-watershed. Flows that exceed the ten year event, flows out of the Oceano Lagoon into the area, and most importantly, high ground water levels will continue to support this wetland complex. To the extent that some storm water will be intercepted by the Hwy 1 and 13th Street project, flooding of residences along Fountain Avenue may be reduced.

Currently, storm water makes its way to Arroyo Grande Creek through various means, one of which is the existing low area on Airport property that functions as a basin. The project will result in cleaner storm water entering this basin and Arroyo Grande Creek as a result of roadside infiltrators catching the first flush runoff from storm events. Additionally, as noted above, debris, sediment and other suspended solids will settle out in the new concrete-lined sediment basin. The sedimentation basin will discharge into the adjacent willow woodland riparian area (the low area), which currently acts as a basin and bio-filter for storm water from the surrounding areas before discharge into Arroyo Grande Creek.

Water quality will be improved as a result of reduced flooding of the roadway. Levels of fuels and lubricants from cars driving through the formerly flooded portion of the roadway will be reduced when flooding is alleviated, thus improving the quality of storm water runoff that is currently making its way into Arroyo Grande Creek.

All storm water (except that which percolates into the ground or enters infiltrators) currently discharges to wetlands and other waters located in Oceano, including Arroyo Grande Creek. The proposed project does not create this situation, but will preserve these natural areas by improving the quality of the runoff entering these areas by collecting debris and trash, removing or minimizing the threat of fuel and other lubricants found on cars that currently drive through this water, and allowing sediments to settle out of this water.

Item #3

The benefits of a drainage project can not be judged against the size of a drainage area. The Hwy 1 and 13th Street drainage project addresses a known and quantifiable drainage issue that impacts the health and safety of the travelling public on public roadways. As noted in the Planning Commission staff report, (Page 1-2), *“One of several long-standing*

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problems involves poor drainage conditions at the intersection of Front Street (Highway 1) and 13th Street. Flooding at this location results in closure of an important roadway and damage to adjacent properties. The proposed project is a cooperative effort by several agencies, lead by the County...” and “...flooding persists because drainage facilities leaving the site are simply inadequate to drain storm waters. Consequently this project proposes to install a new storm drain to address this localized flooding issue.”

While it is true that the overall drainage area for Meadow Creek and Arroyo Grande Creek are significantly larger than the project drainage area; the project's 40.5 acre watershed is a sub-watershed to the larger watershed. Additionally, the flooding experienced at this intersection is more frequent and severe than other specific locations within the watershed. As such, implementation of this project will mitigate drainage issues on Highway 1 in the community of Oceano thereby contributing to a safer, healthier and more livable community.

With regards to water quality issues, road side infiltrators have been installed through-out the community of Oceano as shown on the attached exhibit. As part of this project, road-side infiltrators will be installed upstream of the Hwy 1 and 13th Street intersection. The infiltrators will intercept the first flush run-off from the project drainage area and allow water to infiltrate back into the community groundwater. The combination of infiltrators, storm drain inserts and flow velocities within the drain pipe provides a means and method for debris, sediment and other suspended solids adequate time to settle out of the storm water.

Page 1-3 of the staff report states “...the two upstream inlets lead directly to infiltrators that will direct the first flows, and an increment of flows thereafter, back into the shallow groundwater.”

In accordance with preliminary discussions with CA Coastal Commission staff, the project took into consideration the **draft** “Post-Construction Stormwater Management Requirements for Development Projects in Central Coast Region” scheduled for consideration/adoption on July 12, 2013 by the Central Coast Regional Water Quality Control Board (RWQCB).

Based upon the Performance Requirements, the project is within Watershed Management Zone 1 and subject to retain the 95% Percentile Rain Event which, according to RWQCB, corresponds to a storm water depth of 1.5” to 1.6” (0.13’). As defined in Attachment C and D of the **draft** Resolution, the project's Impervious Surface is 30,700 square feet which is the Regulated Project area. This area includes “replacing a paved surface resulting in alteration of the original line and grade, hydraulic capacity or overall footprint of the road” which is the area of Hwy 1, 13th Street and Paso Robles Street. Other project areas are outside the defined Regulated Project area in accordance with Section B.1.b. and the definition of Impervious Surface in Attachment C. Additionally, per Attachment D.1.b.i, the impervious surface is multiplied by 0.5 because it is outside an approved Urban Sustainability Area.

