



ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

June 14, 2024

Project No. 2402-2551

San Simeon Community Services District

111 Pico Avenue

San Simeon, California 93452

Attention: Patrick Faverty, Interim General Manager

Subject: Proposal for the San Simeon Community Services District Arroyo Del Padre Juan Creek Debris Removal Project – Permitting Support

Dear Mr. Faverty:

Padre Associates, Inc. (Padre) is pleased to submit this proposal to provide permitting support for the San Simeon Community Services District (SSCSD) Arroyo Del Padre Juan Creek Debris Removal Project (Project). Large logs, driftwood and other natural debris has clogged the creek bed above the San Simeon Wastewater Treatment Plant (WWTP) untreated water pipeline bridge which spans the Arroyo Del Padre Juan Creek. Recent structural engineering surveys have identified anomalies in the pipelines' integrity making them particularly vulnerable to high storm flows that may dislodge the large wooden debris. The proposal includes a scope of work and budget for preparation of the required permit application materials for the Project and coordination with the federal and state agencies during the permit application review process.

It is Padre's understanding that the Project will include the following:

- Cutting and lifting of large wooden logs and debris that was lodged in the Arroyo del Padre Juan creek bed during high tide and storm events during the winter of 2023/2024.
- Debris will be removed with the least amount of disturbance feasible and will likely require the use of a crane and/or winch from the paved driveway adjacent to the San Simeon Wastewater Treatment Plant (WWTP).
- Vegetation removal would be necessary to accommodate debris removal equipment and crews; however, vegetation removal will be minimized to the extent feasible.

Project activities are located within designated federal and state wetlands and waters. Due to the anticipated disturbance to wetlands and waters, as well as the location in the Coastal Zone, the Project will trigger review authority from the U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), the California Department of Fish and Wildlife (CDFW), the County of San Luis Obispo, and/or California Coastal Commission (CCC). However, the volume and size of the debris presents an emergency situation, one where there is a clear, sudden, unexpected, and imminent threat to life or property demanding immediate action to prevent or mitigate loss of or damage to, life, health, property or essential public services" related to the WWTP (ACOE, 2023). Therefore, the following scope and costs assume that the Project will qualify for use of the ACOE Regional General Permit (RGP) 63 which covers repair and protection activities in emergency situations and is issued in cooperation with notifications to the State agencies: RWQCB, CDFW and CCC. Below is a summary of the tasks included in this proposal to acquire such permits:

SCOPE OF WORK

TASK 1 – ACOE Regional General Permit (RGP) 63

Padre will work with the ACOE and will schedule a pre-application meeting to discuss the Project and confirm the use of the RGP 63. Following the pre-application meeting, Padre will prepare and submit the required RGP application materials including a Project description containing the basic details outlining the situation, threats to the WWTP pipe bridge and environment if the debris is not removed, and the remedies proposed to correct the situation. Since the Project will occur within U.S. Fish and Wildlife Service (USFWS) designated Critical Habitat for the California red-legged frog as well as habitat for tidewater goby, the ACOE will consult with the appropriate resource agencies, including the USFWS to obtain their input regarding the Project; however, the RGP does not require the preparation of a Biological Assessment or Essential Fish Habitat Assessment.

TASK 2 – RWQCB Notification of Intent (NOI)

Padre will send a copy of the request for an RGP and prepare a NOI for the State and RWQCB. A processing fee will be required; however, this fee is not included in the cost estimate below. Padre will assist the SSCSD in responding to any agency questions or requests for additional information.

TASK 3 – CDFW Lake and Streambed Alteration Emergency Notification

Padre will utilize the aforementioned Project description and support material to submit an emergency notification to the CDFW via their EPIMS portal as an authorized representative for the SSCSD. Padre will provide recommendations for avoidance measures and will provide assistance responding to any agency questions or requests for additional information. Padre would also prepare a Revegetation and Restoration Plan which CDFW would likely require for any vegetation removal within the creek bed and bank.

