

From: [Henry Krzciak](#)
To: [Jeff Oliveira: San Simeon CSD: jolive@sludek.com](#)
Cc: [Gwen Kellas: Charles Grace](#)
Subject: Input to CHRP re: State Parks Wastewater Treatment
Date: Tuesday, June 21, 2022 9:52:10 AM
Attachments: [SSCSD contract with State Parks re-sewage treatment 1971.pdf](#)

Hi Jeff,

Input to CHRP re: State Parks Wastewater Treatment

Some 50 years ago State Parks signed an agreement with San Simeon Acres CSD to process their wastewater. At that time, they agreed to pay up to \$125,000 toward the districts WWTP. That \$125,000 is worth \$1.2 million in today's dollars.

If State Parks wishes to continue to have SSCSD process their wastewater, they should be advised that they will again be expected to pony up their portion of the capital expenditures associated with any new treatment facility and/or sewer lines and/or lift stations and of course associated engineering costs, permitting etc.

Furthermore, they should be on the hook for a proportional amount of the CHRP study costs.

If they want nothing to do with a commitment to the capital funding or study costs, then they should be put on formal notice that their wastewater treatment will be removed from the present CHRP study, and that they will need to plan for their own wastewater treatment. They should be given a firm date for their decision to be a part of the planning process and capital program.

As it is the district is running a budget deficit and cannot afford to pay for State Park's portion of the CHRP study.

Approaching State Parks with the above and demanding a decision should increase their interest in actively participating in the study. Alternatively, they can be pulled from the study and advised via letter from district counsel that SSCSD will no longer be processing their wastewater. Either way, a decision needs to be made in the next three or four months for their continued inclusion in the CHRP study.

Taking such action might motivate State parks to consider providing a location for a new shared regional solution/facility in lieu of capital funding. There are other considerations/implications here, but that is enough for this bit of input to the study.

Attached is the 50-year-old and expired/expiring State Parks agreement.

Note: Jeff, razor thin budgets are an understatement. The district is operating in the red with the recently approved rate increase just covering the General Manager company's increased fees and not covering increased legal fees etc. So, I am including John Davis IV on these emails to save contractor time for you and/or staff to resend my email to them.

Thanks,
Hank Krzciuk
San Simeon Resident
909 437-0041

From: [Henry Krzciuk](#)
To: [Jeff Oliveira: San Simeon CSD](#)
Cc: [Charles Grace: Green Kollas](#)
Subject: CHRP Input No 2 - re: Alternatives Cost Analysis with and without State Parks.
Date: Saturday, July 2, 2022 9:02:22 PM

Jeff,

CHRP Input No 2.

For each alternative wastewater solution, design and wastewater treatment sizing and pricing must be done for two scenarios. One scenario with State Parks wastewater being processed and the other without State Parks.

Besides the obvious capacity differences in the main treatment facility, design and pricing considerations must include lift station(s), backup generator(s), additional piping, valves, et al. These ancillary components should also be downsized or eliminated accordingly.

If a relocated plant (packaged or otherwise) must be placed within district boundaries, in zoned residential and disadvantaged areas, the smaller the plant the better.

Hearst Castle is a big money maker for State Parks (until they can prove otherwise with pre-Covid years of financial records).

There must be some real advantages for the residents.

Please acknowledge submission of this comment to Dudek.

Further, please provide a status on State Parks stakeholder communications and involvement. Your last email was vague relative to who and when contact will be made with them.

Thanks,
Hank Krzciuk
909 437-0041
www.coastcentralphoto.com

From: [Henry Krzciuk](#)
To: [Jeff Oliveira](#)
Cc: [San Simeon CSD](#)
Subject: CHRP Input No. 3 - re: Pipe Bridge Replacement Requirements Development
Date: Wednesday, July 13, 2022 8:25:49 PM

Hi Jeff,

At the July 12, 2022, San Simeon CSD Board meeting an award of \$229,111 was made to Ashley & Vance Engineering, LLC for design and specifications, project management, permitting, bid phase services, and construction management of the community water and sewer pipe bridge replacement. In addition to the design costs, the fabrication and installation of the replacement bridge could exceed \$400,000. This brings the total replacement cost to over \$600,000. Note: Total costs will be higher if the abutments must be replaced.

This is a substantial expense for our small, disadvantaged community. The replacement bridge needs to be designed to meet the needs of the future relocated wastewater treatment plant. To that end, the following recommendation is offered.

During the initial requirements phase, Ashley & Vance needs to work with Dudek to ensure, as best as possible, that the pipe bridge will meet present and future needs assuming a 50-year lifespan for the new bridge.

