CALIFORNIA COASTAL COMMISSION
NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV

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W19a

Prepared December 10, 2013 (for December 11, 2013 hearing)

To: Coastal Commissioners and Interested Persons

From: Dan Carl, Deputy Director
Nancy Cave, District Manager
Nicholas Dreher, Coastal Planner

Subject: STAFF REPORT ADDENDUM for Item W19a
Montara Water and Sanitary District Public Works Plan Amendment Number 2-06-006-A1 (Water Connections)

Staff's proposed suggested modification 5 for the above-referenced item is meant to update the Montara Water and Sanitary District (MWSD) Public Work Plan (PWP) in light of current and updated data, including to ensure the plan appropriately references projects already completed under the PWP to date and changes since the PWP was first certified by the Commission. The primary intent of this suggested modification in that sense is to ensure the PWP is accurate, and can best inform PWP project decisions moving forward. In the time since the staff report (dated prepared November 27, 2013) was distributed, staff has worked closely with MWSD staff on language to do just that. Given that MWSD was in agreement on staff's proposed other suggested modifications (i.e., suggested modifications 1 through 4), staff also worked with MWSD staff to incorporate those changes into a revised PWP document as well. Attached to this addendum is a copy of the PWP as it would be certified under the staff recommendation, reflecting not only the District's proposed changes, but also all of staff's suggested modifications, including suggested modification 5. This addendum adds this document to the staff report as **Exhibit 3**. The new exhibit reflects the staff report recommendation, but does not in any way alter the staff recommendation to approve the PWP amendment as modified.

PUBLIC WORKS PLAN

1. Introduction and Overview

The Montara Water and Sanitary District (MWSD or District) provides water, sanitary sewer, and solid waste disposal services to the coastal communities of Montara, Moss Beach, and adjacent areas located north of Half Moon Bay and south of Pacifica, in San Mateo County, California (Figure 1-1). The District owns and operates water storage, treatment, and distribution facilities that currently (as of December 11, 2013) provide domestic water to approximately 1,650 domestic water connections, most of which (approximately 90%) are single family and multi-family residential connections. The system currently includes a surface water source, a water treatment plant, eleven groundwater wells (nine active and two standbys), three potable water storage tanks, and over 150,000 feet of distribution pipelines.

MWSD prepared a Master Plan in 2004 that identified several areas of the District's water system that required immediate improvement at that time. Several previous and concurrent studies and system valuation reports (performed during the District's acquisition of the water system in 2003) documented poor conditions of the existing facilities. The 2004 Plan identified three major categories of immediate improvements required for the water system:

- Additional storage facilities
- New sources of supply
- New treatment system for the Airport Wells Facility

MWSD subsequently prepared a Public Works Plan (PWP) reflecting those needs (referred to as PWP Phase I). The PWP encompassed several components recommended in the 2004 Master Plan, including the following:

1) **Water Storage Facilities.** Construction of a new water storage tank at the Alta Vista site and at the Schoolhouse site and demolition of the old tank at the Schoolhouse site
2) **New Water Well Production.** Initiation of water production (150 gallons per minute) from the Alta Vista Well No.1 and construction of a new pipeline and electrical conduit
3) **Water Treatment Facility.** Construction of a water treatment facility to address water quality issues at the airport wells

The PWP was originally certified by the Coastal Commission in 2008.

Figure 1.1: Location of Montara Water and Sanitary District Jurisdiction

2013 Water System Update

When the PWP was first certified in 2008, the moratorium on new connections that initially had been imposed by the California Public Utilities Commission in the 1980s on the then privately-owned system was still in effect. After acquiring the water system in 2003, the District continued the moratorium due to the substandard infrastructure and the unreliable water supply. Accordingly, the PWP acknowledged the existence of the moratorium by including reference to it and providing that the improvements authorized by the PWP were not intended to lift the moratorium. That provision also was consistent with the 2004 Water System Master Plan (2004 Master Plan) and the condition of MWSD's system at the time of the PWP approval.

However, through on-going efforts, MWSD has improved the system's infrastructure by extensive water system improvements and high levels of conservation. These improvements and practices are detailed in Tables 1-1 and 1-2 in the sections below. As a result of conservation and system improvments, and as reflected in MWSD's Water System Master Plan Update in 2011, MWSD's water supply has increased independently of any of the improvements encompassed by the PWP. Accordingly, MWSD repealed the moratorium established under its water system regulations in March 2011. The conservation analysis completed by the District staff is summarized in the sections below as justification that the District's efforts in infrastructure improvements and conservation are the primary reason for lifting the moratorium and allowing new connections.

Additionally, since the District's water system has changed substantially since the approval of the PWP, this update includes a section acknowledging the infrastructure that is constructed and currently operational in the District's water system, as well as revised storage, supply, and demand values, correspondant to the parameters initially presented in the approved PWP.

Water System Improvements and Conservation

Since MWSD acquired the water system in 2003, the District has made significant efforts to reduce water losses within the existing water system and minimize customer water usage.

Water System Operational Efficiency Improvements. MWSD acquired the system in August 2003 and immediately implemented projects and programs to improve operational efficiency and minimize water losses. The projects that have most significantly improved operational efficiencies are listed in Table 1-1.

Table 1-1 Water System Improvements

System Improvement	Description	Benefits
Water Main Replacement Program	System-wide in-kind replacements of water mains started in 2003 based on MWSD's leak detection and monitoring program.	Reduced water losses, improved flow efficiency and water quality. Resulted in a six-percent reduction in water losses between 2003 and 2010.
Raw Water Pipeline Replacement	The severely deteriorated Alta Vista Raw Water Pipeline was replaced in 2004 in its entirety.	Improved water quality, reduced water losses, and improved water flows.
Addition of Schoolhouse Control Valve	The addition of a control valve in the Schoolhouse pressure zone in 2009 allowed better water transport in the entire water system.	Improved water conveyance and reduced the volume of water necessary for flushing procedures to protect water quality. Reduced need for flushing equates to significant water savings.

Table 1-1 Water System Improvements		
System Improvement	**Description**	**Benefits**
Distribution System Flow Improvements	Critical modifications were made to the distribution system starting in 2003 to allow for flexibility in delivering water to different pressure zones.	Improved water system flows and energy efficiency.
Supervisory Control & Data Acquisition System (SCADA) Improvements	Starting in 2003, MWSD was making improvements to its SCADA system.	Improved monitoring allowing staff to make better-informed decisions in system efficiency and reliability.
Groundwater Pumping and Treatment Improvements	District implemented well rehabilitation and treatment and pumping modifications, restoring the wells to their respective rated capacities.	Increased water supply and reduced pressure losses throughout the water system.
Surface Water Treatment and Storage Improvements	Montara Creek treatment and storage improvements	Improved seismic reliability and water delivery efficiency.

Water Conservation Efforts. MWSD has employed strategies aligned with the California Urban Water Conservation Council (CUWCC) Best Management Practices (BMPs) to achieve high levels of conservation over the past seven years. The specific conservation methods employed by the District to realize these reductions are included in Table 1-2.

Table 1-2 Conservation Efforts and Benefits		
Conservation Effort	**Description**	**Benefits**
Water Conservation Program	In late 2003, MWSD established the Water Conservation Program to install water-efficient fixtures while offering a customer rebate program.	Reduced the amount of water used by customers and resulted in lower water demands.
Leak Detection Program	In 2007, the District replaced all customer water meters, totaling 1,614, with new radio-read meters. This system alerts operators about any leaks on the customer side.	Reduced the amount of water that was lost through leaks in the customers' homes; resulted in lower water demands.
Water Audits	MWSD purchased several Orion water meter monitors to monitor for leaks. These water meter monitors can be borrowed or purchased by customers through the District.	Reduced water demands due to early leak detection.
Public Education	The District provides free conservation kits to customers, including showerheads and faucet aerators, and emphasizes conservation in newsletters.	Generated community awareness of conservation and resulted in water demand reduction.

Conservation Analysis. The system-wide improvements and conservation efforts summarized in Tables 1-1 and 1-2 resulted in substantial reduction in water usage and system demands, and therefore an increase in the supply available for potential new connections. The conservation

analysis underlying the increased supply availability of the water system is included in the section below. This analysis shows that, mathematically speaking, the repeal of the moratorium was not reliant on the water supply capacity associated with the Alta Vista Well, but upon water supply availability realized through conservation efforts. Thus, the connection prohibition in the original PWP regarding the Alta Vista Well can be safely deleted without having diluted or contravened its intent. The analysis is threefold:

1) Presentation of the updated production and consumption values (2004-2010), detailing the decrease of consumption through system improvements and conservation efforts, resulting in a corresponding decrease in production.
2) Calculation of the general consumption decrease between 2004 and 2010.
3) Calculation of water supply availability resulting from system improvements and conservation.

Production and Consumption Update. A detailed analysis was completed as part of the 2011 Master Plan to evaluate the District's water system production and consumption trends since the acquisition of the system in 2003. MWSD has collected seven full years of data on water source production and customer consumption, allowing for a comprehensive evaluation of the changes in water use and system efficiency due to the management and conservation programs at MWSD. Data on the volume of water delivered to metered customers was used to calculate consumption, or metered sales, values.

Volumes of source water produced from 2004 through 2010 were used to calculate the total water production values, and ultimately the water system demand values. MWSD source production is dependent upon customer consumption, as the sources only produce water in response to customer demands. This water system dynamic is critical in understanding the production and consumption analysis conducted, because production numbers are actually indicative of system demand, not the supply capacity of the system. As consumption decreases, the system production will also decrease, since the sources are directly reacting to customer demands. Therefore, the production numbers presented do not represent the water source production capacity.

The difference between the production and consumption represents water system losses. These water system losses, or unaccounted-for-water, represent water used for fire flow testing, water main flushing, repairs, filter backwash operations at the water treatment plant, and distribution system leaks. Table 1-3, below, presents a summary of daily water production and metered sales in gallons per day (gpd), and unaccounted-for-water values for 2004-2010.

Table 1-3 MWSD System Production and Consumption Data

	2004	2005	2006	2007	2008	2009	2010
Average Daily Production, gpd	359,023	340,539	343,315	314,225	315,050	282,653	274,118
Average Daily Consumption, gpd	321,649	314,983	304,574	286,642	292,393	271,066	254,318
Unaccounted-for-water, Percent of Total Production	10.41%	7.50%	11.28%	8.78%	7.20%	4.1%	7.2%

The water production and consumption values presented were generally decreasing since 2004, and unaccounted-for-water, or system losses, also generally decreasing since 2004. The average unaccounted-for-water over the period of analysis is 8 percent.

Conservation. In order to establish the volume of water supply available due to conservation, an analysis was completed using the data collected by the District since 2004. Volumes and percentages of water conservation have been calculated based on the consumption data presented in Table 1-3. Data from 2004 – 2010 was used to calculate an annual average conservation of 4 percent, and cumulative conservation of 21 percent. Table 1-4 presents the annual changes in consumption and resulting percentages of conservation.

Table 1-4 Annual and Total Changes in Consumption, 2004 – 2010

Year	Average Daily Consumption (gpd)	Annual Change (gpd)	Annual Percent Change
2004	321, 649	--	--
2005	314,983	- 6,666	- 2%
2006	304,574	- 10,408	- 3%
2007	286,642	- 17,932	- 6%
2008	292,393	5,751	+ 2%
2009	271,066	- 21,327	- 7%
2010	254,318	- 16,748	- 6%
Average annual change in consumption			**- 4%**
Total change in consumption (2004 – 2010)			**- 21%**

Additional Supply Availability. Due to the ability of the water supply sources to produce the same volume of high quality water and the recent conservation trend at MWSD, additional supply has been made available for potential new customer connections. Based on the established reliability of the data set collected since MWSD acquired the system, the 2004 annual daily consumption value with an 8-percent adjustment for system losses was used as the baseline value to represent the past production capabilities of the system. The current demand on the system was determined by adjusting the 2010 annual daily consumption by 8 percent for unaccounted-for-water. These values do not represent the overall production capacity of the system, which is actually significantly higher than the values presented.

Based on the consumption and production values, it was determined by MWSD that there is supply available to serve additional customers due to conservation. Calculations determined that there is an excess of 72,718 gpd made available through system improvements and community conservation efforts. Table 1-5 presents this calculation.

Table 1-5 Supply Availability Due to Conservation

2004 Annual Daily Consumption, gpd	321, 649
2004 System Production (Demand), gpd (includes 8% unaccounted-for-water)	347,381
2010 Annual Daily Consumption, gpd	254,318
2010 System Production (Demand), gpd (includes 8% unaccounted-for-water)	274,663
Water Supply Availability, gpd *(2004 System Production – 2010 System Production)*	72, 718

This analysis concludes that there is available water supply in the water system realized through conservation efforts, and the repeal of the moratorium was not reliant on the water supply capacity associated with the Alta Vista Well, or other approved PWP projects.

2013 Water System Facilities Update

Due to the significant changes that took place in the District's water system since the initial PWP approval in 2008, a facilities update has been developed to reflect the existing facilities and planning parameters as of December 2013. The information and tables in the section below are based upon the data collection analysis conducted for the 2011 Master Plan, and are meant to serve as an update to Section 2 of this document.

Existing Storage Facilities. The District maintains three existing treated water storage tanks with a combined capacity of 662,000 gallons. Table 1-6, below, summarizes the available storage and is consistent with Table 2-1.

Table 1-6 Existing Treated Water Storage Tanks

Storage Tank Location	Tank Material	Storage Capacity (Gallons)	Year Built
Portola Estates	Wood	100,000	1981
Alta Vista	Steel	462,000	1976
Schoolhouse Tank East	Steel	100,000	2012

Schoolhouse Tank West, an approved PWP project, is currently under construction and will put another 100,000 gallons of storage online in January 2013. Historically, the District did not have the ability to take any of the storage tanks out of service due to the absence of system-wide storage redundancy. Once the newly constructed Schoolhouse Tank West is brought on line, the District will have the necessary storage redundancy to take storage tanks out of service for maintenance and/or repairs.

Storage Requirements. A more thorough assessment of the District's storage needs was conducted prior to the publication of the 2011 Master Plan, and a summary of the analysis is included in Section 5 of the document. Please reference the 2011 Master Plan for further details and explanation of the calculated values. The values have changed substantially since initial PWP approval, as the PWP was based on the 2004 Master Plan, which was extremely conservative due to limited access to historical data, condition assessments of existing facilities, and information regarding efficient system operations. The total volume of storage estimated includes water for operational, emergency, and fire-fighting uses.

Operational Storage. Operational storage is directly related to the amount of water necessary to meet peak demands, and therefore the only value related to the number of customers connected to the system. The intent of operational storage is to provide the difference in quantity between the customer's peak demands and the system's available supply. MWSD operational storage is 25% of the maximum day demand (MDD), or 118,440 gallons (gal).

Emergency Storage. The volume of water allocated for emergency uses is established by a water utility based on the historical record of emergencies experienced, and on the amount of time which is expected to lapse before the emergency can be corrected. There are several ways in which emergency storage can be calculated, as the ultimate reservation of emergency storage capacity is at the discretion of the water utility. The District's 2011 Master Plan presents a comparison of methods used to calculate emergency storage and can be referenced for further detail. The emergency storage values from this analysis range from 157,916 gal to 636,836 gal. The District

has established its emergency storage goal at the most conservative value, 636,836 gal, based on the American Water Works Association (AWWA) Guidelines for conservative emergency preparedness.

Fire Storage. The National Fire Code, Insurance Service Office, and local Fire Department regulate the quantity of water storage suggested for fire fighting purposes. The quantity of water that the District is required to provide can be drawn from operating sources or from storage facilities. Although areas of the District's system are strictly residential and only require 1,000 gpm for 2 hours, the District has established its fire-fighting delivery and storage goal based on the ability of the District to provide 2,000 gpm for 2 hours, strictly drawn from storage facilities. The District's established fire storage goal is considered conservative, and totals 240,000 gal.

Table 1-7, below, summarizes the District's established storage goal and contains consistent units of measurement with Table 2-2.

Table 1-7 MWSD Storage Goals

Category	Storage Volume (Gallons)
Equalization (Operational) Storage	118,440
Emergency Storage Goal (2 days of ADD)	636,836
Fire Storage Goal	240,000
Total Storage Goal	995,276
Existing Storage	662,000
Additional Storage Needed to Meet Storage Goal	**333,276**

The total storage goal is a target value that the District has set for the operation of its system and is not a mandated requirement, specifically regarding the emergency storage and fire storage goals. The values calculated are conservative estimates of the amount of storage needed in a worst-case scenario, should a disaster occur. The District is not out of compliance with any requirements and has sufficient storage to serve new and existing customers. Operational storage is the only target storage value that would be increased with additional connections, and the impact would be minimal.

If the District established less conservative storage goals, the existing system would already meet the storage goals for operational, emergency, and fire-fighting storage. Assuming an emergency storage goal of 157,916 gal, based on the 8 hrs of the MDD (AWWA recommended target), it is apparent that the District already has enough storage to safely serve existing and new customers. Table 1-8 presents a storage analysis based on a less conservative emergency storage goal. The total storage goal could be further reduced if the fire-fighting storage goal was also established as less conservative.

Table 1-8 Alternative Storage Goals: Less Conservative

Category	Storage Volume (Gallons)
Equalization (Operational) Storage	118,440
Emergency Storage Goal (8 hrs of MDD)	157,916
Fire Storage Goal	240,000
Total Storage Goal	516,356
Existing Storage	662,000
Additional Storage Needed to Meet Storage Goal	**0**

The District has set conservative target values in its 2011 Master Plan in an effort to continue implementing improvements to the water system that further safeguard public health and property, improve efficiency, and provide additional operational flexibility.

Existing Water Supply. The District currently withdraws water from one surface water source and nine groundwater wells, as discuss further below.

Surface Water. The District's surface water source is Montara Creek. The District diverts water from the Creek at a diversion point northeast of Montara. The water is conveyed from the diversion point to the Alta Vista water treatment plant, co-located with the existing Alta Vista Tank. The District's maximum diversion is limited to 70 gpm, which is the rated capacity of the Alta Vista water treatment plant in accordance with the permit for the plant issued by the California Department of Public Health (CDPH).

Groundwater. Groundwater is currently extracted at the following locations:

- The Airport Wells: North Airport Well, South Airport Well, and Airport Well 3 (wells are located within 800 feet of each other on the Half Moon Bay Airport property),
- Portola Estates Wells I, III, and IV,
- Drake Well,
- Wagner Well, and
- Alta Vista Well, approved pursuant to this PWP.

Capacity. Table 1-9 presents a summary of the District's current water supply capacity and presents a calculation of the reliable capacity. Table 1-9 contains consistent units of measurement with Table 2-3. Additional information regarding the water system available supply capacity is included in the 2011 Master Plan.

Table 1-9 Supply Capacity

Supply Source	Capacity (gpm)
Montara Creek	75
Airport Wells	255
Six other groundwater wells	290
Total Supply/Production Capacity[1]	**620**
Total Reliable Capacity Largest Single Source Out of Service	**470**

[1] With all sources at maximum production capacity.

Water System Needs. The California Code of Regulations Title 22, Chapter 16, Article 2 outlines water supply requirements for the state and specifies that the District must deliver sufficient quantities of water to satisfy MDD. Table 1-10 summarizes the current supply and demand comparison, and contains consistent units of measurement with Table 2-4.

Table 1-10 Production Demand	
Demand by Category	**Water Use (gpm)**
Average Daily (2040 - 2010)[1]	221
Maximum Daily[1]	332
Maximum Hourly[1]	575
Maximum Fire Flow (2 hours)	2,000
Total Reliable Capacity Largest Single Source Out of Service	**470**
Production Surplus (Existing Reliable Supply - Maximum Daily Demand)	138
[1] Based on daily production data presented in the 2011 Water System Master Plan.	

Amendments to the Public Works Plan

Amendments to this PWP shall be made in accordance with Public Resources Code Section 30605. All amendments to the Public Works Plan that are certified by the Commission are hereby incorporated into Public Works Plan 2-06-006, as referenced in the San Mateo County LCP.

An amendment to this PWP shall be required for any increase in water supply capacity, including any increase in pumping rates beyond existing supply capacity. The application for such amendment shall include information concerning phasing of infrastructure capacity in conformity with the requirements of the San Mateo County LCP. The information provided shall be sufficiently detailed and complete to enable the Commission to evaluate whether the proposed increase in water supply capacity is in phase with the existing or probable future capacity of other area infrastructure, including but not limited to the need for an adequate level of service for Highways 1 and 92 as required by the LCP.

2. PWP Objective

The objective of the District's Public Works Plan is to guide improvements to specific portions of the District's water system to ensure an adequate and reliable supply of water for its customers for domestic and fire protection uses. New water service connections to MWSD's water system shall be made in accordance with the *Established Guidelines for New Connections* below:

Established Guidelines for New Connections

MWSD and the California Coastal Commission (CCC) have cooperatively established the below guidelines for adding new service connections within the LCP-designated urban area of the MWSD water system with regard to MWSD's Public Works Plan (PWP). New domestic service connections, and the extension of water mains for any purpose, are prohibited in LCP-designated rural areas. These guidelines are effective as of December 11, 2013, and will remain effective under the PWP until amended.

Section I. Conditions

The following conditions have been established to serve as guidance for adding new water service connections to MWSD's water system including usage of PWP improvements.

A. New Service Connections

This Public Works Plan recognizes that as of December 11, 2013 the District currently has

128,000 gallons per day (gpd) available to be utilized for new service connections, beyond those connections existing as of December 11, 2013. Available water supply may be utilized to serve existing development that is within the LCP urban area that is currently served by private wells, or it may be utilized to provide new service connections to development that has been authorized pursuant to the County's LCP, including the LCP's growth limitation, which is currently 1% each year. Consistent with the LCP Land Use Plan, including Policies 2.8 and 2.24 and Table 2.17, the District shall reserve water supply for priority uses. Although 80,959 gallons per day is currently required to be reserved for priority uses, that requirement may be reduced through an update to the LCP, and the amount of water required to be reserved will decrease as priority connections are made.

Montara Water and Sanitary District may allocate priority capacity in accordance with LCP Table 2.17 to provide municipal water service to residential dwellings which are connected to the public sanitary sewer system, when such a connection is necessary to avert a substantial hardship caused by the failure of a private well serving the dwelling in production quantity or quality as certified by the County's Director of the Environmental Health Division, and when non-priority connections are not available. For purposes of this policy, "substantial hardship" shall not include any failure which can be remedied by repair or replacement of well equipment or facilities, or relocation of a well on a parcel. Whether substantial hardship exists shall be determined by the Community Development Director, following consultation with the Director of Environmental Health and the General Manager of MWSD.

Given existing water availability and LCP requirements as of December 11, 2013, 47,041 gpd are available for non-priority uses, including residential, commercial and industrial uses, as well as for conversion of private residential wells within MWSD's service area. Additional water for non-priority uses may become available if the LCP is amended to reduce the quantity of water required to be reserved for Coastal Act and LCP priority uses.

The following definitions apply:

- Annual Water Demand: The annual water demand will be calculated based on MWSD's daily production records for a full calendar year. Since MWSD water source production is directly dependent upon customer demand, recorded production values reflect the water system's demand. The annual water demand will be calculated at the end of the calendar year and included in the annual report submitted by MWSD to CCC, as detailed in Section II.

- Drought Supply Capacity: Drought supply capacity is determined through rated source capacities, as opposed to the recorded source production per water industry standards. The water supply capacity under drought conditions is calculated utilizing the conservative industry-wide water resources methodology in which the sources are assumed to be capable of producing only 50 percent of their rated capacity. This conservative methodology is representative of drought water shortages or other extreme conditions. The drought supply capacity is subject to change over time if new sources are added to the MWSD water system.

If the demand reaches 90% of the calculated drought supply capacity, MWSD will initiate efforts to secure additional water supplies. New connections to MWSD's water system will continue to be available under the PWP until the demand reaches 100% of the drought supply capacity, provided capacity is still reserved for LCP priority uses. However, it is not anticipated that demand will reach 100% of drought supply capacity prior to the need to secure additional water supplies but when it does, a PWP amendment providing for infrastructure improvements will be required to allow for an increase in the drought supply capacity of the water system.

B. Large Service Connections

Large developments will require additional analysis prior to approval of connections to MWSD's water system. All applicants for commercial, industrial, and multi-family residential development must provide MWSD with a justified estimate of the development's projected daily water demand.

Applicants for development that has a projected daily demand of over 200 gallons per day (gpd) must provide additional analysis regarding the projected demand and potential for future growth and associated increased water demand. MWSD will determine, based on its existing supply and demand, whether the District has adequate capacity to serve the development, given requirements to reserve water supply for priority uses, allowances for additional residential connections for well conversions, and for building permits or Coastal Developments permits or other entitlements authorized for issuance by San Mateo County in compliance with its LCP.

Section II. Monitoring and Reporting

The objective of the monitoring and reporting program is to provide an annual report to the CCC about the status of the District's water resources. The annual report for the previous calendar year will be submitted to MWSD's governing Board and CCC staff by March 31 of the following year. The annual report will be prepared by the District Water System Engineer and include the following data:

- Number of connections to MWSD's system, including:
  - The number of new residential connections in the previous calendar year, expressed as the number of physical connections and equivalent residential unit connections (ERUs).
  - The number of new commercial or industrial connections in the previous calendar year, expressed as physical connections and ERUs.
  - The number of new connections provided to LCP priority uses in the previous calendar year, and the remaining available reserved priority use water supply.
  - The number of connections in the previous calendar year that were made to properties previously relying on private wells, which of those connections were made pursuant to the County's abandonment condition, and the number of remaining private domestic wells within the District's water service area.
- Existing water system supply capacities, including:
  - Total supply capacity
  - Reliable supply capacity.
  - Drought supply capacity.
- Existing water system demands, including:
  - Annual system demands since 2004, based on production data.
  - Per capita demand for the previous calendar year, based on annual system demands and number of connections.
- Supply and demand comparison, including:
  - A graphical comparison of the annual system demands since 2004 versus the total supply, reliable supply, and drought supply capacities.
  - The percentage of the drought supply that is being utilized by existing demand.
  - The percentage of reliable supply that is being utilized by existing demand.

- District Water System Engineer's analysis and recommendations, including:
  - The surplus supply availability, based on the supply and demand comparison.
  - Projection of system demands, based on the history of new connections in previous years.
  - Recommendation regarding the necessity of initiating Phase II PWPpursuing additional water supplies.
- An annual data report to the County and Coastal Commission summarizing the results of this monitoring, including:
  - The actual amount of water consumption by land use.
  - The rate of growth of new development.
  - The quantity of water available for non-priority connections.
  - The quantity of water reserved and available for Local Coastal Program priority connections.

3 Location

PWP PROJECTS

MWSD improvement projects would be constructed at several locations throughout the District, as depicted on Figure 3-1. The general locations of the facilities are:

- **Alta Vista Tank and Wells.** Northeast end of Alta Vista Road
- **Schoolhouse Tanks.** West end of Buena Vista Street
- **Airport Wells Water Treatment Facility.** Cabrillo Highway (State Highway 1) at Half Moon Bay Airport

Figure 3.1: Location of Proposed Water System Upgrades

4. PWP Project Descriptions

PWP water system improvements include:

- Construction of a new water storage tank (Alta Vista Tank) northeast of the existing Alta Vista water storage tank.

- Conversion of an existing test well to a production well (Alta Vista Well No.1) northeast of the existing Alta Vista water storage tank.
- Conversion of an existing test well to a monitoring well (Alta Vista Well No.2) northeast of the existing Alta Vista water storage tank.
- Installation of an underground water conveyance pipeline and electrical conduit extending from the production well and monitoring well, respectively, to the existing Alta Vista water storage tank.
- Repair and maintenance of Alta Vista Road that does not result in an addition to, enlargement, or expansion of the road.
- Placement of a security fence on Alta Vista Road, northeast of the existing Alta Vista water treatment facility.
- Construction of one or two new water storage tank(s) (Schoolhouse Tank(s)) adjacent to and in place of (if two are built) the existing Schoolhouse water storage tank. If a two-tank option is chosen, the existing Schoolhouse Tank may be repaired for use as one of the two tanks, if an inspection report signed by a licensed structural engineer that is reviewed and approved by the Executive Director shows that the repaired tank would be seismically sound.
- Demolition of the existing Schoolhouse water storage tank.
- Installation of a water treatment facility (Airport Wells Water Treatment Facility) at the Half Moon Bay Airport to treat groundwater pumped from three existing water production wells for nitrates, TCP, corrosivity, and manganese.
- Installation of an underground water conveyance pipeline to convey pumped groundwater from the existing Airport wells to the Airport Wells Water Treatment Facility.
- Construction of a road leading to the southernmost Airport well.
- Potential installation of solar panels at the Half Moon Bay Airport and on the roofs of the existing and proposed Alta Vista water tanks.

As of December 11, 2013, all PWP projects have been constructed except for the Alta Vista Tank and related development and the Airport Wells Water Treatment Facility and related development.

For remaining development conducted pursuant to the PWP, the District shall assure that safe and reliable access for construction vehicles that does not hinder or jeopardize the safety of regular traffic circulation is provided to each construction site. The improvements are described further below.

The PWP improvements shall be undertaken in accordance with Mitigation Measures listed in the MWSD Public Works Plan Phase I Final Environmental Impact Report (FEIR) SCH# 2004112107 with modifications as certified by the California Coastal Commission. Attached, as Exhibit A, is the Mitigation Monitoring and Reporting Plan (MMRP) section, found in the FEIR, with applicable revisions per CCC's certification.

STORAGE TANKS

The PWP authorized the construction of three new water storage tanks in the vicinity of the District's existing Alta Vista and Schoolhouse water storage tanks. Specifically, the proposed tanks are described in Table 4-1.

Alta Vista Tank

The existing 462,000-gallon Alta Vista Tank is located along an unpaved extension of Alta Vista Road. The existing tank is constructed of steel and is approximately 52 feet in diameter and 28 feet tall. A 100,000-gallon settling tank and associated water treatment facility are located directly north of the existing Alta Vista Tank. The settling tank and adjacent facility store and treat water diverted from Montara Creek before it is introduced into the District's storage and distribution system.

Table 4-1: 2008 Storage Tank Capacities

Location	Existing Storage Tank Capacity (gallons)	Proposed Storage Tank Capacity (gallons)	Comment
Portola Estate	100,000	100,000	No Change
Schoolhouse Tank	100,000	0	Demolished or Repaired
Alta Vista Tank	462,000	462,000	No Change
New Schoolhouse Tanks	-	200,000	New
New Alta Vista Tank	-	1,000,000	New
Totals	**662,000**	**1,762,000**	

The proposed new up to 1,000,000-gallon Alta Vista Tank would be constructed with an overall diameter of about 80 feet and height of about 30 feet (Figure 4-1). The elevation of the proposed tank's floor is set at 488 feet above sea level (asl) allowing 12 feet of the tank's side to be concealed below grade, thus fulfilling the Coastal Commission's line-of-site requirement. The existing 462,000-gallon Alta Vista Tank is located at 470 feet asl. Pumps and pressure vessels may be required to maintain adequate levels in both the existing and new tank. The proposed tank site is situated on the center of the ridge line at an elevation of 502 feet asl. Because the new tank must be "dug" into the site (Figure 4-1), installation would require construction of retaining walls of up to 12 feet in height on either side of the ridge line. The retaining walls would be constructed 10 to 12 feet from the tank to maintain space for an access road.

The installation of the tank would require movement of approximately 7,000 cubic yards of soil and weathered granitics. The cut and fill would be as balanced as possible at the site but approximately 6,000 cubic yards would be taken off site. The excavated material would likely be hauled to Ox Mountain Sanitary Landfill just east of Half Moon Bay. The general area of the reconstruction is shown on Figure 4-2; however the exact boundaries of excavation and fill cannot be determined until bedrock presence is confirmed during grading activities. The tank will be constructed in its entirety on the property owned by the District. The material out of which the tank will be constructed has not been established, but poured in place or cast in place concrete will not be used.

