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March 17, 2014

Hon. Steve Lavagnino, Chair
Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara, CA 93101

Re: Goleta Beach Managed Retreat Project 2.0
Planning & Development Response to the District Comment Letter
Service Address: Goleta Beach Park; APN: 071-200-017
County of Santa Barbara Case Numbers: 11DVP-00016 and 11CDP-00069

Dear Chair Lavagnino:

The Goleta Water District (District) provided a comment letter, dated July 26, 2013, to the County Planning and Development Department (P&D) regarding the Final Environmental Impact Report (FEIR) for the Goleta Beach Managed Retreat Project 2.0 (Project). In that comment letter, the District advised P&D of significant concerns that have not been adequately addressed in the Project review. Despite multiple letters (attached) the District has not received adequate Project plans to review. Given that a number of design parameters associated with the utility corridor have not yet been fully considered, the District is concerned that the Project may not be achievable.

The District is also concerned that P & D's response to the District's DEIR comments inaccurately portray our ongoing collaboration with the County. Specifically:

- The P&D response to District "Comment 13-1" incorrectly states that the District has had an opportunity to review the design with the County engineer, Penfield & Smith. To date, District has not seen specific engineering designs that detail the impacts to affected utilities. As such, we have been unable to provide direction as to District requirements or compliance with State and Federal regulations governing recycled water infrastructure.
- The P&D response to the District "Comment 13-4" incorrectly states that there is an agreement in place regarding the recycled water line relocation within the park. This District is not party to any formal agreement.

Further, the response to our comments appears to defer the exploration of a known viable alternative location to a future uncertain time. The District has no current plan to relocate the affected water line to the north side of State Route 217. The District's comment was merely intended to illustrate that a potentially viable alternate location for this utility corridor was inadequately analyzed prior to its dismissal in the DEIR. The District maintains that this alternative may be the most viable option given that the proposed conceptual berm may not be capable of withstanding the proposed beach retreat.

Recognizing the concerns noted above, the District remains committed to continued collaboration with the County as the Project moves forward into the implementation phase. A successful Goleta Beach Project is one that also adequately protects the reliability and security of District infrastructure.

District staff remain available to discuss all known technical constraints and the host of potential impacts associated with the Project in order to ensure the best outcome possible. Your attention to our concerns is especially important given the drought conditions and supply shortage that we are now facing. There is no question that the recycled water supply line running through the Goleta Beach parking area is a critical resource that must be permanently protected for the District to maintain its ability to sustainably serve the community now and into the future.

Please feel free to have your staff contact me at (805) 879-4620 or David Matson, Assistant General Manager, at (805) 879-4624 if you would like to discuss the District comments or to request additional clarification. Thank you for your attention to these important issues.

Sincerely,



John McInnes
General Manager

CC: Hon. Salud Carbajal, 1st District Supervisor
Hon. Janet Wolf, 2nd District Supervisor
Hon. Doreen Farr, 3rd, District Supervisor
Hon. Peter Adam, 4th District Supervisor
Mona Miyasato, County Chief Executive Officer
Goleta Water District Board of Directors
David Matson, Assistant General Manager

Enclosures: April 6, 2010 – District Letter to the County Planning Commission
July 2, 2010 – District Letter to the County Board of Supervisors
June 27, 2012 – District Letter in response to the Notice of Preparation
July 26, 2013 – District Letter in response to the Draft EIR



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April 6, 2010

Honorable Cecilia Brown, Chair and Members, Santa Barbara County Planning Commission sent via e-mail dvillalo@co.santa-barbara.ca.us

RE: PROPOSED GWD PIPELINE RELOCATION IN GOLETA BEACH PARK

It is our understanding that the proposed Goleta Beach Park 2.0 plan provides for further erosion of the park at the western end. If this erosion is allowed, approximately 1,000 feet of the Goleta Water District's (District) recycled water pipeline will need to be relocated at an estimated cost of \$700,000. The County Parks Department (Parks) estimates that there will be a 60-foot wide corridor for various utilities including the District's pipeline to relocate between the northernmost estimated reach of the erosion line and Caltrans' Highway 217 paved roadway.

Based on our understanding of the proposed project, the District offers the following concerns for your consideration:

At a meeting between the District and Parks on February 8, 2010, County staff indicated that it was unsure whether Caltrans would allow pipeline construction up to Highway 217. In fact, it may be likely that Caltrans would require a distance from the highway to any parallel constructed pipeline, which would reduce the width of the 60-foot corridor. Additionally, the 60-foot corridor may not be adequate because there are separation requirements set by the California Department of Public Health Services between sewer lines, potable waterlines and recycled waterlines. Separation distances are also needed for construction and maintenance purposes of these various pipelines for safety of the facilities and workers maintaining or repairing them.

