

Final Environmental Impact Report for the

## Cal Poly Water Reclamation Facility Project Volume 2



State Clearinghouse No. 2022090231

Prepared for:



California Polytechnic State University, San Luis Obispo

January 2024

Final Environmental Impact Report for the

## Cal Poly Water Reclamation Facility Project Volume 2



#### State Clearinghouse No. 2022090231

Prepared for:

California Polytechnic State University, San Luis Obispo 1 Grand Avenue, Building 70, Room 221 San Luis Obispo, CA 93407

Contact:

Marcus Jackson Project Manager 805.756.6797 mjackson@calpoly.edu

Prepared by:

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Contact:

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January 2024

# Appendix A

# Notice of Preparation and Scoping Comments



CAL POLY

Office: 805-756-5555 facilities-cbs@calpoly.edu afd.calpoly.edu/facilities/

#### NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT Water Reclamation Facility Project California Polytechnic State University, San Luis Obispo

Date: September 14, 2022

To: State Clearinghouse, Responsible Agencies, Trustee Agencies, and Individuals

Lead Agency: California Polytechnic State University, San Luis Obispo

**Purpose of the Notice:** The intent of this Notice of Preparation (NOP) is to inform agencies and interested parties that California Polytechnic State University, San Luis Obispo (Cal Poly) is preparing a project-level Draft Environmental Impact Report (EIR) for the proposed Water Reclamation Facility (WRF) Project. The California State University (CSU) Board of Trustees is the lead agency pursuant to CEQA and as such is responsible for complying with the provisions of CEQA.

This NOP has been prepared pursuant to Sections 15082 and 15083 of the CEQA Guidelines and starts a public scoping period that will assist Cal Poly in the preparation of the Draft EIR. The purpose of the NOP is to provide responsible and trustee agencies, and other interested parties with a description of the project and its potential environmental impacts and allow the opportunity to provide input regarding the scope and content of the EIR, including possible environmental impacts, mitigation measures, and alternatives.

This NOP initiates the **30-day CEQA scoping process** which will run from **September 15**, **2022**, **through October 14**, **2022**. A hard copy of the NOP is available for public review at:

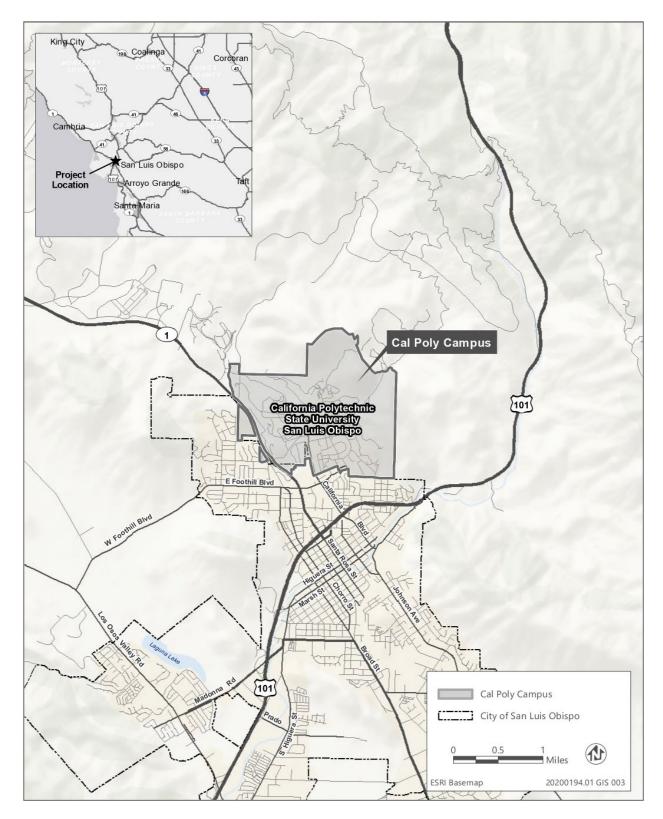
Cal Poly Facilities Management and Development Help Center 1 Grand Ave., Building 70, Room 107 San Luis Obispo, CA 93407

The NOP is also available for public review online at: <u>https://afd.calpoly.edu/facilities/planning-capital-projects/ceqa/</u>.

**Project Location:** Located in San Luis Obispo County, the Cal Poly campus covers 1,339 acres and abuts the City of San Luis Obispo to the south and west, and open space, ranchland, and public land, to the north and east (Figure 1). Cal Poly's main campus consists of 855 acres. An additional 484 acres consisting of rangeland and steep terrain lies to the north, northeast, and northwest of the main campus, and makes up the remainder of the Cal Poly campus property.

Vehicle access to campus is limited to three primary entrances: Grand Avenue with a direct connection to U.S. Highway 101 (US 101) at the southeast corner of campus, Highland Drive directly off State Route (SR) 1 (Santa Rosa Street) on the west side of campus, and California Boulevard off Campus Way in the southwest corner of campus. The campus also has secondary entrances at Stenner Creek Road off SR 1 from the northwest and near the Albert B. Smith Alumni and Conference Center from the south. The Union Pacific Railroad right-of-way bifurcates the campus from Foothill Boulevard to Highland Drive and beyond to the north, limiting other access from the west.





Source: Adapted by Ascent Environmental in 2022

#### Figure 1: Project Site



**Project Description:** The project would involve construction and operation of an on-campus water reclamation facility (WRF) and recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water meeting the requirements of Title 22 of the California Code of Regulations (CCR Title 22. Social Security. Division 4. Environmental Health. Chapter 3. Water Recycling Criteria) for unrestricted reuse, including safe application to agricultural crops, pastures, and recreation fields on campus.

Elements of the proposed project are depicted in Figure 2 and include the following:

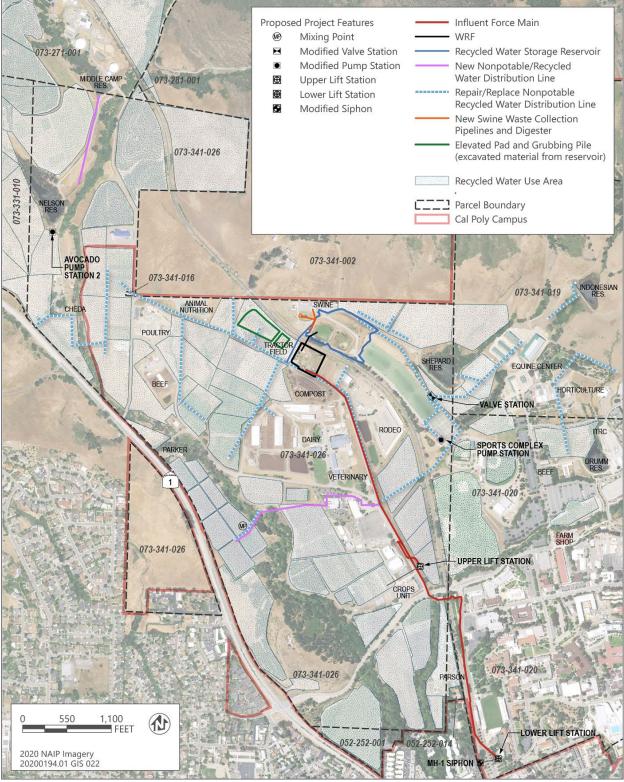
- WRF collection system,
- WRF,
- recycled water storage and distribution system, and
- utility improvements to support operation of proposed facilities.

The nonpotable water demands of the campus that are currently met via untreated water from Whale Rock Reservoir (approximately 15 miles to the northwest) would be transitioned over time to nonpotable recycled water supplied by the on-campus WRF. The campus would then use the Whale Rock Reservoir water freed up by operation of the WRF to meet future potable water demand associated with campus growth proposed under the Campus Master Plan. Cal Poly would continue to pump groundwater for agricultural purposes. Because Cal Poly would not increase agricultural operations as part of the Campus Master Plan, nonpotable water demands associated with agriculture are not anticipated to increase.

**Potential Permits and Approvals Required:** Elements of the project could be subject to permitting and/or approval by agencies other than the CSU Board of Trustees. As the lead agency pursuant to CEQA, the CSU Board of Trustees is responsible for considering the adequacy of the EIR and determining whether to approve the project. Permits that may be required from other agencies include:

- California Department of Fish and Wildlife: Lake and Streambed Alteration Agreement pursuant to California Fish and Game Code Section 1602; California Endangered Species Act incidental take permit authorizations
- California Division of State Architect: Review for accessibility compliance
- California State Fire Marshal: Future facility fire safety review and approval
- Central Coast Regional Water Quality Control Board: General Waste Discharge Requirements for Discharges from Domestic Water Systems with Flows Greater than 100,000 Gallons per Day (Order No. R3-2020-0020); Clean Water Act Section 402 National Pollutant Discharge Elimination System construction stormwater permit (Notice of Intent to proceed under General Construction Permit); Section 401 Water Quality Certification for impacts to waters of the United States
- City of San Luis Obispo: Modifications to existing water supply treatment and wastewater agreements; utility connection permits; utility easements
- National Oceanic and Atmospheric Administration Fisheries: Endangered Species Act (ESA) Section 7 consultation for authorization of incidental take of a listed species; consultation in compliance with the Magnuson-Stevens Fisheries Conservation Management Act Section 305(b) for effects on essential fish habitat





Source: Adapted by Ascent Environmental in 2022

**Figure 2: Proposed Project** 



- San Luis Obispo County Air Pollution Control District: Authority to construct; Title V permit to operate; air quality management plan consistency determination
- State Office of Historic Preservation: National Historic Preservation Act Section 106 compliance; concurrence with effect determination
- State Water Resources Control Board Division of Drinking Water: Approval under General Waste Discharge Requirements Order No. R3-2020-0020 for recycled water use consistent with the Uniform Statewide Recycling Criteria (CCR Title 22, Division 4, Chapter 3); CCR Title 22 Engineering Report approval
- Union Pacific Railroad: Crossing permit
- US Army Corps of Engineers: Clean Water Act Section 404 Permit for impacts to waters of the United States
- US Fish and Wildlife Service: ESA Section 7 consultation for authorization of incidental take of a listed species

**Potential Environmental Effects:** The EIR will describe the significant direct and indirect environmental impacts of the project. The EIR also will evaluate the cumulative impacts of the project, defined as impacts that could be exacerbated when considered in conjunction with other related past, present, and reasonably foreseeable future projects. The project could result in potentially significant environmental impacts in the following resource areas:

- **Aesthetics:** Temporary and long-term changes in visual character or views of the site from key vantage points.
- Air Quality: Temporary increases in air pollutant emissions associated with construction and long-term project operations and associated vehicular trips.
- Archaeological, Historical, and Tribal Cultural Resources: Disturbance of known or unknown archaeological or tribal cultural resources.
- **Biological Resources:** Although the project site is disturbed and located within a semi-urban setting, the potential for impacts to biological resources, including tree removal, nesting birds, and special-status species, will be evaluated.
- **Greenhouse Gas Emissions:** Temporary increases in greenhouse gas (GHG) emissions associated with mobile-source exhaust from construction worker commute trips, truck haul trips, and equipment (e.g., excavators, graders); and long-term increases associated with project operations, including stationary and mobile sources.
- **Hydrology and Water Quality:** Potential to degrade surface water and groundwater quality during construction and operation of the WRF project, including a discussion of permit requirements.
- **Noise:** Temporary increases in noise (including off-site, vehicle traffic noise) and vibration levels during construction; and long-term increases in noise from project operation, including stationary and mobile sources.



• Utilities and Service Systems: Increased demand for water, wastewater service, electricity, or natural gas at the project site and the potential need to increase the capacity of existing infrastructure.

The WRF was contemplated as a near-term project in the Cal Poly 2035 Master Plan and was evaluated at the level of detail known at the time in the Master Plan EIR, certified in 2020. Because air quality, greenhouse gas emissions, and noise impacts of the WRF were sufficiently evaluated in the 2035 Master Plan EIR, the project-specific Draft EIR for the WRF will not include further evaluation of these resources, but will summarize the impact assessments and applicable mitigation measures in the 2035 Master Plan EIR and provide rationale as to why additional analysis is unnecessary. No significant environmental impacts are anticipated for agriculture and forestry resources, energy, hazards and hazardous materials, geology and soils, land use and planning, mineral resources, population and housing, public services, recreation, and wildfire. Therefore, Cal Poly does not propose to evaluate these resources in depth in the Draft EIR. Rather, brief discussions of these resources will be provided in the Draft EIR with explanations as to why significant impacts are not anticipated.

The environmental factors that will be evaluated in depth in the Draft EIR will therefore include aesthetics, archaeological, historical and tribal cultural resources, biological resources, hydrology and water quality, noise, and utilities and service systems. As necessary, feasible mitigation measures will be recommended to reduce any identified significant or potentially significant impacts.

**Scoping Period:** Written comments on the scope and content of the Draft EIR may be submitted during the 30-day scoping period, which runs from **September 15, 2022, through October 14, 2022.** Cal Poly will accept mailed or electronic comments submitted by 5:00 p.m. on October 14, 2022, to the following addresses:

Marcus Jackson Facilities Planning and Capital Projects California Polytechnic State University, San Luis Obispo 1 Grand Avenue San Luis Obispo, CA 93407 Email: <u>mjackson@calpoly.edu</u>

Comments provided via email should include "Water Reclamation Facility Project NOP Scoping Comment" in the subject line and the full name of the commenter in the body of the email.

**Public Scoping Meeting:** Cal Poly will host a public scoping meeting on **Tuesday**, **September 27**, **2022**, **4:30 p.m. to 5:30 p.m.** to inform interested parties about the project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR.

The scoping meeting will be held virtually via Zoom webinar. **Participants must register in advance at the following link:** <u>https://uso6web.zoom.us/webinar/register/WN\_RoMcj7LdS\_uDLozpYyZD\_g</u>. After registering, participants will receive the meeting link via email to log into the webinar on September 27, 2022.

STATE OF CALIFORNIA



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NAHC HEADQUARTERS

1550 Harbor Boulevard Suite 100 West Sacramento, California 95691 (916) 373-3710 nahc@nahc.ca.gov NAHC.ca.gov NATIVE AMERICAN HERITAGE COMMISSION

September 15, 2022

Marcus Jackson California State University Board of Trustees 401 Golden Shore Long Beach, CA 90802-4210

Re: 2022090231, Cal Poly Water Reclamation Facility Project, Los Angeles County

Dear Mr. Jackson:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of <u>portions</u> of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

<u>AB 52</u>

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. <u>Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project</u>: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

**d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. <u>Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a</u> <u>Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report</u>: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4

(SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. <u>Mandatory Topics of Consultation If Requested by a Tribe</u>: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - **b.** Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.

**d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. <u>Confidentiality of Information Submitted by a Tribe During the Environmental Review Process</u>: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. <u>Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:</u> If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

**b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. <u>Conclusion of Consultation</u>: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

**b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. <u>Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:</u> Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. <u>Required Consideration of Feasible Mitigation</u>: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

**10.** Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

 Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

**b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

- i. Protecting the cultural character and integrity of the resource.
- ii. Protecting the traditional use of the resource.
- iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. <u>Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource</u>: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

**a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

**b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

**c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: <u>http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\_CalEPAPDF.pdf</u>

#### <u>SB 18</u>

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09\_14\_05\_Updated\_Guidelines\_922.pdf.

Some of SB 18's provisions include:

1. <u>Tribal Consultation</u>: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).

 <u>No Statutory Time Limit on SB 18 Tribal Consultation</u>. There is no statutory time limit on SB 18 tribal consultation.
 <u>Confidentiality</u>: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).

4. <u>Conclusion of SB 18 Tribal Consultation</u>: Consultation should be concluded at the point in which:

a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or

**b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <u>http://nahc.ca.gov/resources/forms/</u>.

#### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page\_id=30331) for an archaeological records search. The records search will determine:

- a. If part or all of the APE has been previously surveyed for cultural resources.
- b. If any known cultural resources have already been recorded on or adjacent to the APE.
- c. If the probability is low, moderate, or high that cultural resources are located in the APE.
- d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

**a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

**b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

**b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

**b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: <u>Andrew.Green@nahc.ca.gov</u>.

Sincerely,

Andrew Green

Andrew Green Cultural Resources Analyst

cc: State Clearinghouse

From: Hidalgo, Gerardo L CIV USARMY CESPL (USA)
Sent: Wednesday, September 21, 2022 9:20 AM
To: Marcus E. Jackson
Subject: Water Reclamation Facility Project NOP Scoping - Jerry Hidalgo USACE

Dear Mr. Jackson:

It has come to my attention that California Polytechnic State University, San Luis Obispo plans to construct and operate an on-campus water reclamation facility and recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water within the city and county of San Luis Obispo, California.

This activity may require a Department of Army (DA) permit from the U.S. Army Corps of Engineers. A DA permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material other than incidental fallback within, "waters of the U.S.", including wetlands and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to the following activities:

a. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;

b. mechanized land clearing and grading which involve filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the U.S.;

c. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the U.S.; and

d. placing pilings when such placement has or would have the effect of a discharge of fill material .

An application for a DA permit is available on our website:

http://www.spl.usace.army.mil/Missions/Regulatory/PermitProcess.aspx. If you have any questions or would like to setup a pre-application meeting, please contact me at (805) 585-2145 or via email at Gerardo.L.Hidalgo@usace.army.mil.

Sincerely,

Jerry Hidalgo, Project Manager Regulatory Division, North Coast Branch Ventura, CA Field Office Los Angeles District, U.S. Army Corps of Engineers Gerardo.L.Hidalgo@usace.army.mil

Office: 805-585-2145 Government Mobile: 213-320-8992

\* During the Coronavirus Health Emergency, Regulatory Program staff are teleworking. Please do not mail hard copy documents to any Regulatory staff or office. For further details on corresponding with us, please view our COVID-19 special public notice at:

https://www.spl.usace.army.mil/Portals/17/docs/publicnotices/COVID19%20Regulatory\_SPN.pdf? ver=2020-03-19-134532-833 Building Strong http://www.spl.usace.army.mil/Missions/Regulatory.aspx

Assist us in better serving you! You are invited to complete our customer survey, located at the following link: <u>https://regulatory.ops.usace.army.mil/customer-service-survey/</u>



**Public Utilities** 

879 Morro Street, San Luis Obispo, CA 93401-2710 805.781.7215 slocity.org

October 13, 2022

Marcus Jackson Facilities Planning and Capital Projects California Polytechnic State University, San Luis Obispo 1 Grand Avenue San Luis Obispo, CA 93407 Email: mjackson@calpoly.edu

#### SUBJECT: City of San Luis Obispo Comments for the Water Reclamation Facility Project EIR Notice of Preparation

The City of San Luis Obispo staff and City Council have been engaged in the Cal Poly Master Plan Update and implementation since the public process started in 2014. We have appreciated the presentations made by Cal Poly to keep our City Council and community informed on Master Plan implementation, the many staff meetings covering specific issue areas analyzed in the Master Plan Environmental Impact Report, the annual Partnership Meetings held among Cal Poly and City Utilities Department staff, and the ongoing discussions regarding Master Plan implementation and the City/California State University water and sewer agreement.

The City of San Luis Obispo appreciates receipt of the Notice of Preparation (NOP) of a Project-Specific Environmental Impact Report (EIR) for the Water Reclamation Facility (WRF). Based on the information provided in the September 14, 2022 NOP and NOP Scoping Meeting, the City has the following comments on the content of the EIR and issues that should be identified and evaluated in the EIR. While the comments below are focused on the EIR, the City also looks forward to collaborating with Cal Poly on future amendments to the current water and sewer agreement, utility connection permits, and utility easements, which are approval requirements identified in the NOP.

City of San Luis Obispo Comments Cal Poly WRF NOP of EIR Page 2

#### **Project Description**

The EIR Project Description should be comprehensive, and include, but not be limited to, descriptive components and associated figures, tables, and graphics for all Project elements (WRF, recycled water storage, associated infrastructure, and utility easements). The Project Description should include the following details regarding the proposed Project:

- Include a quantified description of wastewater, including volume, flow rates, strength (organic loading) and quality. Describe and show how wastewater will be collected and conveyed, and where wastewater will flow (treatment, storage, and treatment cycles; any untreated or treated wastewater proposed to be discharged to the City system under certain circumstances).
- 2. Identify estimated Cal Poly-generated effluent flows to the proposed Cal Poly WRF and City Water Resource Recovery Facility (WRRF) through build-out of the Cal Poly Master Plan. Please quantify and show how flows are anticipated to fluctuate for both the Cal Poly WRF and City WRRF throughout the school year, and clearly identify if calculations are based on a quarter or semester system. Provide details regarding proposed Campus and Utility Master Plan implementation, including proposed schedules for off-line, rehabilitated, and new housing units. A defensible analysis will be critical to inform future water and sewer agreement amendments.
- 3. A membrane bioreactor (MBR) is a biological and mechanical process that relies on (near) steady-state flows to remain operational and within regulatory compliance. Identify how Cal Poly and the Project will address these seasonal fluctuations in student/staff populations and associated wastewater flow.
- 4. Clarify recycled water storage capacity, including existing and proposed new storage, and total acre-feet (AF) of storage.
- 5. Identify the proposed construction and operational schedule, including proposed phasing and estimated date(s) when the proposed system will be online.
- 6. Identify phased and Master Plan build-out non-potable water demand.
- 7. Describe facility operational and management staff, including but not limited to WRF operations and maintenance, wastewater collections, recycled water distribution, and laboratory analysis.

- 8. Describe management of "overflow" in the event non-potable demand is met and the proposed recycled water storage pond(s) are full. Identify if "overflow" is proposed to be discharged in the City system (to the City WRRF) or if an alternative method is proposed (and please describe).
- 9. Identify how and where solids will be addressed. Initial plans potentially indicate that solids would be sent to a new digester; however, the digester is not included in the NOP Project Description. Clearly identify where the solids will be discharged.
- 10. Identify how odor at the proposed WRF, recycled water storage ponds, and any proposed wastewater going into the City sewer system will be addressed.
- 11. Identify where water will go in the event an upset (i.e., any condition that does not meet regulated treatment requirements). In the event of a WRF upset, does Cal Poly propose that wastewater would be diverted to the City sewer and WWRF, or does the WRF Project include elements capable of addressing and mitigating the upset? Please describe.
- 12. Show how minimum clearance from City infrastructure will be provided.

#### EIR Issue Areas

The Campus Master Plan EIR evaluated the proposed WRF and other projects at a programmatic level and all necessary Project-specific studies anticipated in the Master Plan EIR should be conducted to fully evaluate construction-related, operational, and cumulative impacts of the Project in all issue areas, as previously unknown details regarding the proposed WRF are now known. In addition to the environmental issue areas identified in the NOP, the EIR should include a project-specific analysis of potential air quality, greenhouse gas emissions, and noise impacts resulting from the Project. The EIR analysis should incorporate all applicable mitigation measures identified in the Master Plan EIR and identify any new or modified mitigation measures necessary to avoid or reduce potential impacts to be identified in the WRF Project-Specific EIR.

The EIR should also include analysis of the following Utilities related issues and potential conditions:

1. The currently proposed capacity of the Cal Poly WRF is 0.5 million gallons per day (mgd) peak wet; evaluate how this proposed capacity compares to the demand for wastewater treatment over time, as the Master Plan is implemented and reaches final build-out. Evaluate how flows are anticipated to fluctuate for both the Cal Poly WRF and City WRRF throughout the year.

- 2. Address proposed infiltration/inflow (I/I) projects identified in Utility Master Plan that are required to address sewer pipe capacity constraints experienced during rain events within the Campus. Identify and evaluate how implementation of these projects affect the analysis and flow and capacity estimations.
- 3. Identify potential catastrophic event(s) and failure(s), such as flooding, fires, seismic events, or electrical outages. Identify the potential environmental impacts that could occur as a result of such event(s) and failure(s), and how these impacts would be avoided or minimized.
- 4. Quantify the minimum flow necessary to maintain WRF operations. Identify any potential impacts resulting from low flow conditions, and describe how operation (or non-operation) of the WRF during low-flow months will occur.
- 5. Evaluate and identify any potential impacts to the City sewer system (wastewater collection, WRRF, recycled water) in the event the Cal Poly WRF is shut off as a result of insufficient flow, event, or failure. Identify how these impacts would be avoided or minimized.
- 6. Identify and evaluate any potential impacts to the environment and the City's sewer system and WRRF as a result of discharged wastewater, including but not limited to volume, strength (organic loading), and potential upsets. Identify how these impacts would be avoided or minimized.
- 7. Evaluate existing water supply cross-control infrastructure. Identify if existing backflow devices comply with specifications or if any upgrades needed. Include an analysis of potential environmental impacts resulting from the replacement and/or upgrading of existing infrastructure. Identify how these impacts would be avoided or minimized.
- 8. Evaluate and identify potential water quality impacts to San Luis Obispo Groundwater Basin as a result of construction and operation of the Project. Identify how these impacts would be avoided or minimized.
- 9. The City currently relies on Cal Poly's contribution of wastewater flow to meet discharge requirements supporting habitat for Federally Endangered South-Central California Coast steelhead. The EIR should evaluate potential impacts to steelhead habitat in San Luis Obispo Creek as a result of any changes to Cal Poly's contributed wastewater discharge. Identify how these impacts would be avoided or minimized.