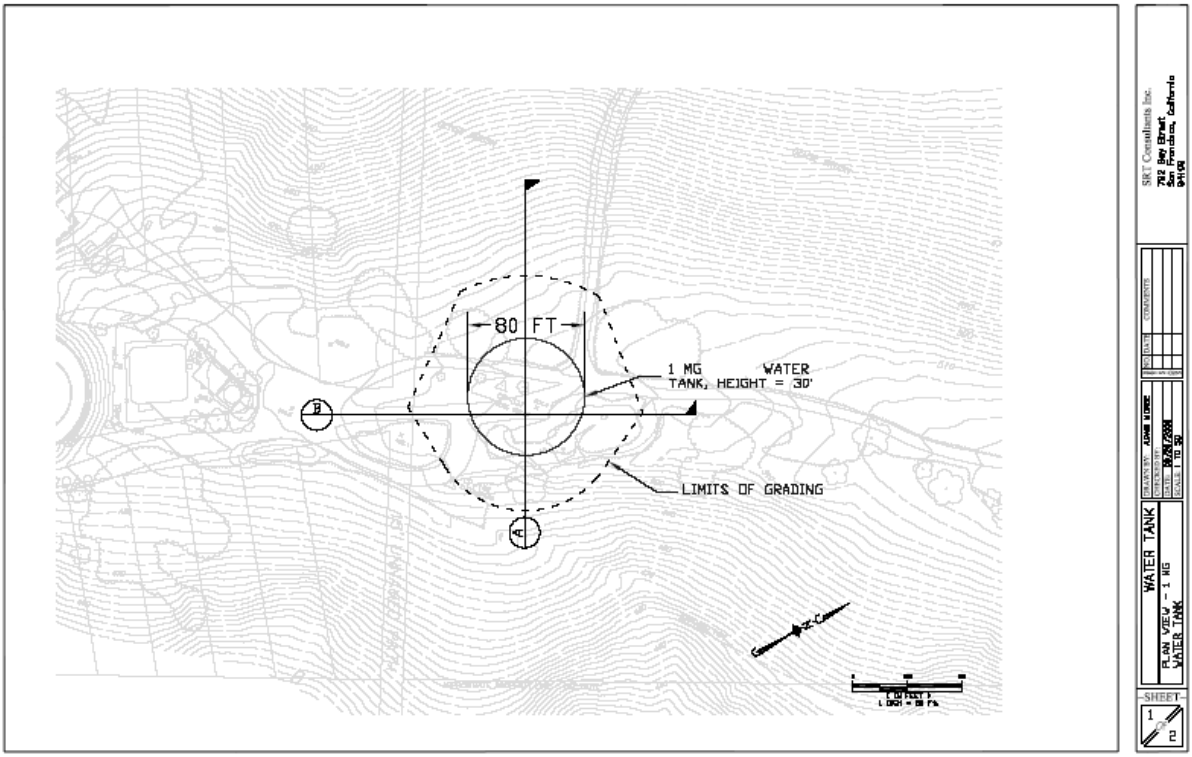
There will be no obstruction of existing hiking trails to Montara Mountain on the Alta Vista ridge property due to design, construction, and operation of the facilities authorized pursuant to PWP 2-06-006. If it is necessary to block the trail temporarily, alternative means of access to Montara Mountain on the Alta Vista ridge property shall be provided.

Pipeline and Power. The new tank would be connected to the existing Alta Vista Tank and associated treatment facilities via an 8-inch, approximately 250-foot long buried pipeline. The pipeline would be installed within the existing unpaved extension of Alta Vista Road.

The Alta Vista Tank would also include the installation of telemetry and remote operating devices to simplify the tank's operation and to minimize the need for on-site operation of the tank. Electrical power to supply the tank's telemetry and remote operating devices would be via a buried electrical supply line or solar panels installed on the roof of the new and existing tanks.

Access Road. 16-foot wide access road, also requiring some landform recontouring, would be constructed leading to the tank site as depicted on Figures 4-1 and Figure 4-2.

Figure 4-1: Proposed Alta Vista Tank Site Plan and Cross-Section



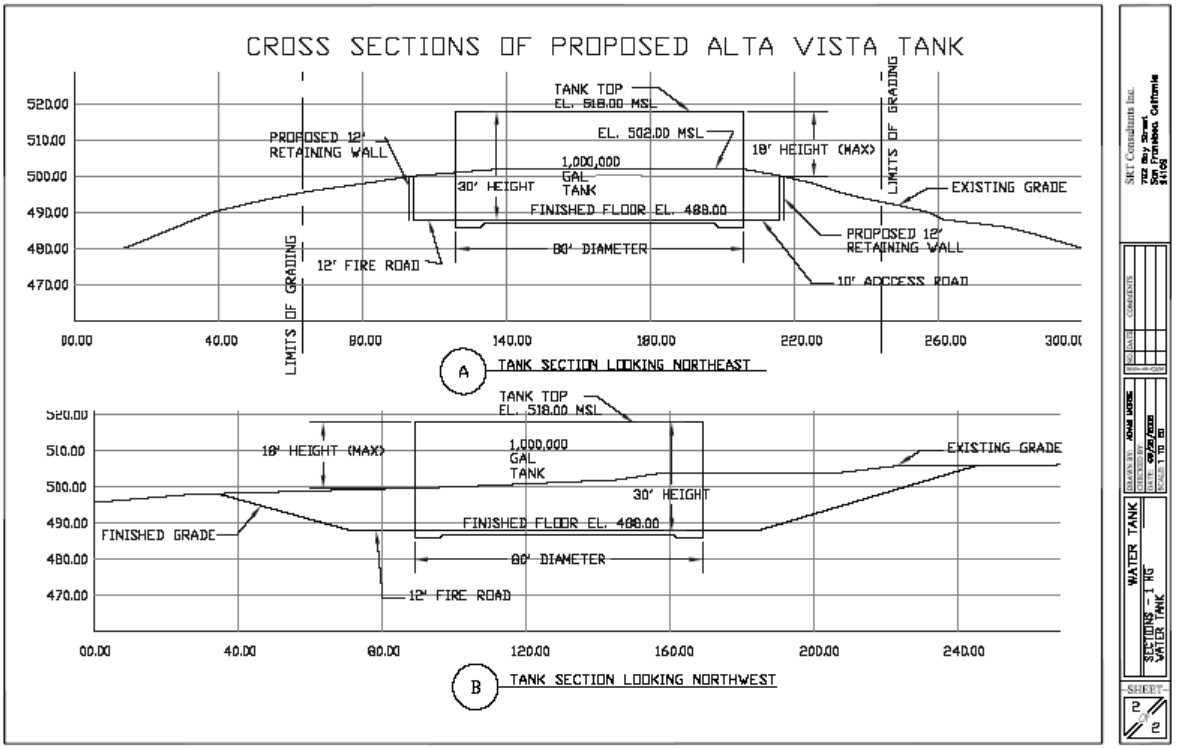
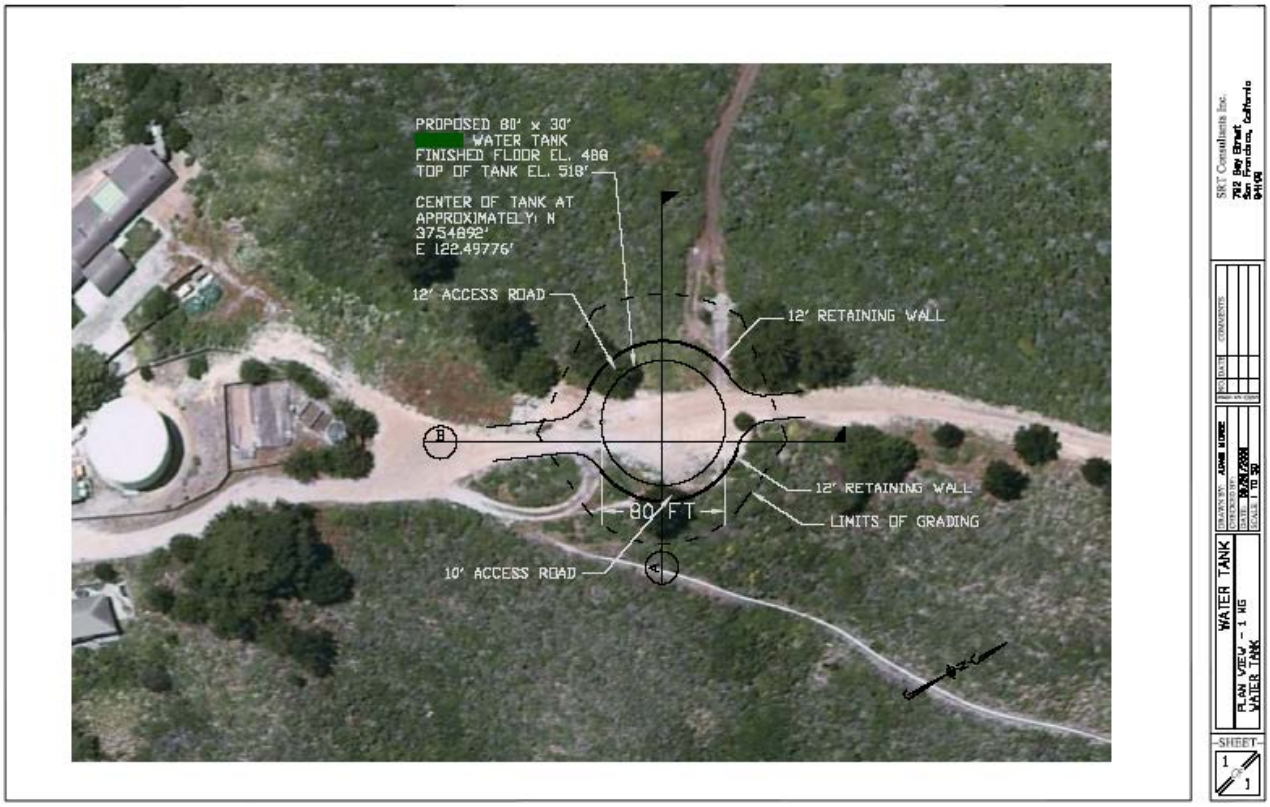


Figure 4-2: Aerial Depiction of Proposed Alta Vista Tank



Solar Panels. Solar panels would be installed on top of the existing and proposed Alta Vista Tanks to provide at least a portion of the electrical power required for the Alta Vista Well No.1 and other electrically powered equipment at the site. The panels would have a non-reflective finish and would be angled up from the roofs of the tanks toward the south to optimize solar exposure. Conduit from the solar panels would be run down the side of the tanks to ground mounted equipment necessary to distribute the electrical power to the equipment, as well as to deliver excess electrical power into the Pacific Gas and Electric Company power grid.

Security Fence. The District has proposed the installation of a chain link fence across the unpaved extension of Alta Vista Road access road. The fence would be installed just northeast of the existing Alta Vista water treatment facility for the purpose of discouraging access to, and vandalism of, the new tank and the proposed production and monitoring wells (Figure 4-2). The fence would be 6 feet in height and approximately 30 feet in length. A gate would be installed at the point where the fence crosses the unpaved extension of Alta Vista Road to provide District staff access to the new storage tank and wells.

Construction. Construction of the Alta Vista Tank shall conform to the specifications and recommendations contained in the Geotechnical Investigation Report for Proposed Alta Vista Tank Site, Montara, California prepared by Terrasearch, Inc. dated August 14, 2008. Prior to commencement of construction, all development subject to PWP-2-06-006 shall obtain all other agency approvals and property owner approvals, as necessary. This includes certification by the San Mateo County engineer that direct damage or indirect threats to public health and safety as a results of construction of the Alta Vista Tank would be unlikely in the event of a fire or geologic hazard.

Tree removal and all other activities associated with tank construction shall be performed between September 1 and January 30 to prevent disturbance to bird nests. If tree clearing and all other

activities associated with tank construction is desired outside of this period, a pre-construction survey for nesting birds shall be conducted prior to clearing of trees and all other activities associated with tank construction. The survey will be conducted by a qualified biologist no more than 30 days prior to initiation or clearing or construction. The survey shall include any areas proposed for any activities such as earthmoving. If occupied migratory bird nests are found within 250 feet of the construction zone, clearing shall not begin until after the nests are protected by an adequate setback (in general, 50 feet for passerines and 250 feet for raptors) defined by a qualified biologist.

All development subject to PWP-2-06-006 shall avoid impacts to the San Francisco Dusky-Footed Woodrat (DFWR) and American badger. Prior to commencement of construction of the Alta Vista water tank, including grading or placement of equipment, a minimum 25-foot buffer shall be established around the active stick nests or burrows adjacent to the project site. A qualified biological monitor shall be present at the site during all grading and construction activities to ensure that the San Francisco DFWR and American Badger are not harmed. Deconstruction of the DFWR nests or relocating the American Badgers or DFWRs is prohibited.

Concurrent with the Notice of Impending Development (NOID) for the Alta Vista Tank, the District shall submit to the Executive Director for review and approval a detailed erosion control plan and landscape plan to revegetate the area around the Alta Vista Tank to control erosion and screen views, in accordance with Mitigation Measures No. 3.1-4 and 3.1-6 of the FEIR, respectively.

Coastal Resource Protection. All development associated with the Alta Vista Tank project shall be sited, designed, and undertaken in such a way as to protect coastal resources to the maximum extent feasible.

Schoolhouse Tanks

Two new storage tanks have been constructed at the Schoolhouse Tank site as part of this PWP, and the original concrete Schoolhouse Tank has been demolished. The original 100,000-gallon Schoolhouse Tank was located along an unpaved roadway at the end of Buena Vista Street. The original tank was constructed of concrete and was 34 feet in diameter and 16 feet tall. A booster pump station is housed in a small structure adjacent to the tank.

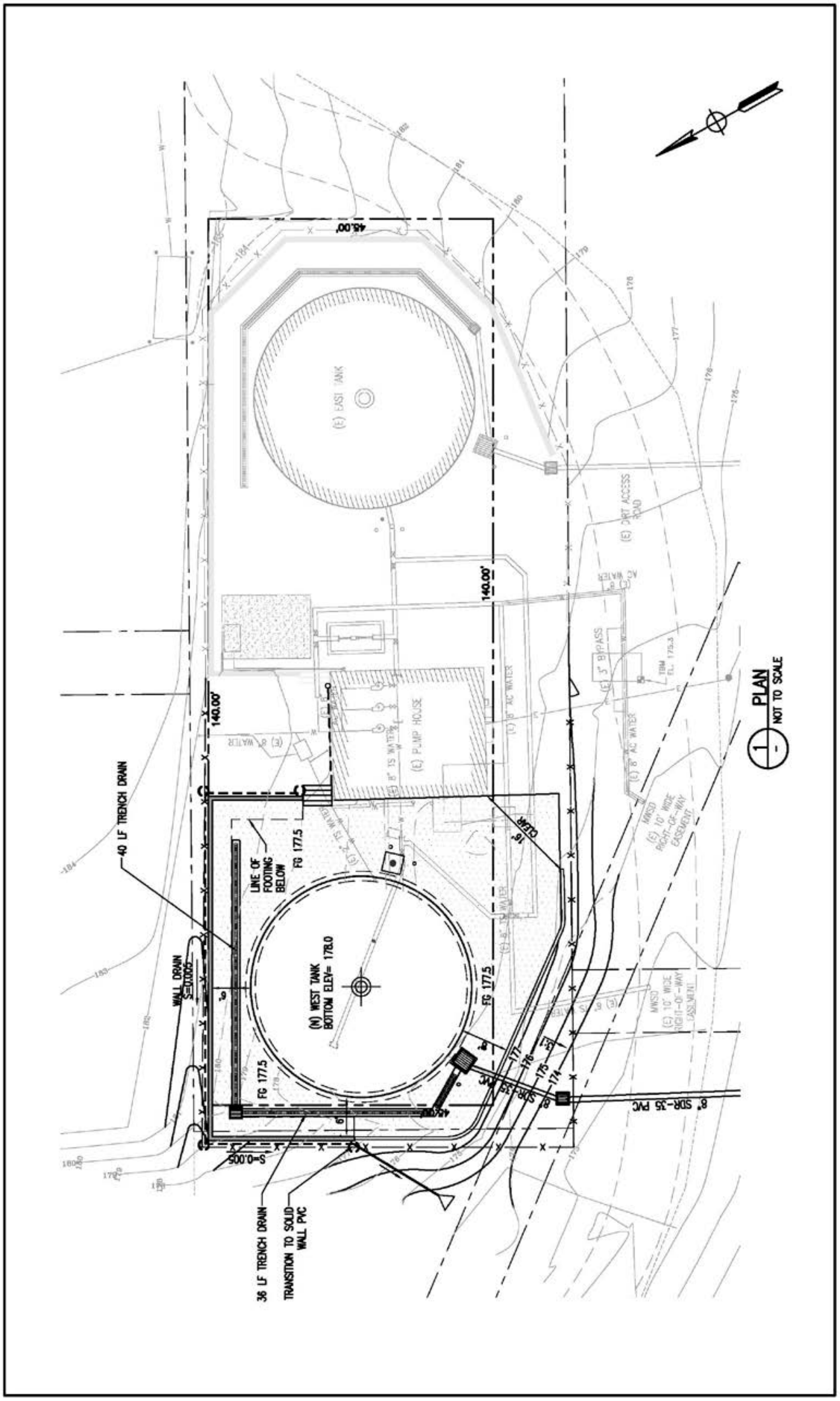
The Schoolhouse Tank site is situated on a gently sloping hillside ranging in elevation from 176 to 179 feet asl. Installation of the Schoolhouse Tanks required cutting a portion of the hillside to achieve the final tank bottom elevation of 178 feet asl. A retaining wall of 6-feet in height was constructed along a section of the tank site to retain areas that would be excavated to accommodate the new tanks.

MWSD constructed a 100,000-gallon water storage tank at the Schoolhouse site (Schoolhouse Tank East) in June 2012, directly adjacent to the existing 100,000-gallon concrete Schoolhouse Tank. The new welded steel water storage tank is 35-feet in diameter and 17-feet tall and sits at an elevation of 178 asl.

In September 2013, MWSD demolished the existing concrete Schoolhouse Tank and began the construction of a new 100,000-gallon storage facility (Schoolhouse Tank West) in its place. Schoolhouse Tank West is directly adjacent to the 100,000-gallon Schoolhouse Tank East. Schoolhouse Tank West is made of welded steel, is 35-feet in diameter and 17-feet tall, and sits at the same elevation as Schoolhouse Tank East. Schoolhouse Tank West is currently under construction and will be brought online in January 2013. Figure 4-3 is the site plan for the construction of Schoolhouse Tank West, and includes the location of both tanks on the

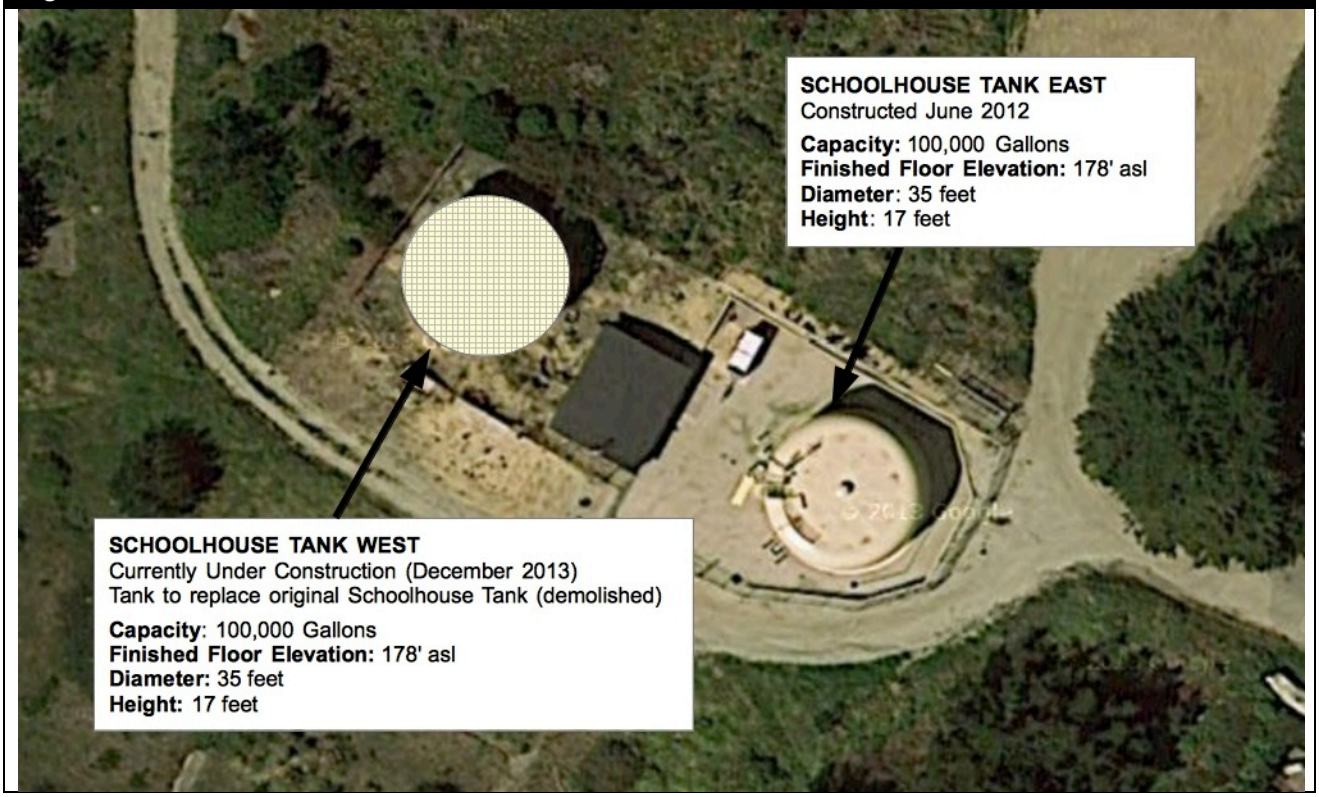
Schoolhouse site. Figure 4-4 shows the general location and dimensions of the two Schoolhouse Tanks.

Figure 4-3: Schoolhouse Tanks Site Plan



(E) EAST TANK
45.00'
140.00'
(E) DIRT ACCESS ROAD
(E) PUMP HOUSE
(E) 3" BYPASS
40 LF TRENCH DRAIN
LINE OF FOOTING BELOW
FG 177.5
(N) WEST TANK
BOTTOM ELEV= 178.0
WALL DRAIN
S=0.005
8" SDR-35 PVC
36 LF TRENCH DRAIN
TRANSITION TO SOLID WALL PVC
MWSD (E) 10' WIDE RIGHT-OF-WAY EASEMENT
1
PLAN
NOT TO SCALE

Figure 4-4: Schoolhouse Tanks Aerial View



Coastal Resource Protection. All development associated with the Schoolhouse Tank projects was sited, designed, and undertaken in such a way as to protect coastal resources to the maximum extent feasible.

PRODUCTION AND MONITORING WELLS

A test well, referred to as Alta Vista Well No.1 (also known as BH-9b or 2004-4 during hydrological investigations), was installed in 2004 to assess the potential for increasing the District's available domestic water supply through additional groundwater extraction. A second well, referred to as Alta Vista Well No.2 (also known as BH-9 or 2004-3), was installed concurrently for monitoring purposes. Both wells were installed in accordance with a Coastal Development Permit (CDP) issued by the San Mateo County Environmental Services Agency on May 19, 2004.

Following a series of tests, the District determined that the test well Alta Vista No.1 has the capability of producing a sustainable volume of water suitable for the District's existing needs. The existing test well draws water from open joints in the granitic formations located approximately 780 feet below the ground surface. Initial tests of the well's production capabilities suggest that it can produce up to 300 gallons of water per minute over a 120-hour duration. The District has proposed to pump the well at 150 gallons per minute continuously. Pumping of the Alta Vista Well No.1 shall not exceed 150 gpm averaged over a 24-hour period. Any future proposals to increase the pumping rate shall require an amendment to this public works plan, and the District shall comply with any informational requests, including pumping tests, to demonstrate with sufficient evidence that the increased pumping rate will not impact nearby wetlands, riparian areas, and sensitive habitats. The District may not initiate any pumping tests for increased pumping rates without authorization from Commission staff after the PWP amendment application has been submitted. The District shall submit to the Coastal Commission annual water production reports for review

and approval by the Executive Director by December 1st of each year that the Alta Vista Well No. 1 is in production. These reports shall demonstrate that the pumping rate of the well does not exceed 150 gpm averaged over any 24-hours period.

The Alta Vista Wells No.1 and No.2 are located approximately 840 feet and 1,250 feet, respectively, northeast (upslope) of the District's existing 462,000-gallon Alta Vista water storage tank, and approximately 590 feet and 1,000 feet respectively from the proposed new Alta Vista water storage tank. Both wells are located along the unpaved extension of Alta Vista Road on District property.

Alta Vista Well No. 1, originally a test well beginning in 2004, was converted to a production well as part of a PWP development project in 2012.

Conversion of the Alta Vista Well No.1 to a production well included (Figure 4-5):

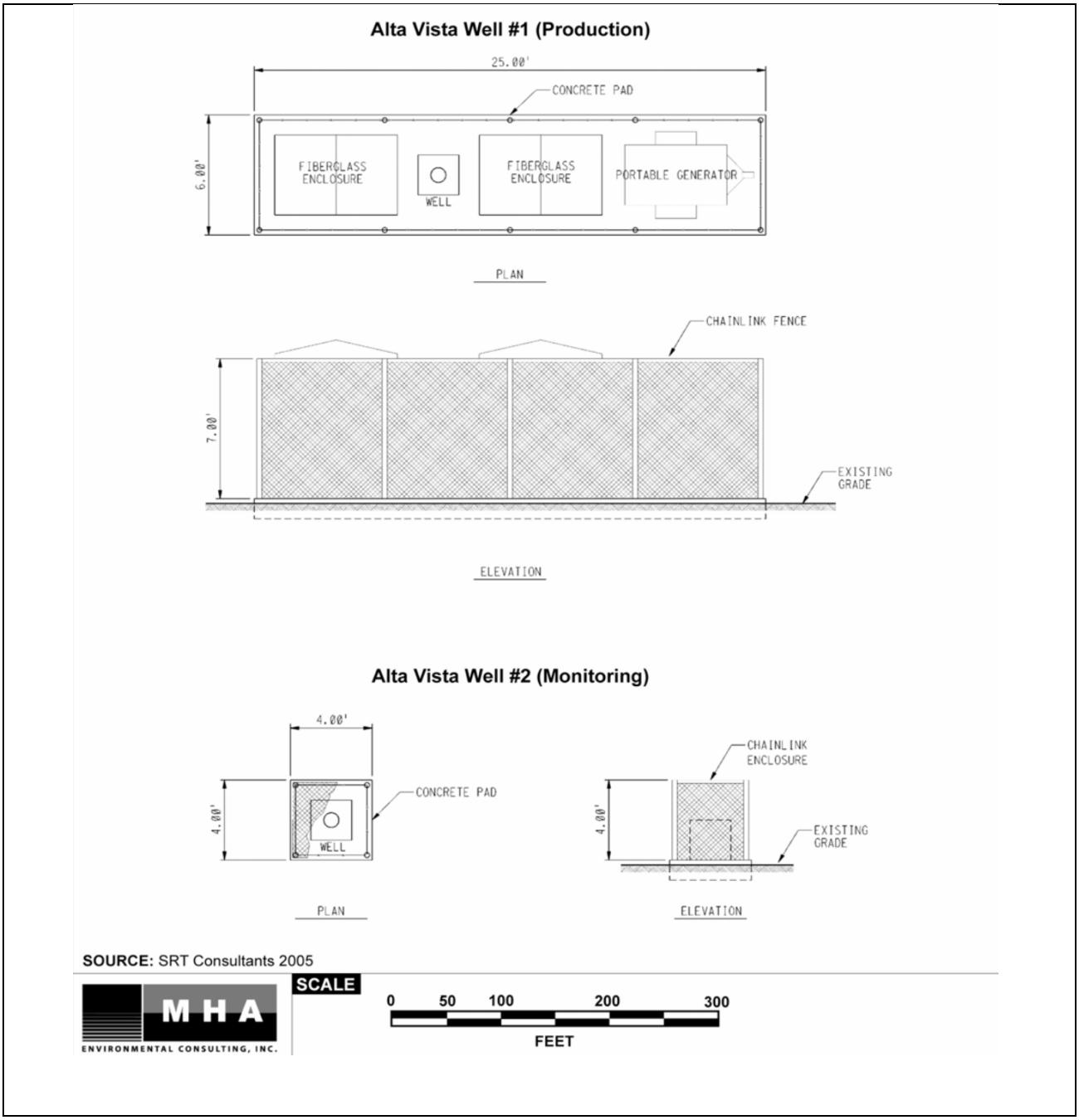
- Construction of a 25-foot by 6-foot concrete pad around wellhead No.1
- Installation of a 7-foot high chain-link fence around the perimeter of the concrete pad
- Placement of two 7-foot tall fiberglass enclosures adjacent to the wellhead and within the fenced enclosure, which would house telemetry equipment for remote monitoring and operation and an electrical pump
- Placement of a portable diesel-powered generator on the concrete pad and within the fenced enclosure
- Installation of an approximately 790-foot long, 6-inch diameter underground pipeline along the unpaved road to convey water from the well to the existing Alta Vista water storage tank
- Installation of a buried electrical conduit along the unpaved road extending from the existing Alta Vista Tank to the well

Water quality testing indicates that groundwater extracted from Alta Vista Well No.1 currently meets drinking water standards. If water quality changes in the future, the District would treat the water with sodium hypochlorite (liquid chlorine) prior to conveyance to District customers. The chlorine would be stored at the wellhead.

The project also included enclosing and securing the existing Alta Vista Well No.2, located approximately 400 feet north of Alta Vista Well No.1, for use as a monitoring well to provide a method for monitoring the aquifer's condition (level and quality). The Alta Vista Well No.2 project improvements included (Figure 4-5):

- Construction of a 4-foot by 4-foot concrete pad around wellhead No.2
- Installation of a 4-foot high chain-link fence around the perimeter of the concrete pad
- Installation of an approximately 1,200-foot long underground electrical conduit along the unpaved road, connecting with Alta Vista Well No.1, and continuing on to the existing Alta Vista water storage tank

Figure 4-5: Alta Vista Production and Monitoring Wells Proposed Improvements



Coastal Resource Protection. All development associated with the Alta Vista Production and Monitoring wells projects was sited, designed, and undertaken in such a way as to protect coastal resources to the maximum extent feasible.

AIRPORT WELLS WATER TREATMENT FACILITY

The District currently operates three production wells at the Half Moon Bay Airport, each of which includes wellhead water treatment facilities. The proposed new treatment system would be centrally located and serve all three wells (Figure 4-6). Water extracted from the three wells would

first be blended to treat for manganese and then conveyed through the Airport Wells Water Treatment Facility's following components:

1) Two granulated activated carbon (GAC) tanks for TCP removal
2) Four ion exchange vessels for nitrate removal
3) Two air stripping towers for pH adjustment to treat for corrosion potential

Air stripping would also potentially be accomplished by (1) diffused aeration, (2) utilization of a spray nozzle and tray aerator, or (3) aeration by piping a diffuser down the wells and adding air directly into the groundwater. A flow diagram of the treatment process is depicted in Figure *4-7.*

The Airport Wells Water Treatment Facility would also include two fiberglass buildings that would house Supervisory Control and Data Acquisition (SCADA), controls, power systems, and a chlorination system.

The centralized treatment facility components would be installed on a 40-foot by 15-foot concrete pad and enclosed by a 7-foot tall chain link fence. The facility would be sited at the east side of the Half Moon Bay Airport, just northwest of the fence line surrounding the existing Half Moon Bay Airport Administration Building, and southwest of the Airport's frontage road. A new access road would be constructed off the Airport's frontage road (Figure 4-7).

The centralized treatment facility would be connected with the three existing wells and the District's distribution system via existing and new buried pipelines. Electrical power supply to the Facility would be through buried electrical conduits or solar panels. Solar panels would be placed on an undeveloped area directly northwest of the proposed Airport Wells Water Treatment Facility (Figure 4-6).

A 380-foot long and 12-foot wide unpaved access road would be constructed leading to the southernmost Airport well. The components of the proposed project at the Half Moon Bay Airport would be located on property not currently owned by the District.