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Therefore, the Retention Volume for the 95% Percentile 24-hr Rainfall Depth equals:

$$\begin{aligned} \text{Volume} &= (0.13 \text{ feet}) \times (30,700 \text{ square feet}) \times (0.50) \\ &= 1,995.50 \text{ cubic feet} \end{aligned}$$

The project will address and infiltrate the required volume through installation of Infiltrators (per attached San Luis Obispo County Detail D-2c) in 13th Street and Paso Robles Street, LID devices within the drain inlets and stormwater infiltration in appropriate areas and as part of the culvert installation and proposed detention basin.

Based upon drainage information provided by Reynolds, Smith & Hills, Inc. (RS&H) in their "Oceano County Airport Drainage Study", dated February 2013, the Oceano Airport (L52) is located on approximately 58 acres. Approximately 7.2 acres of the airport property, i.e., the Delta Street right-of-way and the southeast corner of the airport (the RV storage area) are the only areas that drain into the project drainage shed. This area was taken into consideration by the design engineer during preparation of the project plans and specifications.

The remaining approximately 50.8 acres of airport property is hydraulically separate and drains into the Meadow Creek Lagoon (aka Oceano Lagoon) via a 36" storm drain pipe or into a drainage ditch that drains into Meadow Creek Lagoon. The runoff is collected in a series of vegetated swales, valley gutters and inlets equipped with oil/water separators. These drainage devices convey runoff from the Airport aprons to the swales just north of the apron which ultimately drain into the Meadow Creek Lagoon. The Airport addresses impurities within their runoff outside the purview of the Hwy 1 and 13th Street project. The CEQA document prepared for this project does not attempt to address or mitigate impacts to areas outside of this project scope.

County staff is fully aware of all ongoing and completed studies and projects along Arroyo Grande Creek including, but not limited to:

- Arroyo Grande Creek Habitat Conservation Plan;
- Waterway Management Program and accompanying EIR;
- Habitat Analysis of Arroyo Grande Creek prepared by Essex;
- Dr. Christopher's California red-legged frog Habitat Analysis;
- Douglas Rischbieter's annual tidewater goby surveys; and
- Meadow Creek Lagoon Biological Survey and Wetland Delineation.

Additionally, Arroyo Grande Creek provides habitat for 3 federally listed species: California red-legged frog, steelhead trout, and tidewater goby. This is well documented in the Recovery Plan for the red-legged frog and published Federal Register rules including the critical habitat rule for steelhead (70 FR 52574), and the critical habitat rule for tidewater goby (78 FR 8772). The Creek also provides habitat for nesting birds.

As noted in the Mitigated Negative Declaration prepared for the project, survey efforts were conducted within the project area. Monarch butterfly surveys were conducted on October

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25, 2010 and December 7, 2010 at the stand of eucalyptus trees adjacent to Highway 1 by County staff (Katie Drexhage and Kelly Sypolt). A botanical survey was conducted on May 11, 2012 by County staff (Eric Wier and Katie Drexhage). Information from these surveys as well as the above-noted documents assisted in the preparation of Biological Assessments for both the California red-legged frog and steelhead.

Mitigation for the removal of four non-native Eucalyptus trees from an existing grove that does not provide monarch habitat is not a significant impact. The Initial Study prepared for the project commits to planting new trees offsite for aesthetic reasons, which is more than adequate pursuant to CEQA.

The appellant's letter states that "monitoring is not mitigation under CEQA." Several best management practices to avoid erosion, sediment runoff, and avoid and minimize impacts to sensitive species are included in the Mitigated Negative Declaration as mitigation measures. A separate measure to prepare a Habitat Mitigation Monitoring Program is also included as mitigation. The purpose of the monitoring program is to ensure the implementation of mitigation measures. The Mitigated Negative Declaration does not rely on monitoring alone for mitigation.