This will entail Dudek creating a preliminary/conceptual design for the bridge area and future bridge requirements. The preliminary/conceptual design would include a restoration plan for the existing WWTP site, necessary dual wet well lift station with generator backup, and maintenance and visitor access, etc. all to determine pipeline and bridge placement requirements. As mentioned at the July 12th SSCSD board meeting, sea level rise must be considered for the pipe bridge, hence additional need for preliminary/conceptual restoration planning.

As a reminder, the north side of the bridge is on Cavalier Inn, Inc. property requiring review of the preliminary/conceptual design for the restoration area and new bridge with that corporation's local officer and general acceptability acknowledged. After the district's encroachment on Hearst property and a road right-of-way with its RO/Desalination facility, a boundary survey needs to be completed as part of this preliminary/conceptual design phase.

Please acknowledge receipt of the CHRP Input. Again, requesting that CHRP input be posted on the district website in the spirit of an open study.

Thanks,
Hank Krzciuk
San Simeon Resident

July 5, 2022

John Davis IV/Dudek Consulting

RE: Coastal Hazards Response Plan

Dear Mr. Davis,

Please consider me an interested party in the San Simeon Community Services District (SSCSD) Coastal Hazards Response Plan (CHRP), my contact information is in the signature line of this communication.

Please consider my initial comments on the plan below:

In reviewing SSCSD's Draft CHRP Outline presented to the California Coastal Commission in March of this year, I found no reference to Environmental Justice or how your study will take into account the goals of the California Coastal Commission, whereby "through careful planning and regulation of environmentally-sustainable development, rigorous use of science, strong public participation, education, and effective intergovernmental coordination," the Commission is, "committed to protecting and enhancing California's coast and ocean for present and future generations."

The need to relocate San Simeon's wastewater treatment plant balanced by the fragile socio-economic make up is a quintessential case study for Environmental Justice.

You may be aware that in January 2021, Specialized Utility Services Program (SUSP) consultants completed a Median Household Income (MHI) Survey (attached) for the community of San Simeon. Those resulted in an overall MHI of just \$49,000 per year. Additionally, the recent 2020 US Census results identify that sixty-six percent of the San Simeon community is of Hispanic origin. These factors present a challenging Environmental Justice conundrum when tasked with relocating an industrial facility, such as a wastewater treatment facility, away from the shore where it is susceptible to sea level rise, tsunami run-up and erosion.

You may also know that the district recently underwent California Voting Rights Act "redistricting" using the 2020 Census data. The consultant for this was Cooperative Strategies (CS). These experts created maps of the community depicting the percentage of voting age Hispanics within the newly formed voting districts (graphic included below).

Using the above referenced studies, please consider overlaying the map you created of alternative wastewater treatment plant sites (your Figure 3) with the population data from Cooperative Strategies and you will be alarmed, as I was, when you realize that all three of the sites identified for analysis in your Draft CHRP are populated with 40% -- 80% Hispanic voting age individuals.



SOURCE: NMP 2005

FIGURE 3

Alternative Sites for the Wastewater Treatment Plant

San Simeon Community Services District Wastewater Treatment Plant Alternative Analysis



▶ DISTRICT DEMOGRAPHICS
CITIZEN VOTING AGE POPULATION ESTIMATES



Population	2015 - 2019 CVAP	
	Total	%
Hispanic/Latino	103	46.8%
White	97	44.1%
Black / African American	0	0.0%
American Indian / Alaska Native	0	0.0%
Asian	20	9.1%
Hawaiian/ Pacific Islander	0	0.0%
Two or More Races	0	0.0%
Total	220	100%

*Source: American Community Survey, 2015-2019 Data

San Simeon is a low-income community. Environmental Justice research documents disproportionate environmental burdens facing low-income communities and communities of color, of which, as evidenced above, San Simeon is both. Environmental Justice contextualizes the environmental conditions that threaten the physical, social, economic, or environmental health and well-being of these communities within overall patterns of racism, classism, and other forms of discrimination in the US economy, government, and society in general.

The district has posted the 2008 analysis of alternative wastewater treatment site locations performed by Rincon Consultants, Inc. alongside yours on their website (attached). Rincon's analysis landed on sites "D" and "E" without explaining that these two sites should also be disqualified based on the exact same criteria, "due to the number and proximity of adjacent residences" that they ruled out sites "B" and "C". Additionally, the district is considering a lease option on the parcel at the southeast end of Pico Avenue (i.e. Hurlbert) for a purpose that could include wastewater treatment. This site was considered "Farmland of Local Potential" by Rincon and shares 200 feet of property line with the Pineview Mobile home park (age restricted to 55 and over). While most of these residents are not Hispanic, they are on fixed incomes, triggering classism.

From the Desk of Julie Tacker

The point being, these are all residential neighborhoods and no one wants to, or should have to live next door to a sewage treatment facility that treats mostly (80%) commercial wastewater from State Parks and the hotel and restaurant industry located on the seaside of this disadvantaged community. Force-fitting a sewage treatment facility into an established community is reminiscent of the expression 'square peg in a round hole.'