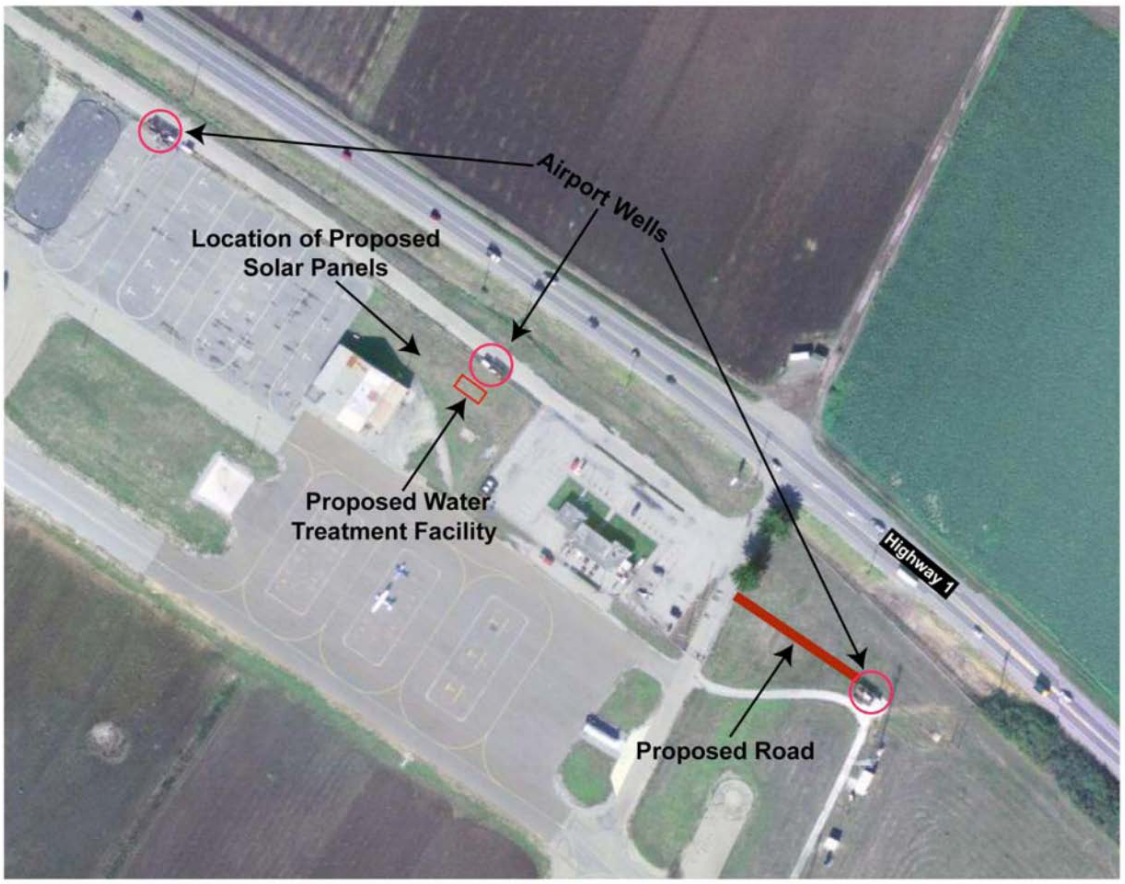
Concurrent with the Notice of Impending Development (NOID) for the Airport Wells Water Treatment Facility, the District shall submit to the Executive Director for review and approval a detailed erosion control plan, drainage plan, and landscape plan to generally screen the Treatment Facility equipment and solar panel array from Highway 1 views in accordance with Mitigation Measures No. 3.1-4, 3.2-2, and 3.9-3 of the FEIR, respectively.

Solar Panels. Approximately 2,500 square feet of solar panels would be installed just northwest of the proposed Airport Wells Water Treatment Facility. The panels would have a non-reflective finish, mounted on a structural system raised off the ground, and angled up toward the south to optimize solar exposure. Conduit from the solar panels would be run in buried conduit to ground-mounted equipment necessary to distribute the electrical power to the site's equipment, as well as to deliver excess electrical power into the Pacific Gas and Electric Company power grid. The panels would be screened from view by low lying landscape around the installation's perimeter.

Existing Airport Wells Treatment Facilities. The existing individual wellhead treatment facilities would be decommissioned and removed from the site following installation of the new central treatment facility.

Coastal Resource Protection. All development associated with the Airport Wells Water Treatment Facility project shall be sited, designed, and undertaken in such a way as to protect coastal resources to the maximum extent feasible.

Figure 4-6: Aerial Depiction of Proposed Airport Wells Water Treatment Facility



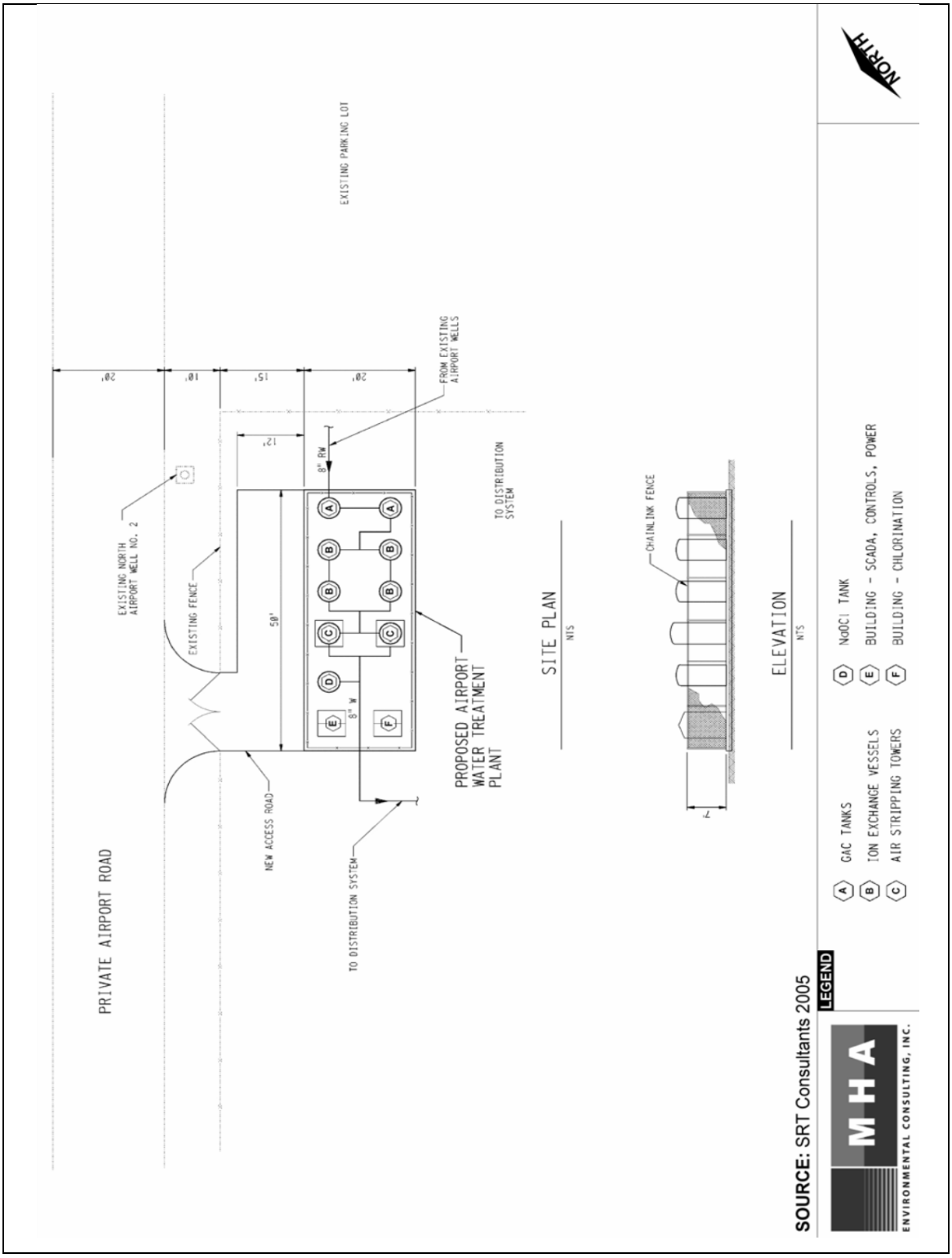
SOURCE: MHA 2005

MHA ENVIRONMENTAL CONSULTING, INC.

SCALE 0 1/4 MILE

NORTH

Figure 4-7: Airport Wells Proposed Water Treatment Plant Site Plan and Cross Section



5. Permits and Approvals

The proposed PWP system improvements included in the Public Works Plan require the approval of a number of public agencies, including:

- Approval by the California Coastal Commission pursuant to Section 30605 of the California Coastal Act
- Coverage under the Construction General Permit obtained from the Regional Water Quality Control Board (Alta Vista Tank and possibly Airport Wells Water Treatment Facility)
- Domestic Water Supply Permit Amendment issued by the California Department of Health Services Drinking Water Program (Airport Wells Water Treatment Facility)
- Drinking Water Supply Permit issued by the California Department of Health Services Drinking Water Program (Alta Vista Well No.1)

5.1 Public Works Plan Project Procedures

The purpose of this chapter is to set forth procedures for reviewing and authorizing projects contained in the Montara Water and Sanitary District ("MWSD") Public Works Plan ("PWP") for MWSD's water facilities improvements. This chapter is divided into six sections. The first section sets forth definitions, general provisions and procedures for supplemental reports. The second section sets forth public notice requirements. The third section sets forth the Coastal Commission's areas of responsibility with regard to the PWP project review process. The fourth section sets forth the procedure for determining the effective and expiration dates of PWP project authorizations and provisions for extension of authorizations. The fifth section sets forth a post-construction authorization monitoring program. The sixth section sets forth procedures for the enforcement of the PWP. All development subject to PWP-2-06-006 shall adhere to the project procedures outlined in this Section.

5.1.1. Definitions, General Provisions and Supplemental Reports

A. Definitions

"California Coastal Commission" and "Coastal Commission" and "Commission" mean the California Coastal Commission.

"Contract Documents" means the plans, specifications, general and specific conditions, agreement and other documents prepared by or for MWSD for the construction or acquisition of a specific project contained in the PWP.

"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code) and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes.

"District General Manager" means MWSD's General Manager or her/his designee.

"Components of the PWP" means, collectively, the eleven projects comprising the PWP, such as the Alta Vista Well, the AltaVista Water Storage Tank, the Schoolhouse Water Storage Tank

and the Airport Wells Water Treatment Facility. “Component” means any one of the projects.

“Executive Director of the Commission” or “Executive Director” mean the Executive Director of the California Coastal Commission or his/her designee.

“MWSD” means the Montara Water and Sanitary District.

“MWSD Board” or “Board,” means MWSD's Board, the governing body of MWSD.

“Notice of Impending Development” means a notice of MWSD’s intention to construct one or more of the projects contained in the PWP, which notice shall be provided by MWSD’s General Manager to the Coastal Commission and to interested persons, organizations, and governmental agencies, and which also shall be posted conspicuously at the same locations within MWSD’s boundaries that MWSD’s official notices are posted and at the site of the impending construction of a project of the PWP.

“Project” means a development component specifically included in the PWP.

"Project Report" means the report on the PWP dated November 12, 2008, including the certified FEIR, submitted with MWSD’s application for certification of its PWP and any supplements thereto and containing all of the information specified in subsection 5.1.1 D2.

“Public works” means (a) all production, storage, transmission, and recovery facilities for water, sewerage, telephone, and other similar utilities owned or operated by any public agency or by any utility subject to the jurisdiction of the Public Utilities Commission, except for energy facilities; (b) all public transportation facilities, including streets, roads, highways, public parking lots and structures, ports, harbors, airports, railroads, and mass transit facilities and stations, bridges, trolley wires, and other related facilities and (c) all publicly financed recreational facilities, all projects of the State Coastal Conservancy, and any Development by a special district.

B. Computation of time

The time in which any act under this PWP is to be done shall be computed by excluding the first day and including the last, unless the last day is a weekend or state holiday, which is also excluded.

C. MWSD’s General Manager

MWSD's General Manager shall be the responsible person for contact regarding inquiries concerning PWP authorizations and implementation.

D. Procedures for Project Review and Authorization

1. Preparation of PWP Project Reports

MWSD’s General Manager shall review all proposed projects pursued under the PWP and prepare a Project Report for each proposed project.

2. Contents of a PWP Project Report

A Project Report shall include the information that MWSD’s Board deemed necessary to satisfy the standards for the PWP. A Project Report shall include:

(a) A description of the proposed project(s), including a narrative description of the size, kind, intensity and location, of each proposed development and including the supporting site plans and elevations thereof;

(b) Environmental documentation for the Project(s) including information prepared pursuant to the California Environmental Quality Act and an analysis of alternative locations for each proposed development activity;

(c) All technical reports associated with the Project(s) (i.e., biological reports, geotechnical reports, traffic analyses, etc.), including all reports and plans required by the PWP;

(d) The results of consultation with parties interested in, with jurisdiction over, and/or affected by the Project(s), including consultations with concerned public entities and agencies.

(e) All implementing mechanisms associated with the Project(s) (including but not limited to CEQA mitigation monitoring reports, legal documents, etc.);

(f) All correspondence received regarding the Project(s);

(g) Identification of the person responsible for ensuring that the proposed Project(s) shall be constructed in accordance with authorized specifications and that all terms and conditions of the authorization are met (Project Manager).

3. Early Coordination with the Coastal Commission

(a) MWSD shall consult with the Executive Director as early as possible regarding proposed Project(s) with the object of identifying issues of possible concern to the Coastal Commission.

(b) Project Descriptions shall be provided to the Executive Director concurrently with submittal thereof to the Board of Directors.

(c) MWSD shall provide the Executive Director with all public notices and documentation circulated to the public pursuant to the Board's required PWP review process, including the process for that portion of the public which expressly requested to be noticed.

(d) All required coordination/consultation with the Executive Director shall be initiated through and facilitated by planning staff of the Coastal Commission's North Central Coast District Office, 45 Fremont Street, Suite 2000 San Francisco, CA 94105.

4. Distribution of Project Reports to the Board

The General Manager shall submit a Project Report containing all of the information specified in subsection 5.1.1 D2 above as well as an action recommendation to MWSD's Board for each proposed Project pursued under the PWP.

5. Board Authorization of PWP Revisions

The Board may authorize a Project based on information contained in the Project Report and any other information in the record provided that:

(a) The proposed project has been reviewed in compliance with the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA), the Board has completed all related CEQA and/or NEPA documents and all conditions and/or mitigation measures identified in those CEQA and/or NEPA documents have been incorporated as part of the project;

(b) The Board finds that the proposed revision advances the specific project objectives of the PWP;

(c) The proposed project, as modified by any conditions and/or mitigation measures incorporated as part of the project, is contained in and consistent with the certified PWP.

6. Project Authorization Required

No Project contained in the PWP shall be undertaken without prior authorization in accordance with this chapter. Any development not contained in the PWP requires coastal development permit authorization by either the Coastal Commission in its retained jurisdiction (e.g., below the mean high tide, on public trust lands, etc.), or San Mateo County pursuant to its certified LCP.

7. Coastal Commission's Retained Jurisdiction

After certification of the PWP, the Coastal Commission continues to retain permit jurisdiction over development on tidelands, submerged lands, and public trust lands, whether filled or unfilled, within MWSD's service area (see "Coastal Commission Retained Jurisdiction Area" in Figure _.1). Under the Federal Coastal Zone Management Act, the Commission also retains federal consistency review authority over federal activities and federally permitted activities on or adjacent to the sites.

The Commission also retains permit jurisdiction outside of the retained jurisdiction area over development that was authorized by Commission action before the date of PWP certification. Projects neither contained in the PWP nor located in the Commission's retained permit jurisdiction shall be reviewed by the County of San Mateo for consistency with its certified LCP.

5.1.1. Notice of Impending Development

A. Provision of Advance Notice and Information to Coastal Commission

The General Manager shall give the Executive Director written notice of MWSD's intent to submit a Notice of Impending Development pertaining to the construction of a project or projects contained in the PWP at least 30 calendar days prior to submittal of the Notice of Impending Development.

B. Recipients of Notice of Impending Development

After approval by the Board of the Contract Documents for a project or projects to be constructed or acquired, and at least 30 working days prior to issuing a notice to proceed to the contractor for such construction or acquisition, the General Manager shall send via first-class mail a written Notice of Impending Development to the following persons, parties and agencies informing them of the Board's decision:

1. The Executive Director;
2. Owners of record of each property within 100 feet (excluding road rights-of-way) of the proposed project(s);
3. Persons residing on properties located within 100 feet (excluding road rights-of-way) of the proposed project(s);
4. All other persons, parties, and agencies who have requested in writing to receive such notice, either for the project(s) that is the subject of the notice or for all PWP projects;
5. All parties consulted with pursuant to Section 5.1.1.D.2 above; and
6. Persons, parties, and agencies that are known by MWSD to be interested in the specific project(s) that is the subject of the notice (e.g., persons, parties, and agencies that submitted testimony or other comments during the CEQA/NEPA process for the PWP, etc.).

C. Contents of Notice of Impending Development

The Notice of Impending Development shall be clearly titled as such and shall, at a minimum, include the following information regarding the PWP authorization:

1. The description of the proposed project(s), including a narrative description of the size, kind, intensity and location of each proposed development as well as an identification of the existence of the PWP Project Report and information regarding where and when it is available for public review;
2. The Board's approval of the Contract Documents for the project(s);
3. The anticipated date of commencement of construction of the project(s);
4. The appropriate MWSD contact person(s) or designated Project Manager and her/his contact information;
5. The process for Coastal Commission review of the project(s) (including contact information for Commission staff); and
6. A list of recipients of the Notice of Impending Development.

D. Posting Requirements for Notice of Impending Development

The General Manager shall post the Notice of Impending Development in conspicuous locations at the proposed project(s) site(s) no later than the date that the Notice of Impending Development is sent pursuant to Section 5.1.2.B, and at least 30 working days prior to the commencement of construction. The Notices shall comply with the following requirements:

1. Notices that are posted shall be clearly visible and printed with black text/graphics on a brightly hued background (e.g., golden-rod yellow) using card-stock weight (at the least) paper or functional equivalent (e.g., wood, cardboard, corrugated plastic (or "coroplast"), plastic, vinyl, metal, etc.). Notices shall be laminated or otherwise weatherproofed so as to be legible at all times, and shall be at least 8½ inches by 11 inches in size, and no greater than 4 feet by 8 feet in size.
2. Notices shall be posted against a solid background at least as large as the notice itself (e.g., posting a card-stock notice on an 8½ inch by 11-inch piece of plywood attached to a stake) or shall be printed onto an integral solid background (e.g., coroplast), and shall be posted at a readable height (i.e., approximately three to six feet).
3. Notices shall be posted at locations on the perimeter (and/or within the perimeter as appropriate) of the proposed project site where the site intersects public use areas (streets, paths, parking lots, etc.). Notices shall also be posted at MWSD office and post offices in Montara and Moss Beach.
4. Notices that do not meet the criteria listed above, that otherwise become illegible, or that otherwise are not visible to pedestrians or disappear (for whatever reason) shall immediately be replaced. All notices shall remain posted until the effective date of authorized commencement of construction (in accordance with Section _.4.C).

E. Supporting Information for the Notice of Impending Development

Supporting information sufficient to allow the reviewer to determine whether the proposed project is consistent with the certified PWP shall accompany the Notice of Impending Development mailed to the Executive Director and to persons, parties, and/or agencies requesting such information. At a minimum, the supporting information shall include:

1. The Project Report (including all of the information identified in subsection 5.1.1.D2), updated to include any changes or additions made in the course of review by MWSD; provided, that copies of lengthy and/or oversized studies, reports, and technical materials included as part of the Project Report shall be provided only to the Executive Director and to interested persons, parties, and agencies that specifically request these materials;
2. Any final authorization documents from the Board (e.g., resolutions, minute orders, certifications, etc.) not included in the Project Report;
3. A separate document that identifies all Project conditions and mitigations and explains how compliance will be achieved and measured for each;
4. Copies of all correspondence received regarding the proposed PWP Project; and
5. For the Executive Director only:
   (a) A mailing list with names and addresses for each of the persons, parties, and agencies listed in Section 5.1.2.B above, where the list is labeled and organized by each of the categories listed;
   (b) One set of plain (i.e., unadorned with no return address) regular business size (9½ inches by 4⅛ inches) envelopes stamped with first class postage (metered postage is not acceptable) addressed to each of the listed addressees from Section 5.1.2.B, above, for each Commission hearing (if applicable) on the matter (i.e., if there are multiple Commission hearings on the matter, then multiple such envelop sets shall be provided as directed by the Executive Director); and,
   (c) Evidence that the Notice of Impending Development has been posted pursuant to the parameters of Section 5.1.2.D, above, (e.g., a site plan with the notice locations noted and/or photos of the notice locations attached).

5.1.3 Coastal Commission Review of PWP Components

The Coastal Commission shall review project(s) authorized for construction by MWSD for consistency with the PWP in accordance with the procedures of this Section.

A. Filing the Notice of Impending Development

Consistent with 14 CCR sections 13357(a)(5), 13359(a), and 13553-13554, unless there are unusual circumstances, within five working days of receipt of the Notice of Impending Development and all applicable supporting information (as described in Section 5.1.2 above) for construction of the project(s), the Executive Director shall review the submittal and shall determine whether additional information is necessary to determine if the proposed project(s) is/are consistent with the PWP, and if additional information is deemed necessary, shall request such information from the General Manager.

1. The Notice of Impending Development shall only be deemed filed if the Executive Director determines that the information supplied is consistent with the information requirements of 14 CCR sections 13357(a)(5), 13359(a) and 13353 and is sufficient to allow the Commission to determine whether the proposed project is consistent with the certified PWP.

2. If the Executive Director has requested additional supporting information needed to determine consistency with the PWP, then the Notice shall be deemed filed when the Executive Director determines that all necessary supporting information has been received.

B. Coastal Commission Hearing Deadline

Consistent with 14 CCR sections 13357(a)(5) and 13359, the thirtieth working day following the day the Notice of Impending Development is deemed filed is the Hearing Deadline. The Hearing Deadline may be extended if, on or before the Hearing Deadline, the General Manager waives MWSD's right to a hearing within thirty working days, and agrees to an extension to a date certain, no more than three months from the Hearing Deadline, to allow for Commission review of the proposed project(s) at a later hearing.

C. Coastal Commission Review and Determination of Consistency with PWP

The Executive Director shall report in writing to the Commission regarding any pending proposed project(s). The Coastal Commission shall review the proposed project(s) at a scheduled public hearing prior to the Hearing Deadline.

The Executive Director's report to the Commission shall include a description sufficient to allow the Commission to understand the location, nature, and extent of the project(s), and a recommendation regarding the consistency of the proposed project(s) with the certified PWP. On or before the Hearing Deadline the Commission shall make one of the following determinations:

1. Determine that the proposed project(s) is/are consistent with the certified PWP, or

2. Determine that conditions are required to render the proposed project(s) consistent with the certified PWP, including identification of the required conditions.

Following the Commission's determination, the Executive Director shall inform the General Manager of the Commission's determination and shall forward any conditions associated with it. If the Commission has identified conditions required to render the project(s) consistent with the PWP, construction shall not be undertaken until the conditions have been incorporated into the project(s).

Coastal Commission review of a proposed project(s) shall be deemed complete on the date of a Commission determination that the project(s) is/are consistent with the PWP with or without conditions.

Upon completion of Commission review, MWSD may undertake construction or acquisition of the project(s) provided, that any conditions imposed by the Commission to render the project(s) consistent with the PWP have been incorporated into the project(s).

5.1.4 Effective Date and Expiration Date of PWP Authorizations; Extension of Authorizations

A. Effective Date of PWP Project Authorizations

Unless expressly stated otherwise in the approval documents, the effective date of a Project authorization shall be the date the Coastal Commission's review of the proposed Project is deemed complete pursuant to Section 5.1.3 C.

B. Expiration Date of Project Authorizations

Unless expressly stated otherwise in the approval documents, the expiration date of a Project authorization pursuant to this PWP shall be three years following its effective date. Thereafter, construction of the Project may not commence unless the authorization has been extended as provided herein, or a new authorization and review by the Commission has been completed in accordance with PWP provisions for initial review of a proposed Project.

C. Extension of Component Authorizations

The expiration date of a Project authorization may be extended for a period not to exceed one year if the General Manager determines that there are no changed circumstances that may affect the Project's consistency with the PWP. In such a case, before the expiration of the authorization, the General Manager shall submit to the Executive Director a notice of intent to extend authorization of the Project together with supporting information sufficient for the Executive Director to determine whether there are changed circumstances that may affect the Project's consistency with the PWP including, at a minimum, any modified and/or new materials comprising the supporting information described in Section 5.1.2.E above. The submittal shall stay the expiration of the authorization and the start of construction.

If the Executive Director determines that the extension is consistent with the PWP, MWSD shall post notice of the determination at the project site consistent with the posting requirements in Section 5.1.2.D, above, and the Executive Director shall mail the notice to all persons, parties, and agencies on the original mailing list for the project and to all persons, parties, and agencies known by the Executive Director to be interested in the proposed extension. The notice shall include a summary of the extension approval process and information on contacting MWSD and the Coastal Commission concerning the proposed extension. If no written objection is received at the Commission office within 10 working days of posting and mailing notice, the determination of consistency shall be conclusive.

If the Executive Director determines that, due to changed circumstances, the Project may not be consistent with the PWP, the proposed extension shall be reported to the Commission at a noticed public hearing. The report shall include any pertinent changes in circumstances relating to the proposed extension. If three or more commissioners object to the extension on grounds the Project may not be consistent with the PWP, the matter shall be set for hearing in the same manner as a new Notice of Impending Development, including posting of notice by MWSD. The General Manager shall provide the Executive Director with supporting information in the manner prescribed for new proposed projects.

Successive extensions of an authorization may not exceed one year each.

5.1.5 Monitoring PWP Project and Components

The Board shall be responsible for ensuring that all terms, conditions, and mitigations associated with an authorized Project, including but not limited to mitigation measures and CEQA/NEPA requirements, are fulfilled. Project managers and other District personnel assigned responsibility to implement and/or monitor authorized Projects shall contact the General Manager annually by the end of each calendar year to provide information regarding compliance with the terms and conditions of authorization for that year and continuing obligations from authorizations in previous years. The General Manager shall verify that all terms and conditions have been timely fulfilled and shall update each Project's list of conditions and mitigations with compliance information on at least a yearly basis. The General Manager shall also review as-built Project plans and verify that the construction is consistent with them, including affixing written documentation to that effect to the as-built plans. The General Manager shall maintain the updated copies of the required approval documents and shall maintain the verified as-built plans, which shall be made available for public review.

The General Manager shall provide an annual written PWP monitoring report that includes a cumulative and calendar year summary of: (i) PWP-authorized Project compliance; (ii)

enforcement undertaken pursuant to Section 5.1.6.; (iii) PWP-required annual monitoring reports (e.g., water quality reports, etc.); (iv) status of PWP-required improvements and other District commitments; and (v) any comments received on PWP implementation. The General Manager shall maintain a record of the annual written summary reports in the General Manager's office, which shall be made available for public review. The General Manager shall submit a copy of each annual report to the Executive Director within ten days of its completion.

5.1.6 Enforcement

In addition to all other available remedies, the provisions of the PWP and the Coastal Act shall be enforceable pursuant to Chapter 9 of California Public Resources Code Division 20. Any person who performs or undertakes Development on MWSD's property that is (a) in violation of the PWP, (b) inconsistent with any pre-PWP certification Coastal Commission authorization (including coastal development permit approval), or (c) inconsistent with any PWP authorization may, in addition to any other penalties or remedies, be civilly liable in accordance with the provisions of Public Resources Code Sections 30820, 30821.6 and 30822.

The Board shall ensure that Development is consistent with the PWP and with the terms and conditions of authorizations pursuant to the PWP. The General Manager shall investigate in a reasonable time allegations regarding Development being undertaken inconsistent with the provisions of the PWP or PWP authorizations, and shall attempt to resolve any such inconsistencies discovered. The Executive Director or Coastal Commission may also enforce the terms of the PWP and the Coastal Act.

CALIFORNIA COASTAL COMMISSION
NORTH CENTRAL COAST DISTRICT OFFICE
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105
PHONE: (904) 904-5260
FAX: (904) 904-5400
WEB: WWW.COASTAL.CA.GOV

W19a

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Staff:	N.Dreher-SF
Staff report:	11/27/2013
Hearing date:	12/11/2013

STAFF REPORT: PUBLIC WORKS PLAN AMENDMENT APPLICATION

Amendment Number: **2-06-006-A1**

Applicant: **Montara Water and Sanitary District (MWSD)**

Amendment Description: Amend the existing certified Public Works Plan to allow the MWSD to use existing available water supply to provide water connections to serve new and existing development, including new residential, commercial and industrial development, as well as new connections to serve existing private domestic well users in the urban midcoast area of San Mateo County, including the communities of Montara and Moss Beach.

Staff Recommendation: Deny as Submitted; Certify if Modified

SUMMARY OF STAFF RECOMMENDATION

The Montara Water and Sanitary District (MWSD or District) proposes to amend their certified Public Works Plan (PWP) (PWP 2-06-006) to allow the District to use existing available water supply to provide new water connections for properties currently served by private domestic wells in the urban midcoast, and to provide connections to new residential, commercial and industrial development. Through conservation and system upgrades and improvements, the District currently has 128,000 gallons per day (gpd) of water supply available for new connections. Because the existing PWP currently prohibits new connections (due to a lack of available water supply when it was certified), the PWP must be amended to allow for new connections. The amendment also updates the PWP with respect to current water supply and demand figures, including taking into account projects undertaken pursuant to the PWP to date. The proposed amendment recognizes that any connections that require additional water supply

will require a future PWP amendment. The standard of review for the proposed amendment is the certified San Mateo County Local Coastal Program (LCP).

The LCP regulates public works facilities to ensure that expanded facilities, including new service connections, are designed and limited to accommodate needs generated by uses permitted consistent with the certified LCP and the Coastal Act. To this end, Chapter 2 of the LCP's Land Use Plan (LUP) includes several policies requiring that public works facilities be developed in a way that ensures that capacities (e.g. water supply, sewage disposal, roads and transit) are all on par with one another (so as to not induce development for which one supply outpaces others), that facilities not expand in capacity beyond the LCP-permitted buildout, and that adequate capacities be reserved for LCP priority uses. Public works expansion in the County is not allowed to induce growth inconsistent with the LCP nor accommodate growth beyond the capacity of other public works facilities, such as sewer and roads.

The proposed amendment will not facilitate future growth that would exceed the capacities of other available public services in the midcoast area, including because the LCP now has a certified 1% growth rate and all future development will be subject to the certified LCP's limitations. The Sewer Authority Midcoast (SAM) plant, of which MWSD is a member, has adequate capacity for its members and the proposed amendment will not adversely impact the SAM plant or the District's ability to collect, transmit and treat midcoast runoff and sewage. Additionally, the roadway segments throughout the District's jurisdiction and the midcoast generally will not be adversely impacted by the proposed amendment, including because all future residential development must be found by the County to be consistent with the LCP's transportation management program, and because potential impacts to the roadway system will be mitigated consistent with the certified LCP. Accordingly, the proposed amendment will not result in water service outpacing the other available services. The District will only extend water connections to otherwise permissible residential, commercial and industrial developments approved by the County consistent with the certified LCP.

However, the proposed amendment does not adequately protect water for Coastal Act and LCP priority uses. The LCP's LUP contains numerous policies that mandate the provision of water supplies to serve Coastal Act and Local Coastal Program priority uses, and includes a specific requirement for MWSD to preserve 80,959 gpd for enumerated priority uses. Additionally, the LUP prioritizes the use of public water to serve existing residences in the event of private domestic well failure. These priorities have not been accommodated in the District's proposal, and thus, as proposed, water could be allocated to non-priority uses, leaving inadequate supply to account for LCP priorities. Accordingly, the proposal is inconsistent with the LCP's priority use provisions. To address this inconsistency, Staff suggests modifications to the proposal designed to ensure that new connections do not eliminate water connections for priority uses. As modified, Staff believes the proposed amendment is consistent with the LCP and existing PWP on this point. As modified, the District can make use of 47,041 gpd annually for the proposed new, non-priority connections.

Finally, Staff also recommends suggested modifications to incorporate LCP-required reporting and monitoring criteria, to replace undefined terms with more descriptive language, and to clarify various inconsistencies, including those related to outdated system information. As

modified, Staff believes the proposed amendment is consistent with the certified LCP. Staff recommends that the **Commission certify the Public Works Plan Amendment with Suggested Modifications**. The resolutions to act on this recommendation follow below on page 4.

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I. MOTIONS AND RESOLUTIONS

A. Denial of PWP Amendment as Submitted

Staff recommends a NO vote on the following motion. Failure of this motion will result in denial of the Montara Water and Sanitary District Public Works Plan Amendment as submitted and the adoption of the following resolution and findings. The motion to certify passes only by an affirmative vote of a majority of the appointed Commissioners.

Motion: I move that the Commission certify the Montara Water and Sanitary District Public Works Plan Amendment as submitted, and I recommend a no vote.

Resolution: The Commission hereby denies certification of Montara Water and Sanitary District Public Works Plan Amendment 2-06-006-A1 and adopts the findings stated below on the grounds that the Amendment does not conform with the certified San Mateo County Local Coastal Program. Certification of the Amendment would not comply with the California Environmental Quality Act because there are feasible alternatives or feasible mitigation measures that would substantially lessen the significant adverse effects that the approval of the Amendment would have on the environment.

A. Approval of PWP Amendment if Modified

Staff recommends a YES vote on the following motion. Passage of this motion will result in certification of the Montara Water and Sanitary District Public Works Plan Amendment as modified and the adoption of the following resolution and findings. The motion to certify passes only by an affirmative vote of a majority of the appointed Commissioners.

Motion: I move that the Commission certify the Montara Water and Sanitary District Public Works Plan Amendment if modified as suggested in this report, and I recommend a yes vote.

Resolution: The Commission hereby certifies Montara Water and Sanitary District Public Works Plan Amendment 2-06-006-A1 as modified and adopts the findings stated below on the grounds that the Amendment as modified conforms to with the certified San Mateo County Local Coastal Program. Certification of the Amendment as modified complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Amendment on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the Amendment on the environment.