Item #4

Within the appellant's letter, several area-wide projects are noted as having a possible impact on operation of this project. The projects mentioned include preliminary, current, and future community projects, improvements at the Oceano Airport, State Park improvements and other recent projects in adjacent cities. Storm water from these projects does not drain into the water shed of the Hwy 1 and 13th Street project; they are hydraulically separate and lower in height than the proposed project site and drain into the Meadow Creek Lagoon. Therefore, the ability of those waters to impact the Hwy 1 and 13th Street drainage project are minimal to negligible.

As discussed at the Planning Commission hearing and in other sections of this memorandum, the purpose of the Hwy 1 and 13th Street drainage project is intended to address frequent and periodic drainage concerns at this intersection. Highway 1 is a main corridor for the travelling public and provides a connection between south county cities and communities. Flooding at this intersection causes traffic delays and potential safety issues for the travelling public and emergency services. Reducing the occurrence of flooding along this roadway will improve circulation in and through the community of Oceano.

That being said, the Hwy 1 and 13th Street project was not developed independently of other projects within the watershed. The Oceano Drainage and Flood Control Study included a review of existing drainage problems and identified near-term drainage improvements that ultimately became this project. An ancillary benefit of this project will be to lessen flows to the Oceano/Meadow Creek Lagoon area which will help mitigate existing drainage issues for residences and businesses downstream of the project site.

Item #5

With regards to project budget and associated costs, at the Planning Commission hearing it was suggested that if this situation had an easy fix, it would have already been

accomplished. However, the combination of existing inadequate storm drain facilities, relatively flat topography, design and permitting constraints and limited available space to store storm water outside the State right-of-way adds a level of complexity and cost to the overall project.

The following is a partial list of agencies, companies and individuals necessary to implement the project:

- California Coastal Commission
- US Department of Housing and Urban Development (for CDBG funding)
- Federal Aviation Administration
- Army Corps of Engineers
 - Regional Water Quality Control Board
 - CA Fish & Wildlife Service
- Caltrans
- San Luis Obispo Council of Governments
- County Planning & Building Department & General Services-Airport Division
- Union Pacific Railroad (right-of-entry agreement)
- Utility company coordination/relocation
 - AT&T
 - Sprint
 - Pacific Crossing
 - MCI
 - Oceano CSD (water)
 - The Gas Company
 - Qwest
 - Nextel
 - Level(3)
 - Pacific Gas & Electric
 - Charter Communications
 - So. San Luis Obispo County Sanitation District (sewer)
- Private land owners and companies (for easement purposes)
 - Phelan & Taylor
 - Pismo Oceano Vegetable Exchange
 - Pismo Coast Village RV Resort

Item #6

Projects proposed, funded, or permitted by one or more State or local public agencies in California are subject to environmental review pursuant to the California Environmental Quality Act (CEQA). Projects proposed, funded, or permitted by one or more Federal agencies are subject to environmental review pursuant to the National Environmental Policy Act (NEPA). Projects involving both California and Federal agencies are subject to both statutes. For some projects, CEQA and NEPA can be addressed in joint documents that satisfy the common and unique requirements of CEQA and NEPA.

This approach works where the agencies involved have developed policies and procedures specifically to facilitate the use of joint documents. An example is Caltrans and the Federal Highway Administration (FHWA). Because the majority of highway projects in California involve Federal funding, Caltrans and FHWA have developed procedures to address both CEQA and NEPA. However, absent an ongoing and regular working relationship involving a narrow range of project types, the use of joint CEQA and NEPA documents is typically not feasible. For this project, at least three federal and five California/State local agencies

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will be subject to CEQA/NEPA as they carry out their various project roles. All eight agencies have adopted CEQA/NEPA implementing guidelines as required by the statutes, yet none have existing inter-agency CEQA/NEPA processing agreements in place. Consequently, an expectation that the involved agencies could use a single CEQA/NEPA document is simply not realistic.