As a twenty-year local activist, having firsthand experience as a member of the Los Osos Community Services District board elected (2004-2008) to "move the sewer"; it is my recommendation that you broaden your analysis to look at sites outside the district boundaries.

The purpose of your study is to avoid the impacts of a wastewater treatment facility on the environment and the disadvantaged community. To continue to pursue the sites identified in your Draft study epitomizes discrimination and perpetuates "Environmental Injustice;" flying in the face of the Coastal Commission's edict.

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

Sincerely,



Julie Tacker



Cc: Esme Wahl, Coastal Planner, California Coastal Commission
Airlin Singewald, Planning Manager, San Luis Obispo County

Attachments:

SUSP, Median Household Income Survey -- January 2021
Alternatives Analysis for Relocation of the San Simeon Community Services District
Wastewater Treatment Facility --2008 Rincon

August 2, 2022

Ms. Gwen Kellas, Chairperson
San Simeon Community Services District Board
111 Pico Avenue
San Simeon, CA 93452

Subject: Relocation of the San Simeon Wastewater Treatment Plant

Dear Ms. Kellas:

The purpose of this letter is to provide thoughts and input on the proposed relocation of the San Simeon Community Services District Wastewater Treatment Plant immediately adjacent to the San Simeon Homes complex on Avonne Avenue. All comments are related to the 2008 Rincon Consultants Inc. alternatives analysis letter and the March 2022 Draft Coastal Hazard Response Plan. Please include this correspondence as part of the written record for the August 9, 2022 San Simeon Community Services Board of Directors Meeting.

The San Simeon Homes neighborhood, located adjacent to Sites D and E (highlighted as chosen sites in the above documents for the relocation of the San Simeon Wastewater Treatment Plant), consists of 20 condominium units that border Hearst Ranch property to the east and south, a hotel to the west, and existing residential homes/vacant residential zoned properties to the north. San Simeon Homes complex units include attached garages, direct access to the unit and generous interior spaces, and are similar to a single-family home neighborhood.

We, the San Simeon Homes Homeowners Association Board, have reviewed both the original Rincon Consultants Inc. alternatives letter dated April 18, 2008 noting two selected sites (D and E) and the rejection of alternative sites, and the March 2022 Draft Coastal Hazard Response Plan. As the research for the 2008 alternatives analysis letter was conducted 14 years ago, and the more recent Draft Coastal Hazard Plan utilizes the same alternatives chosen with the exception of one additional site, the information included in both documents is outdated and must be re-evaluated/updated with a keen understanding this time around that the communities and populations most impacted must have significant input in choosing the best development sites and alternatives to pursue. This outreach would include adjacent property owners and low income/environmental justice properties.

An alternatives analysis provided in both the 2008 Rincon alternatives analysis letter and in the recently completed Draft Coastal Hazard Response Plan must be further studied and its final conclusions re-evaluated as there are definite miscalculations with the original alternatives provided. The Association disagrees with Rincon's original recommendations that only Sites D and E should be considered for the relocation of the wastewater treatment facility and does not agree with the rejection of many other like alternative sites originally analyzed by the consultant (Site A has since been added as a potential site to consider in the Coastal Hazard Response Plan). Noted flaws in accepting Sites D and E over other original alternatives in the above-mentioned documents are as follows:

1. The County of San Luis Obispo designated the proposed project Site D and its surrounding properties on Avonne Avenue with a General Plan land use designation of Multi-Family Residential that allows for only compatible low impact residential uses to develop and co-exist. Therefore, this site should not be considered for an incompatible higher intensity wastewater treatment plant that would impact existing adjacent residential land uses.
2. The County of San Luis Obispo designated the proposed project Site E with a General Plan land use designation of Commercial Retail with the intent that it can be constructed with hotels or other tourist-based/retail uses with frontage and access directly off of Castillo Drive. Adjacent residential uses do exist to the south of this site. Therefore, the site should not be considered for a quasi-industrial wastewater treatment plant that would be incompatible with surrounding land uses and may include access off of Avonne Avenue.
3. Placement of a non-compatible quasi-industrial land use immediately adjacent to existing residentially zoned properties will result in a "spot zoning" situation, the process of singling out a small parcel of land for a use classification totally different from that of the surrounding area solely for the benefit of a property owner or land use while proving to be detrimental to surrounding property owners. Relocation of the waste treatment facility to Sites D and E would create an incompatible land use immediately adjacent to existing residential uses on either side and in the vicinity of the proposed project.
4. A General Plan amendment and land use change would negatively and significantly impact surrounding communities such as Sites D and E and include definite noise, air quality (i.e., odors), public health, visibility and traffic/transportation impacts. These impacts on adjacent residential receptors are equally important, or more important, than potential impacts to wildlife/species that were used as a key component to reject original alternatives in the 2008 alternatives analysis letter, and must be reviewed accordingly.
5. The 2008 alternatives analysis letter incorrectly accepts and rejects sites for the relocation of the wastewater treatment site without adequate study of impacts and full analysis within an environmental document.
6. The 2008 alternatives analysis letter concludes that the relocation of the existing wastewater treatment facility to two sites (D and E) would ultimately result in significant short-term and long-term environmental effects on adjacent residential properties. Does this mean that it is assumed that these effects would be acceptable to the existing residential communities that are most affected by this project? If so, we do not agree with this assumption.
7. Environmental impacts of the construction and operation of a wastewater facility plant relocation from its current more rural site to an existing residential neighborhood setting such as with Sites D and E must be fully evaluated in an environmental document such as an Initial Study and possible Environmental Impact Report.
8. The 2008 alternative analysis letter's inclusion of Sites D and E for the potential relocation of the wastewater treatment facility and the rejection by Rincon of Sites B, C and I is flawed as these sites include the same land use designation of Multi-family Residential, have the same setting of residential land uses immediately adjacent to the site, and have comparable environmental impacts associated with the development of Sites D and E, such as noise and odors. Therefore, based on these criteria, and the fact that Sites B, C and I were rejected as a potential location for the wastewater treatment plant, Sites D and E should have been similarly rejected.