II. SUGGESTED MODIFICATIONS

The District shall make the following changes to the text of the Public Works Plan:

1) Modify Section I and Section I.A of the proposed "Established Guidelines for New Connections" (see pages 11-13 of the proposed PWP amendment in **Exhibit 2**) as follows:

The Montara Water and Sanitary District (MWSD) and the California Coastal Commission (CCC) have cooperatively established the below guidelines for adding new service connections to the MWSD water system with regard to MWSD's Public Works Plan (PWP) ~~Phases I and II~~. New domestic service connections, and the extension of water mains for any purpose, are prohibited in LCP-designated rural areas. These guidelines are effective as of ~~July 1~~December 11, 2013, and will remain effective under the PWP ~~Phase I~~ until amended ~~or deemed inapplicable due to implementation of PWP Phase II~~.

…

A. New Service Connections

This Public Works Plan recognizes that as of December 11, 2013 the District has 128,000 gallons per day (gpd) of water available to be utilized for new service connections, beyond those connections existing as of December 11, 2013. Available water supply may be utilized to serve existing development that is within the LCP-designated urban area that is currently served by private wells, or it may be utilized to provide new service connections to development within the LCP-designated urban area that has been authorized pursuant to the County's LCP, including the LCP's growth limitation, which is currently 1% each year. Consistent with the LCP Land Use Plan, including Policies 2.8 and 2.24 and Table 2.17, the District shall reserve water supply for priority uses. Although 80,959 gallons per day is currently required to be reserved for priority uses, that requirement may be reduced through a future amendment to the LCP. In addition, the amount of water required to be reserved will decrease as priority connections are made.

Montara Water and Sanitary District may allocate priority capacity in accordance with Table 2.17 to provide municipal water service to residential dwellings which are connected to the public sanitary sewer system, when such a connection is necessary to avert a substantial hardship caused by the failure of a private well serving the dwelling in production quantity or quality as certified by the County's Director of the Environmental Health Division, and when non-priority connections are not available. For purposes of this policy, "substantial hardship" shall not include any failure which can be remedied by repair or replacement of well equipment or facilities, or relocation of a well on a parcel. Whether substantial hardship exists shall be determined by the Community Development Director, following consultation with the Director of Environmental Health and the General Manager of MWSD.

Given existing water availability and LCP requirements as of December 11, 2013, there is 47,041 gpd available for non-priority uses, including new non-priority residential, commercial and industrial uses, as well as for conversion of private wells. Additional water for non-priority uses may become available if the LCP is amended to reduce the quantity of water required to be reserved for Coastal Act and LCP priority uses.

~~With the exception of large commercial or industrial developments, as defined in the subsequent section, all new service connections are deemed available under PWP Phase I within the MWSD service area until the MWSD annual water demand reaches 90% of the estimated drought supply capacity. Supporting analysis regarding the determination of the established percentage is included in PWP Amendment Justification~~…

[…]

If ~~When~~ the demand reaches 90% of the calculated drought supply capacity, MWSD will initiate efforts to secure additional water supplies ~~PWP Phase II~~. New connections to ~~the~~ MWSD's water system will continue to be available under the PWP ~~Phase I~~ until the demand reaches 100% of the drought supply capacity, provided capacity is still reserved for LCP priority uses. However, it is not anticipated that ~~this will occur~~ demand will reach 100% of drought supply capacity prior to the need to secure additional water supplies ~~implementation of Phase II~~, at which time a PWP amendment providing for ~~Phase will provide~~ infrastructure improvements will be required to allow~~ing~~ for an increase in the drought supply capacity of the water system.

…

2) Modify Section II of the proposed guidelines for monitoring and reporting new service connections (beginning on page 12 of proposed PWP amendment, see **Exhibit 2**) as follows:

Section II. Monitoring and Reporting

The objective of the monitoring and reporting program is to provide an annual report to the CCC about the status of the District's water resources. The annual report for the previous calendar year will be submitted to the MWSD governing Board and CCC staff by March 31 of the following year. The annual report will be produced by the District Water System Engineer and include the following data:

- *Number of connections to the MWSD system, including:*

  The number of new residential connections in the previous calendar year, expressed as the number of physical connections and equivalent residential connections (ERUs).

  The number of new commercial or industrial connections in the previous calendar year, expressed as physical connections and ERUs.

  The number of new connections provided to Local Coastal Program priority uses, including LCP Coastal Act uses, in the previous calendar year, and the remaining available reserved priority use water.

  The number of connections in the previous calendar year that were extended to properties previously relying on private wells, whether such connections were made pursuant to the County's abandonment condition, and the number of remaining private domestic wells within the District's water service boundary.

  […]

- *An annual data report to the County and Coastal Commission summarizing the results of this monitoring, including:*

  The actual amount of water consumption by land use.

  The rate of growth of new development.

  The quantity of water available for non-priority connections.

  The quantity of water reserved and available for Local Coastal Program priority connections.

  […]

3) Modify the proposed PWP amendment to insert the following after the last paragraph on Page 10 (see **Exhibit 2**) as follows:

   Amendments to Public Works Plan
   Amendments to this Public Works Plan (PWP) shall be made in accordance with Public Resources Code Section 30605. All amendments to the Public Works Plan that are certified by the Commission are hereby incorporated into Public Works Plan 2-06-006, as referenced in the San Mateo County LCP. ~~From and after November 1, 2013 this PWP shall be deemed sufficient to provide for water system connections within the service area that was acquired by MWSD in August 2003; provided, that the requirements of the Established Guidelines for New Connections approved in conjunction with Amendment No. 1 to this Public Works Plan are met.~~

   An amendment to this PWP shall be required for any increase in water supply, including any increase in pumping rates beyond existing supply capacity. The application for such amendment shall include information concerning phasing of infrastructure capacity in conformity with the requirements of the San Mateo County LCP. The information provided shall be sufficiently detailed and complete to enable the Commission to evaluate whether the proposed increase in water supply and/or distribution capacity is in phase with the existing or probable future capacity of other area infrastructure, including but not limited to the need for an adequate level of service for Highways 1 and 92 as required by the LCP.

4) Modify Section I.B of the proposed "Established Guidelines for New Connections" (see pages 11-13 of the proposed PWP amendment in **Exhibit 2**) as follows:

   B. Large ~~Commercial and Industrial~~ Service Connections

   Large ~~commercial and industrial~~ developments will require additional analysis prior to approval of connections to the MWSD water system. All commercial, ~~and~~ industrial, and multi-family residential applicants must provide MWSD with a justified estimate of the development's projected daily water demand. ~~The following definitions apply:~~

   - ~~*Tier 1 Large Commercial and Industrial Development (Tier 1 Commercial Development): Any commercial or industrial development that has a projected daily demand of over 200 gallons per day (gpd).*~~

- ~~*Tier 2 Large Commercial and Industrial Development (Tier 2 Commercial Development): Any commercial or industrial development that has a projected daily demand of over 500 gpd.*~~

~~*Tier 1 Commercial Development a*~~*Applicants* *for development that has a projected daily demand of over 200 gallons per day (gpd) must provide additional analysis regarding the projected demand and potential for future* ~~*business*~~ *growth and associated increased water demand. MWSD will determine, based on its existing supply and demand, whether the District has adequate capacity to serve the development, given requirements to reserve water for priority uses,* ~~*with*~~ *allowances for additional residential connections for well conversions, and for* ~~*corresponding to*~~ *building permits or Coastal Developments permits or other entitlements* ~~*issued*~~ *authorized for issuance by the County of San Mateo County in compliance with its approved Local Coastal Program (LCP).*

~~*Tier 2 Commercial Development applicants must initiate the Public Works Plan amendment approval process with the CCC for the proposed development. The proposed development will undergo a review process regarding the future impacts that the development could have on local resource availability. The CCC must approve Tier 2 Commercial Development in order for the development to be served by MWSD.*~~

5) Modify the PWP to address internal inconsistencies, current and updated data, and outdated phasing language, including but not limited to modifications designed to: delete old data and tables that have been replaced by newer data and tables; recognize already approved PWP projects; on page 13, replace the text "initiating Phase II PWP" with "pursuing additional water supplies"; and on page 31 replace the two instances of the text "Phase II Public Works Plan" with "Public Works Plan amendment."

IV. FINDINGS AND DECLARATIONS

The Commission finds and declares as follows:

A. PROPOSED PUBLIC WORKS PLAN AMENDMENT

Background

The Montara Water and Sanitary District (MWSD or District) provides water, sanitary sewer, and solid waste disposal services to the coastal communities of Montara, Moss Beach and adjacent areas located north of Half Moon Bay and south of Pacifica in San Mateo County (see **Exhibit 1**). The District currently provides water to approximately 1,650 connections, about 90% of which are single and multi-family residential users. The system includes a surface water source (Montara Creek), a water treatment plant, nine groundwater wells that draw water from the Montara and Denniston Creek groundwater basins, three potable water storage tanks and over 150,000 feet of distribution pipelines.

The District acquired their water system, which was previously privately-owned, in August 2003. At the time of the District's acquisition, there was an existing moratorium on new connections (dating back to 1976), which was imposed by the California Public Utilities

Commission.[1] Due to ongoing water supply issues, the District continued the moratorium after acquiring the system, by enacting District Code Section 5-4.229.[2] Following acquisition of the system, the District made significant infrastructure improvements, implemented significant operational efficiencies, encouraged water conservation, and overall improved the operation and maintenance of the system. Due to this effort, the District achieved a water supply surplus, and on March 3, 2011, the MWSD Board of Supervisors repealed District Code Section 5-4.229 and enacted District Code Section 5-4.100, allowing for new connections and lifting the District's moratorium.[3]

In 2003, upon public acquisition of the water system, the District established the Water Conservation Program to install water efficient fixtures while offering a customer rebate program. In 2007, the District replaced all customer water meters, totaling 1,614, with new radio-read meters. The District created an auditing systems using Orion water meters, borrowed or purchased through the District. In addition, the District started a Public Education program, providing free conservation kits to customers, including showerheads, and faucet aerators. Further, the district improved infrastructure by replacing water mains and raw water pipelines and adding a schoolhouse tank control valve. The District also modified their distribution system and the Supervisory Control & Data Acquisition System (SCADA) to allow staff to make better-informed decisions in system efficiency, and rehabilitated wells. The District states that due to these conservation efforts and infrastructure improvements, the District now has 72,718 more gallons per day available than they did in 2004. The District developed the 2011 MWSD Water System Master Plan, which reflects these conservation and infrastructure improvement efforts, and identifies 128,000 gpd of available water (within drought supply capacity.

The objective of the District's original PWP (also referred to as PWP Phase 1 and numbered 2-06-006), now proposed to be amended, was to improve specific portions of the District's water system to ensure an adequate and reliable water supply for existing uses. PWP-identified improvements included new water storage facilities, a new well and a water treatment facility for existing wells. These improvements were not intended to expand existing connections or accommodate new connections to the system, but instead to improve service to existing customers. Since the PWP was first certified by the Commission in 2008, the District has

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[1] The Public Utilities Commission (PUC) no longer regulates the District (as of 2003), because the District is now publicly owned.

[2] MWSD Code Section 5-4.229 states: "The moratorium upon new connections that was recommended in 1976 by the California Department of Health Services and imposed by the California Public Utilities Commission upon the privately-owned water system that was acquired by the District effective August 1, 2003 is hereby continued in effect from and after said date due to the continuing shortage of water supply and storage for existing Customers within the Service area of said system. At such time as there are sufficient sources of water and corresponding supplies available for new connections within the Service area so acquired by the District, the District will review such availability and consider appropriate action."

[3] MWSD Code Section 5-4.100 states: "(a) Availability of water supplies shall be determined by the Board in conjunction with its approval of the Water System Master Plan. The Master Plan shall include data from which such availability may be determined in increments of one or more five (5) year periods. The availability of water supplies so determined shall not constitute, expressly or impliedly, a guarantee that a sufficient quantity of water will be available to serve Customers' demands continuously or at a given time or to serve Applicants' proposed demands. Likewise, the availability of water supplies so determined shall not constitute, expressly or impliedly, a guarantee that a water service connection permit will be issued to any Person or Applicant. The Board may, at its discretion, establish by resolution priorities for the issuance of permits in furtherance of the public health, welfare and safety."

undertaken some of the development projects identified in the PWP and has instituted additional conservation and educational/outreach efforts to reduce water consumption. The existing certified PWP recognizes the water connection Moratorium.

As a result of the long-standing moratorium over the past few decades and the lack of public water in the District's jurisdiction, there has been significant pressure on San Mateo County to approve residential and other development with private water sources. As a result, the County has approved private domestic wells throughout the urban midcoast, with 314 private wells now in the District's jurisdictional area. These wells compete with the groundwater drawn within the basins utilized by the District's groundwater sources. Additionally, since they are within the urban area, the private wells conflict with the intent of the LCP that urban development should rely on public water. In the mid-2000's, to address the increasing number of private wells in the urban midcoast, the County began imposing a condition of approval requiring abandonment of the new private wells as soon as public water becomes available. The County estimates 32 well permits were approved subject to this condition within the District's Jurisdiction. Accordingly, approximately 282 wells within the District's jurisdiction are not subject to this condition.

Following the initial PWP Amendment (2-06-006-A1) submittal, and during the file review process, the Commission certified the San Mateo County LCP Update (August 2012). The updated San Mateo County LCP recognizes a 1% annual growth rate in the urban midcoast, which currently translates to 40 equivalent residential units (ERUs) per year. The recently certified 2012 LCP update only allows for five private wells per year, for three years (i.e. until October 2015). However, the three-year program will end prior to October 2015 if the District obtains the necessary approvals from the California Coastal Commission to provide water service to vacant properties. As updated, the certified LCP now recognizes the County's condition for well permits and also requires non-conditioned wells to be abandoned if the property owners apply for major remodels/expansions[4] or new development on vacant lots served by private wells. In response to these issues, along with identified additional water supply, the District has proposed to utilize the water surplus to both convert private wells to public water and to serve new residential, commercial and industrial developments.

Water Supply

The District owns ten water sources that have a collective annual rated system capacity of 892,800 gallons per day (gpd). The rated system capacity is the collective maximum potential of the water sources, taking into consideration only the amount appropriated from each source (well or surface water source) when the source was initiated. However, the District does not issue water connections to existing customers using this number (rated system capacity) as its supply. Instead, the District operates on what is called the Drought Supply Capacity, which is 446,400 gpd (half of the rated system capacity). Drought supply capacity is determined through rated source capacities, as opposed to the recorded source production, consistent with water industry standards. The water supply capacity under drought conditions is calculated utilizing the conservative industry-wide water resources methodology in which the sources are assumed to be

[4] "For purposes of this policy, major remodels or expansions include all projects where new construction has a value equal or greater to 50% of the value of the existing structure." LUP Policy 1.18.1(f).

capable of producing only 50 percent of their rated capacity. This conservative methodology is utilized in recognition of drought water shortages or other extreme conditions.

The drought supply capacity is subject to change if new sources are added to the MWSD water system, including by future PWP or PWP amendment. The Drought Supply Capacity can be used to demonstrate that at least 446,400 gpd is available at this time for District water connections. The District's existing customer demand is 318,418 gpd. Therefore, the District indicates that they have 128,000 gpd available for new water connections. Of the available 128,000 gpd, 72,718 gpd is available as a result of general system improvements, such as conservation and in-kind transmission upgrades, and the remaining 55,282 gpd is associated with improvements authorized pursuant to projects initiated based on the original PWP, including the Alta Vista Well.

Specific Project Description
The District proposes to put the available 128,000 gpd to beneficial public use prior to obtaining additional water supplies. Eventually, the District intends to initiate another PWP or amendment of the Public Works Plan. Accordingly, this proposal, while it would serve new connections, would not induce pumping beyond the rated drought supply capacity associated with these existing water sources. Therefore, the proposal does not expand capacity, but rather it extends existing capacity to new users through new connections. In short, the current proposal eliminates the existing PWP's prohibition against new water connections, allowing the District to use existing water supply surplus for new connections to development that is approved pursuant to the County's LCP, and establishes a mechanism to serve public water to residents who are currently using private wells.

Recognizing the finite amount of water available under the Drought Capacity figure (128,000 gpd), the District has incorporated trigger points that would require Public Works Amendments to evaluate the consistency of certain actions. The District's proposed amendment contains a trigger point that requires the District to initiate a PWP or PWP amendment process to pursue additional water supplies once the District reaches 90% of its drought rated capacity. The District also proposes that new connections to the system will continue to be available under the PWP until demand reaches 100% of the drought supply capacity. To implement the amendment, the District has proposed changes to the language of 2-06-006, including a new connection guideline framework, trigger points for future public works plan amendments and reporting/monitoring provisions. The proposed language updates portions of the PWP with current figures and the status of the District's operations (See **Exhibit 2**).

B. LOCAL COASTAL PLAN CONSISTENCY ANALYSIS

1. New Montara Water and Sanitary District Connections and Priority Uses

LUP Policy 1.3 (Definition of Urban Areas) states, in part:

> *a. Define urban areas as those lands suitable for urban development because the area is either: (1) developed, (2) subdivided and zoned for development at densities greater than one dwelling unit/5 acres, (3) served by sewer and water utilities, and/or (4) designated as an*

affordable housing site in the Housing Component. [emphasis added]

[….]

LUP Policy 1.4 (Designation of Urban Areas) states:

Designate as urban those lands shown inside the urban/rural boundary on the Land Use Plan Maps. Such areas include Montara, Moss Beach, El Granada, Princeton and Miramar. [emphasis added]

LUP Policy 1.5 (Land Uses and Development Densities in Urban Areas) states, in part:

a. Incorporate the adopted Montara-Moss Beach-El Granada Community Plan into the land use plan for the Midcoast, but amend it where necessary to meet Local Coastal Program objectives.

[….]

LUP Policy 1.18 (Location of New Development) states, in part:

a. Direct new development to existing urban areas and rural service centers in order to: (1) discourage urban sprawl, (2) maximize the efficiency of public facilities, services, and utilities, (3) minimize energy consumption, (4) encourage the orderly formation and development of local governmental agencies, (5) protect and enhance the natural environment, and (6) revitalize existing developed areas. [emphasis added]

b. Concentrate new development in urban areas and rural service centers by requiring the "infilling" of existing residential subdivisions and commercial areas.

[….]

LUP Policy 1.18.1 (Ensure Adequate Public Services and Infrastructure for New Development in Urban Areas) states, in part:

[…]

c. New public water connections in the Montara Water and Sanitary District (MWSD) water service area will be allowed only if consistent with the MWSD Public Works Plan (Coastal Commission PWP No. 2-06-006), Chapter 2 of the LCP, and all other applicable policies of the LCP as amended.

d. Approval of any new private wells within the urban/rural boundary and the Montara Water and Sanitary District (MWSD) water service area shall be limited to five per year for three years of the effective date of this policy (i.e., on October 7, 2012), or until MWSD obtains the necessary approvals from the California Coastal Commission to provide water service to vacant properties, whichever comes first.

e. Approval of any new private well or development that relies on a new private well may only be considered if a connection to the public water supply is not available. In such instances, the applicant for the development must obtain a coastal development permit (CDP) for a test well, and document compliance with all Environmental Health standards and requirements for the proposed use of the well, prior to submitting a CDP application for the development.

[…]

The approval of any development that relies on a private well shall be conditioned to require recordation of a Deed Restriction, to the satisfaction of County Counsel and the Planning and Building Department, prior to the issuance of building permits, that requires the applicant and any successor in interest to abandon the well consistent with Environmental Health requirements and connect to the public water system within 90 days of the date on which a connection becomes available, availability being determined in the reasonable judgment of the Community Development Director. Except as limited above, private wells shall not be prohibited or required to be abandoned if the applicable water district has the authority to issue new connections but refuses or is unable to provide water service.

f. If a public water supply is available, major remodels or expansions of existing development, or new development on vacant lots, served by private wells constructed after September 12, 1989, are not permitted unless the project will connect to the public water system and abandon the well. For purposes of this policy, major remodels or expansions include all projects where new construction has a value equal or greater to 50% of the value of the existing structure.

LUP Policy 1.19 (Definition of Infill) states:

Define infill as the development of vacant land in urban areas and rural service centers which is: (1) subdivided and zoned for development at densities greater than one dwelling unit per 5 acres, and/or (2) <u>served by sewer and water utilities</u>. [emphasis added]

LUP Policy 2.8 (Reservation of Capacity for Priority Land Uses) states, in part:

a. Reserve public works capacity for land uses given priority by the Local Coastal Program as shown on Table 2.7 and Table 2.17. All priority land uses shall exclusively rely on public sewer and water services.

….]

e. Allow Coastside County Water District and Montara Water and Sanitary District to allocate priority capacity in accordance with Table 2.17 to provide municipal water service to residential dwellings which are connected to the public sanitary sewer system, when such a connection is necessary to avert a substantial hardship caused by the failure of a private well serving the dwelling in production quantity or quality as certified by the Director of the

Environmental Health Division. For purposes of this policy, "substantial hardship" shall not include any failure which can be remedied by repair or replacement of well equipment or facilities, or relocation of a well on a parcel. Whether substantial hardship exists shall be determined by the Community Development Director, following consultation with the Director of Environmental Health and the General Manager of the serving water district.

[….]

LUP Policy 2.24 (Reservation of Capacity for Priority Land Uses) states, in part:

a. Reserve water supplies for each land use given priority by the Coastal Act or the Local Coastal Program. These priority uses are shown on Table 2.17. Amend this table to reflect all changes in the Land Use Plan which affect these land uses.

[….]

LUP Policy 2.26 (Water Use Monitoring) states:

Require that the water service providers, presently Coastside County Water District (CCWD) and the Montara Water and Sanitary District (MWSD), monitor: (1) the actual amount of water consumption by land use, and (2) the rate of growth of new development. Require them to submit an annual data report to the County summarizing the results of this monitoring.

LUP Table 2.17 (Amount of Water Capacity to be Reserved for Priority Land Uses):

TABLE 2.17

AMOUNT OF WATER CAPACITY TO BE RESERVED FOR PRIORITY LAND USES[1]
MONTARA WATER AND SEWER DISTRICT (MONTARA/MOSS BEACH)

ALLOCATION OF RESERVED CAPACITY TO PRIORITY LAND USES	PHASE I		BUILDOUT	
	Units	Gallons/Day	Units	Gallons/Day
Coastal Act Priorities				
Marine-Related Industrial	—	—	—	—
Commercial Recreation	.57 acres	1,100	.82 acres	1,230
Public Recreation	282 persons	3,200	408 persons	4,080
Floriculture		13,800		10,000
Essential Public Services[2]				5,000
Local Coastal Program Priorities				
Specific Developments on Designated Sites Containing Affordable Housing	148	64,380	148	35,816 to 51,504
(1) North Moss Beach Site (11 acres)				
Other Affordable Housing			20	5,000
Total Water Capacity for Priority Land Uses		82,480		61,126 to 76,814
Percent of Total Water Capacity for Priority Land Uses		10.6%		5.4 to 9.2%
Percent of Buildout Allowed by Phase		50 to 69%		100%
Total Water Capacity		**778,800**		**836,300 to 1,128,700**

NOTES:

1. Capacity shall be reserved for additional priority land use development when service provider develops new supplies to serve new connections on vacant lands. Does not include existing, developed priority land uses at time of LCP adoption.
2. Essential public services include the following uses: Emergency Facilities, Correctional Facilities, Transportation Facilities (public), Utility Facilities, Hospitals, Skilled Nursing Facilities, Intermediate Care Facilities, Libraries, Community Centers, Elementary and Secondary Schools, Institutional Day Care Facilities for Children (Day Care Centers as defined by State law), Adults and the Elderly, Institutional Full-Time Care Facilities for Children and Adults, Institutional Shared Housing Facilities for the Elderly and One-Family Dwellings with Failed Domestic Wells. These services must be provided by a public agency or private non-profit or government-funded (partially or fully) purveyor to be considered an essential public service. The reserve capacity allocated to these priority uses may not be shared by any associated, non-priority use and must be forfeited when the priority use is discontinued.

   12,710 gallons/day are reserved for One-Family Dwellings with Failed Domestic Wells. This reservation is allocated as follows:

   Coastside County Water District - 7,710 gallons/day (30 units)
   Montara Water and Sanitary District - 5,000 gallons/day (20 units)

3. In order to qualify for priority, historic structures must meet the criteria contained under LCP Policy 2.31c(6).
4. Where development of new public water facilities can accommodate only a limited amount of new connections on vacant land, adequate capacity for Coastal Act priority uses shall be reserved before reserving capacity for Local Coastal Program priority uses.
5. Affordable means as defined by Section 6102.48.6 of the certified zoning regulations, and subject to income and cost/rent restrictions for the life of the development.

The Montara-Moss Beach-El Granada Community Plan states, in part:

> *Under this Plan, future community development is limited to those areas which are already subdivided, zoned for development, and served by utilities—technically speaking, to an "urban infill" of partially built-out subdivisions.*

> *[…]*
>
> *The most important factors controlling the growth of population in the community, however, will be the availability of water and sewage facilities.…*
>
> *[…]*
>
> *Residential – projected growth is restricted to infill of existing subdivided lots zoned for development and served by public utilities, maximizing the utilization of existing facilities.*

The LCP contains a number of policies that relate to the issuance of new water connections by Montara Water and Sanitary District. LUP Policy 1.18.1(c) requires consistency with the approved PWP, Chapter 2 of the LUP and all applicable LUP Policies. LUP Policy 2.8 requires the District to reserve public works capacity for land uses given priority by the Local Coastal Program as shown on Table 2.7 and Table 2.17. LUP Policy 2.24 specifically requires that the District reserve water supplies for each land use given priority by the Coastal Act or the Local Coastal Program, as shown on Table 2.17. LUP Policy 2.26 requires monitoring and reporting by the District for water use allocations.

As described and outlined above, the District has demonstrated that 128,000 gpd are currently available for new connections. The District has proposed to issue new residential connections to properties currently served by private domestic wells as well as issue new connections to new residential, commercial, and industrial developments that are approved pursuant to the County's LCP. The District states that the average daily demand for a residential unit is 197 gpd and the average daily demand for one commercial/industrial/multi-residential development (as proposed to be served pursuant to the proposed amendment) will be at least 197 gpd under this proposal.

Table 2.17 requires that the District reserve sufficient water for Phase 1 priority land use figures. Specifically, the LCP recognizes Coastal Act Priorities totaling 18,100 gpd and Local Coastal program Priorities totaling 64,380 gpd (grand total 82,480 gpd). Since the adoption of Table 2.17, which outlines the Phase 1 priority uses that must be accommodated, CA Department of Parks and Recreation facilities and the San Mateo County Fitzgerald Marine Reserve Phase I Coastal Act Public Recreation priority developments are being served approximately 421 gpd out of the required 3,200 gpd (See Table below). Additionally, the Farallone Inn and Moss Beach Distillery (Commercial Recreation Priority uses) are being served approximately 2,473 gpd out of the required 1,100 gpd (See Table below). Accordingly, the required 18,100 gpd for Coastal Act Priority water has been reduced to 16,579 gpd. The 64,380 gpd for Local Coastal Program priorities remains the same. The current total priority water requirement under LCP Table 2.17 is therefore 80,959 gpd and the District must demonstrate it can reserve 80,959 gpd for the Coastal Act and LCP priority uses enumerated in the County's LCP.

MWSD Existing Phase 1 Coastal Act Priority Use Table

Coastal Act Priority	Priority User	Year Priority Use Water Service Commenced	Annual Average Usage, gpd	Coastal Act Priority Annual Average Usage, gpd
Public Recreation	CA Dept. of Parks & Recreation	1986[1]	43	421
	SMC Fitzgerald Marine Reserve	1989[1]	378	
	American Youth Hostel	1970[1]	~~133~~	
Commercial Recreation	Farallone Inn	1991[2]	712	2,473
	Moss Beach Distillery	1999[3]	1761	

NOTES
[1] The earliest billing records from MWSD's predecessor indicate that water service commenced at the dates noted.
[2] In 1991, the County of San Mateo prevented this historic building from being demolished, and the Farallone Inn Bed & Breakfast was opened after substantial remodeling. A restaurant addition was also completed in 2008. Permits on file with MWSD and San Mateo County.
[3] The Moss Beach Distillery operated as a small, private club starting in the 1930s, and would not have been considered a site of commercial recreation until it was remodeled into the larger bar and restaurant in 1999. Permits on file with San Mateo County.

Subtracting the 80,959 gpd required for LCP enumerated priority uses from the District's demonstrated 128,000 gpd available amounts to 47,041 gpd for non-priority use connections, including residential and general commercial development. It is possible that the LCP's Table 2.17 could be amended by the County in the future, which would reduce the required priority water figure and increase the availability of water for non-priority uses. Such an amendment may be appropriate given the overall reduction in per capita water use since the table was developed, as well as changes in the floriculture industry in the area. In addition, the County indicated that they would be supportive of an amendment to update the table to reflect current demand projections. To the extent Table 2.17 no longer reflects current priorities and their needed water allocation, the Commission is also supportive of an amendment to bring the information (as to Phase I and Buildout figures) up to date. However, until any such amendment is certified, the figures in Table 2.17 represent required quantities of priority water that must be reserved.

The District proposes to reserve only 3,579 gpd for priority uses, which accounts for the currently remaining Table 2.17 LCP priorities that are Coastal Act related other than Floriculture. The proposal does not address the requirement to reserve water for non-Coastal Act priority uses identified in the LCP, including the identified affordable housing developments. The District has omitted floriculture from their proposal because they argue that future floriculture development would be outside the District's service area, as the land most suitable

for floriculture is outside the urban-rural boundary. The District suggests that in the last 10 years, the trend has been for local floriculture businesses to downsize their operations in the area. The District further contends that this trend translates to an unlikely scenario that floriculture will continue to expand in the Midcoast area, especially using public water supply for irrigation, as it is prohibitively expensive for this use. Although these arguments could potentially be accurate, as discussed above, without an amendment to the LCP to modify Table 2.17, the priority water requirements remain the same and must be protected. Therefore, the Commission imposes **Suggested Modification 1** to ensure that water is reserved for all LCP-enumerated priority uses. As modified, the PWP Amendment would include the LCP-required 80,959 gpd priority water figure and would be consistent with LCP Policy 2.8 and Table 2.17.

Conclusion

As described above, the LUP Policies and Table 2.17 require that the District maintain 80,959 gpd for Phase I priority land uses but the proposed amendment does not protect all LCP-enumerated priority uses. Accordingly, as proposed, the District's framework for providing new connections is inconsistent with the LUP Policies protecting priority uses and must be denied as submitted. As demonstrated above, the proposal can be modified to prioritize LCP certified priority uses. Therefore, the Commission imposes **Suggested Modification 1**. As modified, the PWP would protect all LCP-enumerated priority uses, consistent with LUP Policies 2.8, 2.24 and Table 2.17. Thereafter, the District would have 47,041 gpd remaining to serve non-priority uses.

Lastly, the District's proposed amendment contains a monitoring and reporting scheme to ensure up to date understanding of water connections and system supply. LUP Policy 2.26 requires that Montara Water and Sanitary District (MWSD), monitor: (1) the actual amount of water consumption by land use, and (2) the rate of growth of new development. This policy also requires them to submit an annual data report to the County summarizing the results of this monitoring. The District did not provide a specific provision to monitor the actual amount of water consumption by land use or the rate of growth of new development. Additionally, given the above discussion on priorities, it is necessary that the monitoring and reporting incorporate metrics designed to identify and assess priority use allocation and private well abandonment, and to keep track of the availability of both priority and non-priority water. Therefore, the Commission imposes **Suggested Modification 2**. As modified, the District will incorporate the specific language of LUP Policy 2.26, as well as specific provisions to track connections made to existing private well-fed properties and priority land uses. As modified, the amendment is LUP Policies 1.18.1(d), 2.8, 2.24, and 2.26.

Therefore, as modified, the amended PWP is consistent with the certified LCP's requirement to protect all LCP-enumerated priority uses, as well as outstanding County CDP conditions on existing well permits. As a result of the modifications, the District has a surplus of 47,041 gpd to allocate to its proposed residential and commercial/industrial uses, as well as to properties that are currently served by private wells.

2. Adequacy of Public Services

LCP Policy 2.7 (Phased Development of Public Works Facilities) states:

Require the phased development of public works facilities in order to ensure that permitted

public works capacities are limited to serving needs generated by development which is consistent with the Local Coastal Program policies. In accordance with Policies 2.9, 2.14, 2.22, 2.27, and 2.42, allow expansion of public works facilities, including but not limited to water supply and transmission, sewage treatment and transmission, and the San Mateo County Midcoast and City of Half Moon Bay regional transportation system only after considering the availability of other public works facilities, and establishing whether capacity increases would overburden the existing and probable future capacity of other public works facilities.