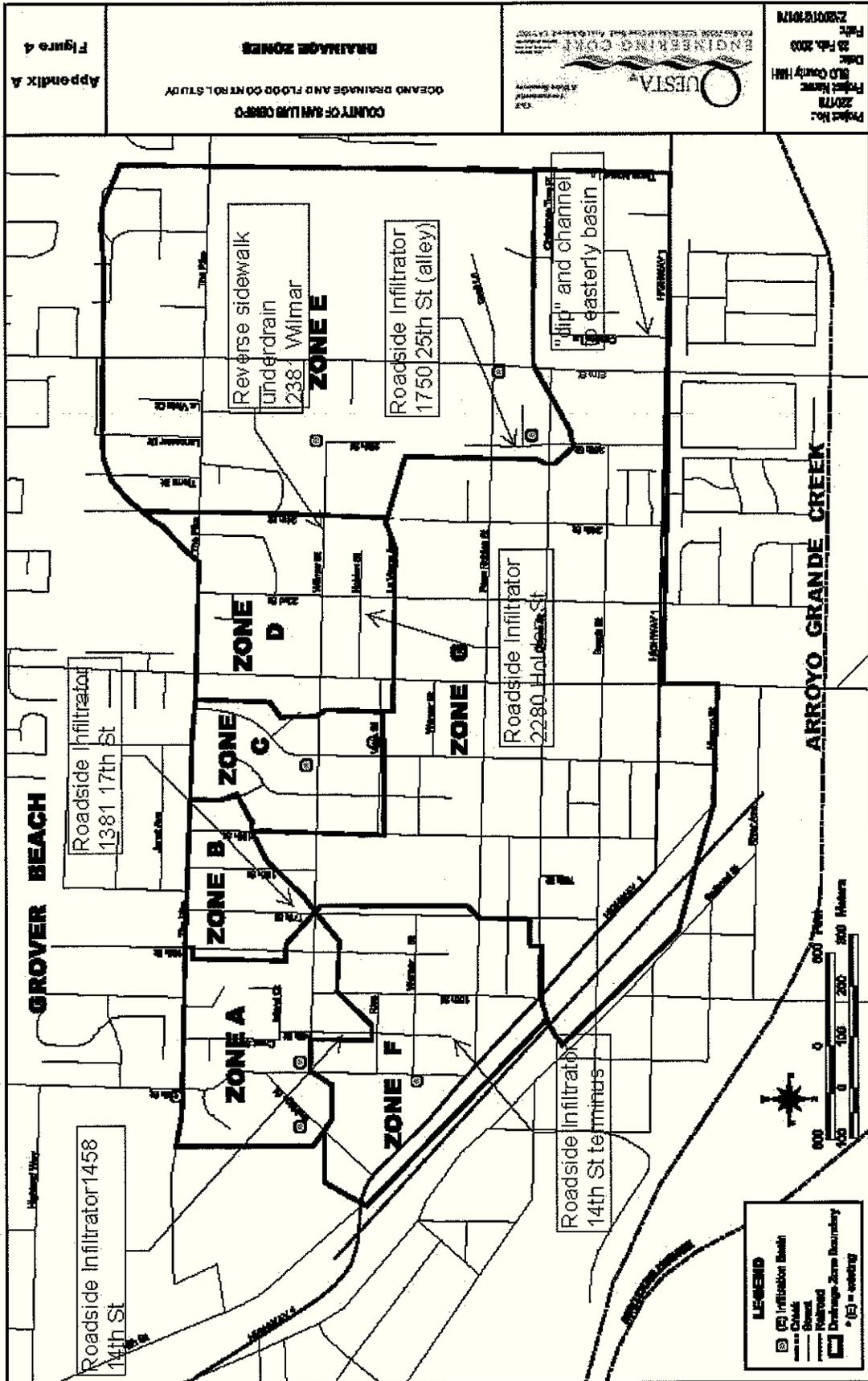
Establishing agreements between multiple agencies to move towards the use of common CEQA/NEPA documents is beyond the scope of the project, and likely beyond the scope of a single local agency. It should be noted that all of the local/State agencies will use the CEQA document prepared by the Lead Agency under CEQA (the County), and one of the Federal agencies has already completed the NEPA process for their permit role on a nationwide basis (the U.S. Army Corps of Engineers). Also, all of the CEQA/NEPA documents that are specific to the project have/will use the same environmental technical information, but will incorporate that information into their internal processes as required by their own guidelines and policies.