City of San Luis Obispo Comments Cal Poly WRF NOP of EIR Page 5

10. Identify the energy demand for the proposed WRF and associated infrastructure, and include a Project-specific energy impact analysis. The analysis should include an assessment of Pacific Gas & Electric (PG&E) Public Safety Power Shutoffs (PSPS) and how the proposed WRF and associated infrastructure would operate under PSPS conditions (e.g., temporary or permanent generators). If proposed, generator operation should be evaluated in applicable sections of the EIR, including air quality, greenhouse gas emissions, noise.

#### Project Alternatives

- 1. Consider incorporation of an equalization basin to address dry and wet weather flow peaks.
- 2. Instead of construction of an on-campus WRF, consider evaluating opportunities through amendment of the existing sewer agreement with the City. This could include the City's treatment of Cal Poly-generated wastewater (increased capacity) and purchase of an equal amount of recycled water to offset non-potable demand.

Thank you for your consideration of the City's recommendations and comments provided in response to the NOP. We look forward to further collaboration and discussion as the Cal Poly moves forward with preparation of the EIR. If you have any questions regarding the City's comments in response to the NOP, please don't hesitate to be in touch with me directly. I can be contacted by phone at 805-781-7205, or by e-mail: <u>afloyd@slocity.org</u>.

Sincerely,

U- FK

Aaron Floyd Public Utilities Director City of San Luis Obispo, Public Utilities

CC: Derek Johnson, City Manager Christine Dietrick, City Attorney Markie Kersten, Assistant City Attorney Shelly Stanwyck, Assistant City Manager Community Services Michael Codron, Community Development Director Matt Horn, Public Works Director Brian Leveille, Senior Planner Bob Hill, Office of Sustainability and Natural Resources Manager Luke Schwartz, Transportation Manager



Northern Chumash Tribal Council

northernchumash.org chumashsanctuary.org



October 14, 2022

Marcus Jackson Facilities Planning and Capital Projects California Polytechnic State University, San Luis Obispo 1 Grand Avenue San Luis Obispo, CA 93407 Email: <u>mjackson@calpoly.edu</u>

RE: Cal Poly Reclamation Notice of Preparation response

Dear Mr. Jackson:

The Northern Chumash Tribal Council, which is traditionally and culturally affiliated with the geographic area which includes the Cal Poly Campus and the Water Reclamation Facility Project, formally requests to consult for the purpose of avoiding and/or mitigating impacts to cultural places that may arise from this project and the applicant's request to modify allowable land uses. We request to review the Environmental Impact Reports and archeological records within a half mile of the water reclamation project area. We will review any ground disturbing activities, and changes to affect the cultural landscape. We also request that an NCTC tribal monitor and representative be onsite for all ground disturbances.

Chairwoman Violet Sage Walker P.O. Box 6533 Los Osos, CA 93412 805-356-6149 violet@northernchumash.org

We request that all notices be sent via email and certified U.S. Mail. Following receipt and review of the information provided, the tribe may request additional consultation to mitigate any impacts the project may cause to tribal cultural resources. If you have any questions or need additional information, please contact our lead contact person listed above and CC info@northernchumash.org.

Sincerely,

Violet Sage Walker Chairwoman Northern Chumash Tribal Council



Air Pollution Control District San Luis Obispo County

#### VIA EMAIL ONLY

October 14, 2022

Marcus Jackson Facilities Planning & Capital Projects Cal Poly State University 1 Grand Avenue San Luis Obispo, CA 93407 mjackson@calpoly.edu

SUBJECT: APCD Comments Regarding the NOP for a Water Reclamation Facility at Cal Poly, San Luis Obispo

Dear Marcus Jackson:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the proposed Water Reclamation Facility (WRF) project located at California Polytechnic State University in San Luis Obispo (Cal Poly).

The proposed project involves the construction and operation of an on-campus water reclamation facility and recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water for unrestricted reuse and would include a WRF collection system and utility improvements to support operation of proposed facilities.

The WRF was contemplated as a near-term project in the Cal Poly 2035 Master Plan and was evaluated at the level of detail known at the time in the Master Plan EIR, certified in 2020. Because air quality, greenhouse gas emissions, and noise impacts of the WRF were evaluated in the 2035 Master Plan EIR, the project-specific Draft EIR for the WRF is not proposed to include further evaluation of these resources; rather, it is proposed to summarize the impact assessments and applicable mitigation measures in the 2035 Master Plan EIR at one provide rationale as to why additional analysis is unnecessary.

The following comments are formatted into 2 sections - (1) General Comments, and (2) Air Quality. Comments pertain to information stated in the project documentation.

The **applicant** or **agent** should contact the APCD Engineering & Compliance Division about permitting requirements stated in the (1) General Comments section. The **lead**.

APCD Comments Regarding an NOP for a Water Reclamation Facility at Cal Poly October 14, 2022 Page 2 of 4

**agency** may contact the APCD Planning Division for questions related to comments stated in the (2) Air Quality section. Both Divisions can be reached at 805-781-5912

Please Note: The APCD recently updated the <u>Land Use and CEQA Webpage</u> on the slocleanair.org website. The information on the webpage displays the most up-to-date guidance from the SLO County APCD, including the <u>2021 Interim CEQA Greenhouse Gas Guidance</u>, <u>Quick Guide for Construction Mitigation</u> <u>Measures</u> and <u>Quick Guide for Operational Mitigation Measures</u>.

#### (1) General Comments

#### Contact Person for DEIR

The NOP indicates an Environmental Impact Report (EIR) is being prepared for the project. The Draft EIR (DEIR) should be sent to the following APCD staff person for APCD review and comment:

Vince Kirkhuff Air Pollution Control District 3433 Roberto Court San Luis Obispo, CA 93401 (805) 781-5912 vkirkhuff@co.slo.ca.us

#### Construction Permit Requirements

Based on the information provided, we are unsure of the types of equipment that may be present during the project's construction phase. Portable equipment, 50 horsepower (hp) or greater, used during construction activities may require a California statewide portable equipment registration (issued by the California Air Resources Board) or an APCD permit. For a detailed listing of equipment requiring a permit, refer to the Technical Appendices, page 4-4, in the APCD's <u>CEQA Air Quality</u> <u>Handbook</u> (April 2012).

#### **Operational Permit Requirements**

Based on the information provided, we are unsure of the types of equipment that may be present at the site. The NOP acknowledges the potential requirement for an APCD Authority to Construct, Title V Permit to Operate, and air quality management plan consistency. Other APCD plans and permits may be required, including an odor control plan. The applicant should contact APCD Engineering & Compliance Division prior to ordering equipment or making substantial investments in processes that may require APCD permits. The following list is provided as a guide to equipment and operations that may have permitting requirements but should not be viewed as exclusive:

- Portable generators and equipment with engines that are 50 hp or greater;
- Electrical generation plants or the use of standby generators;
- Public utility facilities, including wastewater treatment facilities; or
- Boilers.

For a more detailed listing, refer to the Technical Appendix, page 4-4, in the APCD's <u>*CEQA Air Quality*</u> <u>*Handbook*</u> (April 2012). Most facilities applying for an Authority to Construct or Permit to Operate with stationary diesel engines greater than 50 hp, should be prioritized or screened for facility wide health risk impacts. APCD Comments Regarding an NOP for a Water Reclamation Facility at Cal Poly October 14, 2022 Page 3 of 4

#### Proper Abatement of Asbestos-Containing Material (ACM)

Demolition activities can have potential negative air quality impacts, including issues surrounding proper handling, abatement, and disposal of ACM. ACM could be encountered during the demolition or remodeling of existing structures. If this project will include these activities, then it may be subject to various regulatory jurisdictions, including the requirements stipulated in the National Emission Standard for Hazardous Air Pollutants (40CFR61, Subpart M - Asbestos NESHAP).

NESHAP requirements include but are not limited to:

- 1) Written notification to the APCD, within at least 10 business days of activities commencing.
- 2) Asbestos survey report conducted by a Certified Asbestos Consultant.
- 3) Written work plan addressing asbestos handling procedures in order to prevent visible emissions.

Go to <u>slocleanair.org/rules-regulations/asbestos.php</u> for more information.

#### Proper Abatement of Lead-Based Coated Structures

Demolition, remodeling, sandblasting, or removal with a heat gun can result in the release of leadcontaining particles from the site. Proper abatement of lead-based paint must be performed to prevent the release of lead particles from the site. An APCD permit is required for sandblasting operations. For additional information regarding lead abatement, contact the San Luis Obispo County Environmental Health Department at 805-781-5544 or Cal-OSHA at 818-901-5403. Additional information can also be found online at <u>epa.gov/lead.</u>

#### Naturally Occurring Asbestos on Site

Naturally occurring asbestos (NOA) has been identified by the California Air Resources Board as a toxic air contaminant. Serpentine and ultramafic rocks are very common throughout California and may contain NOA. The APCD has identified areas throughout the county where NOA may be present (<u>NOA Map</u>). The following requirements apply because the project site is in a candidate area for NOA:

- The applicant shall ensure that a geologic evaluation is conducted to determine if the area disturbed is or is not exempt from the CARB Asbestos Air Toxics Control
   Measure (Asbestos ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations (Title 17 CCR Section 93105) regulation;
- b. If the site is not exempt from the requirements of the regulation, the applicant must comply with all requirements outlined in the Asbestos ATCM. This may include development of an Asbestos Dust Mitigation Plan and an Asbestos Health and Safety Program for approval by the APCD; or
- c. If the site is exempt, an <u>exemption request</u> must be filed with the APCD.

More information on NOA can be found at <u>slocleanair.org/rules-regulations/noa.php</u>.

#### (2) Air Quality

#### Air Quality Impacts – Insufficient Information

Sufficient information to quantify the air quality impacts from the construction phase and operational phase emissions for this project was not provided in the NOP. As noted in the NOP, air

APCD Comments Regarding an NOP for a Water Reclamation Facility at Cal Poly October 14, 2022 Page 4 of 4

quality and greenhouse gas emission impacts were evaluated at the level of detail known at the time in the Cal Poly 2035 Master Plan EIR, certified in 2020. The NOP states that the WRF EIR will not evaluate those impacts further, "but will summarize the impact assessments and applicable mitigation measures in the 2035 Master Plan EIR and provide rationale as to why additional analysis is unnecessary." Any such summary of impact assessments and mitigation measures, and rationale as to why additional analysis is unnecessary should include a screening of the WRF project using APCD screening criteria from the APCD <u>CEQA Air Quality Handbook</u> (April 2012) to determine if the project would exceed APCD adopted numeric thresholds of significance, as called for in the Master Plan EIR (Sections 3.3-2 and 3.3-3 – Mitigation Measures). Measure 3.3-2 also requires standard construction emission reduction measures for all projects, and if screening determines the project would exceed APCD thresholds, project-specific modeling would be required. If modeling shows exceedance of APCD thresholds, implementation of further emission reduction measures would be required per Mitigation Measures 3.3-2, 3.3-3a and 3.3-3b and the APCD <u>CEQA Air Quality Handbook</u> (April 2012).

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 805-781-5912.

Sincerely,

VINCE KIRKHUFF Air Quality Specialist

VJK/jjr

cc: Dora Drexler, APCD, ddrexler@co.slo.ca.us



State of California – Natural Resources Agency DEPARTMENT OF FISH AND WILDLIFE Central Region 1234 East Shaw Avenue Fresno, California 93710 (559) 243-4005 www.wildlife.ca.gov GAVIN NEWSOM, Governor

CHARLTON H. BONHAM, Director



October 17, 2022

Marcus Jackson Facilities Planning and Capitol Projects California Polytechnic State University 1 Grand Avenue San Luis Obispo, California 93407 <u>mjackson@calpoly.edu</u> (805) 756-6797

#### Subject: California Polytechnic State University, San Luis Obispo Water Reclamation Facility Project (Project) Notice of Preparation (NOP) State Clearinghouse No: 2022090231

Dear Marcus Jackson:

The California Department of Fish and Wildlife (CDFW) received a NOP for a draft Environmental Impact Report (EIR) from the California State University Board of Trustees at California Polytechnic State University, San Luis Obispo (Cal Poly) for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code. While the comment period may have ended, CDFW would appreciate if you will still consider our comments.

<sup>&</sup>lt;sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

#### **CDFW ROLE**

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

**Water Rights:** The capture of unallocated stream flows is subject to appropriation and approval by the State Water Resources Control Board (SWRCB) pursuant to Water Code § 1200 et seq. CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights and petition processes to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Certain fish and wildlife are reliant upon aquatic and riparian ecosystems, which in turn are reliant upon adequate flows of water. CDFW therefore has a material interest in assuring that adequate water flows within streams for the protection, maintenance, and proper stewardship of those resources. CDFW provides, as available, biological expertise to review and comment on environmental documents and impacts arising from project activities.

**Nesting Birds:** CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

In this role, CDFW is responsible for providing, as available, biological expertise during public agency environmental review efforts (e.g., CEQA), focusing specifically on Project activities that have the potential to adversely affect fish and wildlife resources.

CDFW provides recommendations to identify potential impacts and possible measures to avoid or reduce those impacts.

#### **PROJECT DESCRIPTION SUMMARY**

Proponent: California State University Board of Trustees

**Objective:** California Polytechnic State University, San Luis Obispo (Cal Poly) is proposing to construct and operate an on-campus water reclamation facility (WRF) and recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water meeting the requirements of Title 22 of the California Code of Regulations for unrestricted reuse, including safe application to agricultural crops, pastures, and recreation fields on campus.

The non-potable water demands of the campus that are currently met via untreated water from Whale Rock Reservoir (approximately 15 miles to the northwest) would be transitioned over time to non-potable recycled water supplied by the on-campus WRF. The campus would then use the Whale Rock Reservoir water freed up by operation of the WRF to meet future potable water demand associated with campus growth proposed under the Campus Master Plan. Cal Poly would continue to pump groundwater for agricultural purposes. Because Cal Poly would not increase agricultural operations as part of the Campus Master Plan, non-potable water demands associated with agriculture are not anticipated to increase.

**Location:** Located in San Luis Obispo County, the Cal Poly campus covers 1,339 acres and abuts the City of San Luis Obispo to the south and west, and open space, ranchland, and public land to the north and east. Cal Poly's main campus consists of 855 acres. An additional 484 acres consisting of rangeland and steep terrain lies to the north, northeast, and northwest of the main campus, and makes up the remainder of the Cal Poly campus property. Cross streets are California Boulevard, Highland Drive, and Mt. Bishop Road. Brizzolara Creek is located to the southeast on campus and Stenner Creek is located to the northwest, west, and south on the campus as well.

Timeframe: None given.

#### COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the California State University Board of Trustees/Cal Poly University in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document for this Project.

The NOP indicates that the EIR for the Project will consider potential environmental effects of the proposed Project to determine the level of significance of the environmental effect and will analyze these potential effects to the detail necessary to make a determination on the level of significance. The EIR will also identify and evaluate alternatives to the proposed Project. When an EIR is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation.

**Special-Status Species:** Based on aerial imagery, and species occurrence records from the California Natural Diversity Database (CNDDB, 2022), the proposed Project site and/or surrounding area is known to and/or has the potential to support specialstatus species, and these resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities. CDFW is concerned regarding potential impacts to special-status species including, but not limited to, the Federally threatened (FT) and State species of concern (SSC) California red-legged frog (Rana draytonii), the Federal species of concern (FSC) and State endangered (SE) foothill yellow-legged frog (Rana boylii), the FT steelhead South Central California DPS (Oncorhyncus mykiss irideus pop. 9), the Federal Candidate (FC) and SSC Monarch butterfly (Danaus plexippus), the SSC Western pond turtle (Emys marmorata), the 1B.1 (rare, threatened, or endangered in California and elsewhere) and Congdon's tarplant (Centromadia parryi ssp. congdonii), the 1B.2 (rare, threatened, or endangered in California and elsewhere) San Luis mariposa lily (Calochortis obispoensis), and 1B.3 (rare, threatened, or endangered in California and elsewhere) San Luis Obispo dudleya (Dudleya abramsii ssp. murina).

#### California Red-Legged Frog (CRLF)

CRLF have been observed in Brizzolara Creek per CNDDB records. If suitable habitat is present within the Project site and adjoining area, CDFW recommends that a qualified biologist conduct a habitat assessment and protocol surveys for CRLF as part of the biological technical studies conducted in support of the CEQA document and, regardless of the results of the initial surveys, repeated within 48 hours prior to commencing work (two night surveys immediately prior to construction or as otherwise required by the USFWS) in accordance with the USFWS *Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog* (USFWS 2005) to determine if CRLF are within or adjacent to individual project sites.

If any CRLF are found during the initial protocol surveys conducted as part of the biological technical studies, the preconstruction surveys, or at any time during construction CDFW recommends that CDFW be contacted to discuss a relocation plan for CRLF. If CRLF are found at any time during construction, CDFW recommends that construction cease immediately and that CDFW be contacted to discuss a relocation plan for CRLF.

CDFW recommends that initial ground-disturbing activities be timed to avoid the period when CRLF are most likely to be moving through upland areas (November 1 through March 31). If ground-disturbing activities must take place between November 1 and March 31, CDFW recommends that a qualified biologist monitor construction activity daily.

#### Foothill Yellow-Legged Frog (FYLF)

CNDDB records show that FYLF have been observed in Brizzolara Creek. CDFW recommends that a qualified biologist conduct a habitat assessment as part of the biological technical studies conducted in support of the CEQA document to determine if the Project area or its vicinity contains suitable habitat for FYLF.

If it is determined through the habitat assessment that habitat suitable to support FYLF is present within or near the project sites, CDFW recommends that focused visual encounter surveys be conducted by a qualified biologist during appropriate survey period(s) (April – October) in areas where potential habitat exists. CDFW advises that these surveys generally follow the methodology described in pages 5–7 of *Considerations for Conserving the Foothill Yellow-Legged Frog* (CDFW 2018a). In addition, CDFW advises surveyors adhere to *The Declining Amphibian Task Force Fieldwork Code of Practice* (DAPTF 1998). If any life stage of the FYLF (adult, metamorph, larvae, egg mass) is found, CDFW recommends consulting with CDFW to develop avoidance measures and evaluate permitting needs.

Submission of survey results to CDFW is recommended. In the event of negative findings, CDFW recommends that consultation with CDFW include documentation demonstrating FYLF are unlikely to be present in the vicinity of the project site. Information submitted may include, but is not limited to, a full habitat assessment and survey results. If any life stage of FYLF is detected, consultation with CDFW is advised to determine if an Incidental Take Permit (ITP) is necessary to comply with CESA.

If surveys find that FYLF are occupying the project area and cannot be avoided, CDFW may issue an ITP authorizing take of FYLF, pursuant to Fish and Game Code section 2081 subdivision (b). Take authorization is issued only when take is incidental to an otherwise lawful activity, the impacts of the take are minimized and fully mitigated, the applicant ensures there is adequate funding to implement any required measures, and take is not likely to jeopardize the continued existence of the species.

#### Steelhead South-Central California Coast (Steelhead)

An estimated 94,000 steelhead spawned in streams of the central California coast in the early 1960s. Steelhead numbers have been in decline since the 1960's and most coastal streams have remnant runs of 500 fish or fewer (Center for Biological Diversity,

2021). Per CNDDB records, Steelhead have been observed in Stenner Creek approximately 0.6-mile upstream of the Project area.

CDFW recommends Project activities avoid work in water and floodplains whenever possible and conducting Project activities during less critical times of the year (June-February) and avoid spawning riffles or holding pools.

#### Monarch Butterfly (MOBU): Overwintering Population

MOBUs have been observed per CNDDB just south of Highland Drive near Stenner Creek within the Project limits. CDFW recommends that a qualified biologist conduct a habitat assessment, well in advance of Project implementation. The qualified biologist shall determine if the Project area or its immediate vicinity continues to contain habitat suitable to support the MOBU. The qualified biologist should assess habitat following the Xerces Management Guidelines for Monarch Butterfly Overwintering Habitat (The Xerces Society, 2017) or other protocols with prior approval by CDFW.

If suitable habitat for MOBU is present, CDFW recommends consultation with a qualified biologist and site monitors with knowledge of the history of the grove/area to determine primary roosting trees and other structural components of flora integral to maintaining microclimate conditions. These plants/trees shall be marked and avoided during Project activities. CDFW recommends avoiding or minimizing the cutting or trimming of trees within core overwintering habitat except for specific grove management purposes, and/or human health and safety purposes. Management activities in groves should be conducted between March 16<sup>th</sup> and September 14<sup>th</sup>, in coordination with the aforementioned biologist (Marcum and Darst, 2021).

If suitable habitat is present, and it is the overwintering period of September 15<sup>th</sup> – March 15<sup>th</sup> (Marcum and Darst, 2021), a qualified biologist shall be retained to assess habitat for presence of MOBU. The habitat should be assessed by conducting surveys following CDFW recommended protocols or protocol-equivalent surveys that have been developed by experts, such as the Xerces Society Western Monarch Count Protocol.

If MOBU are detected within the Project area, MOBU overwintering habitat shall be avoided by delineating and observing a no-disturbance buffer of at least 0.5 mile from the outer edge of the habitat (Marcum and Darst, 2021). If buffers cannot be maintained, then consultation with CDFW is warranted and recommended to determine how to implement ground and tree-disturbing activities and avoid take.

#### Western Pond Turtle (WPT)

WPT are known to nest in the spring or early summer within 100 meters (approximately 328-feet) of a water body, although nest sites as far away as 500 meters (approximately

1,640-feet) have also been reported (Thompson et al. 2016). CNDDB records show that WPT have been observed approximately 0.2-mile upstream from Project limits.

CDFW recommends that a qualified biologist conduct focused surveys for WPT as part of the biological technical studies conducted in support of the CEQA document and then repeat the focused surveys, regardless of the initial results, ten days prior to Project implementation. In addition, CDFW recommends that focused surveys for nests occur during the egg-laying season (March through August) and that any nests discovered remain undisturbed until the eggs have hatched.

CDFW recommends that if any WPT are discovered at the site immediately prior to or during Project activities, they be allowed to move out of the area on their own.

#### **Special Status Plants (SSP)**

Per CNDDB records, SSPs including Congdon's tarplant, San Luis mariposa lily, and San Luis Obispo dudleya have been observed within and adjacent to the proposed Project site. CDFW recommends the Project area be surveyed for SSPs by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (CDFW, 2022). This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. CDFW recommends that the protocol be repeated over two growing and blooming seasons for each species likely to be present, to minimize effects of varying moisture regimes influencing results and maximize detection of rare plants.

CDFW recommends SSP species be avoided whenever possible by delineation of and observing a no-disturbance buffer of at least 50-feet from the outer edge of the plant population(s) or specific habitat type(s) required by special status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special status plant species.

#### **II. Editorial Comments and/or Suggestions**

CDFW requests that the DEIR fully identify potential impacts to biological resources, including the above-mentioned species. In order to adequately assess any potential impacts to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features may be present within the Project area. Properly conducted biological surveys, and the information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, and to identify any Project-related impacts under CESA and other species of concern.

Therefore, CDFW recommends the DEIR address potential impacts to these species and provide measurable mitigation measures that, as needed, will reduce impacts to less than significant levels. Information on survey and monitoring protocols for sensitive species can be found at CDFW's website

(https://www.wildlife.ca.gov/Conservation/Survey-Protocols).

**Federally Listed Species:** CDFW also recommends consulting with the USFWS on potential impacts to Federally listed species, specifically, but not limited to, the FT steelhead-south-central California coast DPS and the California red-legged frog, and the FC and State SSC monarch-California overwintering population. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting. Consultation with the USFWS to comply with FESA is advised well in advance of any ground disturbing activities.