LCP Policy 2.27 (New and Expanded Water Supply and Distribution Capacity) states, in part:

a. Allow new or expanded water supply, service connections, treatment, storage and distribution capacity to serve new development only under the following circumstances: (1) when existing capacity has been consumed or will be consumed within the time required to construct additional water supply capacity; (2) after considering the availability of other public works facilities, and establishing whether capacity increases would overburden the existing and probable future capacity of other public works facilities; and (3) after considering information from, or being used to create, the Transportation Management Plan required by Policy 2.57.2, if available.

[….]

LCP Policy 2.49 (Desired Level of Service) states:

In assessing the need for road expansion, consider Service Level D acceptable during commuter peak periods and Service Level E acceptable during recreation peak periods.

LCP Policy 2.57.2 (Transportation Management Plan) states:

Develop a comprehensive transportation management plan to address the cumulative traffic impacts of residential development, including single-family, two-family, multi-family, and second dwelling units, on roads and highways in the entire Midcoast, including the City of Half Moon Bay. The plan shall be based on the results of an analysis that identifies the total cumulative traffic impact of projected new development at LCP buildout and shall propose specific LCP policies designed to offset the demand for all new vehicle trips generated by new residential development on Highway 1, Highway 92, and relevant local streets, during commuter peak periods and peak recreation periods; and policies for new residential development to mitigate for residential development's significant adverse cumulative impacts on public access to the beaches of the Midcoast region of San Mateo County.

The plan shall thoroughly evaluate the feasibility of developing an in-lieu fee traffic mitigation program, the expansion of public transit, including buses and shuttles, and development of a mandatory lot merger program.

LUP Policy 2.7 allows expansion of water transmission within the District's service area only after first considering the availability of other public works facilities and establishing whether

capacity increases would overburden the existing and probable future capacity of other public works facilities. LUP Policy 2.27 allows new water service connections to serve new development only under the following circumstances: (1) when existing capacity has been consumed or will be consumed within the time required to construct additional water supply capacity; (2) after considering the availability of other public works facilities, and establishing whether capacity increases would overburden the existing and probable future capacity of other public works facilities; and (3) after considering information from, or being used to create, the Transportation Management Plan required by Policy 2.57.2, if available.

LUP Policy 2.49 establishes acceptable levels of service, allowing Service Level D during commuter peak periods and Service Level E during recreation peak periods. LUP Policy 2.57.2 directs the County to develop a comprehensive transportation management plan to address the cumulative traffic impacts of residential development, including single-family, two-family, multi-family, and second dwelling units, on roads and highways in the entire Midcoast.

Existing Capacity and Time Required to Construct Additional Water Supply Capacity
LUP Policy 2.27 allows new water service connections to serve new development, in part, only when existing capacity has been consumed or will be consumed within the time required to construct additional water supply capacity. As proposed, the maximum potential allocation of the District's proposal would consume the identified 128,000 gpd (available as a result of infrastructure improvements and water conservation measures outside the scope of 2-06-006) within 15 years. Taking into account the priority use requirements, the District's available drought supply capacity could be consumed in as little as 8 years. The District's proposal includes a trigger that requires submittal of a PWP or PWP Amendment for any new water supplies once drought supply capacity is reached. This timeline recognizes the distinct probability that the District's water supply will be consumed prior to the implementation of a future PWP that authorizes new or expanded water sources. Accordingly, since new water supplies will not be available until after all existing water capacity is appropriated to midcoast development, allowing new connections for new development, as modified above, is consistent with LUP Policy 2.27(1).

Sewer Capacity
LUP Policy 2.7 allows expansion of water transmission within the District's service area only after first considering the availability of other public works facilities and establishing whether capacity increases would overburden the existing and probable future capacity of other public works facilities. LUP Policy 2.27 allows new water service connections to serve new development only after considering the availability of other public works facilities, and establishing whether capacity increases would overburden the existing and probable future capacity of other public works facilities. The existing certified PWP 2-06-006 also requires the Commission to evaluate whether the proposed increase in water distribution capacity is in phase with the existing or probable future capacity of other area infrastructure.

The Sewer Authority Mid-Coastside (SAM) Wastewater Treatment Plant (WWTP), which treats the sewage collected from MWSD, has established capacities for each of the three member agencies (MWSD, Granada Sanitary District, and the City of Half Moon Bay) that make up the Joint Powers Authority. SAM maintains a treatment capacity of 3.71 mgd. The District currently

owns 550,000 gpd with the option to purchase up to approximately 750,000. The District's sewer system currently transmits 373,000 gpd on average (68% of allotted capacity), which is approximately 194 gpd per connection. Additionally, the SAM system's other users (City of HMB (1.9 mgd) and Granada Sanitary District (GSD) (1.1 mgd)) are operating below their maximum sewer capacities.

The District provided an analysis of the sewer demand as it may change as a result of its proposed framework for new water connections. The District serves approximately 1,928 sewer connections, including sewer connections to properties within its jurisdiction that rely upon private domestic wells for water. The District contends that the abandonment of wells will reduce the amount of water going into the sewer system because well users typically draw upon their wells to a greater extent than properties served with public water. Properties served with a public water connection are charged based on the water used, whereas the draw on wells is only limited by their capacity. Accordingly, a reduction in private wells will result in a reduction of water in the sewer system. In order to prepare for the maximum amount of water potentially introduced into the sewer system as a result of the District's proposal, the District provided an analysis based on the presumption that no wells would be abandoned/converted to public water service, because such a scenario would pose the greatest anticipated strain on the sewer system's capacity. Under this presumption, it is possible to evaluate the maximum potential sewer demand for the District.

The District provided a 20-year analysis, which demonstrates that assuming no wells are abandoned and assuming the County's maximum growth rate of 1% each year occurs, the sewer demand will reach approximately 445,555 gpd. This maximum potential demand after 20 years is within the District's 550,000 gpd demand capacity. Additionally, since the District will be operating within their capacity, the maximum scenario will not adversely impact its own or the other utilities' (GSD and HMB) ability to operate within their respective capacities. The proposal will therefore not adversely impact SAM's ability to operate within its 3.71 mgd maximum capacity. Therefore, the proposed amendment, as modified above, is consistent with LUP Policies 2.7, 2.27 and the PWP 2-06-006 amendment provision as they relate to midcoast sewer capacity.

The proposed amendment must not outpace or burden the existing and probable future capacity of stormwater collection and transmission capacity within the urban midcoast. On August 18, 2006, the Region 9 Office of the US Environmental Protection Agency (EPA) issued an NPDES Compliance Evaluation Report to SAM, documenting that approximately 200 sanitary sewer overflows (SSOs) occurred between 2000 and 2005, including 64 attributed to MWSD during this period. The infrastructure associated with MWSD has been updated, including by replacing damaged pipes. According to the EPA's report, the SSO's were the result of blocked pipes (as a result of roots or unclean sections) and failing infrastructure. SAM has undertaken a number of transmission system retrofitting and other improvement projects to address blocked pipes and other system deficiencies. As of November 2012, SAM added a 200,000 gpd retention system at the Burnham strip to accommodate wet weather flows, in addition to their existing 400,000 gpd tank near MWSD facility. The SF Regional Water Quality Control Board (RWQCB) recently extended the existing NPDES permit for the facility and this extension was confirmed by EPA earlier this year. Following EPA's review, the SAM facility received a passing grade and no

major issues were identified. According to these documents, SAM's system is expected to be able to handle wet weather flows going forward. The proposed amendment will serve to reduce flows to the system due to reduction in the number of private wells over time. Therefore, as modified, the proposed amendment will not overburden the existing or future probable capacity of the District and SAM to accommodate wet weather collection, transmission and treatment capacity.

Therefore, the proposed amendment, as modified above, is consistent with LUP Policies 2.7, 2.27 and the PWP 2-06-006 amendment provision as they relate to midcoast sewer capacity.

Traffic Capacity

LUP Policy 2.27 allows new water service connections to serve new development only after considering information from, or being used to create, the Transportation Management Plan required by Policy 2.57.2, if available. LUP Policy 2.49 establishes acceptable levels of service, allowing Service Level D during commuter peak periods and Service Level E during recreation peak periods. LUP Policy 2.57.2 directs the County to develop a comprehensive transportation management plan to address the cumulative traffic impacts of residential development, including single-family, two-family, multi-family, and second dwelling units, on roads and highways in the entire midcoast. The existing certified PWP 2-06-006 requires the Commission to evaluate whether the proposed increase in water distribution capacity is in phase with the existing or probable future capacity of other area infrastructure, including but not limited to the need for an adequate level of service for Highways 1 and 92 as required by the local coastal program.

The proposed amendment would allow for new water connections to serve existing residential developments that are served by private domestic wells, as well as new residential, commercial and industrial development that is approved by the County, and therefore limited by the LCP's growth controls, including the allowed 1% annual growth rate. The LUP requires an evaluation of existing levels of service for Highways 1 and 92, and consideration of available information associated with the 2.57.2 mandated Transportation Management Plan, to ensure new water connections serving new development in the midcoast will not overburden the roadway system/segments. The County provided available information related to their efforts to develop a comprehensive Transportation Management Plan (TMP) pursuant to LUP Section 2.57.2. At present, the available information consists of a grant application and TMP scoping documents. The County projects most of the TMP development will take place during the 2014/2015 fiscal year. The County Board of Supervisors passed Resolution No. 072381, authorizing the Planning Director to apply for a Caltrans Community-Based Transportation Planning Grant for no more than $300,000 to develop the TMP. The County's Scope of Work states:

> *This plan will determine how to minimize and mitigate current and future traffic along Highway 1, Highway 92, and other arterial roads on the San Mateo County Midcoast and in the City of Half Moon Bay. Specifically, the CTMP will address the cumulative traffic impacts of future residential development, including single, multi-family, and second unit residential development. The plan will identify and thoroughly evaluate the feasibility of measures to minimize and mitigate these impacts, including the possibility of developing an in-lieu fee traffic mitigation program, expanding public transit (including buses and shuttles), and/or developing a mandatory lot merger program to reduce buildout potential. It will also enhance efforts to ensure residential development is only allowed where roadway*

capacity will not be constrained to unacceptable levels.

The available information suggests that the TMP and mitigation measures will be in place in the near future to ensure County and CCC approved development will reduce congestion/impacts to the Highway 1 and Highway 92 corridors within the urban midcoast in the most comprehensive manner possible.

In addition to the TMP, the LUP requires the phased development of public works facilities, including roadways, to ensure that new development will not be out of phase with Highway 1 and 92 levels of service (LOS). The 2011 Congestion Management Plan demonstrated that the bulk of road way segments along Highway 1 and Highway 92 operate at LOS E.[5] Two segments (one along Highway 1 and the other along Highway 92) operate at LOS D. LUP Policy 2.49 establishes acceptable LOS for the midcoast roadway segments, including Service Level D during commuter peak periods and Service Level E during recreation peak periods. The proposed connections to existing development served by private domestic wells therefore will not adversely impact roadway LOS, as these properties contain existing residential development.

Regarding new connections to new rather than existing development, the 2012 SMC LCP Update approved a 1% growth rate for the midcoast (Equal to a total of 40 ERUs for the midcoast). All development (prior to receiving a water connection) must be reviewed and conditioned to minimize or avoid impacts during County/CCC CDP review and will account for any impacts to these Highways moving forward. As modified, this interim proposal for extension of new water connections will not be out of phase with existing LOS. The County's LCP recognizes a 1% growth rate and includes transportation management mitigation measures, which will address traffic impacts associated with new residential development. The proposal, as modified, therefore will not outpace the growth rate scheme of the LCP and will not adversely impact Highway 1 and 92 roadway segments, consistent with LUP Policies 2.27, 2.49 and 2.57.2.

3. Impacts to Groundwater and other Sensitive Coastal Resources

LUP Policy 2.27 (Groundwater Proposal) states, in part:

Require, if new or increased well production is proposed to increase public water supply consistent with LCP Policy 2.22, that:

[…]

c. The amount pumped be limited such that it does not impact sensitive species and habitats including streams, riparian habitats and wetlands.

d. Base pumping restriction on studies conducted by a person agreed upon by the County and the applicant which shall: (1) prior to the granting of the permit, examine the geologic and hydrologic conditions of the site to determine the amount that may be pumped without adversely affecting a water-dependent sensitive habitat or result in depletion of the aquifer; and (2) during the first [three] years, monitor the impact of the well on groundwater and surface water levels and water quality and plant species and animals of water-dependent

[5] CO-CAT, Congestion Management Program (2011).

sensitive habitats to determine if the preliminary pumping restriction adequately protects the sensitive habitats and what measures should be taken if and when adverse effects occur.

e. If monitoring shows impacts to water-dependent sensitive habitats, the pumping rate shall be reduced until it is clear that such impacts will not occur.

LCP Policy 2.27 applies to new or increased well production and requires groundwater pumping rates to be low enough that the draw on water will not adversely impact groundwater, surface water and sensitive habitats. Accordingly, the Commission analyzed the original 2-06-006 under this policy (at that time, it was LUP Policy 2.32). When PWP 2-06-006 was originally certified, the Commission found that certain development projects authorized in the PWP had the potential to impact identified ESHA and wetland habitats. At the time of PWP certification, the Commission found that the proposed 150 gallon per minute pumping rate of the Alta Vista Well is a safe yield factor which will not impact water dependent sensitive habitats, riparian habitats and marshes, consistent with LUP Policy 2.27. At this time, the District is not proposing to increase the Alta Vista Well pumping rate beyond 150 gallons per minute.

The PWP (2-06-006) required a three-year annual vegetation monitoring report to assess any impacts resulting from continued use of the Alta Vista Well. The Commission has received the report each year beginning in 2011 and received the 2012 Vegetation Monitoring Report on February 8, 2013.[6] According to the Report, which looked at vegetation monitoring data for 2010, 2011 and 2012, the wetland vegetation along Montara Creek is not being impacted by withdrawals from the Alta Vista Well operations. Additionally, while the proposed amendment would allow new connections, the water would be drawn consistent not only with their respective rated capacities (consistent with the Commissions certification of 2-06-006), but also consistent with the District's conservative drought supply capacity approach. The District proposes to draw on the Alta Vista well at no more than the 150 gallon per minute rate that the Commission approved in 2-06-006 as consistent with LCP Policies protecting groundwater, surface water and environmentally sensitive habitat areas.

Midcoast Groundwater Resources

On April 21, 2009 San Mateo County released the long-awaited Midcoast Groundwater Study Phase II ("Kleinfelder report").[7] The County subsequently released the Phase III report,[8] which identified baseline information needed to update and better understand the Midcoast groundwater basins. The Phase III study summarized the Phase II conclusions and determined that the Midcoast aquifers have a considerable groundwater surplus in above average rainfall years but can have a deficit in dry and very dry years, and that the marine terrace subareas appear to be in long-term hydrologic balance and should remain in long-term balance with a moderate increase in water extractions. The report also determined that current pumping rates have lowered the water table to near sea level during dry years, and potentially below sea level during very dry years, posing risks of saltwater intrusion, and that increased pumping over long periods of time,

[6] Public Works Plan Phase I: FINAL Vegetation Monitoring Report , prepared by ESA (2012).

[7] Kleinfelder. January 8, 2007 (Revised October 2008). San Mateo County Midcoast Groundwater Study, Phase II, San Mateo, California.

[8] Balance Hydrolics, Inc. June 2010. San Mateo County Midcoast Groundwater Study, Phase III, San Mateo County, California.

especially during drier years, will increase the amount of time that the water table falls near or below sea level, increasing the risk of saltwater intrusion.

It is evident from the water-balance assessment that several of the subbasins are lowered to around or just below sea-level during dry and very dry years. Such conditions can lead to saltwater intrusion, with possible contamination of existing wells. However, the marine terrace subareas appear to be in long-term hydrologic balance and should remain in long-term balance with a moderate increase in water extractions. The proposed amendment would result in only moderate to low increases in water extractions. Any water extractions to serve new customers would be consistent with the existing water source's rate capacity and further constrained to the very conservative drought supply capacity approach. As described above, the drought supply capacity method assumes only half of the rated capacity exists.

In addition, the proposed amendment would allow for the abandonment of existing private domestic wells in the District's jurisdiction. These wells all draw from the same few basins and compete with the District's public sources. While the rated capacity for private wells may vary, owners can draw as much water as they can every day. Abandonment of private wells will reduce the amount of water drawn from private wells. The District's use of groundwater in this area is highly regulated and customers are charged for their water use. Property owners are not similarly charged for water drawn from wells other than the initial cost of the well itself, and therefore, conservation efforts will extend to public water users, ultimately reducing the amount of water that is currently available.

Finally, the potential for saltwater intrusion issues is most likely during drought conditions, and the District has numerous measures in place to ensure pumping during drought conditions is minimized. First, new connections will only be issued up to the District's drought capacity, not up to their wells' rated capacity, as discussed above. Second, the District Board adopted a Drought Contingency Plan in 2008, which sets forth numerous District water conservation measures to be implemented according to a list of water demand stages.[9] The measures progress from basic public education on water conserving practices to mandatory measures. Notable conservation measures include limiting water use to only beneficial uses, and limiting or prohibiting all outdoor use of water including irrigation. The District also maintains on-going programs, such as water audits, leak detection, repairs, rebate programs for use of water-efficient washing machines and toilets, and public information and education activities.

Therefore, while the Kleinfelder and subsequent reports have identified potential grownwater problems that could occur with continued and increased use of wells during dry and very dry years, the studies also determined the basins can accommodate moderate increases in groundwater extraction and the proposed amendment ensures a prohibition on new private domestic wells, as well as a reduction in existing private domestic water wells. Moreover, as modified, the proposed amendment would result only in issuing new connections to utilize water at the existing rated capacity of each groundwater well in drought conditions. The Commission's hydrogeologist reviewed the proposed amendment in light of the Kleinfelder reports and determined that, as modified, the proposed new connections will not cause adverse impacts on

[9] The five water demand management stages are: 1) Normal Water Supply, 2) Water Alert, 3) Water Warning, 4) Water Crisis, and 5) Water Emergency.

groundwater resources, including potential saltwater intrusion.

Therefore, the Commission finds that the proposal for new service connections, and the continued pumping rate for the Alta Vista Well at 150 gallons per minute, is consistent with the LUP Policy 2.27, which requires protection of ground and surface water and sensitive habitats.

4. Other Issues

Urban Area Domestic Service Connections

The District's jurisdiction area includes both urban and rural areas, as defined by the County's LCP. As proposed, the PWP is intended to provide for new domestic service connections within the urban area of the District's existing service area, utilizing existing water supply capacity. Domestic service connections are those that provide water to residential, commercial or industrial developments, excluding fire protection. Under the LCP, urban and rural areas are distinguished in part by the fact that urban areas are served with public water and sewer. LUP Policy 1.3 defines urban areas, in part, as areas that are served by sewer and water utilities. Policy 1.18 directs new development to existing urban areas in order to maximize the efficiency of public facilities, services, and utilities and concentrates new development in urban areas by requiring the infilling of existing residential subdivisions and commercial areas. Policy 1.19 defines infilling as the development of vacant land in urban areas, which are, in part, served by sewer and water utilities. While the District's jurisdiction contains rural areas, the LCP does not allow for extension of public services to rural areas. Accordingly, the proposed new domestic service connections must be limited to the urban areas within the District's jurisdiction. **Suggested Modification 1** prohibits new domestic service connections, and the extension of water mains for any purpose, including fire protection, in rural areas. As modified, the PWP will direct new public water service to urban areas and is therefore consistent with the certified Local Land Use Policies 1.3, 1.18 and 1.19.

Requirements for Future PWP Amendments

As proposed, the PWP is intended to provide for new connections within the District's existing service area, utilizing existing water supply capacity. The PWP would be amended before any new water supplies can be obtained. However, this point is not clear in Section 1 (Introduction and Overview). Therefore, **Suggested Modification 3** clarifies that the PWP must be amended before new water supply capacity can occur.

In addition, as proposed, the District will evaluate applications for new commercial and industrial development over 200 gallons per day according to certain included criteria. As proposed, commercial and industrial development over 500 gallons per day requires a PWP amendment. However, this requirement for a PWP amendment is unnecessary given that only existing water supply can be utilized for any development that would be served, and given that the County would be required to fully evaluate all development for consistency with the LCP prior to any new service connection. Therefore, **Suggested Modification 4** removes the requirement for a PWP amendment for new development with a demand of over 500 gallons per day. In addition, the District has requested an additional modification to include multi-family residential development, along with large commercial and industrial development, as a development type that would require additional District review prior to providing a service

connection. **Suggested Modification 4** incorporates this District request, and also clarifies the nature of the District's review and consideration prior to its commitment to serve a particular development with water. This review will allow the District to determine, based on its existing water supply and demand, whether the District has adequate capacity to serve the development, given requirements to reserve water for priority uses. This additional review is appropriate to ensure the consistent review of all developments that require more than 200 gallons per day of water, and will allow the District to ensure it has the necessary water available to serve the development.

References to PWP 2-06-006

The San Mateo County Local Coastal Plan references both the Public Works Plan and the Commission-assigned number 2-06-006 (See Policy 1.18.1). In addition, the PWP text uses various terms, including "PWP", "2-06-006" and "Public Works Plan", and this proposed amendment is now referenced by the Commission as 2-06-006-A1. To avoid confusion about the LCP's reference to the Public Works Plan, **Suggested Modification 3**, adds language clarifying that all amendments to the Public Works Plan that are certified by the Commission are incorporated into Public Works Plan 2-06-006, as referenced in the San Mateo County LCP. Accordingly, as modified, references to these terms in the San Mateo County Local Coastal Plan are meant to refer to the Public Works Plan as amended, including by the subject amendment (2-06-006-A1).

PWP Clarifications

As proposed, the amended PWP serves at least two important functions for the public, District, County and other interested parties. First, it contains analysis, information and development project descriptions designed to explain the need for system improvements originally designed to meet the needs of District customers as of November 2008. Second, it contains an updated explanation of conservation and other programs that have resulted in a surplus of water, now proposed for issuance to new customers. Each function remains relevant, because this document serves to explain the need for past and ongoing system improvements, while at the same time explaining the availability and distribution of water moving forward. However, the proposed insertion of updated information has the potential to confuse those who consult the PWP, because different supply and storage numbers are used in different sections, depending on the context of the discussion in that particular section. To resolve this issue, **Suggested Modification 5**, imposes a global change to correct internal inconsistencies and to ensure clarity.

In addition, the proposed amendment contains references to a "Phase II" PWP, which is anticipated by the District to be a future undertaking aimed at identifying and incorporating into the District's system new sources of water. However, the PWP does not define "Phase II" and therefore, its inclusion in the PWP may confuse new readers. Therefore, **Suggested Modification 5** also replaces references to "Phase II" with a more general description of what is intended by Phase II, namely the development of new water sources. **Suggested Modification 5** will be implemented through District and CCC staff collaboration prior to the Commission's action on the PWPA. As modified, the Commission finds that the proposed amendment is consistent with the PWP and LCP.

C. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

As an agency with a certified regulatory program under CEQA section 21080.5, the Commission must consider alternatives and mitigation measures that would substantially lessen any significant adverse environmental effects that the District's proposal would otherwise have on the environment. Sections 13371 and 13356(b)(2) of Title 14 of the California Code of Regulations require that the Commission not approve or adopt a PWPA unless it can find that, "…there are no feasible alternatives, or feasible mitigation measures, . . . available which would substantially lessen any significant adverse impact that the development . . . may have on the environment."

The Commission incorporates its findings on LCP and PWP consistency at this point as if set forth in full. These findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. For the reasons discussed in this report, Montara Water and Sanitary District Public Works Plan Amendment 2-06-006-A1, as suggested to be modified, is consistent with the San Mateo County Local Coastal Plan. There are no feasible alternatives, or feasible mitigation measures available which would substantially lessen any significant adverse impact that the proposed Amendment may have on the environment.

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

1. Administrative record for CDP Application Number 2-06-006-A1
2. MWSD 2011 Water System Master Plan
3. San Mateo County LCP

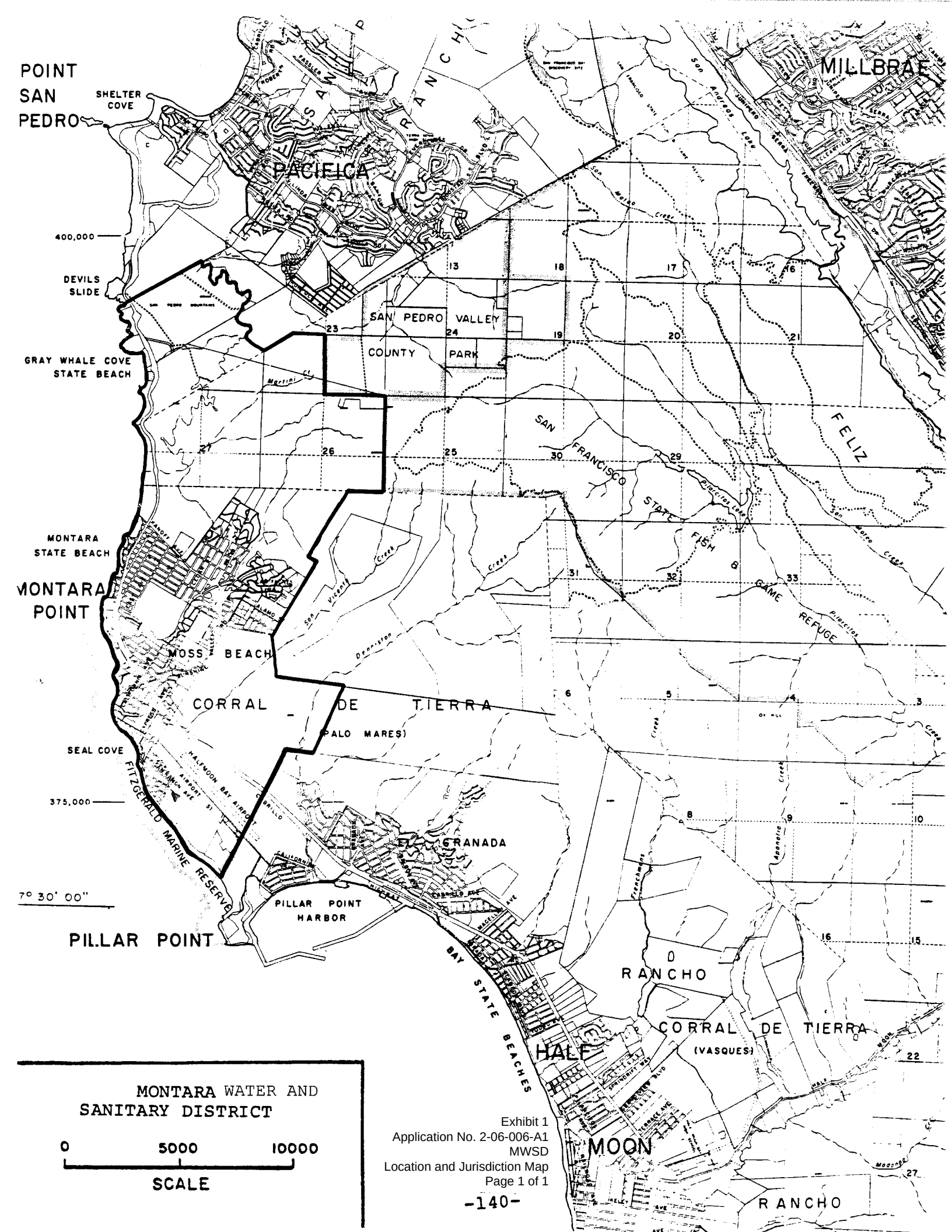

Exhibit 1
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Location and Jurisdiction Map
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PUBLIC WORKS PLAN PHASE I

1. Introduction and Overview

The Montara Water and Sanitary District (District) provides water, sanitary sewer, and solid waste disposal services to the coastal communities of Montara, Moss Beach, and adjacent areas located north of Half Moon Bay and south of Pacifica, in San Mateo County, California (Figures 1-1 and 1-2). The District owns and operates water storage, treatment, and distribution facilities that provide domestic water to approximately 1,650 domestic water connections, most of which (approximately 90%) are single family and multi-family residential connections. The system currently includes a surface water source, a water treatment plant, ten groundwater wells (eight active and two standbys), three potable water storage tanks, and over 150,000 feet of distribution pipelines.

The 2004 Montara Water and Sanitary District Master Plan identified several areas of the District's water system that require immediate improvement. Several previous and concurrent studies and system valuation reports (performed during the District's acquisition of the water system in 2003) documented poor conditions of the existing facilities.

The District must address three major categories of immediate improvements required for the water system:

- Additional storage facilities
- New sources of supply
- New treatment system for the Airport Wells Facility

The Public Works Plan Phase I (PWP) encompasses several components recommended in the 2004 Master Plan, including the following:

1) **Water Storage Facilities.** Construction of a new water storage tank at the Alta Vista site and at the Schoolhouse site and demolition of the old tank at the Schoolhouse site
2) **New Water Well Production.** Initiation of water production (150 gallons per minute) from the Alta Vista Well No.1 and construction of a new pipeline and electrical conduit
3) **Water Treatment Facility.** Construction of a water treatment facility to address water quality issues at the airport wells

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2013 Water System Update

When MWSD applied for the PWP, and at the time of its CCC approval, the moratorium on new connections that initially had been imposed by the California Public Utilities Commission in the 1980s on the then privately-owned system was still in effect. After acquiring the water system in 2003, the District continued the moratorium due to the substandard infrastructure and the unreliable water supply. Accordingly, the PWP acknowledged the existence of the moratorium by including reference to it and providing that the improvements authorized by the PWP are not intended to lift the moratorium. That provision also was consistent with the 2004 Water System Master Plan (2004 Master Plan) and the condition of MWSD's system at the time of the PWP approval.

However, through on-going efforts, MWSD has improved the system's infrastructure by extensive water system improvements and high levels of conservation. These improvements and practices are detailed in Tables 1-1 and 1-2 in the sections below. As a result of conservation and system improvments, and as reflected in MWSD's Water System Master Plan Update in 2011, MWSD's water supply has increased independently of any of the improvements encompassed by the PWP. Accordingly, MWSD repealed the moratorium established under its water system regulations in March 2011. The conservation analysis completed by the District staff is summarized in the sections below as justification that the District's efforts in infrastructure improvements and conservation are the primary reason for lifting the moratorium and allowing new connections.

Additionally, since the District's water system has changed substantially since the approval of the PWP, this update includes a section acknowledging the infrastructure that is constructed and currently operational in the District's water system, as well as revised storage, supply, and demand values, correspondant to the parameters initially presented in the approved PWP.

Water System Improvements and Conservation

Since MWSD acquired the water system in 2003, the District has made significant efforts to reduce water losses within the existing water system and minimize customer water usage.

Water System Operational Efficiency Improvements. MWSD acquired the system in August 2003 and immediately implemented projects and programs to improve operational efficiency and minimize water losses. The projects that have most significantly improved operational efficiencies are listed in Table 1-1.

Table 1-1 Water System Improvements

System Improvement	Description	Benefits
Water Main Replacement Program	System-wide in-kind replacements of water mains started in 2003 based on MWSD's leak detection and monitoring program.	Reduced water losses, improved flow efficiency and water quality. Resulted in a six-percent reduction in water losses between 2003 and 2010.
Raw Water Pipeline Replacement	The severely deteriorated Alta Vista Raw Water Pipeline was replaced in 2004 in its entirety.	Improved water quality, reduced water losses, and improved water flows.
Addition of Schoolhouse Control Valve	The addition of a control valve in the Schoolhouse pressure zone in 2009 allowed better water transport in the entire water system.	Improved water conveyance and reduced the volume of water necessary for flushing procedures to protect water quality. Reduced need for flushing equates to significant water savings.
Distribution System Flow Improvements	Critical modifications were made to the distribution system starting in 2003 to allow for flexibility in delivering water to different pressure zones.	Improves water system flows and energy efficiency.
Supervisory Control & Data Acquisition System (SCADA) Improvements	Starting in 2003, MWSD was making improvements to its SCADA system.	Improved monitoring allowing staff to make better-informed decisions in system efficiency and reliability.
Groundwater Pumping and Treatment Improvements	District implemented well rehabilitation and treatment and pumping modifications, restoring the wells to their respective rated capacities.	Increased water supply and reduced pressure losses throughout the water system.
Surface Water Treatment and Storage Improvements	Montara Creek treatment and storage improvements	Improved seismic reliability and water delivery efficiency.

Water Conservation Efforts. MWSD has employed strategies aligned with the California Urban Water Conservation Council (CUWCC) Best Management Practices (BMPs) to achieve high levels of conservation over the past seven years. The specific conservation methods employed by the District to realize these reductions are included in Table 1-2.