The northernmost reach of the erosion line is based upon historical records of a past erosion extent and therefore is not a guarantee that erosion would not advance further north in the future. In consideration of this, the District's recycled water line would need to be relocated to a safe setback distance north of this imaginary erosion line. Because of the significant cost associated with the line relocation, the District's customers should be provided some assurance that a relocated line would be protected (e.g., a backstop revetment or some other form of protection).

The District recognizes the County's challenges with respect to the long-term management of the Goleta Beach and appreciates your consideration of matters raised herein.

Sincerely,

A handwritten signature in black ink, appearing to read 'John McInnes', with a long horizontal stroke extending to the right.

John McInnes
General Manager



4699 HOLLISTER AVENUE

GOLETA, CALIFORNIA 93110-1999

PHONE 805-964-6761

July 2, 2010

Honorable Janet Wolf, Chair and
Members, Santa Barbara County Board of Supervisors

RE: LONG TERM MASTER PLAN FOR GOLETA BEACH COUNTY PARK

It is our understanding that the proposed Goleta Beach Park 2.0 plan provides for further erosion of the park at the western end. If this erosion is allowed, approximately 1,000 feet of the Goleta Water District's (District) recycled water pipeline will need to be relocated at a cost that will likely exceed \$700,000. As described in the County of Santa Barbara (County) Parks Department's (Parks) agenda letter dated June 22, 2010, it is proposed that Parks will work with the District and Sempra Energy to relocate the respective utility lines into the California Department of Transportation (Caltrans) CA Route 217 right-of-way. It is also proposed that the County's pressurized wastewater line be relocated into the same right-of-way.

While the District is not necessarily opposed to this proposal in concept, the following concerns and comments are offered for the Board of Supervisors' consideration:

At a meeting between the District and Parks on February 8, 2010, County staff indicated that it was unsure whether Caltrans would allow pipeline construction up to Highway 217. In fact, it may be likely that Caltrans would require a distance from the highway to any parallel constructed pipeline. The staff report provides no indication whether Parks has discussed their proposal with Caltrans and offers no indication of Caltrans' potential receptivity. Additionally, it is unclear whether there is adequate space within the CA Route 217 right-of-way to accommodate separation requirements set by the California Department of Public Health Services between sewer lines, potable waterlines and recycled waterlines. Separation distances will also be required for construction and maintenance of the utility lines to preserve the safety of the facilities and workers maintaining or repairing them. **For these reasons, the feasibility of relocating the District's utility line into the CA Route 217 Caltrans right-of-way is undeterminable at this time and cannot be regarded as a realistic solution until a) Caltrans provides an indication that Parks' proposed action plan is acceptable and b) adequate space is available to allow for proper separation of all applicable utility lines.**

July 2, 2010

Honorable Janet Wolf, Chair and
Members, Santa Barbara County Board of Supervisors
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The Parks staff report also proposes to establish a new "utility corridor protection zone" that includes the installation of "soft" protective structures. However, no additional information has been provided and Parks has indicated that it is currently "researching so-called soft protective structures." Additionally, Parks has indicated that said structures would only be installed under certain conditions based on "trigger points" which also have not yet been disclosed. For these reasons, **the effectiveness and reliability of this protection zone concept is undeterminable at this time and cannot be regarded as providing the necessary assurance that utilities will be protected once they are moved at significant expense.**

Finally, Parks has not affirmed whether the County will fund the entire project, including the relocation of the utilities, or require the District's rate-payers to assume the responsibility of relocating the recycled water line. If the County places this responsibility on the District, a rate increase would be necessary and subject to Proposition 218 requirements. An indication of the County's intent with respect to this matter would provide clarification and help inform future District decisions regarding rates and future recycled water systems and deliveries. Pertinent to this issue is Parks agenda letter, fiscal discussion section, which indicates that the new concept plan will realize significant savings over the previously proposed permeable pier proposal and improvements to the park's infrastructure will have a net positive impact on the park's facilities.

The District recognizes the County's challenges with respect to the long-term management of the Goleta Beach and appreciates the Board of Supervisors' consideration of the matters raised herein.

Sincerely,



John McInnes,
General Manager



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Mr. Alex Tuttle
County of Santa Barbara
Planning and Development Department
Development Review South Division
123 East Anapamu Street
Santa Barbara, CA 93101

27 June 2012

Re: APN: 071-200-017
Service Address: Goleta Beach Park
County of Santa Barbara Case Numbers: 11DVP-00016 and 11CDP-00069

Dear Mr. Tuttle:

The Goleta Water District (District) has reviewed the Notice of Preparation (NOP) for the Goleta Beach County Park Managed Beach Retreat Project 2.0. The District appreciates this opportunity to comment on the project and highlight areas within the scope of this environmental review that ensure continued reliability of District facilities. The District looks forward to working with Santa Barbara County (County) through the duration of the environmental review process.