**Waters of the State and U.S.:** Pursuant to Fish and Game Code section 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into "Waters of the State" any substance or material deleterious to fish, plant life, or bird life, including nonnative species. It is possible that without mitigation measures this Project could result in pollution of Waters of the State from storm water runoff or construction-related erosion. Potential impacts to the wildlife resources that utilize watercourses in the Project area include the following: increased sediment input from road or structure runoff; construction-related activity runoff associated with Project-related activities and implementation; and/or impairment of wildlife movement through the area. The Regional Water Quality Control Board and United States Army Corps of Engineers (USACE) also have jurisdiction regarding discharge and pollution to Waters of the State.

**Lake and Streambed:** The Project is subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent, as well as those that are perennial in nature.

For additional information on notification requirements, please contact our staff in the Lake and Streambed Alteration Program at (559) 243-4593. It is important to note, CDFW is required to comply with CEQA, as a Responsible Agency, when issuing a Lake or Streambed Alteration Agreement. If inadequate, or no environmental review, has occurred, for the Project activities that are subject to notification under Fish and Game Code 1602, CDFW will not be able to issue the Final LSAA Lake and Streambed

Alteration Agreement until CEQA analysis for the project is complete. This may lead to considerable Project delays.

**Water Rights:** CDFW recommends the DEIR include a detailed analysis of the water rights and water entitlements that pertain to the Project, including whether any applications or change petitions will be filed. As stated previously, CDFW, as Trustee Agency, is consulted by the SWRCB during the water rights process to provide terms and conditions designed to protect fish and wildlife prior to appropriation of the State's water resources. Given the potential for impacts to sensitive species and their habitats, it is advised that required consultation with CDFW occur well in advance of the SWRCB water right application process.

**Nesting birds:** Per Google and CNDDB aerials along with Google Street View, the Project site contains numerous trees within/adjacent to the two creeks within the proposed Project boundaries. While no tree removal was mentioned in the Project information, CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified biologist conduct an assessment of nesting habitat during biological surveys in support of the project's CEQA document, and then repeated as pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project sites to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. Prior to initiation of construction activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once construction begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified nests by a qualified biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of nonlisted bird species and a 500-foot no-disturbance buffer around active nests of nonlisted raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and

are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the construction areas would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

**Project Alternatives Analysis:** CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in support of the project's CEQA document be used to develop and modify the project's alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, remaining impacts to sensitive biological resources should be mitigated to reduce impacts to a less than significant level, if feasible.

**Cumulative Impacts:** CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the project, even if those impacts are relatively small (i.e. less than significant). Cumulative impacts should be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future project. An appropriate resource study area should be identified and utilized for this analysis. CDFW staff is available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

# **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be found at the following link: <a href="https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data">https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data</a>. The completed form can be mailed electronically to CNDDB at the following email address: <a href="https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data/CNDDB/Submitting-Data">CNDDB@wildlife.ca.gov/Data/CNDDB/Submitting-Data</a>. The completed form can be mailed electronically to CNDDB at the following email address: <a href="https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data/CNDDB/Submitting-Data/CNDDB/Submitting-Data/CNDDB/Submitting-Data/Submitting-D

## **FILING FEES**

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CDFW appreciates the opportunity to comment on the Project to assist the California State University Board of Trustees/California Polytechnic State University in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<u>https://www.wildlife.ca.gov/Conservation/Survey-Protocols</u>). If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, or by electronic mail at <u>Kelley.Nelson@wildlife.ca.gov</u>.

Sincerely,

DocuSigned by: Julie Vance

Julie A. Vance Regional Manager

ec: Patricia Cole (<u>patricia\_cole@fws.gov</u>) United States Fish and Wildlife Service

## LITERATURE CITED

California Department of Fish and Wildlife (CDFW). 2022. Biogeographic Information and Observation System (BIOS). <u>https://www.wildlife.ca.gov/Data/BIOS. Accessed</u> <u>September 27, 2022</u>.

MOBU Literature Citation

- Marcum, S., and Darst, C. 2021. Western Monarch Butterfly Conservation Recommendations.
- The Xerces Society. 2017. Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat.

CRLF Literature Citation

USFWS. 2005. Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog March 2005. 26 pp.

### FYLF Literature Citation

- California Department of Fish and Wildlife (CDFW). 2018a. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife, March 2018.
- Declining Amphibian Task Force (DAPTF). 1998. The Declining Amphibian Task Force Fieldwork Code of Practice. <u>https://www.fws.gov/media/declining-amphibian-task-force-fieldwork-code-practice</u>

### Steelhead Literature Citation

Center for Biological Diversity. 2021. <u>https://www.biologicaldiversity.org/species/fish/central\_California\_coast\_steelhead\_tro\_ut/index.html</u>

WPT Literature Citation

Thomson, R. C., A. N. Wright, and H. B. Shaffer, 2016. California Amphibian and Reptile Species of Special Concern. California Department of Fish and Wildlife and University of California Press.

SSP Species

CDFW. 2022. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. California Department of Fish and Wildlife.

# Appendix B

# **Construction Assumptions**

### Table 1 Projected Construction Schedule, Labor Force, and Equipment Impacts Projection

The following table identifies a breakdown in construction activities, duration of activity, level of effort and required construction equipment necessary to complete each task.

Construction Phase	Estimated Start	Estimated Finish	Duration (Weeks)	Duration (Calendar Days)	Duration (Working Days)	Number of Worker per day (8 hrs. / day)	Equipment List Total # of Equip. / hrs. per day T4
Mobilization – Trailer Set-up, Potholing, Survey, USA	<del>10/17<u>9/3</u>/24</del>	<del>11/11<u>9/28</u>/24</del>	<u>4</u> 3	<del>18<u>25</u></del>	<del>26<u>18</u></del>	4	2-pick-up 1-utility truck 1-vac truck 1-backhoe
Force Main Underground Piping	<del>11/12/2</del> 4	<del>11/26/25</del>	54	<del>378</del>	<u>272</u>	8	2-pick-up 1-utility truck 2-hydraulic track mounted excavator w/bucket (3cy) 1-backhoe and sheep foot 3-4-tri-axle dump trucks 1-water truck
Lift Pump Station LS-1Lower Lift Station Construction	44 <u>9</u> /12/24	<del>5/20/25<u>12/19/24</u></del>	<u>2214</u>	<del>156<u>99</u></del>	<del>135<u>66</u></del>	4	1-pick-up 1-utility truck 1-hydraulic track mounted excavator w/bucket (3cy) 1-backhoe and sheep foot 1-water truck 1-110 ton lattice crane 1-concrete truck 1-concrete pump truck
Existing Irrigation Distribution System Upgrades	<u>9/27/24</u>	<u>12/20/24</u>	<u>12</u>	<u>84</u>	<u>56</u>	<u>12</u>	<u>1-pick-up</u> <u>1-utility truck</u> <u>1-hydraulic track mounted</u> <u>excavator w/bucket (3cy)</u> <u>1-backhoe and sheep foot</u> <u>1-dump trucks</u>
Lift Pump Station LS-2Upper Lift Station Construction	<del>2/6/25<u>9/27/24</u></del>	<del>9/7/25<u>1/10/25</u></del>	<u>2215</u>	<del>156<u>105</u></del>	<del>135<u>69</u></del>	4	1-pick-up 1-utility truck 1-hydraulic track mounted excavator w/bucket (3cy) 1-backhoe and sheep foot 1-water truck

Construction Phase	Estimated Start	Estimated Finish	Duration (Weeks)	Duration (Calendar Days)	Duration (Working Days)	Number of Worker per day (8 hrs. / day)	Equipment List Total # of Equip. / hrs. per day T4
							1-110 ton lattice crane 1-concrete truck 1-concrete pump truck
<u>Dairy and Swine Co-</u> <u>Digester/Biogas Cogeneration</u> <u>Construction</u>	<u>10/27/24</u>	<u>2/14/25</u>	<u>16</u>	<u>111</u>	<u>73</u>	<u>10</u>	<u>1-pick-up</u> <u>1-utility truck</u> <u>1-hydraulic track mounted</u> <u>excavator w/bucket (3cy)</u> <u>1-backhoe and sheep foot</u> <u>1-water truck</u> <u>1-110 ton lattice crane</u> <u>1-concrete truck</u> <u>1-concrete pump truck</u>
<u>Swine Unit Lagoon</u> Decommissioning	<u>3/3/25</u>	<u>4/21/25</u>	Ζ	<u>50</u>	<u>35</u>	<u>8</u>	1-pick-up 1-utility truck 2-hydraulic track mounted excavator w/bucket (3cy) 1-dozer 1-backhoe and sheep foot 2-dump trucks 1-water truck
Site Work – Phase 1 WRF <u>Site</u> Preparation	<del>5/20/25<u>3/3/25</u></del>	<del>8/9<u>6/23</u>/25</del>	<del>12<u>16</u></del>	<u>84113</u>	74 <u>78</u>	10	1-pick-up 1-utility truck 2-hydraulic track mounted excavator w/bucket (3cy) 1-dozer 1-backhoe and sheep foot 2-dump trucks 1-water truck
Recycled Water Reservoir and Effluent Pump Station Construction	<u>3/3/25</u>	<u>8/6/25</u>	<u>22</u>	<u>157</u>	<u>109</u>	<u>10</u>	1-pick-up         1-utility truck         2-hydraulic track mounted         excavator w/bucket (3cy)         1-dozer         1-backhoe and sheep foot         2-dump trucks         1-water truck

Construction Phase	Estimated Start	Estimated Finish	Duration (Weeks)	Duration (Calendar Days)	Duration (Working Days)	Number of Worker per day (8 hrs. / day)	Equipment List Total # of Equip. / hrs. per day T4
Site Work – Phase 2 WRF Prep	<del>6/10/25</del>	7/11/25	5	35	<u>2</u> 4	8	2-pick-up 1-utility truck 1-hydraulic track mounted excavator w/bucket (3cy) 1-dozer 1-backhoe and sheep foot 1-Skid steer loader 1-water truck
Pre-Engineered Metal Building and Equalization Tank Construction	<u>6/2/25</u>	<u>10/15/25</u>	<u>19</u>	<u>136</u>	<u>93</u>	<u>8</u>	<u>2-pick-up</u> <u>2-utility truck</u> <u>1- 50 ton RT crane</u> <u>1-concrete truck</u> <u>1-concrete pump truck</u>
Force Main Installation	<u>6/16/25</u>	<u>9/17/25</u>	<u>13</u>	<u>93</u>	<u>63</u>	<u>8</u>	2-pick-up 1-utility truck 2-hydraulic track mounted excavator w/bucket (3cy) 1-backhoe and sheep foot 3-4-tri-axle dump trucks 1-water truck
<del>Site Work – Phase 3 Lagoon</del> <del>Digester Prep</del>	<del>9/1/25</del>	<del>9/24/25</del>	4	<u>2</u> 4	<del>18</del>	4	2-pick-up 1-utility truck 1-backhoe and sheep foot
Prepackaged WWTP Installation	<u>6/18/25</u>	<u>9/10/25</u>	<u>12</u>	<u>85</u>	<u>57</u>	<u>5</u>	<u>1-pick-up</u> <u>1-utility truck</u> <u>1-110 ton lattice crane</u> <u>1-concrete truck</u> <u>1-concrete pump truck</u>
<u>Avocado Pump Station</u> Improvements	<u>6/25/25</u>	<u>8/22/25</u>	<u>8</u>	<u>59</u>	<u>42</u>	<u>6</u>	<u>1-pick-up</u> <u>1-utility truck</u> <u>1-110 ton lattice crane</u> <u>1-concrete truck</u> <u>1-concrete pump truck</u> <u>1-backhoe and sheep foot</u> <u>1 - water truck</u>

Construction Phase	Estimated Start	Estimated Finish	Duration (Weeks)	Duration (Calendar Days)	Duration (Working Days)	Number of Worker per day (8 hrs. / day)	Equipment List Total # of Equip. / hrs. per day T4
<del>Site Work –</del> <u>WRF</u> Exterior Improvements	<del>12/26/25</del> 6/25/25	<del>1/27/26<u>10/20/25</u></del>	<del>5</del> <u>17</u>	<del>33<u>118</u></del>	<u>2380</u>	6	2-pick-up 1-utility truck 1-backhoe and sheep foot <u>1-roller compactor</u> <u>1-asphalt paving unit</u> 1 - water truck
Substantial Completion	<u>10/20/25</u>	<u>10/20/25</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	
WRF Startup, Commissioning, and Bioassay Testing	<u>10/20/25</u>	<u>2/18/26</u>	<u>17</u>	<u>122</u>	<u>81</u>	<u>6</u>	<u>2-pick-up</u> <u>2-utility truck</u> <u>1-water truck</u>
Punch List and Demobilization	<u>1/21/263/4/25</u>	<u>3/18/2611/10/25</u>	<u>8</u> 36	<u>57</u> 251	1 <u>8040</u>	<u>4</u>	21-pick-up 1-utility truck 1-hydraulic track mounted excavator w/bucket (3cy) 1-backhoe and sheep foot 1-dump trucks
<u>Completion¥ard Piping – Valve</u> <del>Box Structure</del>	<u>3/18/26</u> 3/11/25	<del>8/18/25<u>3/18/26</u></del>	<u>1</u> 23	<del>160<u>1</u></del>	414 <u>1</u>	<u>1</u> 3	1-pick-up 1-utility truck 1-backhoe
<del>Yard Piping – Wet Well Nelson</del> <del>Reservoir</del>	<del>3/25/25</del>	<del>6/2/25</del>	10	<del>69</del>	<del>50</del>	8	1-pick-up 1-utility truck 1-hydraulic track mounted excavator w/bucket (3cy) 1-backhoe and sheep foot

#### Table 2 Import and Export Calculations and Quantities

The following table identifies a breakdown in import and export quantities and pavement repair requirements for the proposed construction activities.

Surface Improvement Activity	Volume (cy)	Truck Size (cy)	Total Weight (Tons)	Estimated Truck Loads Delivered
Building – Stone Base	112	12	191	10
Valve Vault – Stone Base	34	12	58	3
Reservoir – Access Road	1097	12	1865	81
Treatment Unit – Stone Base	162	12	275	12
Lift Station #1 & #2Upper and Lower Lift Stations – Stone Base @ Wet Well	92	12	184	7
Upper and Lower_Lift Stations #1 & #2 – Stone Base	178	12	302	14
Storage Tank – Stone Base	56	12	95	4
Asphalt Paving – Stone Base	210	12	357	16
Concrete for Treatment Unit	250	9	500	28
Concrete for Metal Building	107	9	214	12
Concrete for Upper and Lower Lift Stations #1 & #2	1200	9	2400	134
Concrete Sidewalks	26	9	52	3
Force Main – Pipe Bedding	2889	12	4911	241
Replacement Piping – Pipe Bedding	2667	12	4534	222
Asphalt Paving – Road Replacement	210	12	368	18
Digester Sump Void Space Rock	<u>5</u>	<u>12</u>	<u>18</u>	1
Digester Berm – Access Road	<u>250</u>	<u>12</u>	<u>450</u>	24

#### Table 3Earthwork Excavation Quantities

The following table identifies a breakdown of quantities anticipated for mass excavation efforts.

Earthwork Activity	Cut/Burrow Location	Fill Location	Percent Solids	Earthwork Cut Volume (cy)	High Side Semi Truck Size (cy)	Total Truckloads Transported	Transport Distance (miles)
Remove Organics	Reservoir	Stockpile	100%	4,350	12-14	335	1.5 mi
Remove Organics	WRF	Stockpile	100%	1,300	22-24	57	300-500 ft
Cut/Stockpile	Reservoir	TBD	100%	110,100	22-24	4788	.25
Cut/Haul	Reservoir	Stockpile	100%	16,300	12-14	1254	1.5 mi
Cut/Haul/Fill	Reservoir	WRF Building	100%	21,800	12-14	1677	1.25 mi
Fill	TBD	Reservoir	100%	78,900	22-24	3,430	.25
Cut/Haul	WRF Building	Stockpile	100%	5,300	22-24	231	700-1000 ft
Remove Organics	<u>Digester</u>	<u>Stockpile</u>	<u>100%</u>	<u>6,000</u>	<u>12-14</u>	<u>500</u>	<u>800 ft</u>
<u>Cut/Fill</u>	<u>Digester</u>	<u>Digester</u>	<u>100%</u>	<u>40,000</u>	<u>12-14</u>	<u>3,333</u>	<u>0</u>

#### Table 4 Worker Equipment Excavation and Site Earthwork Calculation

The following table identifies a breakdown of quantities anticipated, transportation expectations and associated level of effort.

Earthwork Activity	Equipment Used for Earthwork	Loads Esc. Per Scraper (per/hr)	Total Loads Excavated (per/hr)	Workday Duration (hr/day)	Load Excavated (per/day)	High Side Semi Truck Size (cy)	Daily Volume Excavated (cy/d)	Days of Mass Excavation
Remove Organics - Reservoir	Hydraulic Excavator 1-1/2 cy bucket	10	10	8	80	13	1000	6
Remove Organics - WRF	Hydraulic Excavator 1-1/2 cy bucket	7	7	8	56	23	1300	1
Cut/Stockpile - Reservoir	Hydraulic Excavator 3 cy bucket	19	19	8	152	23	3496	32
Cut/Haul - Reservoir	Hydraulic Excavator 3 cy bucket	20	20	8	157	13	2041	8
Cut/Haul/Fill - Reservoir	Hydraulic Excavator 3 cy bucket	20	20	8	157	13	2041	11
Fill - Reservoir	Hydraulic Excavator 3 cy bucket	19	19	8	152	23	3496	23
Cut-Haul - WRF	Hydraulic Excavator	14	14	8	115	23	2650	2

Earthwork Activity	Equipment Used for Earthwork	Loads Esc. Per Scraper (per/hr)	Total Loads Excavated (per/hr)	Workday Duration (hr/day)	Load Excavated (per/day)	High Side Semi Truck Size (cy)	Daily Volume Excavated (cy/d)	Days of Mass Excavation
	3 cy bucket							
Remove Organics - Digester	<u>Hydraulic Excavator</u> <u>1-1/2 cy bucket</u>	<u>10</u>	<u>10</u>	<u>8</u>	<u>80</u>	<u>13</u>	<u>1000</u>	<u>8</u>
<u>Cut/Haul/Fill - Digester</u>	<u>Hydraulic Excavator</u> <u>3 cy bucket</u>	<u>20</u>	<u>20</u>	<u>8</u>	<u>157</u>	<u>13</u>	<u>2500</u>	<u>16</u>

# Appendix C

# **Construction Noise Modeling Results**



# Construction Source Noise Prediction Model (Leq)

				Reference Emission	
	Distance to Nearest	<b>Combined Predicted</b>		Noise Levels (L <sub>max</sub> ) at 50	Usage
Location	Receptor in feet	Noise Level (L <sub>eg</sub> dBA)	Equipment	feet <sup>1</sup>	Factor <sup>1</sup>
Threshold	221	75.0	Excavator	85	0.4
	50	87.9	Dozer	85	0.4
	100	81.9	Dump Truck	84	0.4
			Front End Loader	80	0.4
			Grader	85	0.4
			Flat Bed Truck	84	0.4
			Ground Type	HARD	
			Source Height	8	
			Receiver Height	5	
			Ground Factor <sup>2</sup>	0.00	
			Predicted Noise Level <sup>3</sup>	L <sub>eq</sub> dBA at 50 feet <sup>3</sup>	
			Excavator	81.0	
			Dozer	81.0	
			Dump Truck	80.0	
			Front End Loader	76.0	
			Grader	81.0	
			Flat Bed Truck	80.0	
			Combined Predicte	ed Noise Level (L <sub>eq</sub> dBA at 50	) feet)
				87.9	

#### Sources:

<sup>1</sup>Obtained from the FHWA Roadway Construction Noise Model, January 2006. Table 1.

<sup>2</sup> Based on Figure 6-5 from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 6-23).

<sup>3</sup> Based on the following from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 12-3).

L<sub>eq</sub>(equip) = E.L.+10\*log (U.F.) - 20\*log (D/50) - 10\*G\*log (D/50)

Where: E.L. = Emission Level;

U.F.= Usage Factor;

G = Constant that accounts for topography and ground effects (FTA 2006: pg 6-23); and

D = Distance from source to receiver.



# **Construction Source Noise Prediction Model (Lmax)**

				Reference Emission	
	Distance to Nearest	<b>Combined Predicted</b>		Noise Levels (L <sub>max</sub> ) at 50	Usage
Location	Receptor in feet	Noise Level (L <sub>ea</sub> dBA)	Equipment	feet <sup>1</sup>	Factor <sup>1</sup>
Threshold	350	75.0	Excavator	85	1
	50	91.9	Dozer	85	1
	100	85.9	Dump Truck	84	1
			Front End Loader	80	1
			Grader	85	1
			Flat Bed Truck	84	1
			Ground Type	HARD	
			Source Height	8	
			<b>Receiver Height</b>	5	
			Ground Factor <sup>2</sup>	0.00	
			Predicted Noise Level <sup>3</sup>	L <sub>eq</sub> dBA at 50 feet <sup>3</sup>	
			Excavator	85.0	
			Dozer	85.0	
			Dump Truck	84.0	
			Front End Loader	80.0	
			Grader	85.0	
			Flat Bed Truck	84.0	
			Combined Predicte	ed Noise Level (L <sub>eq</sub> dBA at 50	) feet)
				91.9	

#### Sources:

<sup>1</sup>Obtained from the FHWA Roadway Construction Noise Model, January 2006. Table 1.

<sup>2</sup> Based on Figure 6-5 from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 6-23).

<sup>3</sup> Based on the following from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 12-3).

L<sub>eq</sub>(equip) = E.L.+10\*log (U.F.) - 20\*log (D/50) - 10\*G\*log (D/50)

Where: E.L. = Emission Level;

U.F.= Usage Factor;

G = Constant that accounts for topography and ground effects (FTA 2006: pg 6-23); and

D = Distance from source to receiver.



# Utility/Pipeline Construction Leq

	Distance To Where			Reference Emission	
	Threshold Would be	Combined Predicted		Noise Levels (L <sub>max</sub> ) at 50	Usage
Location	Exceeded in feet	Noise Level (L <sub>eq</sub> dBA)	Equipment	feet <sup>1</sup>	Factor <sup>1</sup>
			Excavator	85	0.2
Church of Jesus Christ of			Dump Truck	84	
Latter-Day Saints	150	73.5			0.4
			Backhoe	80	0.4

Ground Type	hard
Source Height	8
Receiver Height	5
Ground Factor <sup>2</sup>	0.00

Predicted Noise Level <sup>3</sup>	L <sub>eq</sub> dBA at 50 feet <sup>3</sup>
Excavator	78.0
Dump Truck	80.0
Backhoe	76.0

#### Sources:

<sup>1</sup>Obtained from the FHWA Roadway Construction Noise Model, January 2006. Table 1.

<sup>2</sup> Based on Figure 6-5 from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 6-23).

<sup>3</sup> Based on the following from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 12-3).

 $L_{eq}(equip) = E.L.+10*log (U.F.) - 20*log (D/50) - 10*G*log (D/50)$ 

Where: E.L. = Emission Level;

U.F.= Usage Factor;

G = Constant that accounts for topography and ground effects (FTA 2006: pg 6-23); and

D = Distance from source to receiver.

Combined Predicted Noise Level (L<sub>eq</sub> dBA at 50 feet)



# Utility/Pipeline Construction Lmax

	<b>Distance to Nearest</b>	<b>Combined Predicted</b>		<b>Reference Emission</b>	Usage
Location	<b>Receptor in feet</b>	Noise Level (L <sub>eq</sub> dBA)	Equipment	Noise Levels (L <sub>max</sub> ) at 50	Factor <sup>1</sup>
Threshold	230	75.0	Excavator	85	1
Church of Jesus Christ of				84	
Latter-Day Saints	150	78.7	Dump Truck		1
			Backhoe	80	1

Ground Type	hard
Source Height	8
Receiver Height	5
Ground Factor <sup>2</sup>	0.00

Predicted Noise Level <sup>3</sup>	L <sub>eq</sub> dBA at 50 feet <sup>3</sup>
Excavator	85.0
Dump Truck	84.0
Backhoe	80.0

#### <sup>1</sup>Obtained from the FHWA Roadway Construction Noise Model, January 2006. Table 1.

<sup>2</sup> Based on Figure 6-5 from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 6-23).