TASK 4 – Coastal Development Permit

The County of San Luis Obispo has a certified Local Coastal Plan, and as such, they are authorized to issue a CDP within County jurisdiction. Accordingly, Padre will initiate discussion with the County to determine if the County is interested in issuing its own emergency permit or CDP for work within County jurisdiction or would like to defer Project review to the California Coastal Commission (CCC) given their existing authorization of the pipe bridge and revetment.

If the County defers their review, Padre will notify and coordinate with the CCC to obtain approvals to conduct the emergency work. Padre will conduct initial outreach to confirm the existing CDP #3-19-0020, which covers maintenance and repairs of the revetment and pipe bridge, would be sufficient for the proposed debris removal. Alternatively, Padre will apply for an Emergency Permit and will coordinate with the CCC to provide supporting documentation in order to amend the existing CDP. For an emergency permit, a permit fee of \$1,471 is required; however, that cost is not included in this proposal.

COST ESTIMATE

Costs associated with obtaining the required permits for the Project are included in Table 1. Padre will complete the above scope of work on a time and materials basis invoiced in

accordance with Padre’s 2024 fee schedule. Padre will not exceed the total amount without written approval from the SSCSD.

TABLE 1. COST ESTIMATE

| Personnel/Item | Rate | Hours/Unit | Cost |
|--|-------------|-------------------|--------------------|
| TASK 1. ACOE RGP | | | |
| Principal Professional II | \$220 | 2 | \$440.00 |
| Senior Professional II | \$170 | 8 | \$1,360.00 |
| Project Professional II | \$135 | 20 | \$2,700.00 |
| Staff Professional | \$100 | 20 | \$2,000.00 |
| Senior GIS Specialist | \$110 | 8 | \$880.00 |
| <i>Task 1 Subtotal</i> | | | \$7,380.00 |
| TASK 2. RWQCB NOI | | | |
| Principal Professional II | \$220 | 2 | \$440.00 |
| Senior Professional II | \$170 | 4 | \$680.00 |
| Project Professional II | \$135 | 8 | \$1,080.00 |
| Staff Professional | \$100 | 12 | \$1,200.00 |
| Senior GIS Specialist | \$115 | 2 | \$230.00 |
| <i>Task 2 Subtotal</i> | | | \$3,630.00 |
| TASK 3. CDFW LSA Emergency Notification | | | |
| Senior Professional II | \$170 | 2 | \$340.00 |
| Senior Professional I | \$160 | 30 | \$4,800.00 |
| Project Professional II | \$135 | 12 | \$1,620.00 |
| Staff Professional | \$100 | 30 | \$3,000.00 |
| Senior GIS Specialist | \$115 | 6 | \$690.00 |
| <i>Task 3 Subtotal</i> | | | \$9,760.00 |
| TASK 4. Coastal Development Permit | | | |
| Principal Professional II | \$220 | 2 | \$440.00 |
| Senior Professional II | \$170 | 8 | \$1,360.00 |
| Project Professional II | \$135 | 16 | \$2,160.00 |
| <i>Task 4 Subtotal</i> | | | \$3,960.00 |
| TOTAL | | | \$24,730.00 |

SCHEDULE AND ASSUMPTIONS

Several assumptions have been made in developing this proposal and cost estimate and, if not valid, will constitute a change in the scope of services, requiring an adjustment in Project cost and schedule. Padre will notify the SSCSD of any such changes in writing. Assumptions and limitations to our scope of services are presented below:

- This proposal is for permitting services; No biological field surveys or compliance monitoring are included in this proposal;
- Technical studies and permitting support documents completed for recent Pipe Bridge Repairs Project would be sufficient to support permitting of proposed Project;
- Either an emergency CDP would be issued by the County or an amendment to the existing CCC CDP may be requested, but a new CDP is not anticipated from the CCC;
- Debris removal will address the immediate emergency and disturbance footprint would be minimized to the extent feasible; and
- Permit application fees are not included in the budget.

CLOSING

If you should have any questions regarding Padre's proposal and/or require additional information for review purposes, please contact Michaela Craighead at (805) 786-2650, ext. 147.

Sincerely,



Michaela Craighead
Project Manager/Marine Biologist