Thank you for the opportunity to provide this information to you. Please contact us with any questions or comments as you are preparing your staff report. We will be available and in attendance at the June 4, 2013 Board of Supervisors Appeal Hearing to provide materials and support for your presentation.

CF: 420.176.01
WBS 300465

May 1, 2013

Oceano Drainage Project – Response to Planning Commission Appeal

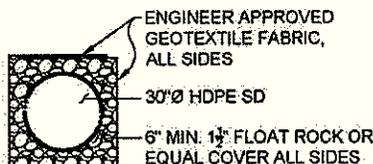


Revisions					
Description	Approved	Date	Description	Approved	Date
NEW STANDARD	REM	NOV 07			
NOTE 6	GDM	JAN 11			

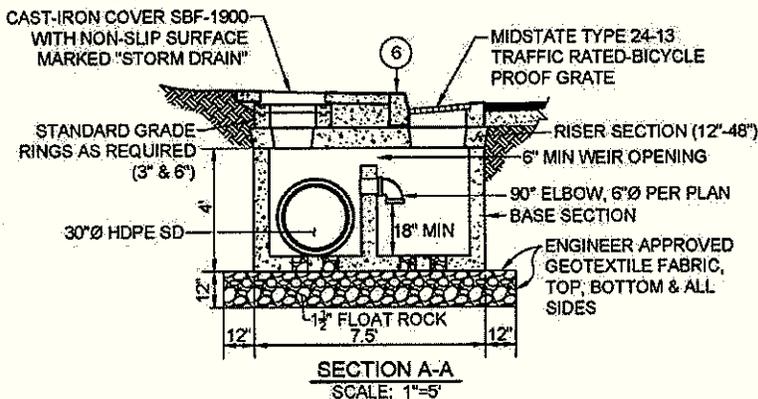
NOTES:

1. USE OF THIS STANDARD DRAWING WITHIN THE PUBLIC RIGHT-OF-WAY SHALL REQUIRE PRIOR DEPARTMENT APPROVAL.
2. CONCRETE BOX BASE SECTION, TRAFFIC RATED TOP SLAB, GRADE RINGS, CURB TOP, GRATE, FRAME AND COVER SHALL BE "MID-STATE CONCRETE PRODUCTS" SLO COUNTY STANDARD OR APPROVED EQUAL.
3. REFER TO SECTION 5.2.2 E FOR ADDITIONAL DESIGN CRITERIA.
4. PROVIDE 2-FEET MIN COVER OVER THE PERFORATED STORM DRAIN, AND PROVIDE 12-INCHES MIN CROSSING CLEARANCE BETWEEN UTILITY LATERAL CROSSINGS AND THE PERFORATED STORM DRAIN.
5. A 30"Ø HDPE PERFORATED STORM DRAIN SHALL BE REQUIRED BY THE DEPARTMENT.
6. INSTALL STORM DRAIN MARKER PER D-6.

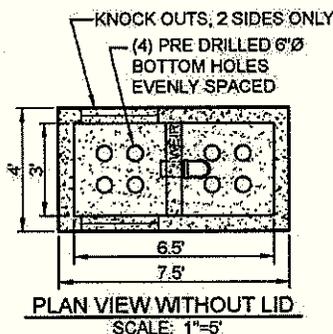
ALL CATCH BASINS SHALL BE EQUIP WITH A STAINLESS STEEL FRAME DESIGNED TO ACCEPT A "DrainPac™" STORM DRAIN FILTER INSERT, OR EQUAL.