<sup>3</sup> Based on the following from the Federal Transit Noise and Vibration Impact Assessment, 2006 (pg 12-3).

 $L_{eq}(equip) = E.L.+10*log (U.F.) - 20*log (D/50) - 10*G*log (D/50)$ 

Where: E.L. = Emission Level;

U.F.= Usage Factor;

Sources:

G = Constant that accounts for topography and ground effects (FTA 2006: pg 6-23); and

D = Distance from source to receiver.

Combined Predicted Noise Level ( $L_{eq}$  dBA at 50 feet)

# Appendix D

Botanical and Wildlife Species Evaluated for the Potential to Occur on the Project Site

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Hoover's bent grass Agrostis hooveri	Occurs in sandy sites in chaparral, cismontane woodland, and valley and foothill grassland. 60–600 meters.	April–July	—/—/1B.2	Not expected to occur: The project site does not support sandy soils.
Arroyo de la Cruz manzanita Arctostaphylos cruzensis	Occurs in broadleaf upland forest, coastal scrub, closed-cone coniferous forest, chaparral, and grassland. On sandy soils. 60– 310 meters	December– March	—/—/1B.2	Not expected to occur: The project site does not support sandy soils.
Santa Lucia manzanita Arctostaphylos luciana	Occurs in chaparral with shale outcrops. 350– 850 meters.	December– March	—/—/1B.2	Not expected to occur: The project site does not contain chaparral vegetation.
Morro manzanita Arctostaphylos morroensis	Occurs in chaparral, cismontane woodland, and coastal scrub and on stabilized coastal dunes. 5–205 meters.	December– March	FT/—/1B.1	Not expected to occur: The project site does not support sandy soils woodlands, chaparral, or coastal scrub habitat.
Oso manzanita Arctostaphylos osoensis	Occurs in chaparral and cismontane woodland associated with dacite porphyry (purple/red igneous volcanic rock) on buttes. 300–500 meters.	February– March	—/—/1B.2	Not expected to occur: The project site does not contain chaparral, woodland, or soils suitable for this species.
Pecho manzanita Arctostaphylos pechoensis	Occurs in closed-cone coniferous forest, chaparral, and coastal scrub on siliceous shale. 125–850 meters.	November to March	—/—/1B.2	Not expected to occur: The project site does not contain closed-cone coniferous forest, chaparral, or coastal scrub habitat, nor does the project site contain soils suitable for this species.
Santa Margarita manzanita Arctostaphylos pilosula	Occurs in closed coniferous forest, chaparral, and cismontane woodland on shale soils. 170– 1,100 meters.	December– May	—/—/1B.2	Not expected to occur: The project site does not contain closed-cone coniferous forest, chaparral, or woodland habitat, nor does the project site contain soils suitable for this species.
Sand mesa manzanita Arctostaphylos rudis	Occurs in maritime chaparral and coastal scrub with sandy soils. 25–322 meters.	November– February	—/—/1B.2	Not expected to occur: The project site does not contain maritime chaparral and coastal scrub habitats suitable for this species.
Dacite manzanita Arctostaphylos tomentosa ssp. daciticola	Occurs in chaparral and cismontane woodland associated with dacite porphyry (purple/red igneous volcanic rock) on buttes. 100–300 meters.	March-May	—/—/1B.1	Not expected to occur: The project site does not contain chaparral, woodland, or soils suitable for this species.
Marsh sandwort Arenaria paludicola	Occurs in marshes and swamps; grows through dense mats of <i>Typha, Juncus, Scirpus,</i> etc. in freshwater marsh. 10–170 meters.	May–August	FE/SE/1B.1	<b>May occur:</b> The edges of reservoirs in the project site may provide habitat suitable for this species.
Mile's milk-vetch Astragalus didymocarpus var. milesianus	Occurs in coastal scrub on clay soils. 20–90 meters.	March–June	—/—/1B.2	Not expected to occur: The project site does not contain coastal scrub habitat suitable for this species.
Coulter's saltbush Atriplex coulteri	Occurs in coastal bluff scrub, coastal dunes, coastal scrub, and valley and foothill grassland/alkaline or clay. 3–460 meters.	March– October	—/—/1B.2	May occur: Grassland habitat in the project site may be suitable habitat for this species.

#### Table D-1 Special-Status Plant Species Documented to Occur within the Project Region

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Twisted horsehair lichen Sulcaria spiralifera	Typically associated with conifers. Largest known population is on Samoa Peninsula in Humboldt County. 0–30 meters.	Not applicable	—/—/1B.2	Not expected to occur: The project site does not contain conifer forest habitat suitable for this species.
San Luis mariposa lily Calochortus obispoensis	Occurs in chaparral, coastal scrub, and valley and foothill grassland. Often in serpentine grassland. 75–665 meters.	May–July	—/—/1B.2	<b>May occur:</b> Documented to occur in Poly Canyon, near the Poly "P," and Pennington Creek preserve (CNDDB 2022a). Serpentine soils may occur within the project site in the vicinity of Indonesian Reservoir. Therefore, the grassland in this area may be suitable for this species.
La Panza mariposa lily Calochortus simulans	Occurs in chaparral, cismontane woodlands, lower montane coniferous forest, and valley and foothill grassland; often in sandy, granitic, or serpentine soils. 395–1,100 meters.	April–June	—/—/1B.3	May occur: The project site contains grasslands near Indonesian Reservoir that may be located on serpentine soils suitable for this species.
Dwarf calycadenia Calycadenia villosa	Typically found in rocky, fine soils within chaparral, cismontane woodland, meadows and seeps, and valley and foothill grassland. 240-1,350 meters	May– October	—/—/1B.1	<b>May occur:</b> The grasslands in the project site provide habitat suitable for this species.
Hardham's evening- primrose Camissoniopsis hardhamiae	Typically found in sandy, decomposed carbonate soils, especially in disturbed or burned areas among chaparral and cismontane woodland. 140–945 meters.	March–May	— /—/1B.2	Not expected to occur: The project site does not support suitable soils or habitats.
San Luis Obispo sedge <i>Carex obispoensis</i>	Occurs in closed-cone coniferous forests, chaparral, coastal prairie, coastal scrub, and valley and foothill grassland. Usually adjacent to seeps, springs, stream sides, or other water source with sand, clay, or serpentine. 5–790 meters.	April–June	—/—/1B.2	May occur: Documented to occur in upper reaches of Stenner Creek (CNDDB 2022a). Grassland habitat adjacent to waterways in the project site may provide suitable habitat.
San Luis Obispo owl's clover <i>Castilleja densiflora</i> ssp. <i>obispoensis</i>	Occurs in valley and foothill grassland. 10–215 meters.	March–May	—/—/1B.2	May occur: Documented to occur in Poly Canyon and Chorro Creek Ranch (CNDDB 2022a). The grassland habitat within the project site may provide suitable habitat.
California jewelflower Caulanthus californicus	Occurs in nonnative grassland, upper Sonoran subshrub scrub, and cismontane juniper woodland and scrub communities in subalkaline and sandy loam soils. 61–1,000 meters.	February– May	FE/SE/1B.1	Not expected to occur: The project site does not contain soils suitable for this species. The campus is outside the current known range of the species (CNPS 2022b).
Nipomo Mesa ceanothus Ceanothus impressus var. nipomensis	Typically found in sandy soils within chaparral habitat. 30–245 meters.	February– April	—/—/1B.2	Not expected to occur: The project site does not contain soil or habitat suitable for this species.
San Luis Obispo ceanothus <i>Ceanothus thyrsiflorus</i> var. <i>obipoensis</i>	Typically found in dacite in chaparral and cismontane woodland. 140–225 meters.	June	—/—/1B.1	Not expected to occur: The project site does not contain soil or habitat suitable for this species.

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Congdon's tarplant Centromadia parryi ssp. congdonii	Occurs in alkaline soils within valley and foothill grassland. 0–230 meters.	June– October (sometimes blooms until November)	—/—/1B.1	May occur: Grassland habitat may provide habitat suitable for this species.
Coastal goosefoot Chenopodium littoreum	Occurs on coastal dunes.10–30 meters.	April–August	—/—/1B.2	Not expected to occur: The project site does not contain coastal dunes.
Dwarf soaproot Chlorogalum pomeridianum var. minus	Occurs in chaparral habitats with serpentine soils. 305–1,000 meters.	May–August	—/—/1B.2	Not expected to occur: Species is not expected to occur within the project site because it lacks chaparral habitat on serpentine soils.
Salt marsh bird's-beak Chloropyron maritimum ssp. maritimum	Occurs in coastal dunes and coastal salt marshes and swamps. 0–30 meters.	May–October (sometimes blooms until November)	FE/SE/1B.2	Not expected to occur: The project site does not contain coastal dune or salt marsh habitat.
Point Reyes salty bird's- beak <i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Occurs in coastal salt marsh, usually <i>Salicornia, Distichlis, Jaumea, Spartina</i> , and other halophytes. 0–10 meters	June– October.	—/—/1B.2	Not expected to occur: The project site does not contain coastal salt marsh habitat.
Irish Hills spineflower Chorizanthe aphanantha	Occurs in chaparral and coastal scrub on gravelly, rocky, and serpentinite soils. 100–370 meters.	April–June	—/—/1B.3	Not expected to occur: The project site does not contain chaparral or coastal dune habitat.
Brewer's spineflower Chorizanthe breweri	Occurs in chaparral, cismontane woodland, coastal scrub, closed-cone coniferous forest; rocky or gravelly serpentine sites; usually in barren areas. 45–800 meters.	April–August	—/—/1B.3	Not expected to occur: The project site does not contain chaparral, cismontane woodland, coastal scrub, or closed-cone coniferous forest habitats suitable for this species.
Straight-awned spineflower Chorizanthe rectispina	Occurs in chaparral, cismontane woodland, and coastal scrub; often on granite in chaparral. 355–1,035 meters.	April–July	—/—/1B.3	Not expected to occur: The project site does not contain chaparral, woodland, coastal scrub, or soils suitable for this species.
San Luis Obispo fountain thistle [=Chorro Creek Bog Thistle] <i>Cirsium fontinale</i> var. <i>obispoense</i>	Occurs in chaparral and cismontane woodlands within serpentine seeps or bogs (strict serpentine endemic). 35–380 meters.	February–July (sometimes as late as August– September)	FE/SE/1B.2	Not expected to occur: Documented to occur in the vicinity of the project site; however, the project site does not contain seeps or bogs on serpentine substrates suitable for this species.
Cuesta Ridge thistle Cirsium occidentale var. lucianum	Occurs in openings among chaparral with rocky substrates and serpentinite; often found on steep rocky slopes and road cuts. 500–750 meters.	April–June	— /—/1B.2	Not expected to occur: The project site does not contain chaparral habitat on serpentine soils suitable for this species.
Surf thistle Cirsium rhothophilum	Occurs in coastal dunes, coastal bluff scrub, and open areas in central dune scrub; usually in coastal dunes. 3–60 meters	April–June	—/ST/1B.2	Not expected to occur: The project site does not contain coast dunes or coastal bluff scrub habitat suitable for this species.

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
La Graciosa thistle Cirsium scariosum var. loncholepsis	Typically found in mesic, sandy soils within cismontane woodland, coastal dunes, coastal scrub, marshes and swamps (brackish), and valley and foothill grassland. 4-220 meters.	May–August	FE/ST/1B.1	Not expected to occur: While mesic grassland areas are present within the project site, the project site does not contain the sandy soils suitable for this species.
Popcorn lichen Cladonia firma	Occurs on soil, detritus, or moss on stabilized coastal dunes among coastal scrub. Known in California only from Morro Bay and Baywood- Los Osos areas. 30–75 meters.	Not applicable	—/—/2B.1	Not expected to occur: The project site does not contain coastal scrub or coastal dunes habitat suitable for this species.
Pismo clarkia Clarkia speciosa ssp. immaculata	Occurs in sandy soils, openings in chaparral, cismontane woodland, and valley and foothill grassland. On ancient sand dunes not far from the coast. 25–185 meters.	May–July	FE/SR/1B.1	Not expected to occur: While grasslands are present within the project site, the project site does not contain the sandy soils suitable for this species.
Dune larkspur Delphinium parryi ssp. blochmaniae	Occurs in maritime chaparral and coastal dunes with sandy or rocky soils. 0–200 meters.	April–June	—/—/1B.2	Not expected to occur: The project site does not contain coastal dunes or maritime chaparral habitat suitable for this species.
Eastwood's larkspur Delphinium parryi ssp. eastwoodiae	Occurs in chaparral and valley and foothill grassland among serpentine soils. 60–640 meters.	March–May (sometimes may start blooming in February)	—/—/1B.2	May occur: Documented to occur in Poly Canyon outside of the project site (CNDDB 2022a). Serpentine soils may occur within the project site in the vicinity of Indonesian Reservoir. Therefore, the grassland in this area may be suitable for this species.
Umbrella larkspur Delphinium umbraculorum	Occurs in cismontane woodland. 400–1,600 meters.	April–June	—/—/1B.3	Not expected to occur: The project site does not contain cismontane woodland habitat suitable for this species.
beach spectaclepod Dithyrea maritima	Occurs in coastal dunes, in coastal scrub, on seashores, on sand dunes, and in sandy places near the shore. 3–50 meters.	March–May	—/ST/1B.1	Not expected to occur: The project site does not contain coastal dune, coastal scrub, or sand dune habitat suitable for this species.
Betty's dudleya Dudleya abramsii ssp. bettinae	Occurs in coastal scrub, valley and foothill grassland, chaparral, and rocky barren serpentine exposures. 20–180 meters.	May–July	—/—/1B.2	May occur: Serpentine soils may occur within the project site in the vicinity of Indonesian Reservoir. Therefore, the grassland in this area may be suitable for this species.
Mouse-gray dudleya Dudleya abramsii ssp. murina	Occurs in serpentine outcrops in chaparral and cismontane woodland. 90–300 meters.	May–June	—/—/1B.3	Not expected to occur: Cal Poly reports occurrences in Poly Canyon (Cal Poly 2020). Also documented to occur on Chorro Creek Ranch and in Poly Canyon but outside of the project site (CNDDB 2022a). Species not expected to occur in the project site because the site lacks chaparral and cismontane woodland habitat suitable for the species.

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Blochman's dudleya Dudleya blochmaniae ssp. blochmaniae	Occurs in coastal scrub, chaparral, and valley and foothill grassland habitats on rocky outcrops in clay or serpentine soils. 5–450 meters.	April–June	—/—/1B.1	May occur: Documented occurrences in Poly Canyon and Pennington Creek outside of the project site (CNDDB 2022a). Grassland habitat within the project site may be suitable for this species.
Yellow-flowered eriastrum Eriastrum luteum	Occurs in broadleaf upland forest, chaparral, and cismontane woodland on sandy or gravelly soils. 290–1,000 meters.	May–June	—/—/1B.2	Not expected to occur: The project site does not contain upland forest, cismontane woodland, chaparral, or sandy soils suitable for this species.
Blochman's leafy daisy Erigeron blochmaniae	Occurs in coastal dunes and coastal scrub on sandy soils. 3–45 meters.	July–August	—/—/1B.2	Not expected to occur: The project site does not contain coastal dune, coastal scrub, or sandy soils suitable for this species.
Indian knob mountainbalm Eriodictyon altissimum	Occurs in maritime chaparral, cismontane woodland, and coastal scrub with sandstone substrates. 80–270 meters.	March–June	FE/SE/1B.1	Not expected to occur: The project site does contain maritime chaparral, cismontane woodland, coastal scrub, or sandstone soils suitable for this species.
Hoover's button-celery Eryngium aristulatum var. hooveri	Occurs in vernal pools and seasonal wetlands (occasionally alkaline). 5–45 meters.	July (may bloom as early as June or as late as August)	—/—/1B.1	Not expected to occur: The project site does not contain suitable vernal pool habitat.
Irish Hills monkeyflower Erythranthe serpentinicola	Occurs in wet meadows and seeps within chaparral on rocky and serpentine soils. 60–360 meters.	February– May	—/—/1B.1	Not expected to occur: The project site does not contain chaparral habitat suitable for this species.
San Joaquin spearscale Extriplex joaquiniana	Occurs in chenopod scrub, meadows, seeps, playas, and valley and foothill grassland, often in alkaline soils. 1–835 meters.	April– October	—/—/1B.2	May occur: The project site contains grassland that may provide habitat suitable for this species.
Ojai fritillary Fritillaria ojaiensis	Occurs in broadleaf upland forest, chaparral, and lower montane coniferous forest on rocky soils. 300–998 meters.	February– May	—/—/1B.2	Not expected to occur: The project site does not contain chaparral or forested habitat suitable for this species.
San Benito fritillary Fritillaria viridea	Occurs in chaparral on serpentine slopes; 300-1,525 meters.	March–May	—/—/1B.2	Not expected to occur: The project site does not contain chaparral habitat suitable for this species.
Monterey cypress Hesperocyparis macrocarpa	Occurs along the coast in closed-cone coniferous forest on granitic soils. 10–30 meters.	Not applicable	—/—/1B.2	Not expected to occur: The project site does not contain closed-cone coniferous forest habitat suitable for this species.
Mesa horkelia Horkelia cuneata ssp. puberula	Occurs in chaparral, cismontane woodlands, and coastal scrub in sandy or gravelly sites. 70–810 meters.	February–July (may sometimes bloom in September)	—/—/1B.1	Not expected to occur: The project site does not contain chaparral, woodlands, or coastal scrub habitat suitable for this species.

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Kellogg's horkelia Horkelia cuneata ssp. sericea	Occurs in closed-cone coniferous forest, maritime chaparral, and coastal scrub with sandy or gravelly openings. 10–200 meters.	April– September	—/—/1B.1	Not expected to occur: The project site does not contain closed-cone coniferous forest, maritime chaparral, or coastal scrub habitat suitable for this species.
Perennial goldfields Lasthenia californica ssp. macrantha	Occurs in coastal bluff scrub, coastal dunes, and coastal scrub. 5–520 meters.	January– November	—/—/1B.2	Not expected to occur: The project site does not contain coastal bluff scrub, coastal dune, or coastal scrub habitat suitable for this species.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Occurs in freshwater wetlands coastal salt marshes, wetland/riparian habitat, alkali sink, playas, vernal pools, and swamps. 1–1,220 meters.	February– June	—/—/1B.1	<b>May occur:</b> The margins of the reservoirs and riparian corridors in the project site may provide habitat suitable for this species.
Jones's layia Layia jonesii	Occurs in chaparral and valley and foothill grassland on clay or serpentine outcrops. 5– 400 meters.	March–May	—/—/1B.2	May occur: Documented to occur adjacent to the project site near Poly Canyon (CNDDB 2022a). The grassland habitat in the project site may provide suitable habitat.
San Luis Obispo County lupine <i>Lupinus ludovicianus</i>	Occurs in chaparral, cismontane woodland, and in open areas in sandy soils or sandstone soils. 50–525 meters.	April–July	—/—/1B.2	Not expected to occur: The project site does not contain chaparral, woodland, or soils suitable for this species.
Slender bush-mallow Malacothamnus gracilis	Usually found in rocky soils within chaparral habitat. 190–575 meters.	May–October	—/—/1B.1	Not expected to occur: The project site does not contain chaparral habitat suitable for this species.
Carmel Valley bush- mallow Malacothamnus palmeri var. involucratus	Typically found in chaparral, cismontane woodland, and coastal scrub. 30–1,100 meters.	April– October	—/—/1B.2	Not expected to occur: The project site does not contain chaparral, cismontane woodland, or coastal scrub habitat suitable for this species.
Santa Lucia bush-mallow Malacothamnus palmeri var. palmeri	Occurs in chaparral with rocky substrates. 60– 360 meters.	May–July	—/—/1B.2	Not expected to occur: The project site does not contain chaparral habitat suitable for this species.
Palmer's monardella <i>Monardella palmeri</i>	Occurs in chaparral and cismontane woodland on serpentine slopes. 200–800 meters.	June–August	—/—/1B.2	Not expected to occur: The project site does not contain chaparral or cismontane woodland suitable for this species.
Southern curly-leaved monardella <i>Monardella sinuata</i> ssp. <i>sinuata</i>	Occurs in sandy soil among chaparral, cismontane woodland, coastal dunes, and coastal scrub with openings. 0–300 meters.	April– September	—/—/1B.2	Not expected to occur: The project site does not contain chaparral, cismontane woodland, coastal dunes, coastal scrub, or sandy soil suitable for this species.
San Luis Obispo monardella <i>Monardella undulata</i> spp. <i>undulata</i>	Typically found in coastal dunes and coastal scrubs with sandy soils. 10–200 meters	May– September	—/—/1B.2	Not expected to occur: The project site does not contain coastal dunes, coastal scrub, or sandy soil suitable for this species.

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Woodland woollythreads Monolopia gracilens	Typically found in serpentine soils within broadleafed upland forest (openings), chaparral (openings), cismontane woodland, North Coast coniferous forest (openings), and valley and foothill grasslands. 100–1,200 meters	March–July (occasionally may bloom as early as February)	—/—/1B.2	May occur: Serpentine soils may occur within the project site in the vicinity of Indonesian Reservoir. Therefore, the grassland in this area may be suitable for this species.
Aparejo grass Muhlenbergia utilis	Occurs in meadows and seeps, marshes and swamps, chaparral, coastal scrub, and cismontane woodland. Sometimes alkaline, sometimes serpentinite. 25–2,325 meters.	October– March	—/—/2B.2	May occur: The edges of the reservoirs and ponds may provide habitat suitable for this species.
Spreading navarretia Navarretia fossalis	Occurs in chenopod scrub, marshes and swamps (assorted shallow freshwater), playas, and vernal pools. 30–655 meters.	April–June	FT/—/1B.1	May occur: The edges of the reservoirs and ponds may provide habitat suitable for this species.
Shining navarretia Navarretia nigelliformis ssp. radians	Sometimes occurs in clay soils within cismontane woodland, valley and foothill grassland, and vernal pools. 76–1,000 meters.	April–July (occasionally may bloom as early as March)	—/—/1B.2	<b>May occur:</b> Grassland habitat within the project site may be suitable for this species.
Coast woolly-heads Nemacaulis denudate var. denudata	Occurs on coastal dunes. 0–100 meters.	April– September	—/—/1B.2	Not expected to occur: The project site does not contain coastal dune habitat suitable for this species.
Hooked popcornflower Plagiobothrys uncinatus	Occurs in chaparral, cismontane woodland, and valley and foothill grassland with sandy soils. 300–760 meters.	April–May	—/—/1B.2	Not expected to occur: The project site does not contain sandy soils suitable for this species.
Diablo Canyon blue grass Poa diaboli	Occurs in closed-cone coniferous forest, chaparral, cismontane woodland, and coastal scrub with shale substrates. 120–400 meters.	March–April	—/—/1B.2	Not expected to occur: The project site does not contain closed-cone coniferous forest, chaparral, cismontane woodland, or coastal scrub habitat suitable for this species.
Adobe sanicle Sanicula maritima	Occurs in moist seeps within coastal prairie, chaparral, meadows, and valley and foothill grassland habitats in clay or serpentine soils. 30–240 meters.	February– May	—/SR/1B.1	May occur: Seasonal drainages within the grassland habitat in the project site area may be suitable for this species.
Black-flowered figwort Scrophularia atrata	Occurs in closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, and riparian scrub; around swales and in sand dunes; and in sand, diatomaceous shale, and soils derived from other parent material. 10– 250 meters.	March–July	—/—/1B.2	Not expected to occur: The project site does not contain soils suitable for this species.
Rayless (chaparral) ragwort Senecio aphanactis	Sometimes occurs in alkaline soils within chaparral, cismontane woodlands, and coastal scrub. 15–800 meters.	January–April (may sometimes bloom till May)	—/—/2B.2	Not expected to occur: The project site does not contain closed-cone coniferous forest, chaparral, cismontane woodland, or coastal scrub habitat.
Cuesta pass checkerbloom <i>Sidalcea hickmanii</i> ssp. anomala	Occurs in closed-cone coniferous forest with rocky serpentine slopes. 600–800 meters.	May–June	—/SR/1B.2	Not expected to occur: The project site does not contain closed-cone coniferous forest habitat suitable for this species.