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Table 1-2 Conservation Efforts and Benefits		
Conservation Effort	**Description**	**Benefits**
Water Conservation Program	In late 2003, MWSD established the Water Conservation Program to install water-efficient fixtures while offering a customer rebate program.	Reduced the amount of water used by customers and resulted in lower water demands.
Leak Detection Program	In 2007, the District replaced all customer water meters, totaling 1,614, with new radio-read meters. This system alerts operators about any leaks on the customer side.	Reduced the amount of water that was lost through leaks in the customers' homes; resulted in lower water demands.
Water Audits	MWSD purchased several Orion water meter monitors to monitor for leaks. These water meter monitors can be borrowed or purchased by customers through the District.	Reduced water demands due to early leak detection.
Public Education	The District provides free conservation kits to customers, including showerheads and faucet aerators, and emphasizes conservation in newsletters.	Generated community awareness of conservation and resulted in water demand reduction.

Conservation Analysis. The system-wide improvements and conservation efforts summarized in Tables 1-1 and 1-2 resulted in substantial reduction in water usage and system demands, and therefore an increase in the supply available for potential new connections. The conservation analysis underlying the increased supply availability of the water system is included in the section below. This analysis shows that, mathematically speaking, the repeal of the moratorium was not reliant on the water supply capacity associated with the Alta Vista Well, but upon water supply availability realized through conservation efforts. Thus, the existing prohibition in the original PWP language regarding the Alta Vista Well can be safely deleted without having diluted or contravened its intent. The analysis is threefold:

(1) Presentation of the updated production and consumption values (2004-2010), detailing the decrease of consumption through system improvements and conservation efforts, resulting in a corresponding decrease in production.

(2) Calculation of the general consumption decrease between 2004 and 2010.

(3) Calculation of water supply availalbility resulting from system improvements and conservation.

Production and Consumption Update. A detailed analysis was completed as part of the 2011 Master Plan to evaluate the District's water system production and consumption trends since the acquisition of the system in 2003. MWSD has collected seven full years of data on water source production and customer consumption, allowing for a comprehensive evaluation of the changes in water use and system efficiency due to the management and conservation programs at MWSD. Data on the volume of water delivered to metered customers was used to calculate consumption, or metered sales, values.

Volumes of source water produced from 2004 through 2010 were used to calculate the total water production values, and ultimately the water system demand values. MWSD source production is dependent upon customer consumption, as the sources only produce water in response to

customer demands. This water system dynamic is critical in understanding the production and consumption analysis conducted, because *production numbers are actually indicative of system demand*, not the supply capacity of the system. As consumption decreases, the system production will also decrease, since the sources are directly reacting to customer demands. Therefore, the production numbers presented do not represent the water source production capacity.

The difference between the production and consumption represents water system losses. These water system losses, or unaccounted-for-water, represent water used for fire flow testing, water main flushing, repairs, filter backwash operations at the water treatment plant, and distribution system leaks. Table 1-3, below, presents a summary of daily water production and metered sales in gallons per day (gpd), and unaccounted-for-water values for 2004-2010.

Table 1-3 MWSD System Production and Consumption Data

	2004	2005	2006	2007	2008	2009	2010
Average Daily Production, gpd	359,023	340,539	343,315	314,225	315,050	282,653	274,118
Average Daily Consumption, gpd	321,649	314,983	304,574	286,642	292,393	271,066	254,318
Unaccounted-for-water, Percent of Total Production	10.41%	7.50%	11.28%	8.78%	7.20%	4.1%	7.2%

The water production and consumption values presented were generally decreasing since 2004, and unaccounted-for-water, or system losses, also generally decreasing since 2004. The average unaccounted-for-water over the period of analysis is 8 percent.

Conservation. In order to establish the volume of water supply available due to conservation, an analysis was completed using the data collected by the District since 2004. Volumes and percentages of water conservation have been calculated based on the consumption data presented in Table 1-3. Data from 2004 – 2010 was used to calculate an annual average conservation of 4 percent, and cumulative conservation of 21 percent. Table 1-4 presents the annual changes in consumption and resulting percentages of conservation.

Table 1-4 Annual and Total Changes in Consumption, 2004 – 2010

Year	Average Daily Consumption (gpd)	Annual Change (gpd)	Annual Percent Change
2004	321, 649	--	--
2005	314,983	- 6,666	- 2%
2006	304,574	- 10,408	- 3%
2007	286,642	- 17,932	- 6%
2008	292,393	5,751	+ 2%
2009	271,066	- 21,327	- 7%
2010	254,318	- 16,748	- 6%
		Average annual change in consumption	**- 4%**
		Total change in consumption (2004 – 2010)	**- 21%**

Additional Supply Availability. Due to the ability of the water supply sources to produce the same volume of high quality water and the recent conservation trend at MWSD, additional supply has been made available for potential new customer connections. Based on the established reliability

of the data set collected since MWSD acquired the system, the 2004 annual daily consumption value with an 8-percent adjustment for system losses was used as the baseline value to represent the past production capabilities of the system. The current demand on the system was determined by adjusting the 2010 annual daily consumption by 8 percent for unaccounted-for-water. These values do not represent the overall production capacity of the system, which is actually significantly higher than the values presented.

Based on the consumption and production values, it was determined by MWSD that there is supply available to serve additional customers due to conservation. Calculations determined that there is an excess of 72,718 gpd made available through system improvements and community conservation efforts. Table 1-5 presents this calculation.

Table 1-5 Supply Availability Due to Conservation	
2004 Annual Daily Consumption, gpd	321, 649
2004 System Production (Demand), gpd (includes 8% unaccounted-for-water)	347,381
2010 Annual Daily Consumption, gpd	254,318
2010 System Production (Demand), gpd (includes 8% unaccounted-for-water)	274,663
Water Supply Availability, gpd *(2004 System Production – 2010 System Production)*	72, 718

This analysis concludes that there is available water supply in the water system realized through conservation efforts, and the repeal of the moratorium was not reliant on the water supply capacity associated with the Alta Vista Well, or other approved PWP projects.

Water System Facilities Update

Due to the significant changes that have taken place in the District's water system since the initial PWP approval, a facilities update has been developed to reflect the existing facilities and planning parameters as of November 2013. The information and tables in the section below are based upon the data collection analysis conducted for the 2011 Master Plan, and are meant to serve as an update to Section 2 of this document.

Existing Storage Facilities. The District maintains three existing treated water storage tanks with a combined capacity of 662,000 gallons. Table 1-6, below, summarizes the available storage and is consistent with Table 2-1.

Table 1-6 Existing Treated Water Storage Tanks			
Storage Tank Location	**Tank Material**	**Storage Capacity (Gallons)**	**Year Built**
Portola Estates	Wood	100,000	1981
Alta Vista	Steel	462,000	1976
Schoolhouse	Concrete	100,000	1959

Schoolhouse Tank West, an approved PWP project, is currently under construction and will put another 100,000 gallons of storage online in the near future. The Alta Vista Tank, also an approved PWP project, is currently being designed by District staff.

Current Storage Requirements. A more thorough assessment of the District's storage needs was conducted prior to the publication of the 2011 Master Plan, and a summary of the analysis is included in Section 5 of the document. Please reference the 2011 Master Plan for further details and explanation of the calculated values. The values have changed substantially since initial PWP approval, as the PWP was based on the 2004 Master Plan, which was extremely conservative due to limited access to historical data, condition assessments of existing facilities, and information regarding efficient system operations. The total volume of storage estimated includes water for operational, emergency, and fire-fighting uses.

Operational Storage. Operational storage is directly related to the amount of water necessary to meet peak demands, and therefore the only value related to the number of customers connected to the system. The intent of operational storage is to provide the difference in quantity between the customer's peak demands and the system's available supply. MWSD operational storage is 25% of the maximum day demand (MDD), or 118,440 gallons (gal).

Emergency Storage. The volume of water allocated for emergency uses is established by a water utility based on the historical record of emergencies experienced, and on the amount of time which is expected to lapse before the emergency can be corrected. There are several ways in which emergency storage can be calculated, as the ultimate reservation of emergency storage capacity is at the discretion of the water utility. The District's 2011 Master Plan presents a comparison of methods used to calculate emergency storage and can be referenced for further detail. The emergency storage values from this analysis range from 157,916 gal to 636,836 gal. The District has established its emergency storage goal at the most conservative value, 636,836 gal, based on the American Water Works Association (AWWA) Guidelines for conservative emergency preparedness.

Fire Storage. The National Fire Code, Insurance Service Office, and local Fire Department regulate the quantity of water storage suggested for fire fighting purposes. The quantity of water that the District is required to provide can be drawn from operating sources or from storage facilities. Although areas of the District's system are strictly residential and only require 1,000 gpm for 2 hours, the District has established its fire-fighting delivery and storage goal based on the ability of the District to provide 2,000 gpm for 2 hours, strictly drawn from storage facilities. The District's established fire storage goal is considered conservative, and totals 240,000 gal.

Table 1-7, below, summarizes the District's established storage goal and contains consistent units of measurement with Table 2-2.

Table 1-7 MWSD Storage Goals

Category	Storage Volume (Gallons)
Equalization (Operational) Storage	118,440
Emergency Storage Goal (2 days of ADD)	636,836
Fire Storage Goal	240,000
Total Storage Goal	995,276
Existing Storage	662,000
Additional Storage Needed to Meet Storage Goal	**333,276**

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The total storage goal is a target value that the District has set for the operation of its system and is not a mandated requirement, specifically regarding the emergency storage and fire storage goals. The values calculated are conservative estimates of the amount of storage needed in a worst-case scenario, should a disaster occur. The District is not out of compliance with any requirements and has sufficient storage to serve new and existing customers. Operational storage is the only target storage value that would be increase with additional connections, and the impact would be minimal.

If the District established less conservative storage goals, the existing system would already meet the storage goals for operational, emergency, and fire-fighting storage. Assuming an emergency storage goal of 157,916 gal, based on the 8 hrs of the MDD (AWWA recommended target), it is apparent that the District already has enough storage to safely serve existing and new customers. Table 1-8 presents a storage analysis based on a less conservative emergency storage goal. The total storage goal could be further reduced if the fire-fighting storage goal was also established as less conservative.

Table 1-8 Alternative Storage Goals: Less Conservative

Category	Storage Volume (Gallons)
Equalization (Operational) Storage	118,440
Emergency Storage Goal (8 hrs of MDD)	157,916
Fire Storage Goal	240,000
Total Storage Goal	516,356
Existing Storage	662,000
Additional Storage Needed to Meet Storage Goal	**0**

The District has set conservative target values in its 2011 Master Plan in an effort to continue implementing improvements to the water system that further safeguard public health and property, improve efficiency, and provide additional operational flexibility.

Existing Water Supply. The District currently withdraws water from one surface water source and nine groundwater wells, as discuss further below.

Surface Water. The District's surface water source is Montara Creek. The District diverts water from the Creek at a diversion point northeast of Montara. The water is conveyed from the diversion point to the Alta Vista water treatment plant, co-located with the existing Alta Vista Tank. The District's maximum diversion is limited to 70 gpm, which is the rated capacity of the Alta Vista water treatment plant in accordance with the permit for the plant issued by the California Department of Public Health (CDPH).

Groundwater. Groundwater is currently extracted at the following locations:

- The Airport Wells: North Airport Well, South Airport Well, and Airport Well 3 (wells are located within 800 feet of each other on the Half Moon Bay Airport property),
- Portola Estates Wells I, III, and IV,
- Drake Well,
- Wagner Well, and

- Alta Vista Well, approved pursuant to this PWP.

Capacity. Table 1-9 presents a summary of the District's current water supply capacity and presents a calculation of the reliable capacity. Table 1-9 contains consistent units of measurement with Table 2-3. Additional information regarding the water system available supply capacity is included in the 2011 Master Plan.

Table 1-9 Current Supply Capacity

Supply Source	Capacity (gpm)
Montara Creek	75
Airport Wells	255
Six other groundwater wells	290
Total Supply/Production Capacity[1]	**620**
Total Reliable Capacity Largest Single Source Out of Service	**470**

[1] With all sources at maximum production capacity.

Water System Needs. The California Code of Regulations Title 22, Chapter 16, Article 2 outlines water supply requirements for the state and specifies that the District must deliver sufficient quantities of water to satisfy MDD. Table 1-10 summarizes the current supply and demand comparison, and contains consistent units of measurement with Table 2-4.

Table 1-10 Current Production Demand

Demand by Category	Water Use (gpm)
Average Daily (2040 - 2010)[1]	221
Maximum Daily[1]	332
Maximum Hourly[1]	575
Maximum Fire Flow (2 hours)	2,000
Total Reliable Capacity Largest Single Source Out of Service	**470**
Production Surplus (Existing Reliable Supply - Maximum Daily Demand)	138

[1] Based on daily production data presented in the 2011 Water System Master Plan.

Amendments to Public Works Plan

~~Any increase in water supply or distribution capacity, to provide additional service connections in excess of the limitations of this Public Works Plan Phase I, including any increase in the Alta Vista well pumping rate, any augmentation or reallocation of existing water supplies, or changes to the District service area shall require an amendment to this PWP. The application for such amendment shall include information concerning phasing of infrastructure capacity in conformity with the requirements of the San Mateo County LCP. The information provided shall be sufficiently detailed~~

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~~and complete to enable the Commission to evaluate whether the proposed increase in water supply and/or distribution capacity is in phase with the existing or probable future capacity of other area infrastructure, including but not limited to the need for an adequate level of service for Highways 1 and 92 as required by the local coastal program.~~

Amendments to this Public Works Plan shall be made in accordance with Public Resources Code Section 30605. From and after November 1, 2013 this PWP shall be deemed sufficient to provide for water system connections within the service area that was acquired by MWSD in August 2003; provided, that the requirements of the Established Guidelines for New Connections approved in conjunction with Amendment No. 1 to this Public Works Plan are met.

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2. Project Objective

The objective of the District's Public Works Plan Phase I (the proposed project) is to improve specific portions of the District's water system to ensure an adequate and reliable supply of water for its ~~existing~~ customers for domestic and fire protection uses. ~~The proposed improvements are not intended to, nor would they accommodate, expanded existing connections or new connections to the system. New water supply, storage, and transmission facilities authorized by and pursuant to PWP 2-06-006 is limited to those areas served by the District as of 11/12/08 and shall not be used for any new water connections, or for the extension of water mains into rural areas, including rural areas designated Open Space or Agriculture within the urban/rural boundary, for any purpose, including for the purpose of private fire protection.~~ From and after March 1, 2013 new water service connections to MWSD's water system shall be made in accordance with the *Established Guidelines for New Connections* approved in conjunction with Amendment No. 1 to this Public Works Plan, and included below:

Established Guidelines for New Connections

The Montara Water and Sanitary District (MWSD) and the California Coastal Commission (CCC) have cooperatively established the below guidelines for adding new service connections to the MWSD water system with regard to MWSD's Public Works Plan (PWP) Phases I and II. These guidelines are effective as of July 1, 2013, and will remain effective under PWP Phase I until amended or deemed inapplicable due to implementation of PWP Phase II.

Section I. Conditions

The following conditions have been established to serve as guidance for adding new water service connections to MWSD's water system including usage of PWP Phase I improvements.

A. New Service Connections

With the exception of large commercial or industrial developments, as defined in the subsequent section, all new service connections are deemed available under PWP Phase I within the MWSD service area until the MWSD annual water demand reaches 90% of the estimated drought supply capacity. Supporting analysis regarding the determination of the established percentage is included in PWP Amendment Justification. The following definitions apply:

- Annual Water Demand: The annual water demand will be calculated based on MWSD's daily production records for a full calendar year. Since MWSD water source production is directly dependent upon customer demand, recorded production values reflect the water system's demand. The annual water demand will be calculated at the end of the calendar year and included in the annual report submitted by MWSD to CCC, as detailed in Section II.

- Drought Supply Capacity: Drought supply capacity is determined through rated source capacities, as opposed to the recorded source production per water industry standards. The water supply capacity under drought conditions is calculated utilizing the conservative industry-wide water resources methodology in which the sources are assumed to be capable of producing only 50 percent of their rated capacity. This conservative methodology is representative of drought water

shortages or other extreme conditions. The drought supply capacity is subject to change over time if new sources are added to the MWSD water system.

When the demand reaches 90% of the calculated drought supply capacity, MWSD will initiate PWP Phase II. New connections to the MWSD system will continue to be available under PWP Phase I until the demand reaches 100% of the drought supply capacity. However, it is not anticipated that this will occur prior to implementation of Phase II, which Phase will provide improvements allowing for an increase in the drought supply capacity of the water system.

B. Large Commercial and Industrial Service Connections

Large commercial and industrial developments will require additional analysis prior to approval of connections to the MWSD water system. All commercial and industrial applicants must provide MWSD with a justified estimate of the development's projected daily water demand. The following definitions apply:

- Tier 1 Large Commercial and Industrial Development (Tier 1 Commercial Development): Any commercial or industrial development that has a projected daily demand of over 200 gallons per day (gpd).

- Tier 2 Large Commercial and Industrial Development (Tier 2 Commercial Development): Any commercial or industrial development that has a projected daily demand of over 500 gpd.

Tier 1 Commercial Development applicants must provide additional analysis regarding the projected demand and potential for future business growth and associated increased water demand. MWSD will determine, based on its existing supply and demand, whether the District has adequate capacity to serve the development with allowances for additional residential connections corresponding to building permits or Coastal Developments permits or other entitlements issued by the County of San Mateo County in compliance with its approved Local Coastal Program (LCP).

Tier 2 Commercial Development applicants must initiate the Public Works Plan amendment approval process with the CCC for the proposed development. The proposed development will undergo a review process regarding the future impacts that the development could have on local resource availability. The CCC must approve Tier 2 Commercial Development in order for the development to be served by MWSD.

Section II. Monitoring and Reporting

The objective of the monitoring and reporting program is to provide an annual report to the CCC about the status of the District's water resources. The annual report for the previous calendar year will be submitted to the MWSD governing Board and CCC staff by March 31 of the following year. The annual report will be produced by the District Water System Engineer and include the following data:

- Number of connections to the MWSD system, including:
    - The number of new residential connections in the previous calendar year, expressed as the number of physical connections and equivalent residential connections (ERUs).
    - The number of new commercial or industrial connections in the previous calendar year, expressed as physical connections and ERUs.

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- Existing water system supply capacities, including:
  - Total supply capacity
  - Reliable supply capacity
  - Drought supply capacity

- Existing water system demands, including:
  - Annual system demands since 2004, based on production data.
  - Per capita demand for the previous calendar year, based on annual system demands and number of connections.

- Supply and demand comparison, including:
  - A graphical comparison of the annual system demands since 2004 versus the total supply, reliable supply, and drought supply capacities.
  - The percentage of the drought supply that is being utilized by existing demand.
  - The percentage of reliable supply that is being utilized by existing demand.

- District Water System Engineer's analysis and recommendations, including:
  - The surplus supply availability, based on the supply and demand comparison.
  - Projection of system demands, based on the history of new connections in previous years.
  - Recommendation regarding the necessity of initiating Phase II PWP.

The monitoring and reporting program includes a contingency plan as a part of the District's Board annual review process. Based on the annual report produced by the District Water System Engineer, the District's Board will determine if any action needs to be taken to protect sustainable water supply. If the Board determines that MWSD is at risk of over-committing its water supply, the Board has the authority to impose limits on the number of connections until further notice (Wat. C. §§31001, 31026). Although the District does not anticipate this outcome, the Board is prepared to regulate connections to the system based on unforeseen environmental conditions or number of applicants generated by actions of the planning agencies, i.e., the CCC and the County.

Proposals for any future water facility development connected to or using water system components or infrastructure authorized pursuant to PWP 2-06-006 shall require an amendment of the PWP as described above, except for repair and maintenance activities as defined by Coastal Act Section 30610(d), which shall require coastal authorization from San Mateo County, either in the form of a coastal development permit or a coastal development permit exemption as determined by Section 6328.5(d) of the certified San Mateo County zoning regulations. ~~The improvements would not enable the District to ease or lift the existing moratorium on new water service connections~~

To achieve the project objective, the District has proposed adding water supply and storage capacity, as well as improving treatment of groundwater. SRT Consultants prepared a Fire Flow Deficiencies Project Draft Alternatives Analysis Technical Memorandum in January 2005. The Technical Memorandum provides background information on the District's immediate needs, which are summarized below."

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Existing Storage Facilities

The District maintains three existing treated water storage tanks with a combined capacity of 662,000 gallons (Table 2-1).

Table 2-1: Existing Treated Water Storage Tanks

Storage Tank Location	Tank Material	Storage Capacity (Gallons)	Year Built
Portola Estates	Wood	100,000	1981
Alta Vista	Steel	462,000	1976
Schoolhouse	Concrete	100,000	1959

The three existing treated water storage tanks have been evaluated in the past for compliance with current codes, including the 2000 Uniform Building Code (UBC), their physical condition, and their remaining service life. All three tanks require various improvements to extend their service life and to ensure operational and seismic reliability. The required improvements are:

- **Alta Vista and Portola Estates Tanks.** Structural strengthening to ensure seismic reliability
- **Alta Vista Tank.** Internal and external coating
- **Schoolhouse Tank.** Replacement; this tank has reached the end of its service life

The Schoolhouse Tank replacement is incorporated within the Public Works Plan Phase I (proposed project). Currently, the District has no ability to take any of the storage tanks out of service for any period of time for maintenance and/or repair due to the absence of any system-wide storage redundancy. Removing a tank from service would not allow the District to meet its current water demands. In addition, the District requires increased storage to satisfy the District's operational and emergency response needs.

Current Storage Requirements. The District's current storage requirements are comprised of three elements:

- Operations
- Emergencies
- Fire suppression

Operational Storage. Customer water demands vary over the 24-hour period, with higher demands occurring in the morning and evening hours, and decline to a nominal baseline during the day. Operational storage is the storage volume required to meet the daily demand variations. It is typical in the water industry that water supply sources such as treatment plants and groundwater wells operate at a constant rate during the 24-hour period. The constant water production rate is augmented by flow from storage tanks during peak demand periods, lowering the storage volume. The storage tanks are then refilled when the demand drops below the constant production rate. In the United States, storage tanks are customary designed to hold a reserve of about 50 percent of the water used during maximum day demand for equalization purposes. With the District's current demand of 423 gallons per minute (gpm), this amounts to an Operational Storage requirement of 306,000 gallons.

Emergency Storage. A reserve of potable water is required to meet demands during emergency outage periods when normal supply may be interrupted due to a natural disaster (e.g., seismic event, flood), power failure, loss of supply, loss of treatment, or a scheduled outage for repair and maintenance. The industry standard recommended by the American Water Works Association (AWWA) and other leading authorities in disaster preparedness and readiness is the storage volume equivalent to a two maximum day demand. This storage volume amounts to 1,224,000 gallons.

Fire Storage. Fire fighting storage requirements are identified by the National Fire Code (NFC), the Insurance Service Office guidelines, and by the local Fire Department. The fire storage requirements are based on the fire flow requirements and the anticipated fire duration. The fire requirement for the District's service area includes fire flows of 2,000 gpm for a two-hour duration, equating to a storage volume requirement of 240,000 gallons.

The District's total storage requirement under three these criteria amounts to 1,770,000. With the existing storage of 662,000 gallons, an additional volume of 1,108,000 gallons is required, as summarized in Table 2-2 on the following page.

Table 2-2: Current Storage Requirements

Category	Storage Volume (Gallons)
Required Equalization (Operational) Storage	306,000
Required Emergency Storage	1,224,000
Required Fire Storage	240,000
Required Total Storage	1,770,000
Existing Storage	662,000
Storage Deficit	**1,108,000**

Existing Water Supply

The District currently withdraws water from one surface source and several groundwater wells, as discuss further below.

Surface Water. The District's surface water source is Montara Creek. The District diverts water from the Creek at a diversion point northeast of Montara. The water is conveyed from the diversion point to the Alta Vista water treatment plant, co-located with the existing Alta Vista Tank. The District's maximum diversion is limited to 70 gpm, which is the rated capacity of the Alta Vista water treatment plant in accordance with the permit for the plant issued by the California Department of Health Services (DHS).

Groundwater. Groundwater is currently extracted at the following locations:

- The Airport Well Facility, including the North Airport Well, South Airport Well, and Airport Well 3 (wells are located within 800 feet of each other on the Half Moon Bay Airport property)
- Drake Well, Portola Estates Wells I, III, and IV, and Wagner Well

Park and Portola Estates II wells are also existing groundwater wells, but have been out-of-service due to higher-than-acceptable iron and manganese levels and have not contributed to system

production in the last six years. The Park and Portola Estates II wells are permitted as standby by California DHS.

Capacity. Table 2-3 presents a summary of the existing District water supply capacity and presents a calculation of the reliable capacity.

Table 2-3: Current Supply Capacity

Supply Source	Capacity (gpm)
Montara Creek	70
Airport Wells Water Treatment Facility	225
Five other groundwater wells	171
Total Production Capacity[1]	**466**
Total Reliable Capacity with the Largest Single Source Out of Service[2]	**241**

[1] With all sources at maximum production capacity

[2] In accordance with the California DHS guidelines, the reliable capacity of a water system is calculated based on the largest source out of service. This calculation is based on the three existing Airport wells (collectively considered one single water supply source) being offline.

Airport Wells Facility. Water from the three Airport Wells has demonstrated elevated levels of nitrate, corrosivity, manganese, and 1,2,3-trichloropropane (TCP). Currently, the District utilizes a water blending operation to ensure that the water delivered to customers complies with safe drinking water standards. However, due to rising levels of nitrate in the last two years and promulgation of more stringent drinking water regulations, it has become apparent that blending may soon prove inadequate. The increased likelihood of the shutdown of all Airport Wells for water quality reasons requires development of immediate alternate solutions, including but not limited to developing new water sources to replace the 225 gpm production of the Airport Wells or installation of a treatment facility to address all water quality issues and to ensure water supply reliability for the District.

Water System Needs. The California Code of Regulations Title 22, Chapter 16, Article 2 outlines water supply requirements for the state and specifies that the District must deliver sufficient quantities of water to satisfy maximum day demand. Table 2-4 presents a summary of the District's water demand to comply with current AWWA and other industry standards.

During periods of water supply shortages, various water use restrictions have been instituted in the District. The District has employed some form of a progressively tiered program since 1985 to manage customer water demand in response to water supply availability. The levels progress from basic public education on water conserving practices to mandatory measures. The specific demand management level is triggered by the availability of water supply and the ability to maintain fire fighting and emergency reserves in distribution system storage tanks. For example, Stage 1 of the program requests customers to voluntarily water early in the day or late in the evening; Stage 5 prohibits irrigation at any time.

Table 2-4: Current Production Demand[1]	
Demand by Category	**Water Use (gpm)**
Average Daily (2000 - 2004)	271
Maximum Daily	423
Maximum Hourly	700
Maximum Fire Flow (2 hours)	2,000
Total Reliable Capacity with the Largest Single Source Out of Service	**241**
Production Deficit (Existing Reliable Supply - Maximum Daily Demand)	182

[1] Based on daily production data presented in the Montara Water and Sanitary District 2004 Water System Master Plan.

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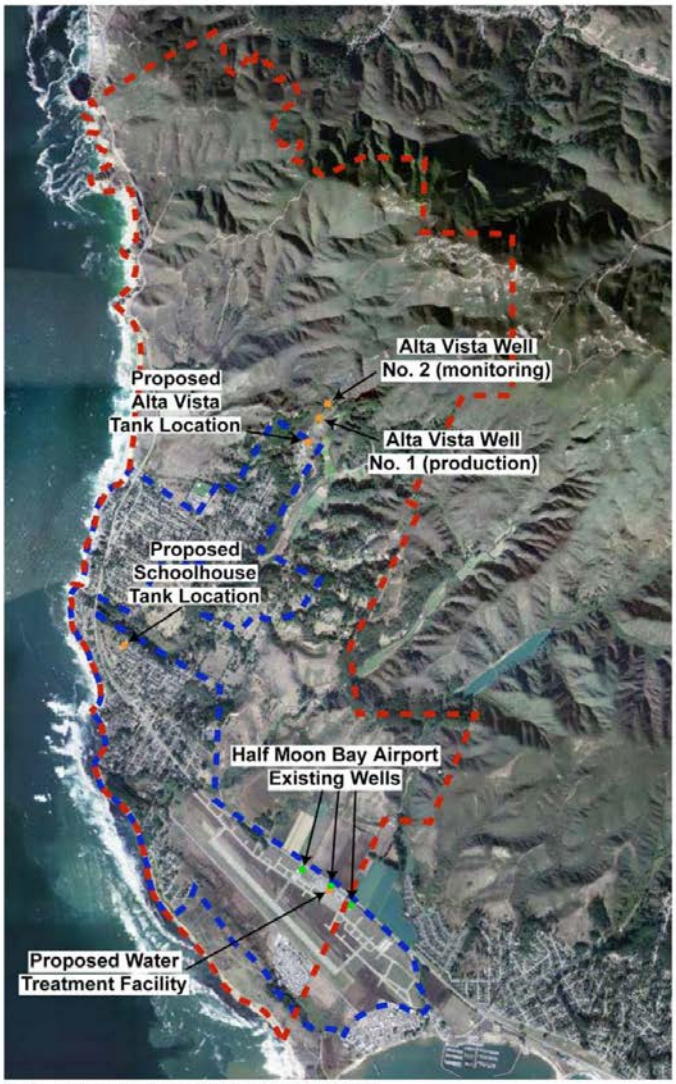
3 Project Location

PROJECT LOCATION

The proposed improvements would be constructed at several locations throughout the District, as depicted on Figure 3-1. The general locations of the facilities are:

- **Alta Vista Tank and Wells.** Northeast end of Alta Vista Road
- **Schoolhouse Tank.** West end of Buena Vista Street
- **Airport Wells Water Treatment Facility.** Cabrillo Highway (State Highway 1) at Half Moon Bay Airport

Figure 3.1: Location of Proposed Water System Upgrades



SOURCE: MHA 2005, SRT Consultants 2005, and Balance 2005

MHA ENVIRONMENTAL CONSULTING, INC.

LEGEND
Montara Sanitary Service Boundary
Montara Water Service Boundary

SCALE
0 1
Miles

NORTH

4 Project Description

The proposed water system improvements include:

- Construction of a new water storage tank (Alta Vista Tank) northeast of the existing Alta Vista water storage tank.
- Conversion of an existing test well to a production well (Alta Vista Well No.1) northeast of the existing Alta Vista water storage tank.
- Conversion of an existing test well to a monitoring well (Alta Vista Well No.2) northeast of the existing Alta Vista water storage tank.
- Installation of an underground water conveyance pipeline and electrical conduit extending from the production well and monitoring well, respectively, to the existing Alta Vista water storage tank.
- Repair and maintenance of Alta Vista Road that does not result in an addition to, enlargement, or expansion of the road.
- Placement of a security fence on Alta Vista Road, northeast of the existing Alta Vista water treatment facility.
- Construction of one or two new water storage tank(s) (Schoolhouse Tank(s)) adjacent to and in place of (if two are built) the existing Schoolhouse water storage tank. If a two-tank option is chosen, the existing Schoolhouse Tank may be repaired for use as one of the two tanks, if an inspection report signed by a licensed structural engineer that is reviewed and approved by the Executive Director shows that the repaired tank would be seismically sound.
- Demolition of the existing Schoolhouse water storage tank.
- Installation of a water treatment facility (Airport Wells Water Treatment Facility) at the Half Moon Bay Airport to treat groundwater pumped from three existing water production wells for nitrates, TCP, corrosivity, and manganese.
- Installation of an underground water conveyance pipeline to convey pumped groundwater from the existing Airport wells to the Airport Wells Water Treatment Facility.
- Construction of a road leading to the southernmost Airport well.
- Potential installation of solar panels at the Half Moon Bay Airport and on the roofs of the existing and proposed Alta Vista water tanks.

The District shall assure that safe and reliable access for construction vehicles that does not hinder or jeopardize the safety of regular traffic circulation is provided to each construction site. The improvements are described further below.

The PWP improvements shall be undertaken in accordance with Mitigation Measures listed in the MWSD Public Works Plan Phase I Final Environmental Impact Report (FEIR) SCH# 2004112107 with modifications as certified by the California Coastal Commission. Attached, as Exhibit A, is the Mitigation Monitoring and Reporting Plan (MMRP) section, found in the FEIR, with applicable revisions as per CCC request.

STORAGE TANKS

The proposed project includes the construction of two new water storage tanks in the vicinity of the District's existing Alta Vista and Schoolhouse water storage tanks. Specifically, the proposed tanks are described in Table 4-1.

Alta Vista Tank

The existing 462,000-gallon Alta Vista Tank is located along an unpaved extension of Alta Vista Road. The existing tank is constructed of steel and is approximately 52 feet in diameter and 28 feet tall. A 100,000-gallon settling tank and associated water treatment facility are located directly north of the existing Alta Vista Tank. The settling tank and adjacent facility store and treat water diverted from Montara Creek before it is introduced into the District's storage and distribution system.