As stated in the NOP, the County has been directed by the Coastal Commission to analyze options that would allow the beach sand at Goleta Beach State Park to erode naturally. Considerable erosion of coastal sand in the area is anticipated, which may adversely impact the District's existing recycled waterline. One aspect of the proposed project includes relocating utilities such as the District's 18-inch reclaimed water main to a utility corridor, protected by a berm, to prevent possible damage to the waterline resulting from ongoing beach erosion. This waterline conveys approximately 1,000 acre feet per year of recycled water to 19 large recycled water customers including UC Santa Barbara, various golf courses and other large landscaped areas that are valued by the community. Recycled water service is an important aspect of our water conservation efforts because the reclaimed water can be used in lieu of potable drinking water resources that are of limited supply in our arid region.

Accordingly, the District offers the following EIR Scope Comments:

1. The environmental document should address and analyze the long term viability of the protective measures proposed for utility infrastructure. For example, the analysis should, at a minimum, address whether the berm or other design options proposed to protect the utility corridor will stand up to climatic events impacting the shoreline. This analysis could include development of a model that addresses historic wave, tidal and weather activity for the project site and contributing marine environment. Additionally, inputs for the model should be made available for peer review to ensure the effectiveness of the model.

In addition to providing assurance that proposed utility protective measures are adequate, this review will support the climate change analysis currently required per California Environmental Quality Act (CEQA) Guidelines. Notably, the State Department of Water Resources has prepared an

analysis (using LiDAR technology) of the California Coastline for use in considering sea level rise. Use of this data would help produce a more refined understanding of shoreline impacts in the project area.

2. The current project design calls for relocation of utilities to a corridor outside of the Coastal Process Zone. The physical location of the corridor would be within what appears to be less than 20 feet of the Zone at its closest point (the western end of the proposed corridor) based on *Figure 2* of the *AMEC Technical Proposal*. Location of the proposed corridor would require CalTrans approval which, according to previous communications with County staff, has not been secured. Additionally, the current location of the Coastal Process Zone is based on the 1943 back beach zone location. Given potential increases to the northern encroachment of this Zone resulting from strong weather events as well as sea level rise associated with climate change, environmental review should analyze appropriate alternatives for the location of the utility corridor.

For example, incorporation of an Alternative considering relocation of utilities to an easement north of Highway 217 would support the long-term viability and protection of utility and related community infrastructure. The location of the bike path may need to be separated out from the utility corridor analysis if sea-side location of the recreational facility is preferred. The District encourages the County to add this consideration as a fully-analyzed Alternative including appropriate level of hydrological, biological, traffic and other supportive studies.


3. CEQA analysis of *Hydrology and Water Quality* as well as *Utilities and Service Systems* should address public safety and health by protecting utility infrastructure in the design alternatives. Specifically, the project analysis should include detailed quantitative analysis regarding appropriate maximum spacing between and protection of utilities. This is especially the case, as the California Department of Health Services requires specific separation standards applicable to reclaimed water and sewer facilities. This concern could potentially be addressed in an expansion of the utility corridor easement area and installation of hard protective structures (rather than "soft" protective structures such as the proposed berm).

Given the physical constraints associated with the encroachment of the proposed utility corridor into the Highway 217 right-of-way, and CalTrans policies to minimize or disallow encroachment, it may be infeasible to meet regulations regarding adequate utility separation. It may also be difficult to establish that the design is the preferred environmental solution. Accordingly, review and analysis of a regulatory compliant more northerly location should be included in the CEQA project review scope.

4. Lastly, any environmental analysis requires a reasonableness test. Although fiscal impacts are not typically part of an environmental review process, to ignore fiscal constraints while analyzing Alternatives could lead decision-makers on a path toward adoption of an alternative that may create an environmentally preferred option, but is economically impractical and infeasible. If the intent of CEQA is to inform decision-makers regarding potential environmental impacts, that analysis must include the appropriate economic and social context. Absent a commitment by the County to pay for relocation of District facilities, the costs associated with implementation of the adopted Alternative will be borne by area residents, business owners, and educational institutions that rely on our service. Before the District expends limited resources in response to the County's project, our ratepayers need assurance that the Alternative approved was adequately analyzed as to its long term ability to protect relocated District facilities.

In closing, this letter provides initial comments regarding the Notice of Preparation. The District looks forward to reviewing the Draft Environmental Impact Report and working with the County on developing a range of solutions addressing our shared concern for protecting vital public resources. Please contact David Matson, Assistant General Manager, at (805) 879-4624 if you would like to discuss these comments or if you would like to request additional clarification.