Species Name	Habitat and Elevation	Flowering Period	Legal Status <sup>1</sup> Federal/ State/CNPS	Potential for Occurrence within the Project Site <sup>2</sup>
Most beautiful jewelflower <i>Streptanthus albidus</i> ssp. <i>peramoenus</i>	Occurs in chaparral, cismontane woodlands, and valley and foothill grasslands on serpentine soil. 110–1,000 meters.	April– September (may bloom as early as March or as late as October)	—/—/1B.2	May occur: Serpentine soils may occur within the project site in the vicinity of Indonesian Reservoir, and there are documented occurrences of the species in this area (CNDDB 2022a). Therefore, the grassland in this area may be suitable for this species.
California seablite Suaeda californica	Occurs in coastal salt marshes and swamps. 0–15 meters.	July–October	FE/—/1B.1	Not expected to occur: The project site does not contain coastal salt marsh and swamp habitat suitable for this species.
Splitting yarn lichen Sulcaria isidiifera	Occurs on branches of old growth oaks and shrubs in coastal scrub habitat.	Not applicable	—/—/1B.1	Not expected to occur: The project site does not contain old growth oak or coastal scrub habitat suitable for this species.
Saline clover Trifolium hydrophilum	Occurs in marshes and swamps, valley and foothill grassland (mesic, alkaline), and vernal pools. 0–300 meters.	April–June	—/—/1B.2	<b>May occur:</b> Mesic areas within grassland habitat may provide suitable habitat for this species.
Caper fruited tropidocarpum Tropidocarpum capparideum	Occurs in valley and foothill grassland habitats on alkaline hills 1–455 meters.	March–April	—/—/1B.1	Not expected to occur: The project site does not contain alkaline habitat suitable for this species.

Notes: CESA = California Endangered Species Act; CNPPA = California Native Plant Protection Act; ESA = federal Endangered Species Act.

#### <sup>1</sup> Legal Status Definitions

Federal:

- FE Endangered (legally protected by ESA)
- FT Threatened (legally protected by ESA)

State:

SE Endangered (legally protected by CESA)

ST Threatened (legally protected by CESA)

SR Rare (legally protected by CNPPA)

California Rare Plant Ranks:

Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)
 Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

0.3 Not very threatened in California (less than 20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

#### <sup>2</sup> Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present in the project site because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

May occur: Suitable habitat is available in the project site, and populations/occurrences are known to occur in the project vicinity.

Sources: CNDDB 2022a; CNPS 2022a, CNPS 2022b; Baldwin et al. 2012.

Species Name	Habitat and Distribution	Legal Status <sup>1</sup> Federal/State/ Other	Potential for Occurrence within the Project Site <sup>2</sup>
Gastropods			
Morro shoulderband snail Helminthoglypta walkeriana	Restricted to Baywood fine sand in coastal dune and coastal sage scrub communities near Morro Bay; often occurs under shrubs that exhibit dense, low growth and have ample contact with the ground. Use mock heather, seaside golden yarrow, deerweed, sand almond, and ice plant, among others.	E/—/—	Not expected to occur: The project site is outside of the current known range of this species.
Insects			
Crotch bumble bee Bombus crotchii	Found primarily in California: Mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground.	—/CE/—	<b>May occur:</b> Crotch bumble bee has been documented to occur in the City of San Luis Obispo within the last 20 years (CNDDB 2022a), and the grassland and riparian habitat within the project site likely provides adequate floral resources for the species.
Western bumble bee Bombus occidentalis	Once common throughout much of its range, in California, this species is currently largely restricted to high-elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	—/CE/—	Not expected to occur: Although western bumble bee has been documented to occur historically in the vicinity of Pismo Beach (CNDDB 2022a), the project site is outside of the current known range of this species (CDFW 2019).
Monarch butterfly Danaus plexippus	Occurs along the coast from northern Mendocino to Baja California, Mexico. Winter roosts in wind-protected tree groves (eucalyptus, Monterey pine, and cypress), with nectar and water sources nearby.	—/SSC/—	<b>Known to occur:</b> The riparian corridors of Smith Reservoir, Brizzolara Creek, and Stenner Creek support marginal conditions for this species. There is a documented occurrence of a winter roost within the project site along Stenner Creek (CNDDB 2022a), downstream from Highland Drive.
Branchiopods			
Vernal pool fairy shrimp Branchinecta lynchi	Occurs in vernal pool habitats, including depressions in sandstone, to small swale, earth slump, or basalt-flow depressions with a grassy or, occasionally, muddy bottom in grassland.	T/— /—	Not expected to occur: The project site does not support vernal pools suitable for this species.
Fish		1	
Tidewater goby Eucyclogobius newberryi	Occurs in brackish shallow lagoons and lower stream reaches where water is fairly still, but not stagnant.	E/SSC/—	Not expected to occur: The project site does not support brackish water aquatic sites suitable for this species.
South-Central California Coast steelhead DPS Oncorhynchus mykiss	Occurs in clear, cool water with abundant instream cover, well-vegetated stream margins, relatively stable water flow, and a 1:1 pool-to- riffle ratio.	T/SSC/—	<b>Known to occur:</b> Species has been documented in Stenner Creek and Brizzolara Creek. Both these creeks are designated critical habitat and suitable for steelhead.

### Table D-2 Special-Status Wildlife Species Evaluated for the 2019 Master Plan

Species Name	Habitat and Distribution	Legal Status <sup>1</sup> Federal/State/ Other	Potential for Occurrence within the Project Site <sup>2</sup>
Amphibians			
California tiger salamander <i>Ambystoma californiense</i>	Cismontane woodland, meadow and seep, riparian woodland, valley and foothill grassland, vernal pool, and wetlands. Central Valley DPS federally listed as threatened. Santa Barbara and Sonoma Counties DPS federally listed as endangered. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	Т/Т/—	Not expected to occur: The project site is located between the range of the Santa Barbara DPS and the nearest documented occurrences of the Central Valley DPS. The nearest documented occurrence of the Central Valley DPS to the project site is in extreme northwestern San Luis Obispo County (CNDDB 2022a).
Lesser slender salamander <i>Batrachoseps minor</i>	Occurs in the South Santa Lucia Mountains in tanbark oak, coast live oak, blue oak, and sycamore and laurel groves that support shaded slopes with abundant leaf litter.	—/SSC/—	Not expected to occur: The project site does not provide habitat suitable for this species.
Foothill yellow-legged frog <i>Rana boylii</i>	Frequents rocky streams and rivers with rocky substrate and open, sunny banks, in forests, chaparral, and woodlands. Range in California includes the north and central coasts and the western Sierra.	—/E/—	Not expected to occur: The species occurred historically in Brizzolara Creek (1958); however, the species has been extirpated from the creek and has not been detected during multiple surveys from 1981 to 2014. The closest documented extant population is in northern San Luis Obispo County (CNDDB 2022a).
California red-legged frog Rana draytonii	Occurs in aquatic habitats with little or no flow and surface water depths to at least 2.3 feet. Presence of shrubby or emergent vegetation such as cattails required. Requires 11–20 weeks of permanent water for larval development. Must have access to estivation habitat.	T/SSC/—	<b>Known to occur:</b> Shepard, Smith, and Drumm Reservoirs; the Swine Unit detention basins; and Brizzolara and Stenner Creeks support suitable aquatic habitat, although not all of these features are suitable for breeding. Cal Poly staff observed species in the Swine Unit detention basin in 2011 (Cal Poly 2020). Also documented in Brizzolara Creek (CNDDB 2022a).
Western spadefoot Spea hammondii	Inhabits vernal pools in primarily grassland but also in valley and foothill hardwood woodlands with sandy or gravely soils.	—/SSC/—	Not expected to occur: The clay and clay loam soils found in the undeveloped parts of the project site are not suitable for this burrowing species. No vernal pools have been documented in the project site. The nearest documented occurrence of the species is in the Atascadero area (CNDDB 2022a).
Coast Range newt Taricha torosa torosa	Breeds in ponds, reservoirs, and slow-moving streams. Frequents terrestrial habitats, such as oak woodlands.	—/SSC/—	<b>Known to occur</b> The perennial reservoirs and stream reaches on the campus lands support appropriate aquatic habitat. Documented to occur historically in Brizzolara Creek (CNDDB 2022a).

Species Name	Habitat and Distribution	Legal Status <sup>1</sup> Federal/State/ Other	Potential for Occurrence within the Project Site <sup>2</sup>
Reptiles			
California legless lizard Anniella pulchra (inclusive of A. p. nigra)	Occurs in sandy or loose loamy soils with high moisture content under sparse vegetation.	—/SSC/—	Not expected to occur: Clay and clay loam soils in the project site are not suitable for this species.
Western pond turtle Actinemys marmorata	Quiet waters of ponds, lakes, streams, and marshes. Typically, in the deepest parts with an abundance of basking sites.	—/SSC/—	May occur: Some of the reservoirs in the project site support aquatic habitat suitable for this species. The species has been documented to occur in Stenner Creek upstream from the project site (CNDDB 2022a).
Coast horned lizard Phrynosoma coronatum (blainvillii population)	Frequents a wide variety of habitats, commonly occurring in lowlands along sandy washes, riparian woodland, valley and foothill grassland, coastal sage scrub, and chaparral in arid and semiarid climate conditions. Species prefers friable, rocky, or shallow sandy soils.	—/SSC/—	May occur: The nonnative annual grasslands in the project site could support this species. Documented to occur west of the project site in El Chorro Regional Park (CNDDB 2022a).
Birds			
Tricolored blackbird Agelaius tricolor	Species requires open water; protected nesting substrate, such as blackberry, cattails, tules, or tall rushes; and foraging area with insect prey.	—/E, SSC/—	<b>Known to occur:</b> Some of the reservoirs in the project site support suitable breeding habitat. A small flock of fewer than 25 individuals was observed foraging in the fields where two of the proposed Water Recycling Facility water storage ponds would be located (Cal Poly 2020).
Grasshopper sparrow Ammodramus savannarum	Dense grasslands on rolling hills, on lowland plains, in valleys, and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs, and scattered shrubs. Loosely colonial when nesting.	—/SSC/—	May occur: The nonnative annual grasslands in the project site could support this species. Documented to occur west of Santa Margarita (CNDDB 2022a).
Golden eagle Aquila chrysaetos	Usually occurs in mountainous areas with varying vegetative cover and removed from people; may forage in grasslands and other open habitats; nests on cliff edges and rarely in tall trees.	—/FP/—	Not expected to occur: The project site does not support cliffs suitable for nesting by this species project site.
Burrowing owl Athene cunicularia	Occurs in open, dry grasslands, deserts, and scrublands; subterranean nester, dependent upon burrowing mammals.	—/SSC/—	May occur: The campus is outside the breeding range for burrowing owl. However, burrowing owls could occupy the campus grasslands during the winter months.
Western yellow-billed cuckoo Coccyzus americanus occidentalis	Occurs in forests to open riparian woodlands with thick understory.	T/E/—	Not expected to occur: The project site is outside of the current range of this species (CNDDB 2022b). The one documented occurrence within San Luis Obispo County is from 1921 and is assumed to be extirpated (CNDDB 2022a). The riparian habitat within the project site is narrow, lacks complexity, and would be marginally suitable for the species.
White-tailed kite Elanus leucurus	Occurs in open grasslands, meadows, or marshlands for foraging close to isolated trees used for nesting and perching.	—/FP/—	May occur: Brizzolara Creek and Stenner Creek riparian areas support suitable conditions for this species. The species has been documented to occur within the vicinity of the project site (CNDDB 2022a).

Species Name	Habitat and Distribution	Legal Status <sup>1</sup> Federal/State/ Other	Potential for Occurrence within the Project Site <sup>2</sup>
Southwestern willow flycatcher Empidonax trailii extimus	Typically found in areas with willows or other shrubs near standing or running water in southern California. Most nests are in willow, but some have been found in box elder, dogwood, hawthorn, bracken fern, and tamarisk.	E/E/—	Not expected to occur: Although the project site is within the historical range of the species, the riparian habitat in the project site does not provide suitable complexity to function as habitat for this species. Nearest historical observation is within the Santa Ynes River near Buellton, Santa Barbara County (CNDDB 2022a).
California condor Gymnogyps californianus	Requires vast expanses of open savanna, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Forages up to 100 miles from roost/nest.	E/E, FP/—	Not expected to occur: The project site does not contain suitable roosting or nesting habitat for this species. In addition, the existing human disturbance within the project site makes use as foraging habitat for condors unlikely.
California black rail Laterallus jamaicensis coturniculus	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	—/T, FP/—	Not expected to occur: The project site does not provide marsh habitat that is suitable for this species.
Least Bell's vireo Vireo bellii pusillus	Riparian forest, riparian scrub, and riparian woodland. Summer resident of southern California in low riparian vegetation in vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, Baccharis, mesquite.	E/E/—	<b>May occur:</b> The project site is within the historic range of least Bell's vireo. While the species was extirpated throughout much of its historic range, subsequent to listing under the Endangered Species Act, the least Bell's vireo population is expanding (Kus 2002). The species has been recorded within western San Luis Obispo County (Preston et al. 2021). While the species is uncommon, it is possible that recolonization of the historic range could continue into the foreseeable future.
Loggerhead shrike Lanius ludovicianua	Frequents open areas with scattered shrubs; commonly observed foraging in grassland, and desert scrubs; builds nests in isolated trees or shrubs in the vicinity of foraging areas.	—/SSC/—	May occur: The grasslands associated with grazing areas and pastures could support this species.
Purple martin Progne subis	Occupies valley foothill and montane hardwood forests, conifer forests, and riparian habitats; may nest in old woodpecker cavities or in human- made structures, such as bridges and culverts; feeds on insects.	—/SSC/—	May occur: Brizzolara Creek and Stenner Creek riparian areas may provide habitat suitable for this species.
California Ridway's rail (= California clapper rail) Rallus obsoletus obsoletus (= Rallus longirostris obsoletus)	Occurs within salt and brackish marshes dominated by pickleweed and Pacific cordgrass; currently restricted to marsh areas within the vicinity of San Francisco Bay; last species to be sighted in Morro Bay was documented in 1939.	E/E, FP/—	Not expected to occur: The project site does not provide marsh habitat that is suitable for this species.
Mammals			
Pallid bat Antrozous pallidus	Prefers rocky outcrops, cliffs, and crevices with access to open habitats for foraging; day roosts in caves, crevices, mines, and occasionally in hollow trees and buildings; night roosts may be in more open sites, such as porches and buildings. Species highly sensitive to disturbance.	—/SSC/—	<b>May occur:</b> Tree cavities within riparian corridors, unused buildings, bridges, and other similar structures within the project site may provide roosting habitat suitable for this species.

Species Name	Habitat and Distribution	Legal Status <sup>1</sup> Federal/State/ Other	Potential for Occurrence within the Project Site <sup>2</sup>
Ringtail Bassariscus astutus	Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations. Usually found within 0.6 mile of a permanent water source, but may range farther in some locations.	—/FP/—	May occur: Brizzolara Creek and Stenner Creek riparian areas support habitat suitable for this species.
Townsends big-eared bat Corynorhinus townsendii	Occurs in a wide variety of habitats; most common in mesic (wet) sites; may use trees for day and night roosts; however, requires caves, mines, rock faces, bridges, or buildings for maternity roosts. Maternity roosts are in relatively warm sites. Species highly sensitive to disturbance.	—/SSC/—	<b>May occur:</b> Tree cavities within riparian corridors, unused buildings, bridges, and other similar structures within the project site may provide roosting habitat suitable for this species. There are documented occurrences just west of the project site on Camp San Luis Obispo (CNDDB 2022a).
Morro Bay kangaroo rat Dipodomys heermanni morroensis	Typically occurs in habitats associated with stabilized dunes and coastal dune scrub communities with dominant vegetation, including mock heather, buck brush, and deer weed.	E/E/—	Not expected to occur: The project site does not provide habitat suitable for this species and is outside of the current known range of the species.
Giant kangaroo rat Dipodomys ingens	Typically found in annual grasslands on the western side of the San Joaquin Valley and marginal habitat in alkali scrub. Needs level terrain and sandy loam soils for burrowing.	E/E/—	Not expected to occur: The project site is outside of the current known range of this species (CNDDB 2022c).
Western mastiff bat Eumops perotis	Found in many open, semiarid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc.; roosts in crevices in cliff faces, high buildings, trees, and tunnels.	—/SSC/—	May occur: Within the project site, tree cavities, buildings, bridges, and other similar structures where there are unobstructed drops of several feet below the roost may provide roosting habitat suitable for this species.
Monterey dusky-footed woodrat Neotoma macrotis luciana	Occurs in coastal central California in habitats that exhibit a moderate vegetative canopy, with a brushy understory. Builds nests of sticks and leaves at the base of, or within, a tree or shrub, or at the base of a hill. Primarily feeds on woody plants, but also eats fungi, flowers, grasses, and acorns.	—/SSC/—	<b>May occur:</b> The project site is at the boundary of the range of the species (Koenig 2015). However, <i>Neotoma macrotis</i> , big-eared woodrat, which is not a special-status species, may also occur within the project site. The riparian habitat within the project site is potentially suitable for this species.
San Diego desert woodrat Neotoma lepida intermedia	Coastal scrub of southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops and rocky cliffs and slopes.	—/SSC/—	Not expected to occur: The coastal scrub habitat required for this species is not found within the project site.
Big free-tailed bat Nyctinomops macrotis	Rare vagrant in California, probable resident in Texas, New Mexico, and southern Arizona; probably does not breed in California; prefers rugged, rocky canyons but will roost on buildings or in caves and trees.	—/SSC/—	May occur: This species does not breed in California and is an uncommon visitor; however, the species has been documented to occur in San Luis Obispo County (CNDDB 2022a), and suitable nonmaternity roosting habitat and foraging habitat is present in the project site.
Mountain lion—Southern California/Central Coast evolutionarily significant unit <i>Puma concolor</i>	Found in most habitats within central California. Uses caves, other natural cavities, and brush thickets for cover and denning often within riparian habitats.	—/CT/—	<b>May occur:</b> Mountain lion is not anticipated to den within the project site because of the level of human disturbance and the narrow riparian corridors. However, the species may forage in the project site.

Species Name	Habitat and Distribution	Legal Status <sup>1</sup> Federal/State/ Other	Potential for Occurrence within the Project Site <sup>2</sup>
American badger Taxidea taxus	Occurs in open stages of shrub, forest, and herbaceous habitats; needs uncultivated ground with friable soils.	—/SSC/—	<b>Known to occur:</b> Grassland habitat in the project site is potentially suitable for the species, and American badger burrows were observed within the project site during surveys by Ascent Environmental biologists.
San Joaquin kit fox Vulves macrotis mutica	Typically found in annual grasslands or grassy open stages with scattered shrubby vegetation in chenopod scrub and valley and foothill grasslands. Needs loose-textured sandy soils for burrowing, and suitable prey base.	E/T/—	Not expected to occur: The project site is outside of the current known range of the species (CNDDB 2022d).

General references: Unless otherwise noted, all habitat and distribution data provided by CNDDB.

Notes: CNDDB = California Natural Diversity Database; DPS = distinct population segment.

#### <sup>1</sup> Legal Status Definitions

Federal:

- C Candidate (no formal protection other than CEQA consideration)
- E Endangered (legally protected)
- T Threatened (legally protected)

State:

- FP Fully protected (legally protected)
- SSC Species of special concern (no formal protection other than CEQA consideration)
- E Endangered (legally protected)
- T Threatened (legally protected)
- CE Candidate Endangered (legally protected)
- CT Candidate Threatened (legally protected)

#### <sup>2</sup> Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present in the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

May occur: Suitable habitat is available in the project site; however, there are little to no other indicators that the species might be present.

Known to occur: The species has been documented to occur within the project site, either during searches of relevant databases and other sources, or during survey.

Sources: CalPoly 2019; CDFW 2019; CNDDB 2022a, 2022b, 2022c, 2022d; Kus 2002; Preston et al. 2021.

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# Appendix E

# **Draft EIR Comment Letters**



Public Utilities 879 Morro Street, San Luis Obispo, CA 93401-2710 805.781.7215 slocity.org

May 31, 2023

Marcus Jackson Facilities Planning and Capital Projects California Polytechnic State University, San Luis Obispo 1 Grand Avenue, Bldg. 70, Rm 221 San Luis Obispo, CA 93407 Email: mjackson@calpoly.edu

#### SUBJECT: City of San Luis Obispo Comments for the Water Reclamation Facility Project Draft Environmental Impact Report SCH# 2022090231

Dear Mr. Jackson:

The City of San Luis Obispo provides this letter as its formal comments on the Draft EIR for the Cal Poly Water Reclamation Facility (WRF) Project (the "Project"). We appreciate the opportunity to comment, and the purpose of our comments are to ensure Cal Poly has considered and evaluated all aspects related to construction, operation, and maintenance of a WRF and collection system and recycled water storage and distribution system. The City's comments are also provided to ensure any potential impacts to the environment and the City's wastewater collection system, Water Resource Recovery Facility (WRRF), and associated water quality compliance programs and permits have been considered and adequately addressed in compliance with the California Environmental Quality Act (CEQA). The comments are intended to be constructive to facilitate 1) the City's ability to continue to support Cal Poly's implementation of the 2035 Master Plan, and 2) collaborative strategic planning related to current, and future, water and sewer agreements that would ensure the City's and Cal Poly's continued partnership and mutual success.

#### Comments on the Proposed Project and Associated Assumptions

The City's General Plan Water and Wastewater Element (WWE) establishes goals, policies, and programs to ensure provision of adequate sanitary sewer infrastructure and wastewater treatment capacity to accommodate existing and future development in order to protect public health, human safety, and the environment. Adopted WWE goals include provision of "wastewater treatment that meets or exceeds regulatory requirements and ensures the protection of public health and the environment." The City has reviewed the Project in consideration of consistency with the City's General

Plan, in addition to good governance practices to ensure both City and Cal Poly goals would not be impeded by the proposed WRF project.

The City currently treats wastewater generated by Cal Poly at the WRRF, which processes wastewater in accordance with standards set by the Regional Water Quality Control Board (RWQCB). The RWQCB issued a permit to the City under the National Pollutant Discharge Elimination System (NPDES), setting standards for the discharge of treated wastewater. These standards were established to protect beneficial uses of San Luis Obispo Creek including recreation, agricultural supply, and fish and wildlife habitat. The City will be receiving a new NPDES permit following completion of a comprehensive upgrade to the WRRF, and will subsequently be issuing a new or amended Significant Industrial User permit to Cal Poly reflecting the updated loading limitations and associated requirements. As Cal Poly would continue to send wastewater to the City's WRRF under the proposed Project scenario, the City's comments emphasize the importance of current and future regulatory compliance related to potential water quality contaminants and associated loading limits.

Regarding Cal Poly's assumptions and calculations on recycled water quantities, the EIR does not appear to have factored in potable and recycled water distribution system water loss, which would change the amount of water available to facilitate implementation of the Campus Master Plan. In addition, the City advises Cal Poly to prepare campus-specific water demand studies (average and peak flow) and water loss audits to ensure the planning, engineering, and evaluation of the Project and identified alternatives, and the Project's ability to provide the quantity and flow of water needed to implement the Campus Master Plan, is based on project-specific and site-specific substantial evidence.

The City's comments on the Project Description are intended to encourage Cal Poly's consideration of realistic assumptions and costs regarding construction, operation, and maintenance of the proposed WRF and recycled water storage and distribution infrastructure, including: associated regulatory compliance and permitting; staffing resources and required certifications and licenses to operate the WRF and recycled water system; and on-going monitoring, reporting, and response to agency audits. It is recommended that the University hire a 3<sup>rd</sup> party consultant to peer review assumptions so that both construction and operating costs are fully vetted.

Based on the substantial efforts, resources, and funding necessary to implement the Project as proposed, the City advises that Cal Poly consider approval of *Alternative 3: City Wastewater Treatment and Recycled Water Delivery Alternative*, which would consolidate wastewater collection and treatment and provision of recycled water pursuant to existing and future agreements to be negotiated between our agencies.

#### **Comments on the Draft EIR**

The City of San Luis Obispo appreciates receipt of the Draft Environmental Impact Report (Draft EIR) for the Water Reclamation Facility. The City has the following comments on the Draft EIR.

#### **Project Description**

The Draft EIR includes project information based on conceptual plans and processes. Based on further design and engineering analysis of the facility and associated infrastructure, the project may change and warrant further analysis and comments from the City and regulatory agencies. In addition, excluding details that would be known during the engineering and design phase of the Project, and the associated lack of disclosure of potentially significant impacts and Project alternatives, may deprive the public and Responsible Agencies of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the State Board of Trustees may decline to implement. Disclosure of significant new information prior to certification of the Final EIR may require recirculation of the Draft EIR pursuant to *CEQA Guidelines* Section 15088.5. Specific comments regarding the Project Description as currently presented in the Draft EIR are provided below.