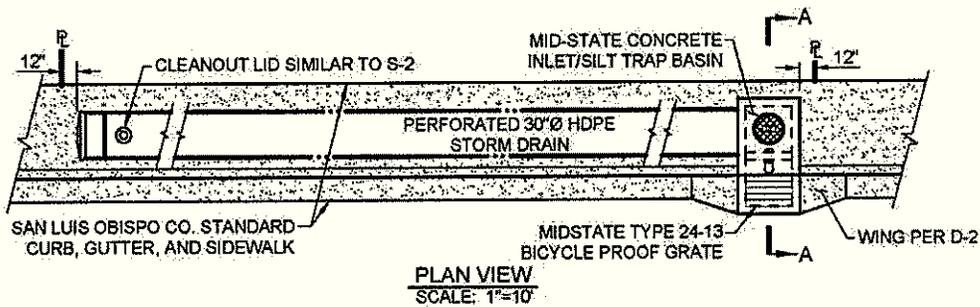
TYPICAL PIPE SECTION
SCALE: 1"=5'



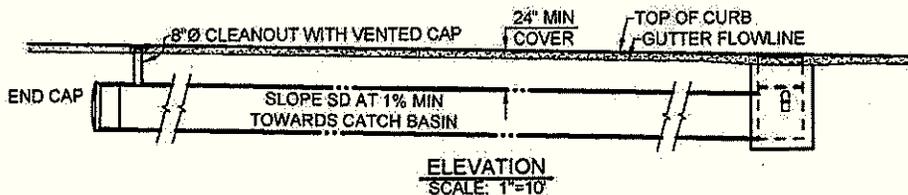
SECTION A-A
SCALE: 1"=5'



PLAN VIEW WITHOUT LID
SCALE: 1"=5'



PLAN VIEW
SCALE: 1"=10'



ELEVATION
SCALE: 1"=10'



DEPARTMENT OF PUBLIC WORKS & TRANSPORTATION
ROAD SIDE INFILTRATOR
(R.S.I.)

Scale: AS SHOWN	Adopted: 2011
Drawing No: D-2c	
Sheet No: 1 OF 1	

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J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN

March 27, 2013

San Luis Obispo County Planning Department
976 Osos Street
Room 200
San Luis Obispo, CA 93408

RE: DRC2012-000444 Oceano Drainage Project at 13th St. and HWY 1
Development Plan, CUP and CDP/ED11-173 (300465)

Attention: Ramona Hedges, Planning Commission Secretary

Dear Ms. Hedges,

As you know, at its regular meeting of March 14, 2013, the Planning Commission approved the above referenced project with conditions. As you may be aware, I wrote a letter dated March 7, 2013 raising questions and concerns about the proposed project. Additionally, at the March 14, public hearing, I provided oral testimony in a similar connection.

Please be advised this letter and the attached appeal form shall serve as my official appeal of the Planning Commission approval of the above referenced project to the Board of Supervisors. The following discussion is a preliminary presentation of concerns that will be raised before the Board of Supervisors at the de Novo hearing.

Specifically, I wish to appeal the Planning Commission approval of the subject development as referenced above on Coastal Zone grounds. As proposed, the Oceano Drainage Improvement project is inconsistent with the San Luis Obispo County Coastal Zone Land Use Ordinance and LCP Plans & Policies. Furthermore, I believe the proposed Mitigated Negative Declaration is inadequate to fully assess and mitigate potential significant environmental effects from the project.

At the Planning Commission hearing, staff presented photographs of the intersection of 13th St. and HWY 1 in a storm event depicting the intersection under 2-3 feet of water in December of 2010. This is not an accurate reflection of how drainage functions at this location since remedial work was completed following the flooding of December 19, 2010. In other words, the problem as represented in the photographs no longer exists and the real scope of any remaining problem remains uncertain.

The proposed project includes grading to fill an area of approximately five (5) acres with upwards of 10,000 cubic yards of soils. It is unclear what the maximum height of the fill would be. There appears to be no detailed soils report or other geotechnical analysis of the fill area or the sedimentation/ detention basin. Staff does note in the staff report that groundwater is known to occur three (3) feet or less in the area. In the absence of hydrophytic vegetation, the presence of wetland hydrology and, or the presence of hydric soils would constitute a wetland under state law. If a wetland, the primary area of fill

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ACQUISITION MARKETING LAND USE REDEVELOPMENT

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J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN

placement and the detention basin would be considered an Environmentally Sensitive Habitat Area (ESHA). The project also proposes to drain the concrete lined detention basin into a "natural" area of Arroyo Willows where the stormwater will be concentrated before it exists into Arroyo Grande Creek. I don't believe the Coastal Act supports the use of an ESHA to cleanse concentrated urban stormwater runoff.