Table 4-1: Existing and Proposed Storage Tank Capacities

Location	Existing Storage Tank Capacity (gallons)	Proposed Storage Tank Capacity (gallons)	Comment
Portola Estate	100,000	100,000	No Change
Schoolhouse Tank	100,000	0	Demolished or Repaired
Alta Vista Tank	462,000	462,000	No Change
New Schoolhouse Tank	-	200,000	New
New Alta Vista Tank	-	1,000,000	New
Totals	**662,000**	**1,762,000**	

The proposed new 1,000,000-gallon Alta Vista Tank would be constructed with an overall diameter of about 80 feet and height of about 30 feet (Figure 4-1). The elevation of the proposed tank's floor is set at 488 feet above sea level (asl) allowing 12 feet of the tank's side to be concealed below grade, thus fulfilling the Coastal Commission's line-of-site requirement. The existing 462,000-gallon Alta Vista Tank is located at 470 feet asl. Pumps and pressure vessels may be required to maintain adequate levels in both the existing and new tank. The proposed tank site is situated on the center of the ridge line at an elevation of 502 feet asl. Because the new tank must be "dug" into the site (Figure 4-1), installation would require construction of retaining walls of up to 12 feet in height on either side of the ridge line. The retaining walls would be constructed 10 to 12 feet from the tank to maintain space for an access road.

The installation of the tank would require movement of approximately 7,000 cubic yards of soil and weathered granitics. The cut and fill would be as balanced as possible at the site but approximately 6,000 cubic yards would be taken off site. The excavated material would likely be hauled to Ox Mountain Sanitary Landfill just east of Half Moon Bay. The general area of the reconstruction is shown on Figure 4-2; however the exact boundaries of excavation and fill cannot be determined until bedrock presence is confirmed during grading activities. The tank will be constructed in its entirety on the property owned by the District. The material out of which the tank

will be constructed has not been established, but poured in place or cast in place concrete will not be used.

There will be no obstruction of existing hiking trails to Montara Mountain on the Alta Vista ridge property due to design, construction, and operation of the facilities authorized pursuant to PWP 2-06-006. If it is necessary to block the trail temporarily, alternative means of access to Montara Mountain on the Alta Vista ridge property shall be provided.

Pipeline and Power. The new tank would be connected to the existing Alta Vista Tank and associated treatment facilities via an 8-inch, approximately 250-foot long buried pipeline. The pipeline would be installed within the existing unpaved extension of Alta Vista Road.

The Alta Vista Tank would also include the installation of telemetry and remote operating devices to simplify the tank's operation and to minimize the need for on-site operation of the tank. Electrical power to supply the tank's telemetry and remote operating devices would be via a buried electrical supply line or solar panels installed on the roof of the new and existing tanks.

Access Road. 16-foot wide access road, also requiring some landform recontouring, would be constructed leading to the tank site as depicted on Figures 4-1 and Figure 4-2.

Figure 4-1: Proposed Alta Vista Tank Site Plan and Cross-Section

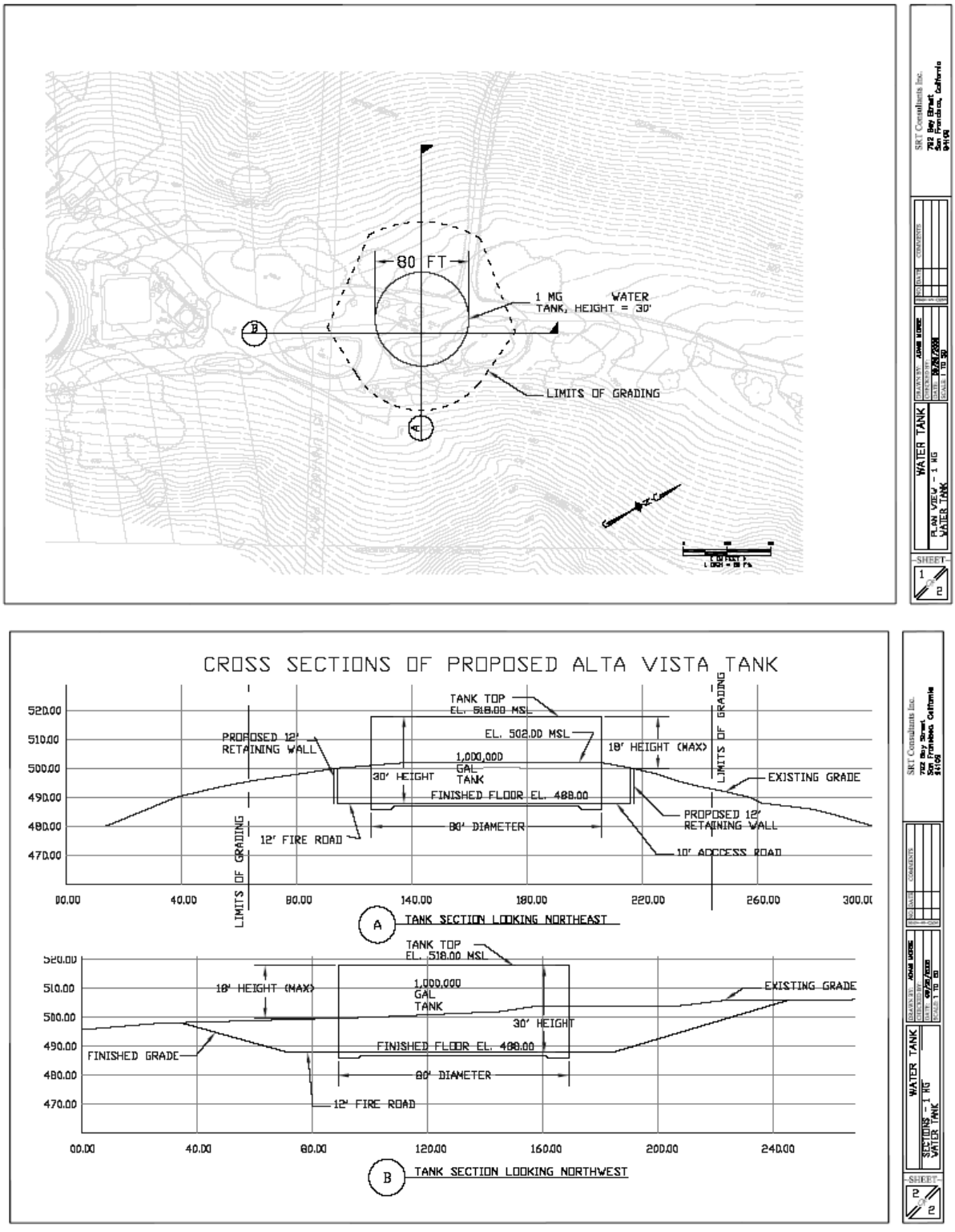


Figure 4-2: Aerial Depiction of Proposed Alta Vista Tank

Solar Panels. Solar panels would be installed on top of the existing and proposed Alta Vista Tanks to provide at least a portion of the electrical power required for the Alta Vista Well No.1 and other electrically powered equipment at the site. The panels would have a non-reflective finish and would be angled up from the roofs of the tanks toward the south to optimize solar exposure. Conduit from the solar panels would be run down the side of the tanks to ground mounted equipment necessary to distribute the electrical power to the equipment, as well as to deliver excess electrical power into the Pacific Gas and Electric Company power grid.

Security Fence. The District has proposed the installation of a chain link fence across the unpaved extension of Alta Vista Road access road. The fence would be installed just northeast of the existing Alta Vista water treatment facility for the purpose of discouraging access to, and vandalism of, the new tank and the proposed production and monitoring wells (Figure 4-2). The fence would be 6 feet in height and approximately 30 feet in length. A gate would be installed at the point where the fence crosses the unpaved extension of Alta Vista Road to provide District staff access to the new storage tank and wells.

Construction. Construction of the Alta Vista Tank shall conform to the specifications and recommendations contained in the Geotechnical Investigation Report for Proposed Alta Vista Tank Site, Montara, California prepared by Terrasearch, Inc. dated August 14, 2008. Prior to commencement of construction, all development subject to PWP-2-06-006 shall obtain all other agency approvals and property owner approvals, as necessary. This includes certification by the San Mateo County engineer that direct damage or indirect threats to public health and safety as a results of construction of the Alta Vista Tank would be unlikely in the event of a fire or geologic hazard.

Tree removal and all other activities associated with tank construction shall be performed between September 1 and January 30 to prevent disturbance to bird nests. If tree clearing and all other

activities associated with tank construction is desired outside of this period, a pre-construction survey for nesting birds shall be conducted prior to clearing of trees and all other activities associated with tank construction. The survey will be conducted by a qualified biologist no more than 30 days prior to initiation or clearing or construction. The survey shall include any areas proposed for any activities such as earthmoving. If occupied migratory bird nests are found within 250 feet of the construction zone, clearing shall not begin until after the nests are protected by an adequate setback (in general, 50 feet for passerines and 250 feet for raptors) defined by a qualified biologist.

All development subject to PWP-2-06-006 shall avoid impacts to the San Francisco Dusky-Footed Woodrat (DFWR) and American badger. Prior to commencement of construction of the Alta Vista water tank, including grading or placement of equipment, a minimum 25-foot buffer shall be established around the active stick nests or burrows adjacent to the project site. A qualified biological monitor shall be present at the site during all grading and construction activities to ensure that the San Francisco DFWR and American Badger are not harmed. Deconstruction of the DFWR nests or relocating the American Badgers or DFWRs is prohibited.

Concurrent with the Notice of Impending Development (NOID) for the Alta Vista Tank, the District shall submit to the Executive Director for review and approval a detailed erosion control plan and landscape plan to revegetate the area around the Alta Vista Tank to control erosion and screen views, in accordance with Mitigation Measures No. 3.1-4 and 3.1-6 of the FEIR, respectively.

Schoolhouse Tank

The existing 100,000-gallon Schoolhouse Tank is located along an unpaved roadway at the end of Buena Vista Street. The tank is constructed of concrete and is 34 feet in diameter and 16 feet tall. A booster pump station is housed in a small structure adjacent to the tank (Figure 4-3).

The proposed new 200,000-gallon Schoolhouse Tank would be constructed with an overall diameter of 48 feet and height of 16 feet (Figure 4-3). The elevation of the proposed tank's floor and water level would be identical to that of the existing tank to allow for balancing the tanks and maintaining consistent pressure throughout the District's system.

The existing tank is located at 174 feet asl. The proposed tank site is situated on a gently sloping hillside ranging in elevation from 176 to 179 feet asl. Installation of the Schoolhouse Tank would require cutting a portion of the hillside and the final tank bottom would be at 174 feet asl (Figure 4-4). A retaining wall up to 6-feet in height would be constructed along a section of the tank site to retain areas that would be excavated to accommodate the new tank (Figure 4-5).

The installation of the tank would require movement of at least 150 cubic yards of soil and weathered granitic rocks based on the geotechnical recommendations (Terrasearch 2005). The cut and fill would be as balanced as possible at the site but approximately 100 cubic yards would be taken off site. The excavated material would likely be hauled to the Ox Mountain disposal site in Half Moon Bay.

An alternative design would place two new 100,000 gallon tanks at the Schoolhouse Tank site. One tank would replace the existing tank, while the other would be placed adjacent to the existing pump station on its southeast side (Figure 4-6). Both tanks would be constructed with a diameter of 34 feet and a height of 16 feet. The new tanks would both sit at the existing tank's current elevation. The material out of which the tank(s) will be constructed has not been established, but poured in place or cast in place concrete will not be used.

Figure 4-3: Proposed Schoolhouse Tank Site Plan

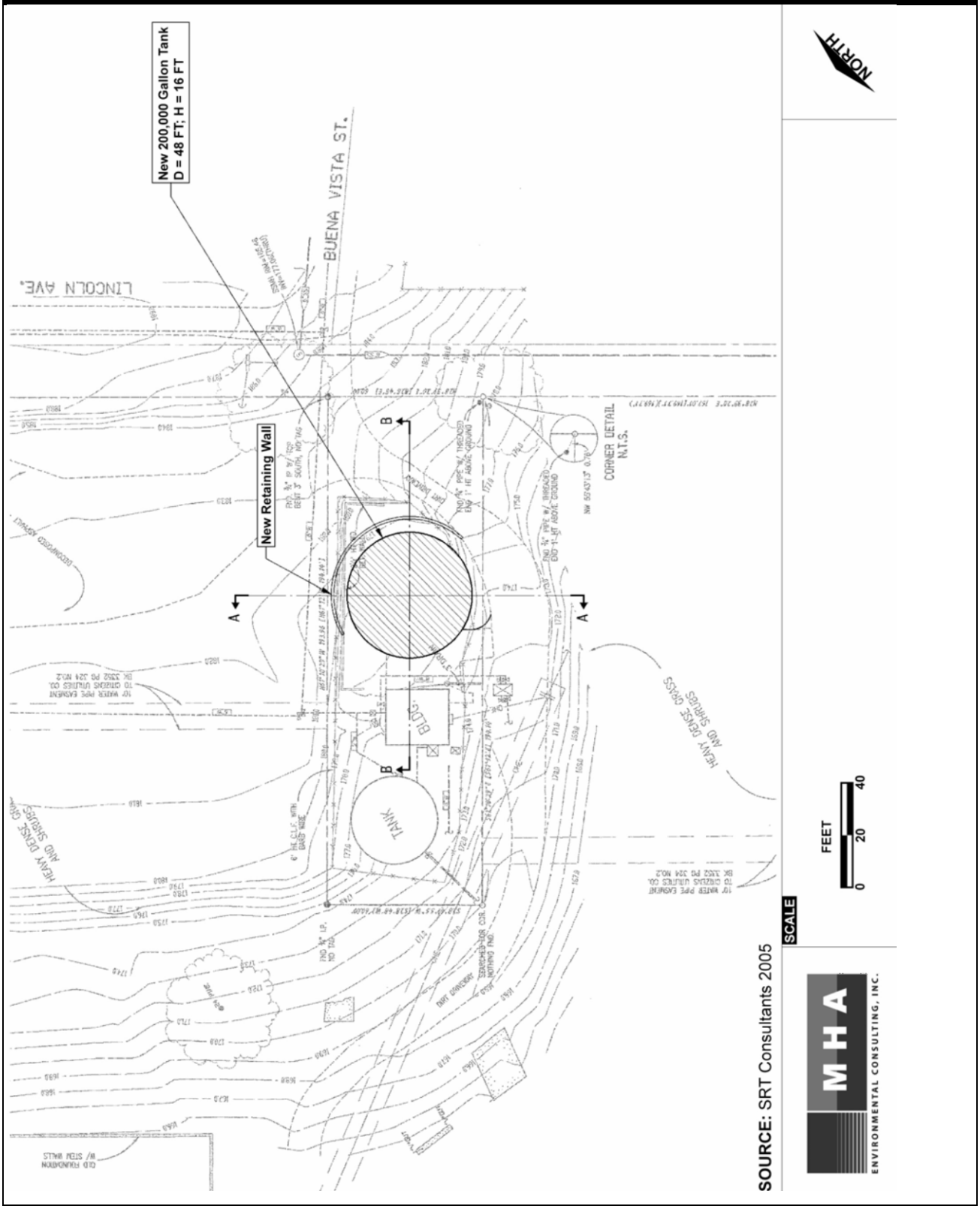


Figure 4-4: Proposed Schoolhouse Tank Site Plan

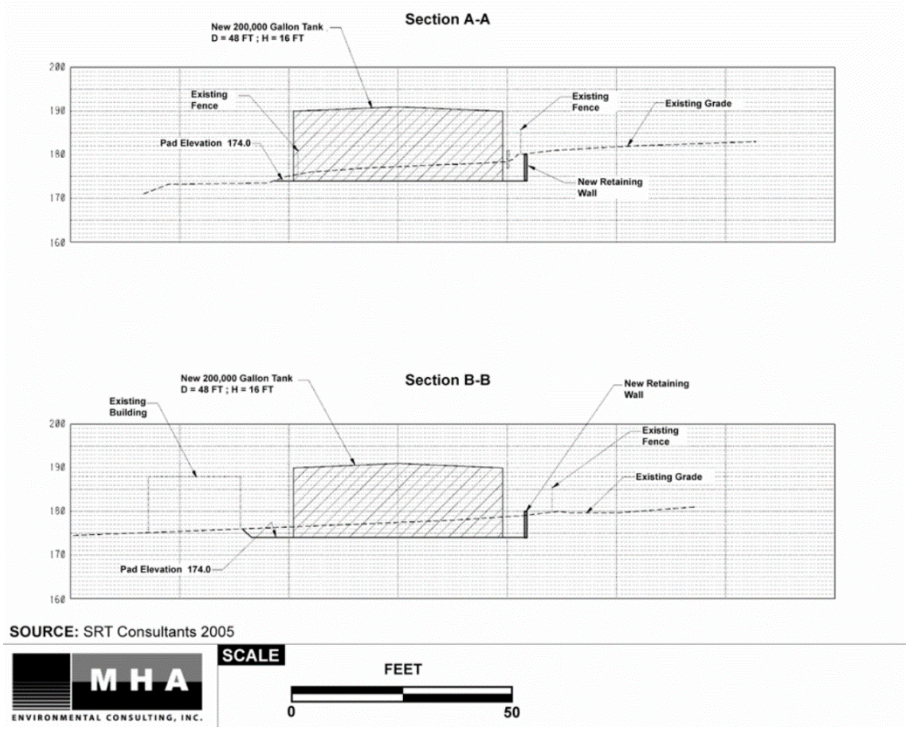


Figure 4-5: Aerial Depiction of Proposed Schoolhouse Tank

Figure 4-6: Proposed Schoolhouse Tank Site Plan

Pipeline and Power. The new tank would be connected to the existing pump house via an 8-inch diameter, less than 20-foot long buried pipeline. The Schoolhouse Tank would also include the installation of telemetry and remote operating devices to simplify the tank's operation and to minimize the need for on-site operation of the tank. Electrical power to supply the tank's telemetry and remote operating devices would be via a buried electrical supply line.

Solar Panels. Solar panels would be installed on top of the proposed Schoolhouse Tank to provide at least a portion of the electrical power required for equipment at the site. The panels would have a non-reflective finish and would be angled up from the roof of the tank toward the south to optimize solar exposure. Conduit from the solar panels would be run down the side of the tank to ground mounted equipment necessary to distribute the electrical power to the site's electrically power equipment, as well as to deliver excess electrical power into the Pacific Gas and Electric Company power grid.

Existing Schoolhouse Tank Demolition. Following installation of the new Schoolhouse Tank, the existing 100,000-gallon Schoolhouse Tank would be decommissioned and removed from the site. This area would then be paved and used by the District as a maintenance yard, consistent with the current use of the proposed tank location.

Construction. Construction of the Schoolhouse Tank(s) shall conform to the specifications and recommendations contained in the Geotechnical Investigation Report for Proposed Schoolhouse and Alta Vista Tank Sites, Montara, California prepared by Terrasearch, Inc. dated August 4, 2005. If a two-tank option is chosen, the existing Schoolhouse Tank may be repaired for use as one of the two tanks, if an inspection report signed by a licensed structural engineer that is reviewed and approved by the Executive Director shows that the repaired tank would be seismically sound.

Prior to commencement of construction, all development subject to PWP-2-06-006 shall obtain all other agency approvals and property owner approvals, as necessary. This includes certification by the San Mateo County engineer that direct damage or indirect threats to public health and safety as a results of construction of the Schoolhouse Tank(s) would be unlikely in the event of a fire or geologic hazard.

Tree removal and all other activities associated with tank construction shall be performed between September 1 and January 30 to prevent disturbance to bird nests. If tree clearing and all other activities associated with tank construction is desired outside of this period, a pre-construction survey for nesting birds shall be conducted prior to clearing of trees and all other activities associated with tank construction. The survey will be conducted by a qualified biologist no more than 30 days prior to initiation or clearing or construction. The survey shall include any areas proposed for any activities such as earthmoving. If occupied migratory bird nests are found within 250 feet of the construction zone, clearing shall not begin until after the nests are protected by an adequate setback (in general, 50 feet for passerines and 250 feet for raptors) defined by a qualified biologist.

All development subject to PWP-2-06-006 shall avoid impacts to the San Francisco Dusky-Footed Woodrat (DFWR) and American badger. Prior to commencement of construction of the Alta Vista water tank, including grading or placement of equipment, a minimum 25-foot buffer shall be established around the active stick nests or burrows adjacent to the project site. A qualified biological monitor shall be present at the site during all grading and construction activities to ensure that the San Francisco DFWR and American Badger are not harmed. Deconstruction of the DFWR nests or relocating the American Badgers or DFWRs is prohibited.

Concurrent with the Notice of Impending Development (NOID) for the Schoolhouse Tank(s), the District shall submit to the Executive Director for review and approval a detailed erosion control plan in accordance with Mitigation Measures No. 3.1-4 of the FEIR.

PRODUCTION AND MONITORING WELLS

A test well, referred to as Alta Vista Well No.1 (also known as BH-9b or 2004-4 during hydrological investigations), was installed in 2004 to assess the potential for increasing the District's available domestic water supply through additional groundwater extraction. A second well, referred to as Alta Vista Well No.2 (also known as BH-9 or 2004-3), was installed concurrently for monitoring purposes. Both wells were installed in accordance with a Coastal Development Permit (CDP) issued by the San Mateo County Environmental Services Agency on May 19, 2004.

Following a series of tests, the District determined that the test well Alta Vista No.1 has the capability of producing a sustainable volume of water suitable for the District's existing needs. The existing test well draws water from open joints in the granitic formations located approximately 780 feet below the ground surface. Initial tests of the well's production capabilities suggest that it can produce up to 300 gallons of water per minute over a 120-hour duration. The District has proposed to pump the well at 150 gallons per minute continuously. At no time would the increased pumping rate exceed the District's current demand. Further, the District would only increase the well's pumping rate if it could be conclusively determined that there would be no adverse biological or hydrological impacts associated with the increased rate. Pumping of the Alta Vista Well No.1 shall not exceed 150 gpm averaged over a 24-hour period. Any future proposals to increase the pumping rate shall require an amendment to this public works plan, and the District shall comply with any informational requests, including pumping tests, to demonstrate with sufficient evidence that the increased pumping rate will not impact nearby wetlands, riparian areas, and sensitive habitats. The District may not initiate any pumping tests for increased pumping rates without authorization from Commission staff after the PWP amendment application has been submitted. The District shall submit to the Coastal Commission annual water production reports for review

and approval by the Executive Director by December 1st of each year that the Alta Vista Well No. 1 is in production. These reports shall demonstrate that the pumping rate of the well does not exceed 150 gpm averaged over any
24-hours period.

The Alta Vista Wells No.1 and No.2 are located approximately 840 feet and 1,250 feet, respectively, northeast (upslope) of the District's existing 462,000-gallon Alta Vista water storage tank, and approximately 590 feet and 1,000 feet respectively from the proposed new Alta Vista water storage tank. Both wells are located along the unpaved extension of Alta Vista Road on District property.

Conversion of the Alta Vista Well No.1 to a production well would include (Figure 4-7):

- Construction of a 25-foot by 6-foot concrete pad around wellhead No.1
- Installation of a 7-foot high chain-link fence around the perimeter of the concrete pad
- Placement of two 7-foot tall fiberglass enclosures adjacent to the wellhead and within the fenced enclosure, which would house telemetry equipment for remote monitoring and operation and an electrical pump
- Placement of a portable diesel-powered generator on the concrete pad and within the fenced enclosure
- Installation of an approximately 790-foot long, 6-inch diameter underground pipeline along the unpaved road to convey water from the well to the existing Alta Vista water storage tank
- Installation of a buried electrical conduit along the unpaved road extending from the existing Alta Vista Tank to the well

Water quality testing indicates that groundwater extracted from Alta Vista Well No.1 currently meets drinking water standards. If water quality changes in the future, the District would treat the water with sodium hypochlorite (liquid chlorine) prior to conveyance to District customers. The chlorine would be stored at the wellhead.

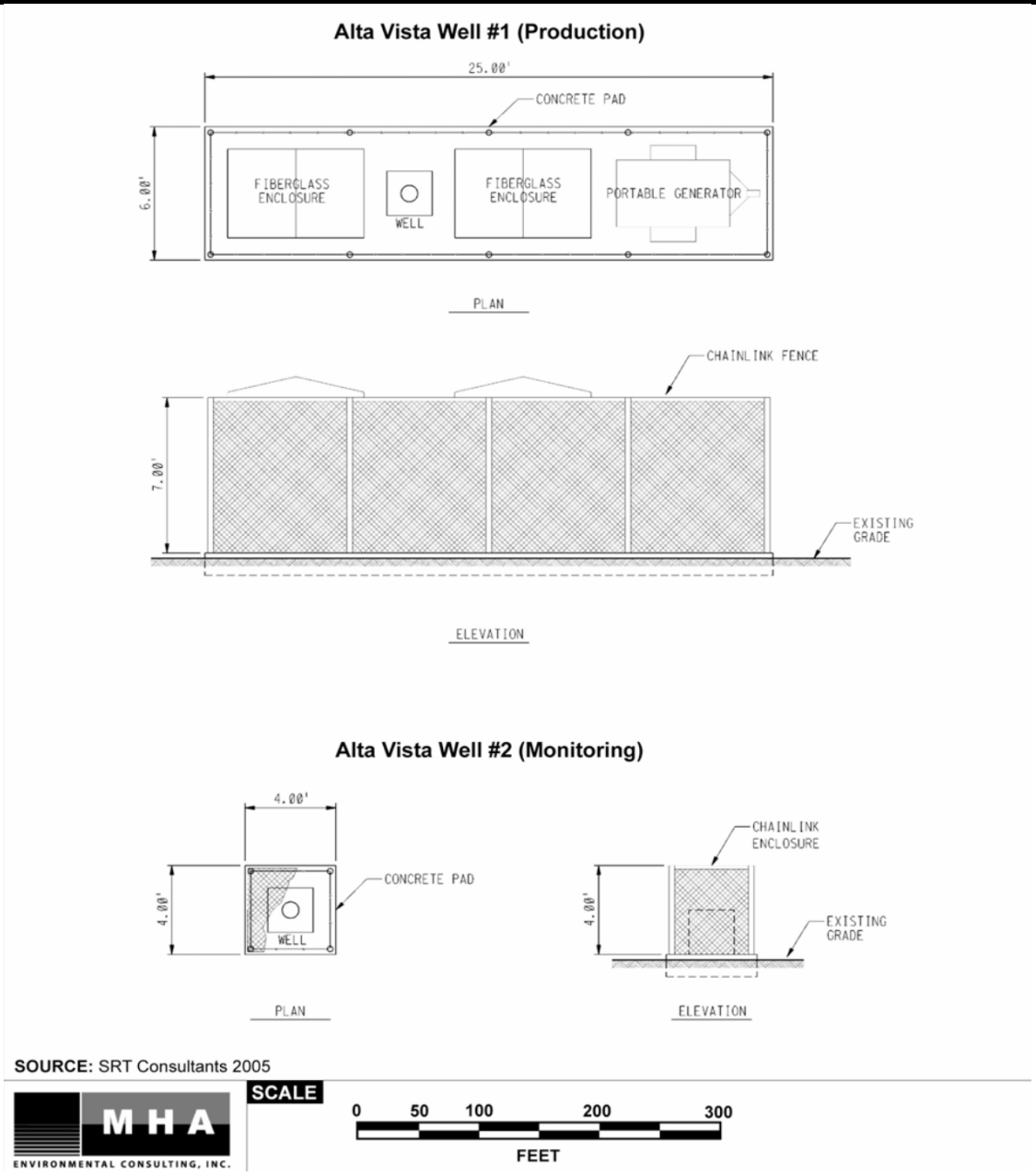
The project also includes enclosing and securing the existing Alta Vista Well No.2, located approximately 400 feet north of Alta Vista Well No.1, for use as a monitoring well to provide a method for monitoring the aquifer's condition (level and quality). The Alta Vista Well No.2 project improvements would include (Figure 4-7):

- Construction of a 4-foot by 4-foot concrete pad around wellhead No.2
- Installation of a 4-foot high chain-link fence around the perimeter of the concrete pad
- Installation of an approximately 1,200-foot long underground electrical conduit along the unpaved road, connecting with Alta Vista Well No.1, and continuing on to the existing Alta Vista water storage tank

Concurrent with the Notice of Impending Development (NOID) for construction of the Alta Vista production well and water tank, the District shall submit to the Executive Director for review and approval a Spill Prevention and Containment Plan in accordance with Mitigation Measure 3.5-1 of the FEIR.

No re-boring or re-configuration of the well casings would be required at Alta Vista Wells No.1 or No.2.

Figure 4-7: Alta Vista Production and Monitoring Wells Proposed Improvements



Monitoring. Hydrologic Monitoring shall continue for a period of three years according to the "Hydrologic and Vegetation Monitoring Schedule Alta Vista Well" and "Hydrologic and Vegetation Monitoring Plan Alta Vista Well," dated September 5, 2008. In addition, if granted permission by individual property owners, the District shall also conduct hydrologic monitoring of individual

private wells on Alta Vista Road. Annual and final monitoring reports shall be submitted to the Executive Director. The vegetation monitoring portion of the aforementioned Alta Vista Monitoring Plan shall be superseded and replaced by the plan described below.

Concurrent with the submittal of the Notice of Impending Development (NOID) for conversion of the Alta Vista Well No.1 from a test well to production well, a qualified biologist or biometrician shall prepare a revised Vegetation Monitoring Plan for review and approval by the Executive Director, and shall at a minimum include the following:

(i) A baseline assessment, including photographs, of the current physical and ecological condition of the potential impact site and appropriate control sites that are unlikely to be affected by the pumping. All sites shall be sampled using the same methods.

(ii) A description of the goals of the vegetation monitoring plan, including a description of how the potential impact site will be compared to the control sites and how significant effects will be demonstrated. If statistical tests are to be employed there must be a statistical power analysis before sampling begins to insure that there is sufficient replication to detect biologically meaningful differences between the potential impact area and the control areas.

(iii) A formal monitoring plan

(iv) A schedule

(v) Description of sampling units

(vi) Sampling design, e.g. how will the sampling units be placed in the field, including description of the random component in the spatial distribution of samples and sample size for the various variables.

(vii) Detailed description of the variables to be measured and the field methods used in their estimation. For continuous variables, estimates of the actual value should be made. Continuous variables should not be converted to categorical variables through the use of thresholds or lumping data into broad categories. Estimates of changes in survivorship, tree height, and condition should be based on repeated observations of at least 30 randomly selected and marked individuals of each species of interest in each sample area.

(viii) A monitoring period of at least three years, beginning with the first sample taken based on the revised sampling plan.

(ix) Provision for submission of annual reports of monitoring results to the Executive Director for the duration of the required monitoring period for purposes of review for a future Phase II Public Works Plan application. Each report shall be cumulative and shall summarize all previous results. Each report shall document the condition of the sample sites with photographs taken from the same fixed points in the same directions. Each report shall also include an “Impact Evaluation” section where information and results from the monitoring program are used to evaluate whether there is evidence of an effect of the pumping.

(x) Provision for submission of a final monitoring report to the Executive Director at the end of the final monitoring period for purposes of review for a future Phase II Public Works Plan

application. The report must evaluate whether the vegetation near the wells has been negatively affected by the pumping.

(xi) Provision for possible further action. If the final report indicates that there have been negative impacts, the applicant shall submit within 90 days a mitigation plan to compensate for those impacts. The revised restoration program shall be processed as an amendment to the coastal development permit unless the Executive Director determines that no permit amendment is required.

AIRPORT WELLS WATER TREATMENT FACILITY

The District currently operates three production wells at the Half Moon Bay Airport, each of which includes wellhead water treatment facilities. Based on elevated levels of nitrates, TCP, corrosion, and manganese in the water extracted from these wells, the District has determined that an additional treatment system is required prior to the well water's introduction into the District's distribution system. The proposed new treatment system would be centrally located and serve all three wells (Figure 4-8). Water extracted from the three wells would first be blended to treat for manganese and then conveyed through the Airport Wells Water Treatment Facility's following components:

1) Two granulated activated carbon (GAC) tanks for TCP removal
2) Four ion exchange vessels for nitrate removal
3) Two air stripping towers for pH adjustment to treat for corrosion potential

Air stripping would also potentially be accomplished by (1) diffused aeration, (2) utilization of a spray nozzle and tray aerator, or (3) aeration by piping a diffuser down the wells and adding air directly into the groundwater. A flow diagram of the treatment process is depicted in Figure 4-9.

The Airport Wells Water Treatment Facility would also include two fiberglass buildings that would house Supervisory Control and Data Acquisition (SCADA), controls, power systems, and a chlorination system.

The centralized treatment facility components would be installed on a 40-foot by 15-foot concrete pad and enclosed by a 7-foot tall chain link fence. The facility would be sited at the east side of the Half Moon Bay Airport, just northwest of the fence line surrounding the existing Half Moon Bay Airport Administration Building, and southwest of the Airport's frontage road. A new access road would be constructed off the Airport's frontage road (Figure 4-9).