- The graphics provided in the Draft EIR (such as Figure 2-8 Proposed Project Components) are general in nature, and do not provide the level of detail warranted for an informative and legally sufficient Project-specific EIR. A complete, accurate, stable, and finite project description is essential for adequate review of project pursuant to CEQA (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199-192).
- 2. The EIR should quantify and show how flows are anticipated to fluctuate for both the Cal Poly WRF and City WRRF throughout the school year (monthly fluctuations, average and peak, at a minimum), and clearly identify if calculations are based on a quarter or semester system. Under the proposed Project scenario, low sewer flows within the affected wastewater collection main (particularly from California Boulevard to Santa Rosa) will have an adverse effect on the pipe and would require increased maintenance by City staff. These impacts must be disclosed in the EIR.
- 3. The EIR should provide details regarding proposed Campus and Utility Master Plan implementation, including proposed schedules for off-line, rehabilitated, and new housing units. A defensible analysis will be critical to inform future water and sewer agreement amendments and evaluation of potential impacts to the City's wastewater collection system and WRRF in compliance with CEQA.

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- 4. A membrane bioreactor (MBR) is a biological and mechanical process that relies on (near) steady-state flows to remain operational and within regulatory compliance. In order to provide an informative, complete, accurate, stable, and finite project description, the EIR should identify how Cal Poly and the Project will address these seasonal fluctuations in student/staff populations and associated wastewater flow.
- 5. Draft EIR Executive Summary (page ES-2): pursuant to the current 2021 capacity and rate agreement, Cal Poly's capacity interest in the City's Water Treatment Plant capacity is 0.893 million gallons per day (not 0.9 million gallons per day) this rounding up carries through the Draft EIR and should be corrected for accuracy.
- 6. Draft EIR Section 2.2.2 Existing Campus Water Supply (page 2-10): The Draft EIR states that Cal Poly has the right to 959 acre feet (af) safe annual yield (SAY) in Whale Rock. This statement needs to be corrected in this section of the EIR, as Cal Poly does not have a "right" to the 959 acre feet; the SAY acrefeet amount will likely change (lower) over time as siltation, climate, evaporation, longer droughts predicted all have their cumulative impact. For example, as identified in the Cal Poly Master Plan Final EIR (Utilities and Service Systems) and Cal Poly WRF Draft EIR Section 3.6.2 Utilities and Service Systems, Water Demand, page 3.6-9, an update to the SAY model "indicated that SAY is 4,910 afy, approximately 2,000 afy less than the 6,940 afy used in previous planning documents." Refer to Draft EIR Section 3.6.2 Utilities and Service Systems, Water, Water, Water Demand, Extremely Dry Years (Conference Years) (page 3.6-9), which accurately defines SAY as "the quantity of water that can be sustainably withdrawn every year considering dry and multiple dry year conditions."
- 7. Draft EIR Section 2.2.2 Existing Campus Water Supply (page 2-10): The Draft EIR states that "Cal Poly may take more or less water than its SAY of 959 [acre-feet] af." This statement should be corrected by removing the word "more"; withdrawing more than determined SAY would result in adverse impacts not evaluated or disclosed in the Draft EIR.
- 8. Draft EIR Section 2.2.2 Existing Campus Water Supply (page 2-10): The Draft EIR states that Cal Poly's allocated storage limit at Whale Rock Reservoir is 13,136 af of storage. The EIR must clarify that only 12,485.8 af of this volume is usable storage when taking into account Cal Poly's share of the minimum pool, which must be maintained for aquatic species, pursuant to the *Whale Rock Operating Procedures Manual*.
- 9. Draft EIR Section 2.2.2 Existing Campus Water Supply (page 2-10): The Draft EIR notes that the two on-campus wells produce approximately 120 acre-feet per year (afy) of non-potable water, which is used to irrigate agricultural crops

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> on the main campus. The EIR should provide additional information regarding these wells (directly or sourced and incorporated by reference), including the documented SAY of the groundwater source, any regulated or internal policies that determine when use of these wells would be restricted or suspended, clarification if these wells are monitored, and associated well monitoring data (historical pumpage rates and quantities, water quality).

- 10. Draft EIR Section 2.2.3 Existing Campus Water Treatment and Delivery (page 2-10): The Draft EIR states that "Two pump stations managed by the City under Whale Rock Commission oversight are used to pump potable water from the City WTP to Cal Poly through the City's main water pipelines that pass through campus." The EIR should be corrected to note that the pump stations are used to pump <u>non-potable</u> water from Whale Rock Reservoir, not potable water.
- 11. Draft EIR Section 2.2.3 Existing Campus Water Treatment and Delivery (page 2-10): For accuracy, the EIR should clarify and provide additional descriptions of Cal Poly facilities located outside the campus core that receive fire flow from City Reservoir 2. In addition, the EIR references capacity interest in the transfer pump station, 24-inch line, and 30-inch line. All of these identified pipelines and the transfer pump station have been replaced at this point in time and purchasing capacity has been superseded. The EIR must be updated to reflect existing conditions and the current capacity agreement, which does not include capacity in the City's water distribution system.
- 12. Draft EIR Table 2-3 Modeled Wastewater Flows from Cal Poly to City WRRF (page 2-13): The flows identified in this table appear to be outdated based on recent discussions and collaboration with Cal Poly. Please clarify if this table is intended to show proposed flow to the City's WRRF under the identified scenarios. Wastewater volumes and flow rates are presented in five-year increments (*Table 2-3 Modeled Wastewater Flows from Cal Poly to City WRRF*, page 2-13); the Draft EIR should provide more detailed analysis of changes in flow as campus populations fluctuate throughout the year, and identify the methodologies to address these fluctuations and achieve compliance with existing and future water quality standards.
- 13. Draft EIR Section 2.2.5 Existing Campus Wastewater Collection and Treatment (page 2-13): The EIR states the following: Cal Poly's discharges of wastewater to the City's collection system are regulated under Significant Industrial User (SIU) Permit Number 259-S (effective January 1, 2021) issued by the City. EIR Section 2.2.6 (Project Campus Wastewater Demand) (page 2-15) identifies effluent limitations and notes existing non-compliance; however, there is no description or project components proposed that would bring the effluent into compliance beyond noting that constituent

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concentrations would become more dilute as more students live on campus. L1-14 The EIR should consider potential processes that would facilitate compliance.

- 14. Draft EIR Section 2.2.6 Projected Campus Wastewater Demand (page 2-15) includes the following statement: "Model results used to calculate peak wet weather flow (PWWF), peak dry weather flow, and ADWF indicate that even with operation of the WRF, PWWF from Cal Poly to the City's wastewater collection systems would continue to exceed the 1.2 mgd of collection capacity agreed to by the City and Cal Poly through 2035." These model results should be provided as an appendix to the EIR, as this data will inform potential considerations of Cal Poly's purchase of additional capacity in the City's wastewater collection system and WWRF and noted future negotiations, and facilitate the City's capital infrastructure planning.
- 15. Draft EIR Section 2.4 Proposed Project Components (page 2-17): The EIR states that "Cal Poly would continue to pump up to 120 afy of groundwater for agricultural irrigation purposes." The Draft EIR should describe how the existing well system would be integrated or isolated from the proposed recycled water system, to ensure the whole of the action is described and evaluated and identify how the Project would comply with water quality and recycled water regulations and standards.
- 16. Draft EIR Section 2.4.1 WRF Collection System, Force Mains (page 2-24) describes four Union Pacific Railroad (UPRR) crossings within the proposed forcemain alignments. Negotiations for easements and other associated approvals from UPRR can take a significant amount of time to resolve and execute. Cal Poly should consider and incorporate reasonable timeframes necessary to complete this phase of the project and adjust the descriptions, schedule, and EIR analysis accordingly.
- 17. Draft EIR Section 2.4.2 Water Reclamation Facility (page 2-25) includes the following: "The WRF would also include a belowground vault or aboveground tank to provide equalization during high inflows to the WRF. The equalization vault or tank would include up to 500,000 gallons of capacity to also provide short-term storage, as specified in CCR Title 22 Section 60341(a), allowing retention of partially treated wastewater for at least a 24-hour period. All the equipment except the pump-back equipment would be either independent of the normal power supply or provided with a standby power source. In addition, the WRF would include a waste-activated sludge (biosolids) handling area to support the dewatering and off-haul of biosolids produced by the treatment processes. Biosolids would be disposed of at a permitted municipal solid waste landfill." The EIR is lacking modeled, project specific information supporting a conclusion that the 500,000 gallon capacity would be adequate. There is no provided analysis if water storage in the equalization vault or tank would need

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to exceed 24 hours during a major storm event, and what the impact would be in that realistic circumstance. Quantification of biosolids production and hauling should be provided. Please clarify if the biosolids handling area will be covered, and provide additional details regarding biosolids treatment. If proposed, the description should be clarified, and any process treatments should be added to *Figure 2-10 Generic Process Flow Diagram Based on the Anticipated WRF Treatment Process* (page 2-27). In addition, it is advised that Cal Poly consider the effects of California Senate Bill 1383, which may result in fewer landfill facilities' acceptance of biosolids past the year 2025.

- 18. Draft EIR Section 2.4.2 Water Reclamation Facility (page 2-25): The EIR states that "the WRF would be designed to meet water reclamation requirements and waste discharge requirements (WDRs) established by the Central Coast Regional Water Quality Control Board." Based on the preliminary nature of the proposed plans, has the Board been contacted to confirm that the proposed facility would meet all WDRs?
- 19. Draft EIR Section 2.4.3 Recycled Water Storage and Distribution System, Recycled Water Storage Reservoir (page 2-25)" The EIR states that a new recycled water storage reservoir with a capacity of up to 120 af would be constructed north of the proposed WRF, and that the reservoir would provide storage of recycled water for up to five months before distribution. The EIR must provide the calculations and substantial evidence pursuant to PRC § 21080(e)(1)(2) demonstrating that a basin of this size would be adequate.
- 20. Draft EIR Section 2.5.1 Project Operations and Maintenance, Staffing (page 2-32) states that "operation and maintenance of the recycled water distribution system would be performed by existing agricultural operations staff from the College of Agriculture, Food and Environmental Sciences." The EIR should clarify staff (and associated roles and qualifications) responsible for monitoring, inspection, and reporting associated with the proposed recycled water system.
- 21. Draft EIR Section 2.5.2 WRF Operation (page 2-33): The Draft EIR states that Cal Poly would continue to send wastewater to City WRRF. Section 2.5.4 Contingency Plan and Emergency Operations (page 2-34) states that: "Cal Poly would have the ability to redirect untreated wastewater from the lower lift station into the campus sewer system for treatment at the downstream City WRRF." Existing and potential future non-compliance issues are not addressed, as noted above. To ensure an adequate evaluation, the EIR must include a specific detailed plan for diversion and disposal methods in the event water quality does not meet permit requirements, and the proposed plan should be evaluated in the EIR such that impacts can be disclosed and mitigation measures and alternatives can be identified. This information is

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critical for consideration by the City, RWQCB, and State Board of Trustees (decision-maker for the Project). These direct and indirect impacts to the City's infrastructure and facilities, in addition to capacity limitations and associated potential water quality violations and loading exceedances must be addressed in the EIR, including identification of potential infrastructure improvements that may have an impact on the environment, and enforceable mitigation measures and performance standards sufficient to mitigate identified impacts (PRC § 21081.6(b), *CEQA Guidelines* Section15126.4(a)(2)).

- 22. Draft EIR Section 2.7 Required Project Approvals and Permits (pages 2-39 and 2-40): *Table 2-9 Responsible Agencies and Anticipated Permits and Approvals for the Project* identifies numerous permits and approvals required to implement the Project. The City advises Cal Poly consider reasonable timeframes to obtain these permits and approvals, and adjust the Project schedule accordingly.
- 23. Draft EIR Section 2.7 Required Project Approvals and Permits (page 2-40): Table 2-9 identifies modifications to existing water supply treatment and wastewater agreements with the City as required for the Project. Potential modifications should be summarized here. There is no description or delineation of potential proposed utility easements in the Draft EIR. These locations should be identified and evaluated in the Draft EIR.
- 24. Draft EIR Section 2.7 Required Project Approvals and Permits (pages 2-39 and 2-40): Table 2-9 should include the requirement for a Sewer System Management Plan (SSMP), pursuant to SWRCB Order WQ 2022-0103-DWQ Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems.
- 25. Draft EIR Table 2-2 Comparison of 2019 and Campus Master Plan Buildout Water Supply and Demand with and without the WRF only shows average 2019 demand and average campus master plan buildout demand – this table must show phasing over time consistent with the Campus Master Plan and subsequent known amendments to ensure that the operational impacts of the Project both on campus and affecting the City's wastewater collection system and WWRF can be adequately addressed in the analysis.
- 26. Draft EIR Section 2.5.4 Contingency Plan and Emergency Operations generally describes the components of the contingency plan, but does not specifically describe what would occur other than discharge into the campus wastewater collection system, to Parshall Flume, and City WRRF. In addition, if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be disclosed (*CEQA Guidelines* Section

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> 15126.4(a)(1)(D), Stevens v. City of Glendale (1981) 125 Cal.App.3d 986). L1-27 Additional details are necessary, including a complete contingency plan to provide the substantial evidence that the potential direct, indirect, and secondary impacts would be less than significant.

- 27. The Draft EIR should clearly identify how odor at the proposed WRF, recycled water storage ponds, and any proposed wastewater going into the City sewer system will be addressed. The mention of a future odor control plan is generic and insufficient and should include specific details regarding plan components: all of which would be informed by detailed plans.
- 28. Draft EIR Section 2.4.2 Water Reclamation Facility (page 2-25) notes that "All the equipment except the pump-back equipment would be either independent of the normal power supply or provided with a standby power source." The EIR must specifically identify the proposed standby power source and evaluate the potential impacts resulting from its operation.
- 29. Draft EIR Section 2.4.4 Utility Improvements to Support Operation of Proposed Facilities and other Campus Needs (page 2-31): The proposed plan for energy resiliency and redundancy must be detailed in the EIR, and potential environmental impacts must be evaluated. Potential impacts as a result of power outages or Pacific Gas & Electric (PG&E) Public Safety Power Shutoffs (PSPS) (affecting operation of the WRF and all lift stations) should also be identified in the EIR.
- 30. Draft EIR Section 2.6.3 Construction Methods and Labor Force, Other Distribution System Improvements (page 2-39) states the following: "The project would involve minor modifications to the Avocado Pump Station 2 and Sport Complex Pump Station to increase storage capacity. Construction activities necessary for these improvements would be minor, involving installation of proper backflow preventers, labels, minor valving and piping modifications, and other Title 22 requirements. No earth-moving activities would be necessary." Based on a lack of detailed design plans and associated design narratives, additional evidence is warranted demonstrating that these improvements would be sufficient to ensure the project description is comprehensive and that the whole of the project is analyzed in the EIR.

#### EIR Issue Areas

31. The Draft EIR does not provide a project specific analysis of agriculture and forestry, air quality and odors, energy, geology and soils and paleontological resources, greenhouse gas emissions, hazards and hazardous materials, land

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use and planning, mineral resources, noise and vibration, population and housing, public services and recreation, transportation, and wildfire. While the tiering was identified as the level of environmental review pursuant to Public Resources Code (PRC) § 21094, the Draft EIR does not provide substantial evidence that potential impacts to the environment specific to the resource categories excluded from project-specific analysis were either: (1) Mitigated or avoided pursuant to paragraph (1) of subdivision (a) of PRC § 21081 as a result of the certified EIR for the Campus Master Plan or (2) examined at <u>a</u> sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

At a minimum for adequacy pursuant to CEQA, in addition to the resource topics evaluated in the Draft EIR, the Draft EIR should provide a project-specific analysis of energy (consistent with *CEQA Guidelines Appendix F: Energy Conservation*), air quality and greenhouse gas emissions (operational), and hazardous materials (due to chemical use, biosolids, swine unit pond relocation).

- 32. The Draft EIR relies on general research and non-seasonal reconnaissance surveys to determine potential impacts to biological resources. Project-site specific, seasonal biological surveys should be conducted in order to determine potential Project-specific impacts to biological resources and identify associated Project-specific mitigation.
- 33. The City currently relies on Cal Poly's contribution of wastewater flow to meet discharge requirements supporting habitat for Federally Endangered South-Central California Coast steelhead. The EIR must evaluate potential impacts to steelhead habitat in San Luis Obispo Creek as a result of any changes to Cal Poly's contributed wastewater discharge. The EIR must also identify how these impacts would be avoided or minimized. The absence of this analysis and other analyses, which will likely lead to identifying new significant impacts, may constitute significant new information warranting recirculation.
- 34. The EIR does not identify the energy demand for the proposed WRF and associated infrastructure, and does not include a Project-specific energy impact analysis. The analysis should include an assessment of Pacific Gas & Electric (PG&E) Public Safety Power Shutoffs (PSPS) and how the proposed WRF and associated infrastructure would operate under PSPS conditions with the exception of the lower lift station (e.g., temporary or permanent generators). If proposed, generator operation should be evaluated in

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applicable sections of the EIR, including air quality, greenhouse gas L1-36 emissions, noise.

#### Hydrology and Water Quality

- 35. Draft EIR Section 3.5.2 Groundwater Hydrology (page 3.5-9): The EIR should include a graphic delineating the boundaries of the San Luis Obispo Valley Groundwater Basin relative to campus boundary, including existing well locations and proposed facility and infrastructure improvements.
- 36. Draft EIR Section 3.5.2 Groundwater Hydrology (page 3.5-9) notes that the sustained yield of the San Luis Obispo Valley Ground Water Basin is 5,900 afy; as noted in the Final San Luis Obispo Valley Groundwater Sustainability Plan: "without mitigation for land subsidence or specific projects that increase recharge during dry periods, the preliminary sustainable yield of the San Luis Valley subarea is estimated at 2,500 AFY." The sustainable yield of the Basin was estimated at 5,800 AFY (2,500 AFY for San Luis Valley and 3,300 AFY for Edna Valley) (page 6-51, GSP). The EIR should be updated pursuant to the Final GSP and clarify estimated sustainable yield for the San Luis Valley Subarea.
- 37. Draft EIR Section 3.5.2 Wastewater Retention Ponds (page 3.5-12) identifies seven clay-lined wastewater retention ponds on campus, which are subject to Cal Poly's WDR for point-source pollution. The EIR should address any wastewater retention pond capacity issues and provide substantial evidence and calculations supporting the conclusion that implementation of identified Mitigation Measure 3.5-3 Design and Construct Earthen Berms to Minimize Risk of Failure (page 3.5-19) would result in a less than significant impact to water quality.
- 38. Draft EIR Section 3.5.3 Environmental Impacts and Mitigation Measures, Issues not Discussed Further, Substantially Decrease Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management of the Basin and Conflict with or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan (page 3.5-13): The EIR does not evaluate potential indirect impacts to the Groundwater Basin resulting from downstream discharges of pollutants into creek and tributaries that flow into the Groundwater Basin. This potentially significant environmental impact must be evaluated on a Project-specific level in the EIR.
- 39. The EIR relies on compliance with existing regulations to reach a determination that potential water quality impacts to San Luis Obispo Groundwater Basin as a result of construction and operation of the Project

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would be less than significant. The EIR should identify the potential direct and indirect impacts that could occur as a result of an exceedance or violation.

#### **Utilities and Service Systems**

- 40. Draft EIR Section 3.6.2 Environmental Setting, Water, Water Demand and Table 3.6-2 Cal Poly Water Demand (page 3.6-8 and 3.6-9): The Draft EIR identifies that the campus potable water demand would be 891 afy (795,434 gpd), and non-potable water demand would be 500 afy (446,371 gpd). EIR Section 3.6-3 Environmental Impacts and Mitigation Measures, Issues Not Discussed Further, Result in Insufficient Water Supplies concludes that water demands would be met with implementation of the Project. However, the analysis does not consider potential water loss in the potable distribution system and proposed recycled water system. The Draft EIR and associated analysis of future water supply and demand is insufficient, and should address if water demand can still be met when including water loss in potable water distribution system and proposed recycled water system.
- 41. Draft EIR Section 3.6.2 Water Treatment and Conveyance (page 3.6-8) states that "the City's 24-inch potable water main goes through campus, serving seven metered connections. The Academic Core subarea includes a 1-million-gallon in-ground storage tank, a 30,000-gallon elevated storage tank, and a 500,000-gallon elevated storage tank for reliable service of potable water demands and to provide adequate volume for firefighting purposes. Cal Poly owns and maintains water supply conveyance piping, including providing fire flows to its buildings, throughout the campus (Watearth 2019b)." The EIR should clearly distinguish and identify structures not currently relying on Cal Poly water service for fire flow.
- 42. Draft EIR Section 3.6.2 Water Demand states that: "Campus water demand is presented in Table 3.6-2 (Watearth 2019b). Peak demands shown in Table 3.6-2 were derived from the City's 2015 Final Potable Water Distribution System Operations Master Plan, which uses a peaking factor of 1.5 and 4.0 for peak daily and peak hourly demands, respectively (City of San Luis Obispo 2015)" (page 3.6-8). In order to ensure adequate planning, analysis, and assumptions informing impact determinations, and thus compliance with CEQA, Cal Poly must conduct a campus-specific water demand and flow peaking study, as City water consumption characteristics do not equate to campus uses and associated water demand fluctuations.
- 43. Draft EIR Section 3.6.2 Wastewater, Wastewater Treatment and Collection Agreements between Cal Poly and the City (page 3.6-9): This section needs to be updated to reflect current agreements and MOU (2021).

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- 44. The currently proposed capacity of the Cal Poly WRF is 0.5 million gallons per day (mgd) peak wet; the EIR does not evaluate how this proposed capacity compares to the demand for wastewater treatment over time, as the Master Plan is implemented and reaches final build-out. The EIR must evaluate how flows are anticipated to fluctuate for both the Cal Poly WRF and City WRRF throughout the year. The EIR must identify and evaluate how implementation of these projects affect the impact analysis and flow and capacity estimations.
- 45. The EIR should specifically address proposed infiltration/inflow (I/I) projects identified in Utility Master Plan that are required to address sewer pipe capacity constraints experienced during rain events within the Campus. The Draft EIR provides the following generic statement (Section 2.2.6 Projected Campus Wastewater Demand, page 2-15): "Improvements to Cal Poly's collection system to reduce inflow and infiltration that contribute to PWWF are ongoing." The EIR should provide specifics regarding these improvements and quantity how the improvements are reducing I/I.
- 46. The Draft EIR generally identifies potential catastrophic event(s) and failure(s), such as flooding, fires, seismic events, or electrical outages and relies on the preparation of a future contingency and emergency plan to address potential impacts. The EIR must specifically identify and describe the potential environmental impacts that could occur as a result of such event(s) and failure(s), including potential impacts to water quality, and the City's wastewater collection system and WWRF, and specifically how these impacts would be avoided or minimized during operation of the proposed WRF.
- 47. The EIR is lacking a quantified analysis of the minimum flow necessary to maintain WRF operations. The EIR should identify any potential impacts resulting from low flow conditions, and describe how operation (or non-operation) of the WRF during low-flow months will occur.
- 48. The EIR lacks an evaluation of any potential impacts to the City sewer system (wastewater collection, WRRF, recycled water) in the event the Cal Poly WRF is shut off as a result of insufficient flow, event, or failure. The EIR must identify these impacts, and include measures demonstrating how the impacts would be avoided or minimized.
- 49. The EIR lacks an evaluation of any potential impacts to the environment and the City's sewer system and WRRF as a result of discharged wastewater, including but not limited to volume, strength (organic loading), and potential upsets. The EIR must identify how these impacts would be avoided or minimized.

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50. The EIR must specifically evaluate stormwater discharges, including how potential discharges would affect the City's compliance with stormwater regulations and distinguish potential violation responsibility (City or Cal Poly).

Thank you for your consideration of the City's comments provided in response to the Draft EIR. We look forward to further collaboration and discussion. If you have any questions regarding the City's comments in response to the Draft EIR, please don't hesitate to be in touch with me directly. I can be contacted by phone at 805-781-7215, or by e-mail: <u>afloyd@slocity.org</u>.