②

The proposed project will collect and concentrate stormwater runoff from an approximately 40.5 acre watershed being a subset of the larger Meadow Creek watershed. The anticipated flow rate under a 10-year storm event is expected to be 45 cubic feet per second. Secondly, given the project watershed area is only 40 acres (contrast to Meadow Creek watershed of 6,400 acres) it raises the question of whether, or not this project will have measurable beneficial impacts on the storm water runoff and flooding issues that have been chronic in the community of Oceano.

Purportedly the project "is designed to enhance and restore riparian and aquatic habitat by reducing sedimentation and improving water quality." There appears to be no evidence in the record to support this conclusion including baseline water quality reports, wetland delineation or other supportive documentation.

③

The mitigation measures addressing water quality are inadequate. It does not appear there was any water quality analysis with regard to the concentration of urban runoff including airport runoff which may include lead and other aircraft products which discharges into Meadow Creek and possibly Arroyo Grande Creek. There appears to be no demonstration that airport runoff will not migrate into the detention basin by either surface runoff or groundwater infiltration. There is a known presence of Federal Endangered Species (i.e. Tidewater goby and Steelhead trout). Also, it does not appear wildlife surveys conducted for the riparian and other natural areas were adequate to properly craft mitigation measures. Moreover, the offsite mitigation plan lacks specificity and cannot be considered adequate mitigation without doing so. Also, monitoring is not mitigation under CEQA.

Staff indicated the proposed project is one of a "suite" of projects County Public Works will be deploying to address the community of Oceano's flooding issues. However, there is no analysis of how any of the other projects will complement the proposed project. For example, it is unclear how the sand bar management, Delta St. grading, Juanita pipeline and pump, HWY 1 at 17th St./19th St. or Sand Canyon flapgate modifications will work in conjunction and collaboration with the proposed project. A programmatic EIR would be helpful to better organize and prioritize drainage solutions for the community.

④

Additionally, there are several other projects being undertaken in the immediate vicinity by other agencies that may significantly affect the efficacy of the proposed project. They include, additional paving and creation of impervious surfaces at the Oceano Airport (see Master Plan Exhibit 5A), California State Parks drainage improvements along Meadow Creek (SCH 2012101012) or the City of Grover Beach's recent stormwater improvements at Grand Avenue and HWY 1.

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J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN

A number of alternatives were considered to the proposed project; however all of them focused on a small portion of Oceano and the limited watershed that drains to HWY 1 and 13th Street. There appears to be no watershed-wide (Meadow Creek, 6,400 acres) approach to achieving solutions in the community. Moreover, the project scope and components appear to be driven by grant availability other than sound design strategies.

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The proposed project includes a cost estimate of approximately \$2.7 million. I have several concerns in connection with the scope of the project and its overall cost. One, it appears approximately 50% of the total project cost is for engineering, administration, right-of-way acquisition and other soft costs. Secondly, there is no cost-benefit analysis to determine the relative benefits of the proposed project. Lastly, given finite financial resources and the limited availability of grant funding, it would appear these funds may be better applied in a different context.

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Finally, it appears that a NEPA document will be required due to the involvement of federal agencies, including the FAA and the USACE. It is my understanding that concurrent processing of a joint CEQA and NEPA document may be the most effective approach in satisfying environmental review requirements. I recommend a programmatic EIR to address CEQA issues and an Environmental Assessment for NEPA.

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Please feel free to contact me with any questions you may have.

Sincerely,

Jeff Edwards

Jeff Edwards
805.235.0873

Cc: Ryan Hostetter, Planning Department Staff
Nicole Retana, Planning Department Secretary

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ACQUISITION MARKETING LAND USE REDEVELOPMENT