Sincerely



John McInnes,
General Manager

dm/te/cr/et



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July 26, 2013

Mr. Alex Tuttle
County of Santa Barbara
Planning and Development Department
Development Review South Division
123 East Anapamu Street
Santa Barbara, CA 93101

Re: APN: 071-200-017
Service Address: Goleta Beach Park
County of Santa Barbara Case Numbers: 11DVP-00016 and 11CDP-00069

Dear Mr. Tuttle:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Goleta Beach County Park Manager Beach Retreat Project 2.0. The Goleta Water District (District) would like to reiterate the concerns raised in our previous comment letters including the June 27, 2012 letter in response to the Notice of Preparation, the July 2, 2010 letter to the County Board of Supervisors, and April 6, 2010 letter to the County Planning Commission during the preliminary design phase of the project. The District is committed to ensuring that the project protects the reliability and security of District infrastructure while maintaining compliance with State and Federal regulations.

Recycled water is an important component of the District water supply portfolio as it conserves potable water supplies; helping to maintain the sustainability of our precious water resources. The transmission main through Goleta Beach provides approximately 1,000 acre feet of recycled water per year to 35 recycled water customers in the Goleta community including the University of California Santa Barbara, several golf courses, and a number of commercial campuses. Failure of this line would disrupt water service to every one of these customers. The District has significant concerns that the utility corridor portion of the proposed project has not been adequately developed to protect the transmission line and may pose a significant risk to the entire District recycled water system. Moreover, the analysis contained in the EIR appears deficient in its analysis of the potential adverse impacts to the Utility Corridor associated with the project. The following comments are provided to assist in the refinement of that environmental impact analysis as the CEQA process continues:

1. Berm Design

The proposed Utility Corridor is adjacent to, and at points overlaps, the Coastal Process Zone as defined in the project. In order to comment on the viability of this option, the District again requests that specific engineering designs of the County of Santa Barbara's (County) proposed earth berm be provided to impacted public utilities. Without such information, it is impossible to provide adequate comments regarding the ability of the County's proposed berm to protect the embedded critical public utility infrastructure.

Further, the DEIR does not address Utility Corridor accessibility for repairs and replacements. If the County's berm design results in the need for specialized equipment or procedures to access the Utility Corridor, the proposed project could result in significant unforeseen costs to the District and other utility providers for ongoing operation and maintenance of the system.

2. Utility Corridor Location

The DEIR incorrectly states that the District is independently pursuing an alternate location for the 18-inch recycled water transmission line. In previous discussions with the County, the District suggested and the County agreed to investigate alternative locations. The DEIR is the first time the County has communicated any information concerning its efforts to investigate alternatives. Specifically, the DEIR states that the alternative of locating the Utilities Corridor on the other side of State Route 217 was considered and discarded due to potential impacts that were not quantified or fully studied. Since no information is contained in the DEIR documenting this consideration, the District is concerned that this option was inadequately analyzed prior to dismissal. The District urges the County to consider conducting a complete biological and archeological study of this alternative location to determine the potential impacts in order to properly provide for an informed comparison of project alternatives.

3. Use of Abandoned Water Lines

The DEIR indicates that if the District main line is relocated, the abandoned lines could become laterals for the park. The abandoned main lines are not appropriately sized for serving the currently known recycled water needs of the park thus the District strongly urges the County to contact the District to discuss its future water service needs to determine whether such a concept is feasible. To wit, the lack of analysis regarding the use of these lines raises concerns regarding compliance with State and Federal regulations associated with the use of recycled water.

4. Utility Separation

The proposed Utility Corridor would house the District 18-inch recycled water transmission main and up to five additional utility lines. The proposed 40-foot corridor must be wide enough to ensure all of the proposed utilities comply with statutory and regulatory required separation distances. As noted in previous letters, further design review is required to determine how utilities would be positioned in the proposed corridor. Until such time as this information is presented, the District cannot provide adequate comment on the corridor or the potential impacts on the District's recycled water transmission line.

5. Easements

The District recycled water transmission line currently lies in an easement granted to the District by the County. Any relocation of the line would require a new Easement to ensure the District has the unrestricted access necessary to effectively operate and maintain affected facilities.

The protection of District recycled water infrastructure is of critical importance to the District. We look forward to receiving the County's formal responses to these comments addressed in revisions to the DEIR. The District remains committed to working collaboratively to address our shared community goals on this project. District engineers are available to discuss the design constraints and provide feedback on specific proposals and related design plans associated with relocating District infrastructure. Please contact David Matson, Assistant General Manager, at (805) 879-4625 if you would like to discuss these comments or to request additional clarification. Thank you for your attention to these important issues.

Sincerely,



John McInnes
General Manager