Sincerely,

L FK

Aaron Floyd Public Utilities Director City of San Luis Obispo, Public Utilities

CC: City of San Luis Obispo Mayor and City Council Central Coast Regional Water Quality Control Board Mike McCormick, Associate Vice President Facilities Management & Development Cyndi Villa, Senior Vice President for Administration and Finance Derek Johnson, City Manager Christine Dietrick, City Attorney Markie Kersten, Assistant City Attorney Shelly Stanwyck, Assistant City Manager Community Services Michael Codron, Community Development Director Matt Horn, Public Works Director Brian Leveille, Senior Planner Bob Hill, Office of Sustainability and Natural Resources Manager Luke Schwartz, Transportation Manager



Air Pollution Control District San Luis Obispo County Letter L2

#### **VIA EMAIL ONLY**

May 31, 2023

Marcus Jackson Cal Poly State University 1 Grand Avenue San Luis Obispo, CA 93407 mjackson@calpoly.edu

# SUBJECT: APCD Comments Regarding the Draft Environmental Impact Report (DEIR) for a Water Reclamation Facility at Cal Poly, San Luis Obispo

Dear Marcus Jackson:

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Draft Environmental Impact Report (DEIR) for the proposed Water Reclamation Facility (WRF) project located at California Polytechnic State University in San Luis Obispo (Cal Poly).

The proposed project involves the construction and operation of an on-campus water reclamation facility and recycled water storage and distribution system to produce and deliver disinfected tertiary recycled water for unrestricted reuse and would include a WRF collection system and utility improvements to support operation of proposed facilities.

The WRF was contemplated as a near-term project in the Cal Poly 2035 Master Plan and was evaluated at the level of detail known at the time in the Master Plan EIR, certified in 2020. Because air quality, greenhouse gas (GHG) emissions, and noise impacts of the WRF were evaluated in the 2035 Master Plan EIR, the project-specific DEIR for the WRF does not include further evaluation of these resources; rather, it summarizes the impact assessments and applicable mitigation measures in the 2035 Master Plan EIR and provides rationale as to why additional analysis is unnecessary.

The APCD previously commented on this project on October 14, 2022. The DEIR proposes to implement air quality and GHG impact mitigation measures as outlined in the Cal Poly 2035 Master Plan. With the implementation of these measures, including 3.3-2: Implement Dust and Exhaust Emissions Reduction Measures; 3.3-6: Prepare an Odor Control Plan; and 3.8-2: Purchase GHG Offsets, air quality and GHG impacts appear to be mitigated to a level of insignificance and APCD is not recommending further mitigation.

L2-1

APCD Comments Regarding a DEIR for a Water Reclamation Facility at Cal Poly May 31, 2023 Page 2 of 2

As a reminder, as outlined in our October 14, 2022, letter, certain construction, and operation activities may be subject to permitting requirements of the APCD and other governmental agencies.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at (805) 781-5912.

Sincerely,

line Ku

VINCE KIRKHUFF Air Quality Specialist

VJK/edc

cc: Dora Drexler, APCD (ddrexler@co.slo.ca.us)





## Central Coast Regional Water Quality Control Board

May 31, 2023

#### Sent Via Electronic Mail

Marcus Jackson Project Manager California Polytechnic State University 1 Grand Avenue San Luis Obispo, CA 93407 Email: <u>mjackson@calpoly.edu</u>

Dear Mr. Jackson:

### CENTRAL COAST WATER BOARD COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED CALIFORNIA POLYTECHNIC STATE UNIVERSITY WATER RECLAMATION FACILITY

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed the Draft Environmental Impact Report (EIR) for the Cal Poly Water Reclamation Facility (WRF) Project, prepared by Ascent Environmental, Inc. The Draft EIR was prepared in accordance with California Environmental Quality Act (CEQA) requirements.

Note that these are preliminary comments based on the Draft Environmental Impact Report which does not include design documents or calculations. The Central Coast Water Board has received and commented on the 10% design documents and looks forward to Cal Poly addressing those comments in future design submittals. The Central Coast Water Board and the State Water Resources Control Board Division of Drinking Water staff may have additional comments on future design submittals.

The Central Coast Water Board has the following comments on the Draft EIR:

1. Cal Poly is currently regulated by *Waste Discharge Requirements Order No. R3-2003-035 for California Polytechnic State University* (Existing Permit) that covers a variety of campus wastewater discharges including, but not limited to, activities of the Dairy Unit, Beef Unit, Swine Unit, and composting operations. Cal Poly has a long history of noncompliance with the Existing Permit. In October 2019, the

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

S1-1

Central Coast Water Board sent Cal Poly a notice of violation for their Existing Permit. Cal Poly has not met the schedules identified in Cal Poly's notice of violation compliance plan. Cal Poly should look wholistically at how the university can put appropriate processes and resources in place to comply with existing and potential future Central Coast Water Board permits.

- Cal Poly must receive approval of a title 22 engineering report from the Division of Drinking water and obtain additional permits from the Central Coast Water Board for the construction and operation of the WRF including:
  - Enrollment in General Waste Discharge Requirements Order No. R3-2020-0020 for Discharges from Domestic Wastewater Systems with Flows Greater than 100,000 Gallons per Day (Large Wastewater General Permit).
  - Enrollment in State Water Resources Control Board Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water Use Permit).
  - Enrollment in Statewide General Order No. WQ 2022-0103-DWQ, Statewide General Waste Discharge Requirements for Sanitary Sewer Systems
  - Enrollment in Statewide General Order No WQ 2009-0009-DWQ, Statewide General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities
- 3. The construction of a Cal Poly WRF will impact stormwater runoff on campus. Cal Poly Dairy Unit wastewater storage lagoon overflowed during heavy storm events in January and March 2023 in violation of the Existing Permit and the university has been asked to evaluate stormwater on campus and implement actions to prevent future violations. In the university's stormwater analysis, please consider not only the existing campus facilities but also changes to the campus landscape from WRF facilities.
- 4. Wastewater cannot be land applied within 24-hours of forecasted precipitation with a greater than 50-percent probability of occurring, during precipitation events, or when the land application area surface soil is saturated. The Draft EIR report states that recycled water will be retained in a storage reservoir during non-irrigation periods and that the storage reservoir would be designed for at least 5 months of retention time. Please provide details on how 5-month storage capacity is determined.
- 5. The Draft EIR includes influent and effluent flow monitoring as well as recycled water monitoring in Table 2-6 and Table 2-7. However, these tables do not capture the breadth of monitoring requirements that will be required by the Large Wastewater General Permit, Recycled Water Use Permit, and title 22 Engineering Report (priority pollutants, total coliform, etc.). Daily monitoring of select constituents is required and therefore Central Coast Water recommend

S1-1 cont.

S1-2

S1-3

	Cal Poly have full-time staff onsite to implement the monitoring and reporting program requirements.	│ S1-5 │ cont.	
6.	Cal Poly must periodically test dual plumbed systems for cross connection and backflow prevention devices that must be installed in accordance with title 22 and the Large Wastewater General Permit.	S1-6	
7.	Additional permitting (and monitoring and reporting) may be required to discharge groundwater from dewatering wells to the storm drain or sanitary sewer if high groundwater is encountered during construction.	S1-7	
8.	The Central Coast Water Board is transitioning to using the GeoTracker database for waste discharge requirement monitoring and reporting programs. GeoTracker is the State Water Board's Internet-accessible database system used by the State Water Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land. Cal Poly will be required to upload monitoring and reporting data to this database.	S1-8	
9.	Please confirm that the location of the storage reservoir meets the setback requirements for ephemeral drainages required by the Large Wastewater General Permit. Although the reservoir is replacing existing Swine Unit ponds, construction of a new reservoir in an ephemeral drainage in this location may require a Water Quality Certification 401 and/or 404 permit. Please confirm with U.S. Army Corps of Engineers and with Central Coast Water Board 401 Certification staff (Phil Hammer at phillip.hammer@waterboards.ca.gov).	S1-9	
10	The Draft EIR discusses designing and constructing the recycled water reservoir earthen berms to minimize the risk of failure. Although these mitigation measures are important, Central Coast Water Board staff have observed similar earthen berms fail due to undermining from burrowing animals. Central Coast Water Board staff recommend implementing practices to reduce the occurrence of burrows in the constructed earthen berms in addition to the listed mitigation measures.	S1-10	
11	11.Lift stations and pump stations would be constructed at topographic low points which makes them vulnerable to inundation by storm water in extreme		

S1-11

for potential storm -related inundation of lift stations.

precipitation events. Although the proposed lift station locations are outside of the

100-year Flood Zone, inundation by storm water could still occur, resulting in a total power loss and equipment failure at the station. Please identify mitigations

- 12. Cal Poly must coordinate with the San Luis Obispo Valley Groundwater Sustainability Agency and the City of San Luis Obispo as well as adequately evaluate the environmental impacts to the groundwater basins of reductions in wastewater flow to the City's wastewater treatment facility that would occur if the Cal Poly WRF is constructed. According to the Groundwater Sustainability Plan for the San Luis Obispo Valley GSA, percolation of treated wastewater from the City's facility is a significant source of anthropogenic recharge to the basin. If Cal Poly were to recycle and use wastewater on-site, rather than sending the wastewater to the City's treatment facility, it would result in a net reduction in the amount of recharge going into the San Luis Obispo Valley groundwater basin since most of Cal Poly lies outside of the basin boundaries. Please coordinate with the GSA and the City regarding this potential reduction in recharge to the San Luis Obispo Valley groundwater basin.
- 13. Cal Poly must coordinate with the City of San Luis Obispo as well as evaluate the environmental impacts of reductions in wastewater delivery to the City's facility that would result in reduced recycled water discharge to San Luis Obispo Creek. Note that a water rights change petition may be needed through the State Water Resources Control Board for the reduced flows to San Luis Obispo Creek. The environmental impacts of reduced flow to San Luis Creek were not addressed in the Draft EIR.
- 14. The Central Coast Water Board recommends that Cal Poly maintains a wastewater connection with the City's wastewater treatment facility and develop an agreement with the City prior to WRF construction to set expectations (and develop a realistic contingency plan) for the flows the City could handle without negatively impacting the City's wastewater treatment facility. Reliance on this connection as a contingency plan will have direct impacts on the operation of the City's plant. During periods of heavy inundation and infiltration, the City may not have the capacity to accept large volumes of water from Cal Poly. Additionally, wastewater flow must remain relatively stable to effectively run the plant and therefore large volumes of unexpected water may be problematic to the functionality of the City's plant.
- 15. The draft EIR states that the existing collection system is operated and maintained by the City. However, upon construction of the WRF, it is unclear if the City will continue to operate and maintain this collection system. In the event that the City no longer is responsible for the collection system on Cal Poly property, Cal Poly will need to be enrolled in the Statewide General Order No. WQ 2022-0103-DWQ, *Statewide General Waste Discharge Requirements for*

S1-13

S1-12

S1-14

<i>Sanitary Sewer Systems</i> <sup>1</sup> because the collection system is greater than 1 mile in length and is publicly owned.	S1-15
16. Please provide a greater amount of detail on how the plant will handle flow variability. There will be large peaks at the beginning of the academic year and substantial reductions during the summer. Demonstrate that the proposed equalization tank sized appropriately based on the historical and future flow data.	S1-16
17. Please estimate mass loading for key constituents (BOD, TSS, ammonia, TOC, nitrate). Please demonstrate that the treatment system is sized adequately for the anticipated loads as well as flows.	S1-17
18. Please provide more detail on the volume and composition of industrial wastewater as well as where industrial discharge(s) may enter the system. Cal Poly would need to develop a program that manages all discharges to the collection system and prevents issues from industrial discharges. Industrial discharges can significantly impact a domestic wastewater system from operating properly and can be a source of groundwater pollution. Components of the program should include an inspection program to audit the types of wastewater being disposed of into the collection system and to prevent problematic discharges. Central Coast Water Board understands that the City of San Luis Obispo currently audits Cal Poly to assess risks to the facility from industrial discharges and the City would no longer provide this oversight in the future if flows are no longer going to their system.	S1-18
19. The Draft Environmental Impact Report mentions dewatering and off-hauling sludge (biosolids). How will sludge be dewatered? Where will biosolids be hauled to?	S1-19
20. Please provide detail on how the equalization tank storage capacity was determined. Based on the historical data provided, peak hourly wet weather flows may exceed the combined capacity of the plant and equalization tank.	S1-20
21. Groundwater monitoring data from the Existing Permit indicates that waste discharges from campus operations already degrade underlying groundwater quality. If the WRF is constructed, additional wastewater would be discharged on campus. Cal Poly should evaluate the impact of the WRF to the beneficial uses of underlying groundwater.	S1-21

<sup>&</sup>lt;sup>1</sup> Statewide General Order No. WQ 2022-0103-DWQ can be accessed online at the following link: <u>https://www.waterboards.ca.gov/board\_decisions/adopted\_orders/water\_quality/2022/wqo\_2022-0103-dwq.pdf</u>

- 22. Cal Poly has stated that the facility will be operated by a contract operator. Cal Poly should develop a contingency plan in case the contract operator is not able to provide services. Cal Poly will need in-house personnel with adequate authority and resources to ensure that permit compliance is maintained.
- 23. As noted in our 10% design comments, Cal Poly must demonstrate that Cal Poly has adequate technical, managerial, and financial capacity to perform the capital improvement projects to update the existing sewer system as presented in the capital improvement plan, perform future capital improvement projects over the lifespan of facility and system as it ages, build the wastewater reclamation facility, employ or contract qualified personnel to operate and maintain the facility, and fund the ongoing operations, maintenance of the facility in compliance with regulatory requirements for protection of water quality and human health. Cal Poly has not demonstrated that they can comply with their Existing Permit and there appears to be impediments for maintaining permit compliance on campus.

The Central Coast Water Board appreciates the opportunity to provide comments on the Draft Environmental Impact Report. If you have questions or would like to discuss these comments in greater detail, please contact **Rachel Hohn at (805) 542-4789 or by** email at <u>Rachel.Hohn@waterboards.ca.gov</u> or Jennifer Epp at <u>Jennifer.Epp@waterboards.ca.gov</u>.

Sincerely,



*for* Matthew T. Keeling Executive Officer

Cc: Dennis Elliott, <u>delliott@calpoly.edu</u> David Korpan, <u>dkorpan@calpoly.edu</u> Scott Bloom, <u>sbloom@calpoly.edu</u> Mike McCormick, <u>mmccor21@calpoly.edu</u> Erin Grace Winett <u>egwinett@calpoly.edu</u> Andrea Shepard, <u>andrea.shephard@ascentenvironmental.com</u> Craig Hartman, <u>craig@hartman.engineering</u> Denise Connors, <u>denisec@lwa.com</u> Shawna Scott, <u>sscott@slocity.org</u> Aaron Floyd, <u>afloyd@slocity.org</u> S1-22

S1-23

Chris Lehman, <u>clehman@slocity.org</u> Mychal Boerman, <u>mboerman@slocity.org</u> Miguel Barcenas, <u>MBarcena@slocity.org</u> Markie Kersten, <u>mkersten@slocity.org</u> Phil Hammer, <u>phillip.hammer@waterboards.ca.gov</u> Jeff Densmore, <u>Jeff.Densmore@Waterboards.ca.gov</u> Rachel Hohn, <u>Rachel.Hohn@waterboards.ca.gov</u> Jennifer Epp, <u>Jennifer.Epp@Waterboards.ca.gov</u> James Bishop, <u>James.Bishop@Waterboards.ca.gov</u> Leah Lemoine, <u>Leah.Lemoine@waterboards.ca.gov</u> Arwen Wyatt-Mair, <u>Arwen.WyattMair@waterboards.ca.gov</u> Harvey Packard, <u>Harvey.Packard@waterboards.ca.gov</u> Jesse Woodard, <u>Jesse.Woodard@Waterboards.ca.gov</u> WDR Program, <u>RB3-WDR@Waterboards.ca.gov</u>

Place ID 883846

GT No. WDR100055424

Subject: Cal Poly Water Reclamation Facility comments on Draft EIR \\ca.epa.local\RB\RB3\Shared\WDR\WDR Facilities\San Luis Obispo Co\\_Draft Facilities\_non-permitted\Cal Poly WRF\4 - Correspondence\2023\_05\_ Central Coast Board comments on draft EIR\Central Coast Water Board comments on draft EIR\_final.docx CALIFORNIA PRATINENT OF FISH & WILDLIFE State of California – Natural Resources Agency DEPARTMENT OF FISH AND WILDLIFE Central Region 1234 East Shaw Avenue Fresno, California 93710 (559) 243-4005 www.wildlife.ca.gov

May 31, 2023

GAVIN NEWSOM, Governor

CHARLTON H. BONHAM, Direc



**Governor's Office of Planning & Research** 

JUNE 1 2023

#### **STATE CLEARINGHOUSE**

Marcus Jackson California State University Board of Trustees 401 Golden Shore Long Beach, California 90802-4210 (805) 756-6797 mjackson@calpoly.edu

#### Subject: California Polytechnic State University, San Luis Obispo Water Reclamation Facility Project Draft Environmental Impact Report (DEIR) State Clearinghouse No. 2022090231

Dear Marcus Jackson:

The California Department of Fish and Wildlife (CDFW) received a DEIR from California Polytechnic State University for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

After reviewing the provided CEQA document, CDFW concurs with the biological resources related analyses and measures proposed in the DEIR and recommends that all such measures in the DEIR be carried forward into the Final EIR. CDFW has determined that the biological resource mitigation measures as currently documented in the DEIR are sufficient for mitigation of potential project related impacts to listed species. Please note that implementation of certain mitigation measures such as the relocation of listed species would constitute take of listed species under the California Endangered Species Act (CESA), and erecting exclusion fencing could also result in take of listed species under CESA. Such take of any species listed under CESA would be unauthorized if an Incidental Take Permit (ITP) pursuant to Fish and Game Code Section 2081(b) was not acquired in advance of such actions. It is recommended to consult with CDFW before any ground disturbing activities commence and to obtain an ITP if take (including capture related to salvage and relocation) cannot be avoided.

S2-1

S2-2

<sup>&</sup>lt;sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Marcus Jackson California State University Board of Trustees May 31, 2023 Page 2

#### **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDB. The CNDDB field survey form can be found at the following link: <u>https://www.wildlife.ca.gov/Data/CNDDB/Submitting-Data</u>. The completed form can be mailed electronically to CNDDB at the following email address: <u>CNDDB@wildlife.ca.gov</u>. The types of information reported to CNDDB can be found at the following link: <u>https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals</u>.

#### **FILING FEES**

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CDFW appreciates the opportunity to comment on the Project to assist the California State University Board of Trustees in identifying and mitigating the Project's impacts on biological resources.

More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<u>https://www.wildlife.ca.gov/Conservation/Survey-Protocols</u>). If you have any questions, please contact Kelley Nelson, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 580-3194, or by electronic mail at <u>Kelley.Nelson@wildlife.ca.gov</u>.

Sincerely,

DocuSigned by: Julie Vance

Julie A. Vance Regional Manager

ec: State Clearinghouse, Governor's Office of Planning and Research <u>State.Clearinghouse@opr.ca.gov</u>. S2-4

From: Brandon Hurd <<u>bhurd@calpoly.edu</u>>

Sent: Thursday, May 18, 2023 14:02

To: Dennis K. Elliot <<u>delliot@calpoly.edu</u>>

Cc: Nicholas Lawrence Babin <nbabin@calpoly.edu>; Claire N. Balint <cbalint@calpoly.edu>; Sophie Claire Ortiz <soortiz@calpoly.edu>; Made I. Roger <maroger@calpoly.edu>; Benjamin Harold Sherman <bhsherma@calpoly.edu>; Kylee Lynn Singh <klsingh@calpoly.edu>; Matt K. Ritter <mritter@calpoly.edu>; Seeta Sistla <<u>ssistla@calpoly.edu</u>>; Nicholas E. Williams <<u>nwilli37@calpoly.edu</u>> Subject: Next Steps for the WRF and the Experimental Farm

Hi all,

I am the previous Student Farm Manager of the CAFES / Student Experimental Farm (CEF). I wanted to reach out here, particularly to Dennis Elliot, the Executive Director Energy & Infrastructure Planning, to ensure that we are all up to date with the developments of the Water Reclamation Facility (WRF) at the CEF. The folks cc'ed are all involved with the CEF as care-takers or stakeholders in some way. We did not receive the information to attend the public hearing of the developments here in September and many faculty and students (myself included) feel frustrated and confused. That said, I would like to encourage stronger communication moving forward with the folks in this message as stakeholders.

For now, we need to know some information. What is the timeline for the WRF construction? Is it possible that the WRF might be constructed in another site with much less faculty/ student importance? If not, how will facilities, CAFES and other relevant campus units be involved to support the move to a new site where we can continue to develop this educational farm to showcase sustainability and true hands-on learn-by-doing.

Dennis, can you provide details about how to address those items?

Just for context, the goal of a university Experimental / Agroecological Farm is to fill the void of sustainable action in Cal Poly by providing a space for sustainable development and true sustainable agriculture in practice: demonstrating systems of alternative cropping that could be replicated or scaled, providing space for sustainability research, providing workshops and hands-on education, providing a potential restoration nursery in collaboration with industry projects (with organizations like CALFIRE or the RCD), putting USDA sustainable concepts into practice (e.g., agroforestry demonstration), etc.

Lastly, here are specific items that will need attention before moving into later stages of development (or compromise) -

- NRES faculty researchers: Dr. Seeta Sistla, Dr. Nicholas Babin, Dr. Nick Williams, etc.
- NRES graduate projects: Brandon Hurd, Robyn Brooks, Sarah Williams, etc.
- Cal Poly classes: Lab space for NR 304 Agroecology and NR 306 Natural Resource Ecology and Habitat Management
- Active projects: carbon sequestration and soil health research (Dr. Sistla), decomposable plastic strawberry mulch (Dr. Sistla), Silphium civic science with The Land Institute (Dr. Babin), intercropping experiment series (Dr. Babin), ancient and drought-tolerant grain research (Dr. Williams), Californian agroforestry demonstration orchard activities (Dr. Babin and Brandon Hurd, MS), vegetable row crops and forest garden (Garden Club), culinary mushroom growing (Mycology Club), greenhouse aquaponics system (Polyponics)

- **Center for Sustainability:** led on-campus by Claire Balint, where the CEF is a physical location for sustainable development, educational farming, and workshops / events
- **Club activity:** Garden Club regularly uses all outdoor spaces for hands-on gardening experience and mental well-being, Mycology Club uses the lower shed for inoculating culinary mushrooms, and Polyponics uses most of the main greenhouse for aquaponics work
- Rare and valuable plants: 3 EA large *Quercus rotundifolia* (Balota "Sweet Acorn" Oak) donated by Jan of the SLO Botanical Garden and Dr. Matt Ritter, ~50 EA *Silphium spp*. (Perennial Sunflower) dontated by the Land Institute, 2 EA *Sorbus domestica* (Service Tree) donated from Burnt Ridge Nursery, 2 EA *Prosopis glandulosa* (Honey Mesquite) and 2 EA *Acacia aneura* (Mulga) donated by Mountain State Nursery, 1 EA *Butia capitata* (Jelly Palm) donated by Michael and Carol from the SLO Rare Fruit Growers, 4 EA *Castanea sativa* and *C. sativa x crenata* (European and European-Japanese Hybrid Chestnut), 4 EA *Ziziphus jujuba* (Jujube), 4 EA *Morus macroura* (Pakistan Mulberry) + 1 EA enormous *Morus alba x rubra* (Everbearing Mulberry), 2 EA *Araucaria araucana* (Monkey Puzzle), 4 EA *Hippophae rhamnoides* (Seaberry), 6 EA *Eleagnus spp*. (Silverberry, Goumi berry, and Autumn Olive), 4 EA *Hydrastis canadensis* (Goldenseal)

Thank you for taking the time to read this and consider these activities while deciding on how to relocate or compromise the various spaces at the Experimental Farm.