9. Incorrect interpretations of rejected Site F in the 2008 alternatives analysis letter were made stating that the site is being used as a park and would reduce valuable farmland on a portion of the property.
10. A Buffer Study for the actual placement of the wastewater treatment facility was not addressed in either Study and would be necessary to reduce any and all associated environmental impacts on adjacent residential communities.
11. A Cost/Benefit Analysis to analyze general costs and impacts associated with the move of the wastewater treatment plant to a specific parcel or parcels was not addressed in either Study and should be prepared. The document should include the evaluation of a more costly wastewater treatment plant relocation east of Highway 1 and the likelihood of a less costly plant relocation and placement west of the Highway 1. Land use impacts to residential communities must be included in this study.
12. Conclusions and land use alternatives within the 2008 alternatives analysis letter were not circulated to surrounding property owners such as residents in the San Simeon Homes complex and those residents in the surrounding community that are most affected by the relocation such as environmental justice communities, and therefore meaningful comments were not received from such.

It is important to note that pursuant to the requirements of the California Environmental Quality Act, an Initial Study must be completed to determine all possible impacts of the proposed General Plan Amendment and change of zone. It is likely that an Environmental Impact Report (EIR) would be required for this relocation to study feasible alternatives and impacts of each to the adjacent residential areas that are most affected. An EIR can further study impacts on existing residential communities in regards to sensitive residential land use receptors, air quality, visibility, public health and transportation/traffic impacts to existing roadways.

In conclusion, the San Simeon Homes Homeowners Association does not agree with relocation of the wastewater treatment facility along Avonne Avenue (Sites D and E). The placement of a wastewater treatment facility on Sites D and E located immediately adjacent to residential uses contradicts with language in the Coastal Hazard Response Plan (Page 7 of the Study) and the County of San Luis Obispo's North Coast Planning area goal (2.3.1 6B) that stresses preservation and enhancement of the quality of residential areas by, "protecting residential areas from incompatible land uses and protecting the residential character of these same areas". The Association believes that the relocation of the facility should be placed either west of Highway 1, within the more rural area of Site A, or on other alternative sites considered in the original 2008 alternatives analysis letter. The treatment plant must not be relocated to properties/parcels that would impact existing residential neighborhoods such as in Sites D and E. We respectfully ask that the San Simeon Community Services District provide future engagement with all residents of the most impacted properties included in the alternatives analysis of the March 2022 Coastal Hazard Response Plan such as those residents residing in the complex of San Simeon Homes. On-going meetings and charrettes must be conducted by the San Simeon Community Services District prior to sending a final document to the County of San Luis Obispo and California Coastal Commission with the primary purpose of engaging those residents that are most affected and providing necessary input and suggestions from the community. An updated and more robust study of impacts and alternatives must be provided in an environmental document and possible EIR that will appropriately review all project alternatives effectively and determine all valid impacts associated with the relocation of the wastewater treatment plant. If the above items included in Nos. 1-12 above are appropriately addressed, the final treatment plant relocation will be fully vetted with the community that is most impacted by the proposed move, and more appropriate alternatives and recommendations can be carried forward prior to choosing a final home for the wastewater treatment plant.

Sincerely,

San Simeon Homes Homeowners Association Board



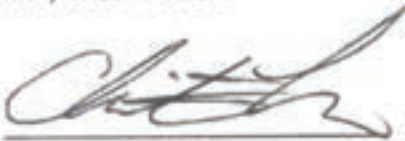
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Mary Giacoletti, Director