The centralized treatment facility would be connected with the three existing wells and the District's distribution system via existing and new buried pipelines. Electrical power supply to the Facility would be through buried electrical conduits or solar panels. Solar panels would be placed on an undeveloped area directly northwest of the proposed Airport Wells Water Treatment Facility (Figure 4-8).

A 380-foot long and 12-foot wide unpaved access road would be constructed leading to the southernmost Airport well. The components of the proposed project at the Half Moon Bay Airport would be located on property not currently owned by the District.

Concurrent with the Notice of Impending Development (NOID) for the Airport Wells Water Treatment Facility, the District shall submit to the Executive Director for review and approval a detailed erosion control plan, drainage plan, and landscape plan to generally screen the Treatment Facility equipment and solar panel array from Highway 1 views in accordance with Mitigation Measures No. 3.1-4, 3.2-2, and 3.9-3 of the FEIR, respectively.

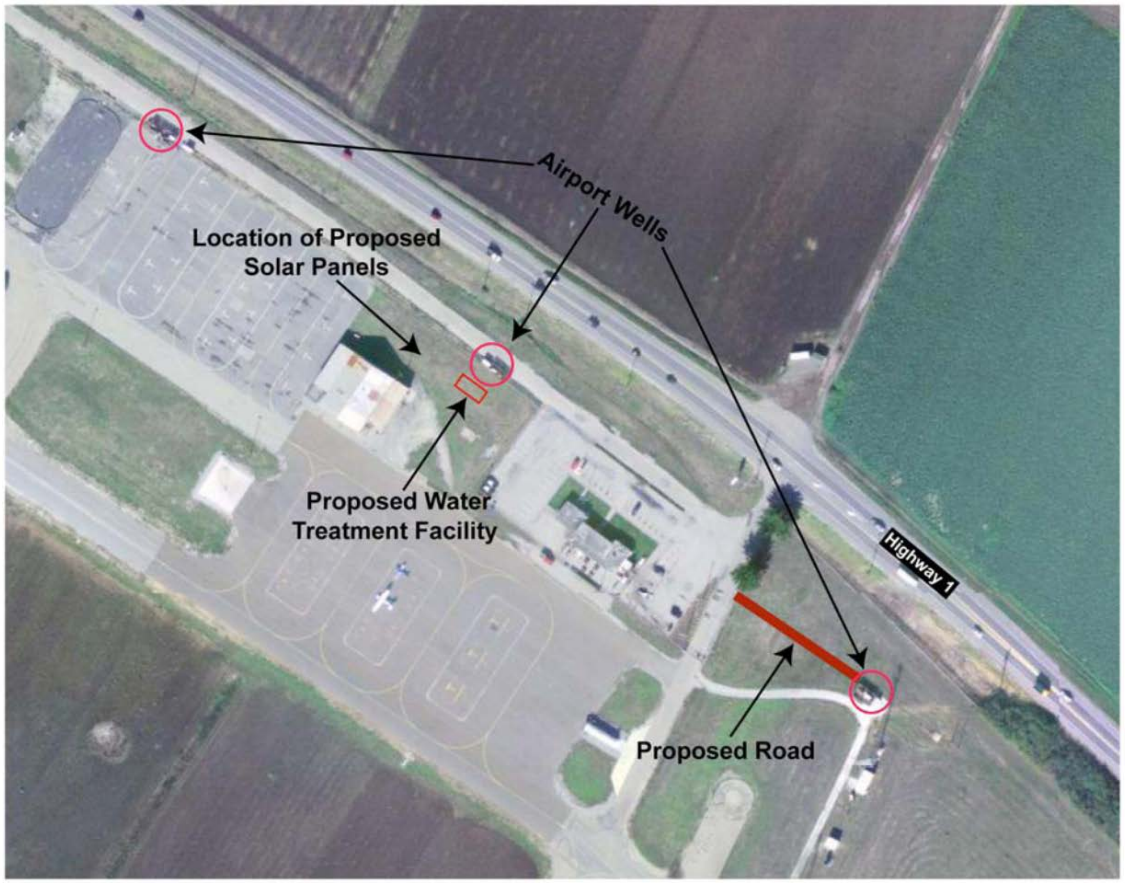
Solar Panels

Approximately 2,500 square feet of solar panels would be installed just northwest of the proposed Airport Wells Water Treatment Facility. The panels would have a non-reflective finish, mounted on a structural system raised off the ground, and angled up toward the south to optimize solar exposure. Conduit from the solar panels would be run in buried conduit to ground-mounted equipment necessary to distribute the electrical power to the site's equipment, as well as to deliver excess electrical power into the Pacific Gas and Electric Company power grid. The panels would be screened from view by low lying landscape around the installation's perimeter.

Existing Airport Wells Treatment Facilities

The existing individual wellhead treatment facilities would be decommissioned and removed from the site following installation of the new central treatment facility.

Figure 4-8: Aerial Depiction of Proposed Airport Wells Water Treatment Facility



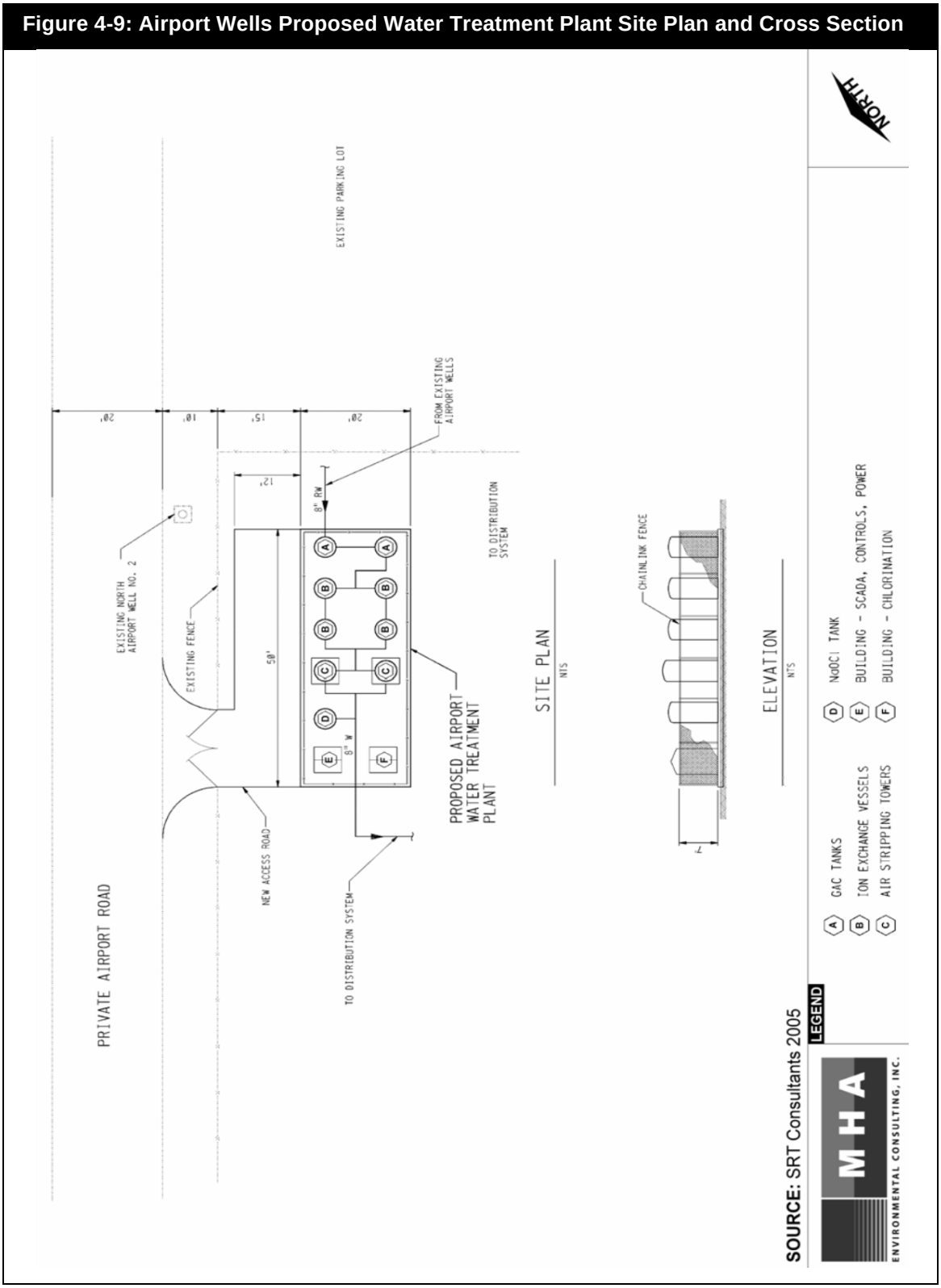
SOURCE: MHA 2005

MHA ENVIRONMENTAL CONSULTING, INC.

SCALE 0 1/4 MILE

NORTH

Figure 4-9: Airport Wells Proposed Water Treatment Plant Site Plan and Cross Section



5 Permits and Approvals

The proposed system improvements included in the first phase of the Public Works Plan will require the approval of permits by a number of public agencies, including:

- Approval by the California Coastal Commission pursuant to Section 30605 of the California Coastal Act
- Coverage under the Construction General Permit obtained from the Regional Water Quality Control Board (Alta Vista Tank and possibly Airport Wells Water Treatment Facility)
- Domestic Water Supply Permit Amendment issued by the California Department of Health Services Drinking Water Program (Airport Wells Water Treatment Facility)
- Drinking Water Supply Permit issued by the California Department of Health Services Drinking Water Program (Alta Vista Well No.1)

5.1 Public Works Plan Project Procedures

The purpose of this chapter is to set forth procedures for reviewing and authorizing projects contained in the Montara Water and Sanitary District ("MWSD") Public Works Plan Phase I ("PWP") for MWSD's water facilities improvements. This chapter is divided into six sections. The first section sets forth definitions, general provisions and procedures for supplemental reports. The second section sets forth public notice requirements. The third section sets forth the Coastal Commission's areas of responsibility with regard to the PWP project review process. The fourth section sets forth the procedure for determining the effective and expiration dates of PWP project authorizations and provisions for extension of authorizations. The fifth section sets forth a post-construction authorization monitoring program. The sixth section sets forth procedures for the enforcement of the PWP. All development subject to PWP-2-06-006 shall adhere to the project procedures outlined in this Section.

5.1.1. Definitions, General Provisions and Supplemental Reports

A. Definitions

"California Coastal Commission" and "Coastal Commission" and "Commission" mean the California Coastal Commission.

"Contract Documents" means the plans, specifications, general and specific conditions, agreement and other documents prepared by or for MWSD for the construction or acquisition of a specific project contained in the PWP.

"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code) and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes.

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"District General Manager" means MWSD's General Manager or her/his designee.

"Components of the PWP" means, collectively, the eleven projects comprising the PWP, such as the Alta Vista Well, the AltaVista Water Storage Tank, the Schoolhouse Water Storage Tank and the Airport Wells Water Treatment Facility. "Component" means any one of the projects.

"Executive Director of the Commission" or "Executive Director" mean the Executive Director of the California Coastal Commission or his/her designee.

"MWSD" means the Montara Water and Sanitary District.

"MWSD Board" or "Board," means MWSD's Board, the governing body of MWSD.

"Notice of Impending Development" means a notice of MWSD's intention to construct one or more of the projects contained in the PWP, which notice shall be provided by MWSD's General Manager to the Coastal Commission and to interested persons, organizations, and governmental agencies, and which also shall be posted conspicuously at the same locations within MWSD's boundaries that MWSD's official notices are posted and at the site of the impending construction of a project of the PWP.

"Project" means a development component specifically included in the PWP.

"Project Report" means the report on the PWP dated November 12, 2008, including the certified FEIR, submitted with MWSD's application for certification of its PWP and any supplements thereto and containing all of the information specified in subsection 5.1.1 D2.

"Public works" means (a) all production, storage, transmission, and recovery facilities for water, sewerage, telephone, and other similar utilities owned or operated by any public agency or by any utility subject to the jurisdiction of the Public Utilities Commission, except for energy facilities; (b) all public transportation facilities, including streets, roads, highways, public parking lots and structures, ports, harbors, airports, railroads, and mass transit facilities and stations, bridges, trolley wires, and other related facilities and (c) all publicly financed recreational facilities, all projects of the State Coastal Conservancy, and any Development by a special district.

B. Computation of time

The time in which any act under this PWP is to be done shall be computed by excluding the first day and including the last, unless the last day is a weekend or state holiday, which is also excluded.

C. MWSD's General Manager

MWSD's General Manager shall be the responsible person for contact regarding inquiries concerning PWP authorizations and implementation.

D. Procedures for Project Review and Authorization

1. Preparation of PWP Project Reports

MWSD's General Manager shall review all proposed projects pursued under the PWP and prepare a Project Report for each proposed project.

2. Contents of a PWP Project Report

A Project Report shall include the information that MWSD's Board deemed necessary to satisfy the standards for the PWP. A Project Report shall include:

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(a) A description of the proposed project(s), including a narrative description of the size, kind, intensity and location, of each proposed development and including the supporting site plans and elevations thereof;

(b) Environmental documentation for the Project(s) including information prepared pursuant to the California Environmental Quality Act and an analysis of alternative locations for each proposed development activity;

(c) All technical reports associated with the Project(s) (i.e., biological reports, geotechnical reports, traffic analyses, etc.), including all reports and plans required by the PWP;

(d) The results of consultation with parties interested in, with jurisdiction over, and/or affected by the Project(s), including consultations with concerned public entities and agencies.

(e) All implementing mechanisms associated with the Project(s) (including but not limited to CEQA mitigation monitoring reports, legal documents, etc.);

(f) All correspondence received regarding the Project(s);

(g) Identification of the person responsible for ensuring that the proposed Project(s) shall be constructed in accordance with authorized specifications and that all terms and conditions of the authorization are met (Project Manager).

3. Early Coordination with the Coastal Commission

(a) MWSD shall consult with the Executive Director as early as possible regarding proposed Project(s) with the object of identifying issues of possible concern to the Coastal Commission.

(b) Project Descriptions shall be provided to the Executive Director concurrently with submittal thereof to the Board of Directors

(c) MWSD shall provide the Executive Director with all public notices and documentation circulated to the public pursuant to the Board's required PWP review process, including the process for that portion of the public which expressly requested to be noticed.

(d) All required coordination/consultation with the Executive Director shall be initiated through and facilitated by planning staff of the Coastal Commission's North Central Coast District Office, 45 Fremont Street, Suite 2000 San Francisco, CA 94105.

4. Distribution of Project Reports to the Board

The General Manager shall submit a Project Report containing all of the information specified in subsection 5.1.1 D2 above as well as an action recommendation to MWSD's Board for each proposed Project pursued under the PWP.

5. Board Authorization of PWP Revisions

The Board may authorize a Project based on information contained in the Project Report and any other information in the record provided that:

(a) The proposed project has been reviewed in compliance with the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA), the Board has completed all related CEQA and/or NEPA documents and all conditions and/or mitigation measures identified in those CEQA and/or NEPA documents have been incorporated as part of the project;

(b) The Board finds that the proposed revision advances the specific project objectives of the PWP;

(c) The proposed project, as modified by any conditions and/or mitigation measures incorporated as part of the project, is contained in and consistent with the certified PWP.

6. Project Authorization Required

No Project contained in the PWP shall be undertaken without prior authorization in accordance with this chapter. Any development not contained in the PWP requires coastal development permit authorization by either the Coastal Commission in its retained jurisdiction (e.g. below the mean high tide, on public trust lands), or San Mateo County pursuant to its certified LCP.

7. Coastal Commission's Retained Jurisdiction

After certification of the PWP, the Coastal Commission continues to retain permit jurisdiction over Development on tidelands, submerged lands, and public trust lands, whether filled or unfilled, within MWSD's service area (see "Coastal Commission Retained Jurisdiction Area" in Figure _.1). Under the Federal Coastal Zone Management Act, the Commission also retains federal consistency review authority over federal activities and federally permitted activities on or adjacent to the sites.

The Commission also retains permit jurisdiction outside of the retained jurisdiction area over Development that was authorized by Commission action before the date of PWP certification. Projects neither contained in the PWP nor located in the Commission's retained permit jurisdiction shall be reviewed by the County of San Mateo for consistency with its certified LCP.

5.1.2 Notice of Impending Development

A. Provision of Advance Notice and Information to Coastal Commission

The General Manager shall give the Executive Director written notice of MWSD's intent to submit a Notice of Impending Development pertaining to the construction of a project or projects contained in the PWP at least 30 calendar days prior to submittal of the Notice of Impending Development.

B. Recipients of Notice of Impending Development

After approval by the Board of the Contract Documents for a project or projects to be constructed or acquired, and at least 30 working days prior to issuing a notice to proceed to the contractor for such construction or acquisition, the General Manager shall send via first-class mail a written Notice of Impending Development to the following persons, parties and agencies informing them of the Board's decision:

1. The Executive Director;
2. Owners of record of each property within 100 feet (excluding road rights-of-way) of the proposed project(s);
3. Persons residing on properties located within 100 feet (excluding road rights-of-way) of the proposed project(s);
4. All other persons, parties, and agencies who have requested in writing to receive such notice, either for the project(s) that is the subject of the notice or for all PWP projects;
5. All parties consulted with pursuant to Section 5.1.1.D.2 above; and
6. Persons, parties, and agencies that are known by MWSD to be interested in the specific project(s) that is the subject of the notice (e.g., persons, parties, and agencies that submitted testimony or other comments during the CEQA/NEPA process for the PWP, etc.).

C. Contents of Notice of Impending Development

The Notice of Impending Development shall be clearly titled as such and shall, at a minimum, include the following information regarding the PWP authorization:

1. The description of the proposed project(s), including a narrative description of the size, kind, intensity and location of each proposed development as well as an identification of the existence of the PWP Project Report and information regarding where and when it is available for public review;
2. The Board's approval of the Contract Documents for the project(s);
3. The anticipated date of commencement of construction of the project(s);
4. The appropriate MWSD contact person(s) or designated Project Manager and her/his contact information;
5. The process for Coastal Commission review of the project(s) (including contact information for Commission staff); and
6. A list of recipients of the Notice of Impending Development.

D. Posting Requirements for Notice of Impending Development

The General Manager shall post the Notice of Impending Development in conspicuous locations at the proposed project(s) site(s) no later than the date that the Notice of Impending Development is sent pursuant to Section 5.1.2.B, and at least 30 working days prior to the commencement of construction. The Notices shall comply with the following requirements:

1. Notices that are posted shall be clearly visible and printed with black text/graphics on a brightly hued background (e.g., golden-rod yellow) using card-stock weight (at the least) paper or functional equivalent (e.g., wood, cardboard, corrugated plastic (or "coroplast"), plastic, vinyl, metal, etc.). Notices shall be laminated or otherwise weatherproofed so as to be legible at all times, and shall be at least 8½ inches by 11 inches in size, and no greater than 4 feet by 8 feet in size.
2. Notices shall be posted against a solid background at least as large as the notice itself (e.g., posting a card-stock notice on an 8½ inch by 11-inch piece of plywood attached to a stake) or shall be printed onto an integral solid background (e.g., coroplast), and shall be posted at a readable height (i.e., approximately three to six feet).
3. Notices shall be posted at locations on the perimeter (and/or within the perimeter as appropriate) of the proposed project site where the site intersects public use areas (streets, paths, parking lots, etc.). Notices shall also be posted at MWSD office and post offices in Montara and Moss Beach.
4. Notices that do not meet the criteria listed above, that otherwise become illegible, or that otherwise are not visible to pedestrians or disappear (for whatever reason) shall immediately be replaced. All notices shall remain posted until the effective date of authorized commencement of construction (in accordance with Section _.4.C).

E. Supporting Information for the Notice of Impending Development

Supporting information sufficient to allow the reviewer to determine whether the proposed project is consistent with the certified PWP shall accompany the Notice of Impending Development mailed to the Executive Director and to persons, parties, and/or agencies requesting such information. At a minimum, the supporting information shall include:

1. The Project Report (including all of the information identified in subsection 5.1.1.D2), updated to include any changes or additions made in the course of review by MWSD; provided, that copies of lengthy and/or oversized studies, reports, and technical materials included as part of the Project Report shall be provided only to the Executive Director and to interested persons, parties, and agencies that specifically request these materials;

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2. Any final authorization documents from the Board (e.g., resolutions, minute orders, certifications, etc.) not included in the Project Report;
3. A separate document that identifies all Project conditions and mitigations and explains how compliance will be achieved and measured for each;
4. Copies of all correspondence received regarding the proposed PWP Project; and
5. For the Executive Director only:
   (a) A mailing list with names and addresses for each of the persons, parties, and agencies listed in Section 5.1.2.B above, where the list is labeled and organized by each of the categories listed;
   (b) One set of plain (i.e., unadorned with no return address) regular business size (9½ inches by 4⅛ inches) envelopes stamped with first class postage (metered postage is not acceptable) addressed to each of the listed addressees from Section 5.1.2.B, above, for each Commission hearing (if applicable) on the matter (i.e., if there are multiple Commission hearings on the matter, then multiple such envelop sets shall be provided as directed by the Executive Director); and,
   (c) Evidence that the Notice of Impending Development has been posted pursuant to the parameters of Section 5.1.2.D, above, (e.g., a site plan with the notice locations noted and/or photos of the notice locations attached).

5.1.3 Coastal Commission Review of PWP Components

The Coastal Commission shall review project(s) authorized for construction by MWSD for consistency with the PWP in accordance with the procedures of this Section.

A. Filing the Notice of Impending Development

Consistent with 14 CCR sections 13357(a)(5), 13359(a), and 13553-13554, unless there are unusual circumstances, within five working days of receipt of the Notice of Impending Development and all applicable supporting information (as described in Section 5.1.2 above) for construction of the project(s), the Executive Director shall review the submittal and shall determine whether additional information is necessary to determine if the proposed project(s) is/are consistent with the PWP, and if additional information is deemed necessary, shall request such information from the General Manager.

1. The Notice of Impending Development shall only be deemed filed if the Executive Director determines that the information supplied is consistent with the information requirements of 14 CCR sections 13357(a)(5), 13359(a) and 13353 and is sufficient to allow the Commission to determine whether the proposed project is consistent with the certified PWP.

2. If the Executive Director has requested additional supporting information needed to determine consistency with the PWP, then the Notice shall be deemed filed when the Executive Director determines that all necessary supporting information has been received.

B. Coastal Commission Hearing Deadline

Consistent with 14 CCR sections 13357(a)(5) and 13359, the thirtieth working day following the day the Notice of Impending Development is deemed filed is the Hearing Deadline. The Hearing Deadline may be extended if, on or before the Hearing Deadline, the General Manager waives MWSD's right to a hearing within thirty working days, and agrees to an extension to a date certain, no more than three months from the Hearing Deadline, to allow for Commission review of the proposed project(s) at a later hearing.

C. Coastal Commission Review and Determination of Consistency with PWP

The Executive Director shall report in writing to the Commission regarding any pending proposed project(s). The Coastal Commission shall review the proposed project(s) at a scheduled public hearing prior to the Hearing Deadline.

The Executive Director's report to the Commission shall include a description sufficient to allow the Commission to understand the location, nature, and extent of the project(s), and a recommendation regarding the consistency of the proposed project(s) with the certified PWP. On or before the Hearing Deadline the Commission shall make one of the following determinations:

1. Determine that the proposed project(s) is/are consistent with the certified PWP, or

2. Determine that conditions are required to render the proposed project(s) consistent with the certified PWP, including identification of the required conditions.

Following the Commission's determination, the Executive Director shall inform the General Manager of the Commission's determination and shall forward any conditions associated with it. If the Commission has identified conditions required to render the project(s) consistent with the PWP, construction shall not be undertaken until the conditions have been incorporated into the project(s).

Coastal Commission review of a proposed project(s) shall be deemed complete on the date of a Commission determination that the project(s) is/are consistent with the PWP with or without conditions.

Upon completion of Commission review, MWSD may undertake construction or acquisition of the project(s) provided, that any conditions imposed by the Commission to render the project(s) consistent with the PWP have been incorporated into the project(s).

5.1.4 Effective Date and Expiration Date of PWP Authorizations; Extension of Authorizations

A. Effective Date of PWP Project Authorizations

Unless expressly stated otherwise in the approval documents, the effective date of a Project authorization shall be the date the Coastal Commission's review of the proposed Project is deemed complete pursuant to Section 5.1.3 C.

B. Expiration Date of Project Authorizations

Unless expressly stated otherwise in the approval documents, the expiration date of a Project authorization pursuant to this PWP shall be three years following its effective date. Thereafter, construction of the Project may not commence unless the authorization has been extended as provided herein, or a new authorization and review by the Commission has been completed in accordance with PWP provisions for initial review of a proposed Project.

C. Extension of Component Authorizations

The expiration date of a Project authorization may be extended for a period not to exceed one year if the General Manager determines that there are no changed circumstances that may affect the Project's consistency with the PWP. In such a case, before the expiration of the authorization, the General Manager shall submit to the Executive Director a notice of intent to extend authorization of the Project together with supporting information sufficient for the Executive Director to determine

whether there are changed circumstances that may affect the Project's consistency with the PWP including, at a minimum, any modified and/or new materials comprising the supporting information described in Section 5.1.2.E above. The submittal shall stay the expiration of the authorization and the start of construction.

If the Executive Director determines that the extension is consistent with the PWP, MWSD shall post notice of the determination at the project site consistent with the posting requirements in Section 5.1.2.D, above, and the Executive Director shall mail the notice to all persons, parties, and agencies on the original mailing list for the project and to all persons, parties, and agencies known by the Executive Director to be interested in the proposed extension. The notice shall include a summary of the extension approval process and information on contacting MWSD and the Coastal Commission concerning the proposed extension. If no written objection is received at the Commission office within 10 working days of posting and mailing notice, the determination of consistency shall be conclusive.

If the Executive Director determines that, due to changed circumstances, the Project may not be consistent with the PWP, the proposed extension shall be reported to the Commission at a noticed public hearing. The report shall include any pertinent changes in circumstances relating to the proposed extension. If three or more commissioners object to the extension on grounds the Project may not be consistent with the PWP, the matter shall be set for hearing in the same manner as a new Notice of Impending Development, including posting of notice by MWSD. The General Manager shall provide the Executive Director with supporting information in the manner prescribed for new proposed projects.

Successive extensions of an authorization may not exceed one year each.

5.1.5 Monitoring PWP Project and Components

The Board shall be responsible for ensuring that all terms, conditions, and mitigations associated with an authorized Project, including but not limited to mitigation measures and CEQA/NEPA requirements, are fulfilled. Project managers and other District personnel assigned responsibility to implement and/or monitor authorized Projects shall contact the General Manager annually by the end of each calendar year to provide information regarding compliance with the terms and conditions of authorization for that year and continuing obligations from authorizations in previous years. The General Manager shall verify that all terms and conditions have been timely fulfilled and shall update each Project's list of conditions and mitigations with compliance information on at least a yearly basis. The General Manager shall also review as-built Project plans and verify that the construction is consistent with them, including affixing written documentation to that effect to the as-built plans. The General Manager shall maintain the updated copies of the required approval documents and shall maintain the verified as-built plans, which shall be made available for public review.

The General Manager shall provide an annual written PWP monitoring report that includes a cumulative and calendar year summary of: (i) PWP-authorized Project compliance; (ii) enforcement undertaken pursuant to Section 5.1.6.; (iii) PWP-required annual monitoring reports (e.g., water quality reports, etc.); (iv) status of PWP-required improvements and other District commitments; and (v) any comments received on PWP implementation. The General Manager shall maintain a record of the annual written summary reports in the General Manager's office, which shall be made available for public review. The General Manager shall submit a copy of each annual report to the Executive Director within ten days of its completion.

5.1.6 Enforcement

In addition to all other available remedies, the provisions of the PWP and the Coastal Act shall be enforceable pursuant to Chapter 9 of California Public Resources Code Division 20. Any person who performs or undertakes Development on MWSD's property that is (a) in violation of the PWP, (b) inconsistent with any pre-PWP certification Coastal Commission authorization (including coastal development permit approval), or (c) inconsistent with any PWP authorization may, in addition to any other penalties or remedies, be civilly liable in accordance with the provisions of Public Resources Code Sections 30820, 30821.6 and 30822.

The Board shall ensure that Development is consistent with the PWP and with the terms and conditions of authorizations pursuant to the PWP. The General Manager shall investigate in a reasonable time allegations regarding Development being undertaken inconsistent with the provisions of the PWP or PWP authorizations, and shall attempt to resolve any such inconsistencies discovered. The Executive Director or Coastal Commission may also enforce the terms of the PWP and the Coastal Act.

San Mateo County
Association of REALTORS®

W19a

December 2, 2013

Mary Shallenberger, Chair
and Commissioners
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105- 2219

Dear Chair Shallenberger and Commissioners;

On December 11, 2013, the California Coastal Commission (CCC) will consider *Item 2-06-006-A1*: A request from the Montara Water and Sanitary District (MWSD) to amend its existing certified Public Works Plan (PWP) to allow the MWSD to use existing available water supply to provide water connections to serve new and existing development, including new residential, commercial and industrial development, as well as new connections to serve existing private domestic well users in the urban midcoast area of San Mateo County, including the communities of Montara and Moss Beach.

The San Mateo County Association of REALTORS®(SAMCAR) would strongly recommend the Commission certify the PWP.

Resolution of this matter would be greatly appreciated as MWSD is prohibited from making any new connections, for any reason, until the PWP is approved. One of the reasons for our fervent urging is, for example, the City of Half Moon Bay has had its clean up revisions at the CCC for more than two years despite a 'Mediator' being brought in; thus with that illustration, we were not initially buoyed for a quick resolution to the PWP.

As staff has noted, through conservation, system upgrades and improvements, MWSD currently has 128,000 gallons per day (gpd) of water supply available for new connections, but because the existing PWP currently prohibits new connections (due - *at the time* - to a lack of available water supply), the PWP must be amended to allow for new connections.

And the CCC needn't worry about the proposal fostering growth or economic development as the standard of review for the proposed amendment is the certified San Mateo County Local Coastal Program (LCP). And the LCP has a 1% growth rate and all future development will be subject to the certified LCP's limitations.

850 Woodside Way • San Mateo, California 94401 • (650) 696-8200 • Fax (650) 342-7509 • www.samcar.org

(It should be noted the Sewer Authority Midcoast [SAM] plant, of which MWSD is a member, has adequate capacity for its members and staff has reported the proposed amendment will not adversely impact the SAM plant or the District's ability to collect, transmit and treat Midcoast runoff and sewage.)

One area of disagreement is the suggestion by staff that the proposed amendment does not adequately protect water for Coastal Act and LCP priority uses. An in-depth review of the MWSD operational paradigm does, in fact, show the provision of water supplies to serve Coastal Act and Local Coastal Program priority uses is addressed. And in addition, the proposed amendment recognizes that any connections that require additional water supply will require yet another PWP amendment.

Thank you for the opportunity to provide our input and we look forward to the Commission taking a positive action in this matter.

Respectfully,
Signature on file

Paul Stewart
Government Affairs Director
San Mateo County Association of REALTORS®

cc: Madeline Cavalieri, CCC staff

W19a

June 10, 2013

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Dear Coastal Commission,

I have been doing the feasibility of buying and building at 0 Date Street in Montara, CA since February of this year (link to property below). I understand that the water moratorium in Montara was lifted approximately three years ago for existing residents as well as for new construction to connect to Montara Water Sanitary District (MWSD) water. I also understand that the Public Works Plan amendment (PWP) is waiting for review and approval by the Coastal Commission. This amendment is holding up my dream of buying, building, and raising my daughter on 0 Date Street in Montara, California. I have put so much work into making sure the project would be a success and this PWP amendment is holding it up. I may even lose out to 0 Date Street because the property owner has a cash offer in the works. This cash offer can clearly wait until the PWP amendment gets on agenda and passes---- but I cannot and I have invested SO much. I have a land/construction loan and there is a time frame on such a loan. So it would not be wise to enter into loan contract hoping the Coastal Commission acts promptly. It is too risky.

I sincerely urge you to act fast and get the PWP amendment on this Wednesday's (6.12.13) meeting consent agenda in Long Beach or on the July or August agenda. If I go into contract with this property and the PWP amendment does not pass, then I will have lost all my money. I am a full time single working mom residing in San Francisco. I grew up in Moss Beach and wish to return to the coast but this PWP amendment is preventing me from moving forward with my project. I sincerely hope that the Coastal Commission acts fast and approves this PWP amendment. If the Coastal Commissioners know that the PWP amendment will not pass, then perhaps an exception can be made for my situation?

Thank you or your time and consideration. I look forward to receiving a response promptly.

Sincerely,

Hale' Guerra
San Francisco, CA 94134
www.linkedin.com/in/haleguerra
halebyrd@gmail.com
415.370.3611

Cc:
Montara Water and Sanitary District
Supervisor Carole Grow
Supervisor Dan Horsley

Link to property:
http://www.zillow.com/homedetails/0-Date-St-Montara-CA-94037/2114406569_zpid/