Much appreciation, **Brandon Hurd** Californian Agroforestry and Restoration MS Environmental Science and Management Cal Poly, San Luis Obispo (707) 318-7886 From: Desert Rose <desert333rose@gmail.com>
Sent: Sunday, May 21, 2023 4:48 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

To Marcus Jackson and whoever else this may concern,

My name is Desert Rose and I am a 4th year Sociology student at Cal Poly who has spent much of time here at the Student Experimental Farm, the very place this EIR plans to destroy. Words cannot begin to describe the level of shock and rage I am feeling about the changes made in the latest draft EIR regarding the destruction of the Student Experimental Farm (SEF) for placement of a water treatment facility. The SEF has served and will continue to provide a space for students to experiment with regenerative agriculture and other forms of sustainable horticulture. I have been a part of the club Poly Ponics for 4 years now, taking care of the aquaponics system in the greenhouse on the farm. The amount of hours I have spent working on a project I feel passionate about runs through the roof. I wouldn't have been happy at Cal Poly if it wasn't for the SEF and I know many agree with me on this. The SEF is the epitome of Cal Poly's "Learn By Doing" philosophy as it provides the opportunity for students to learn about the intricacies and creative outlets of sustainable agriculture. I have learned more on the SEF than I have in many of my places. It is a LEARNING space and a HEALING place. This is the last space on campus that cultivates free and expressive education. Please don't take this away from us.

You would save a whole lot of trouble by changing the location of the WRF because if this passes, expect trouble from many of us who will literally chain ourselves to the trees to prevent our sacred place from being bulldozed.

Sincerely, Desert Rose From: Tara Bowman <tmbow777@gmail.com>
Sent: Tuesday, May 23, 2023 7:01 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR comment

Hello, my name is Tara Bowman and I am a second year psychology major. I wanted to email you regarding the planned placement of the WRF project and how it effects the very lively community on campus that uses the Student Experimental Farm. I personally go to the SEF to feel more at home and to find a nice quiet spot to enjoy San Luis Obispo. I know I am one of many students who rely on and look forward to going to the SEF. Please reconsider your placement for the WRF to be in an area that would not affect the SEF, as the relocation of the SEF is not guaranteed. Best,

Tara Bowman

From: Daron Birkholz <daronbirkholz@gmail.com> Sent: Tuesday, May 23, 2023 5:30 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

My name is Daron Birkholz, a 4th year Materials Engineering student, and I am contacting you to express my concerns about the placement of the potential water reclamation facility, which threatens the Student Experimental Farm. The SEF is a very important place for me and many others as it provides an opportunity for a mental health-benefitting break from the extreme stress of the college workload. The SEF has been a place of community, teaching, food production and creativity as well as being an important space for reflection and healing for me and so many others and I hope that planning for projects like the WRF keeps in mind the importance of the SEF for so many.

Thank you for your time.

Sincerely, Daron Birkholz From: Kelsey Maire Byrne <kmbyrne@calpoly.edu>
Sent: Tuesday, May 23, 2023 10:21 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Kelsey Byrne

To whom it may concern,

My name is Kelsey Byrne and I am a second-year biology major at Cal Poly. am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

The Student Experimental Farm is a place for students to learn about sustainable agricultural practices, grow their own food, make incredible connections, and more. Personally, I met most of my friends there at gardening club; the SEF has defined my college experience. The SEF is the grounds of priceless research, student and faculty study, and community. I cannot emphasize enough how devastating its loss would be to so many people.

Additionally, especially among our global trends of overconsumption, habitat destruction, and climate change, a space dedicated to sustainable practices should be given more energy and time, not built on top of. The SEF is a sanctuary for many as it is a space for sustainable collaboration, especially when the academic teachings of most classes fail to prioritize our planet's long-term health and well-being. This construction decision is short-sighted and actively destructive to our environment and community. The placement of this project sends a clear message to the public: Cal Poly prioritizes profit and unsustainable growth over responsible land stewardship and the communities dedicated to those practices. I urge you to reconsider this proposal.

Thank you for your time.

Kelsey Byrne

From: Bella Suhr <bsuhr@calpoly.edu>
Sent: Tuesday, May 23, 2023 8:39 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment
Importance: High

Hello Mr. Jackson,

I wanted to email and formally state my opinion on the proposed removal of the Student Experimental Farm will do more harm than you and the University know. The Farm is a highly influential and special place that hold so much importance, both club wise, food availability wise, sustainability and spiritually, to so many people. The farm is the epitome of Learn By Doing, were students get together and grow their own food, they irrigate and laugh and hangout and get their hands dirty. It is a place students apply the concepts they have learned in classes; a place people go just for a little bit of quiet and a whole lotta beauty. This farm has so much dedication, love and heart put into it. Removing the farm would be so harmful to so many realms of campus and to me personally. **Therefore, I highly disagree with the proposal to move it and build on the land.** If that were to happen it would greatly impact me and so many other students in such a negative way. Please do not move the farm, please do not move the farm.

Bella Suhr 3<sup>rd</sup> year Biology student at Cal Poly From: Alondra M. Cabrera <acabre23@calpoly.edu> Sent: Wednesday, May 24, 2023 8:20 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Public Comment: Experimental Farm

Good evening,

The experimental farm should not be moved from where it is now.

Sincerely Alondra M. Cabrera

**pronouns** she/her/hers Interdisciplinary Studies: Health and Society College of Liberal Arts Cal Poly, San Luis Obispo, CA

email <u>acabre23@calpoly.edu</u> cell (323) 745-6699 From: Wes Convery <wconvery@calpoly.edu>
Sent: Wednesday, May 24, 2023 4:25 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Preserving the Student Experimental Farm

Dear Director Jackson,

My name is Wes Convery and I am a Computer Science sophomore at Cal Poly who is deeply invested in the future of our Student Experimental Farm (SEF). The proposed displacement of the SEF by the Water Reclamation Facility (WRF) has raised concerns among us about the potential loss of this irreplaceable cornerstone of our campus life. Not only does this move question the importance placed on practical, sustainable education, but it also risks eroding the unique charm of our university.

The SEF, widely used and cherished by hundreds of students, is more than a plot of land; for me, it's a common study spot that I frequent weekly, a place where I've made some of my closest friends, and a testament to Cal Poly's commitment to sustainability. In recognizing the importance of the WRF, I urge you to consider alternative locations, ensuring the preservation of the SEF in its current form and location.

Sincerely, Wes Convery From: Andrew Engel <andrersonengel@gmail.com>
Sent: Wednesday, May 24, 2023 11:10 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Student Experimental Farm

Greetings,

It has recently come to my attention that the student experimental farm here at CalPoly is set to be repurposed in the coming years. I'm writing to urge your proposal to reconsider as the farm contains tremendous value to the students of San Luis Obispo. In addition to the wonderful space for projects and research, the experimental farm and garden offer a completely unique environment that cannot be found elsewhere on campus. Countless friends of mine use the area simply to get away from the noise and stress that the university lifestyle brings. It would be in the best interest of the students here at CalPoly to leave this precious space intact and consider an alternative location for the water treatment center. Though I believe establishing a water reclamation facility would be highly beneficial, I strong recommend a somewhere that does not serve as a sanctuary for so many.

Sincerely, Andrew Engel From: Madeline Elizabeth Everson <meverson@calpoly.edu>
Sent: Wednesday, May 24, 2023 11:34 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Please Do Not Relocate the Farm!

Hi there,

I am a student here at Cal Poly, and I just wanted to say how disheartening it was to hear of plans to relocate or potentially destroy the experimental farm. The idea that Cal Poly cannot find anywhere else to build is beyond me, but I cannot imagine the farmland is the only option.

Please consider building elsewhere and continuing to allow innovation and growth on our campus, as Learn by Doing is what we do.

Sincerely,

Madeline Everson

Get Outlook for iOS

From: Morgan Hope Francis <mhfranci@calpoly.edu>
Sent: Wednesday, May 24, 2023 5:56 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF project Draft EIR Comment

To whom it may concern,

Hello my name is Morgan Francis. I am a second year student at Cal Poly and I am opposed to the relocation of the Student Experimental Farm. The club has worked so hard to grow the land into what it is now and all of this work would be undermined by developing on it. Please look into developing elsewhere. I appreciate your time.

From: Ella Olivia Hood <eohood@calpoly.edu>
Sent: Wednesday, May 24, 2023 12:58 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

Good afternoon Mr. Jackson,

My name is Ella Hood, I'm a third-year forestry student at Cal Poly, and I am contacting you to express my opposition to the recent developments of Cal Poly planning to build a Water Reclamation Facility (WRF) on the land currently occupied by the Student Experimental Farm (SEF). The SEF is a special place to many of Cal Poly's students, including myself, by providing a space where students can practice sustainable agriculture and spend time outdoors. There has been an immense amount of work put into the SEF space, most importantly being the nutrient-rich soil quality that takes years to develop. If built on top of our existing space, and relocated, students would have to start the farm's processes from square one, and limits the amount of hands on experience for future students. I would strongly encourage the Cal Poly Master Plan Committee to reconsider the location of this WRF, and find a new area that is not valued by hundreds of Cal Poly's students.

Thank you for your consideration,

Ella Hood

From: Ethan Michael Keller <etkeller@calpoly.edu>
Sent: Wednesday, May 24, 2023 12:29 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: SEF Farm

Dear Jackson,

I have recently heard of the plan to put the WRF on top of where the SEF is located. This is deeply saddening as for years the SEF has been a space for people of all backgrounds, diversities, and majors to get together and learn about the process of agriculture on a small scale. This is also accompanied by the fact that the space is a hangout and safe space for people looking to find hobbies, express interests and make friends. Removing this space for Cal Poly students would be a detriment to the school as a whole. As a city planning student the problem of "NIMBYism" is major for stopping development and changes to the built environment. I also know that the destruction of community-based spaces is bad and that without pushback and listening from government, there can be many problems associated with this bulldozing. The space is good, established, and has a strong club based in its roots. I ask you on behalf of a student and member of the garden club, do not remove this space. Find a new place for the WRF. This can be a student collaboration and everyone's voices can be heard.

Thank you, Ethan Keller From: Anjana Suresh Kumar <asureshk@calpoly.edu> Sent: Wednesday, May 24, 2023 8:18 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Experimental Farm: public comment

#### Good evening,

I do not think the experimental farm should be moved to a different location. Because firstly what does moving it entail. Students have built this from the ground up with sections meant for specific structure and plants. How can you move all of it to a different location? Plants can die from that move and to move so much is such a tall order. Would it not be better to just let it stay. Not to mention the sinks that they do have and having to redo plumbing and all that? Also, what happens to interrupted experiments happening there? The experimental garden is home to so many clubs making them restart from ground 0 knowing cal poly is not going to help them out with it is cruel. It also a place where people can destress and is in the perfect location. Please do not move it. Students 15 years from now deserve the same serenity we get right now overlooking the hills. Also by 15 years I know major changes will be made to it with the students trying to better it so tearing it down would quite literally go against learn by doing because these kids are really encompassing this motto and tearing that much progress down is unnecessary. I know there are constant improvements being made because I'm out there most Sundays helping it become better. I also personally think it's a poor reflection on cal poly for tearing down something that is such a massive reflection of their motto. Even if you say it's getting "moved" years of progress and memories will be lost by doing so. If you have any questions or clarifications, please let me know. Once again please do not tear it down.

Sincerely, Anjana Suresh Kumar 3rd year Animal Science major From: Keegan Kathryn O'sullivan <kosull01@calpoly.edu>
Sent: Wednesday, May 24, 2023 5:30 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Student experimental farm

Dear Cal Poly Facilities and Planning Director, I am emailing to submit my public comment regarding the location change of the WRF:

The Student Experimental Farm is, in my eyes, one of the cornerstones of Learn By Doing at Cal Poly. I am a tour guide for Cal Poly, and often highlight the community and hands on experience that is achieved through the Student Experimental Farm. I always receive positive reactions and comments from prospective students and faculty. There is not another space on campus that can compare in its freedom, community, and resources. Many students, including myself, rely on the farm's produce. The Student Experimental Farm brings people together, connects students to nature and the food on our plates, and has been, at least for me, a special place I go to clear my head and escape the worries of the world for a while.

I hope that Cal Poly will consider the input of its students on this project, and the positive impact of the Student Experimental Farm

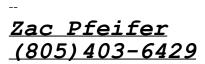
Sincerely, Keegan O'Sullivan From: Zac Pfeifer <zac.pfeifer@gmail.com>
Sent: Wednesday, May 24, 2023 8:58 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

Hello,

I'm writing to voice my opposition to the plan for the construction of the water reclamation facility on the current student experiment farm. I am a founding member of the Garden Club, which continues to utilize the SEF during multiple workdays a week, teaching many students gardening skills and establishing a sustainable food forest. The SEF has provided students, including my close friends and me, with the resources to develop skills and interests that are the foundation of our careers and lives.

Please consider the impact the experimental farm has on the current and future students of Cal Poly, and look elsewhere as a site for the WRF project.

Thank you, Zachary Pfeifer



From: Amy Lynn Becker <abecke15@calpoly.edu>
Sent: Thursday, May 25, 2023 12:05 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF project draft eir comment

Hello Marcus,

My name is Amy Becker. I am a first year interdisciplinary studies major minoring in law&society and environmental studies.

I am writing in opposition of the building of the WRF on the student experimental farm. This farm is used by 3+ student clubs on campus and is one of our sole places for sustainable farming on campus. This area is an important area for Cal Poly's learn by doing statement. This farm has been a part of Cal Poly's campus since the late 1980's and has been a part of so many student projects. I hope that you take these facts into consideration as well as the importance of this area for students. We understand that this project is important but we urge you to consider another location that will not disrupt this area for our students well being and the history of this important piece of Cal Poly land.

Thank you,

--Amy Becker

-----Original Message-----From: Dillon Behling <dillonmbehling@gmail.com> Sent: Thursday, May 25, 2023 12:05 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hi Marcus my name is Dillon Behling, a 4th year Cal Poly student. I am writing in opposition to the WEF building that is proposed on the Student Experimental Farm. A lot of student research and 3 clubs use this land and have worked here since the late 80s. The work that has gone into preparing this soil is invaluable and generational. If the WEF goes through this will be a scar on the reputation of Cal Poly and to the land that has been loved for decades.

This is a poor reflection on cal poly especially being a learn by doing school. This is one of the biggest learning space for my self and the community I have found here.

I strongly encourage you to reconsider this proposition and listen to the people who will be affected and the land on which we stand.

Please please preserve the Student Experimental Farm and the 2 acres that it sits on.

Thank you for your consideration

Sincerely

~ Dillon Behling

Sent from my iPhone

From: Grace Wayne Bender <gwbender@calpoly.edu>
Sent: Thursday, May 25, 2023 12:03 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

Hello, my name is Grace Bender and I am writing to express my opposition for this upcoming project. The Student Experimental farm is an important place for students who use it for clubs, research, and to build a community. I have many friends who have met people that have changed their lives through this farm. If Cal Poly is imenent on their idea of learn by doing, taking away this farm would show their values are elsewhere. I hope you can take the time to consider my concern.

Thank you, Grace Bender gwbender@calpoly.edu From: Kalea H. Conrad <khconrad@calpoly.edu> Sent: Thursday, May 25, 2023 5:44 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Threat to SEF

# Hello,

I want to take a moment to express my gratitude for the Student Experimental Farm-- a space that has cultivated intellect, companionship, curiosity, and plants for decades. Cal Poly as an institution is unique in that it gives students the ability to propose/design projects, make mistakes, enact change, chart new territory, and create a community in the meantime. While I have not utilized the space nearly as much as I would have wished to, I know that more students in the future deserve to explore all that the SEF has to offer in whatever capacity they can. The times I have visited the farm have been incredibly enriching--for one, learning about composting fueled my passion for organic waste management to the point that I hope to pursue its expansion in my future career. I know that localized wastewater treatment is a priority of Cal Poly's, however, they must be a less disruptive space to locate the new plant so the SEF can persist as a hallmark location for Cal Poly as a living Laboratory model that is promoted in Facilities Management and the Sustainability Department. I am an employee of Green Campus, and I know that the SEF exemplifies the type of space where sustainability and community can be cultivated for the benefit of all.

Thank you for your consideration.

Best,

Kalea Conrad (she/her/hers) Green Campus Reuse Team Lead M.S. Environmental Sciences & Management (2024) B.S. Environmental Management (2022) Cal Poly San Luis Obispo khconrad@calpoly.edu]310.283.4183

Cal Poly is in tiłhini, the Place of the Full Moon. We gratefully acknowledge, respect, and thank yak tit<sup>y</sup>u tit<sup>y</sup>u yak tiłhini, Northern Chumash Tribe of San Luis Obispo County and Region in whose homelands we are guests.

From: Olivia Elman <olivia.elman@gmail.com> Sent: Thursday, May 25, 2023 12:15 AM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Cal Poly Master Plan Public Comment

Hello,

I would like to express my concern for the future of the Cal Poly experimental farm. I took Dr. Babin's Agroecology course a few years ago and remember our time spent on the experimental farm as extremely valuable to my own personal growth and learning as well as instrumental in strengthening our Cal Poly community. I also have a deep respect for the work that the Cal Poly Garden Club has put into the farm and for the various clubs and groups that utilize the space for sustainability education.

I believe that attempting to relocate the farm would have little success because so much of the value of this space lies in the time, energy, love and care put into the farm as it exists now, and in the location it exists.

I hope that the voices of the community are taken into account and there is a possibility to amend the master plan to find a way to incorporate the farm into the plan without relocation.

I appreciate your time and consideration in reading this.

Olivia Elman Cal Poly Alumna Class of 2022 From: Nathan Patrick Gollay <ngollay@calpoly.edu> Sent: Thursday, May 25, 2023 10:53 AM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Student Experimental Farm Relocation

To whom it may concern,

I am simply writing to let it be known that there are voices in the Cal Poly community that want to see the student experiential farm left untouched. The farm is a testimate to learn by doing and fosters a community of people who work hard at its upkeep.

Movement of the farm would create a disruption to all of the work done and more importantly the bonds it has created. It is irresponsible and nonfactual to assume that this farm will be able to be moved without seriously jeopardizing its future as an organization. The hours that would be involved are far beyond the capabilities of volunteering students, and even if attainable, most of the plants and economic investments would be lost along the way.

Please do not disrespect the work of these students, and do consider other options for the location of the water reclamation facility.

Thank you, Nathan San Luis Obispo, CA 93405 mlee324@calpoly.edu

May 25, 2023

Marcus Jackson Facilities Planning and Capital Projects California Polytechnic State University, San Luis Obispo 1 Grand Avenue San Luis Obispo, CA 93407 Email: <u>mjackson@calpoly.edu</u>

Dear Mr. Jackson,

I am contacting you because I would like to submit a formal comment to the Lead Agency on the new Water Reclamation Facility Development which is up for public review until May 31, 2023. My name is Moe Lee, and I am a student who is active in many of the clubs based at the Student Experimental Farm (SEF), including president of Polyponics and a member of Garden Club.

It is my understanding that the new Water Reclamation Facility (WRF) will be a necessary addition to the Cal Poly Campus in accordance with the Cal Poly 2035 Master plan. The project will serve as a new source of water to support the expanding campus population and functions especially in its agricultural capacities. The facility will require the construction of the WRF as well as a recycled water storage and distribution system. According to the NOP posted in 2022 and the recently published draft EIR, the facility will now be constructed directly on top of the SEF above the Rodeo facility.

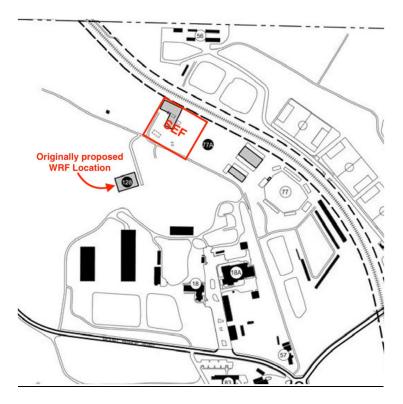
The first issue I have identified with this document is that the WRF has moved across the road from its first proposed location under the Final Environmental Impact Report for the 2035 Master Plan. In that official document, Figure 2-17 on page 2-45 designates the WRF is as (M), a near term project, and is marketed on the map as across the road from the SEF where the current composting Facility exists. On page 2-40 of the same document, it clearly states "As part of the 2035 Master Plan, a WRF is proposed to be constructed in the northern portion of campus, **south of the Student Experimental Farm** and west of the compost operation (see Figures 2-4 and 2-5, Building #128)". Why is this new document entirely inconsistent with that plan.

I would like there to be no misconceptions about the formality of the Final Master Plan Document as an official CEQA document meant to streamline the development process in accordance with Cal Poly's planned growth. Given the time, money, and other resources that have already been put into this document and its proposed developments, why has Cal Poly immediately changed one of the first projects to be constructed after the Master Plan finalization. "The project is located in the Campus Master Plan Area and is identified as a near-term project in the Campus Master Plan; thus, it would not conflict with the Campus Master Plan" (Water Reclamation Facility Project Draft EIR 3-13). This is a false statement and substantial justification for the movement of the facility is not provided within this document. There is absolutely no discussion in the DEIR for the WRF of alternative locations. Cal Poly has only conducted analysis of the required no-project alternative and alternative water treatment options. I would like to point out that Cal Poly's own Building and Design Guidelines from 2010 outline that "Compliance with the Master Plan is not limited to reconciling building locations with the map but includes meeting the relevant planning principles contained within the text of the adopted plan." This suggests that it is Cal Poly facilities responsibility to stick with the original outline of the Water Reclamation Facility or offer a reasonable analysis of the new construction site with considerations of where and how to SEF will be relocated. It is unacceptable that there is there no discussion of the project site being moved to an entirely new piece of land, especially considering the reliance in the WRF DEIR on the 2035 Master Plan document environmental impact analysis.

The SEF holds over 30 years of student time, labor, and resources contributing to a thriving community of honeybees, native pollinators, duck ponds, culinary mushroom growing facilities, and closed loop aquaponics systems. In the discussion of Visual Character of the site, this DEIR falsely depicts the SEF as "an undeveloped site currently used as a garden by Cal Poly students (the Cal Poly Student Experimental Farm)" then provided pictures of site ponds. There are three built facilities with running utilities located at this site which are not depicted in this document. I have provided my own images as reference below. What will happen with these buildings? Will they also be relocated so that the hundreds of students which use the space in the spirit of our motto "Learn by Doing" have access to the resources they need? For the sake of the space used consistently by students since 1989 and all of the effort they have put into maintaining one of the most valuable resources for our campus community, I believe it is the responsibility of Cal Poly to reconcile the changes of this project with the Cal Poly 2035 Master Plan and place the WRF where it was originally designated.



Building No.	Building Name
77A	Rodeo Support Facilities
82D	IT Services Consolidation
8∦4	Technology Park Expansion
T28	Water Reclamation Facility
132	Northwest Campus Parking Structure
133F	Orfalea Family and ASI Children's Center Expansion
136B	Irrigation and Training Research Center Practice Fields
138	Via Carta Parking Structure
142A	Creekside Village
142B	Creekside Village
142C	Creekside Village
142D	Transit Center
143A	Northeast Academic Complex
143B	Northeast Academic Complex
143C	Northeast Academic Complex



From: Fiona Maeve O'Neill <fmoneill@calpoly.edu>
Sent: Thursday, May 25, 2023 3:02 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment Fiona O'Neill

# Marcus,

I hope that all is well. My name is Fiona O'Neill, and I am a third year Environmental Management and Protection (ENVM) student here at Cal Poly. I am writing in regards to the Water Reclamation Facility Project on the West side of campus that is currently in the process of preparing an Environmental Impact Report (EIR) as part of the CEQA process.

The project will facilitate the construction and operation of an on-campus water reclamation facility (WRF) and recycled water storage and distribution system. This system will produce and deliver disinfected, recycled water for unrestricted reuse, including safe application to agricultural crops, pastures, and recreation fields on campus. It will supplement demand for non-potable water across campus and allow Cal Poly to use its share of Whale Rock Reservoir for only potable water in the future. New construction will include a collection system, the facility itself, a storage and distribution system, and also covers any modifications or updates to the existing facilities to help integrate the new technology.

The WRF project appears in several documents related to general community planning on campus, but there are discrepancies in these documents related to project location and mapping, adherence to Cal Poly's academic missions and principles, and master plan guidelines. The NOP issued in late 2022 states that the location of this project will be directly on the existing two-acre Student Experimental Farm (SEF). Contrary to this, in the 2035 General Plan, published in 2017, the project is located south of the Student Experimental farm and west of the compost operation. It seems there are also some inconsistencies with the zoning or current and future land use of the project site. It is mapped as everything from "Agricultural Facilities," "Ag/Equine Uses," "Agricultural Facilities Redevelopment," or "Other Land."

By building atop the SEF, this project appears to go against Cal Poly's academic mission, which generally states that "Cal Poly fosters teaching, scholarship, and service in a Learn by Doing environment in which students, staff, and faculty are partners in discovery." It could be argued that the Student Experimental Farm that will be displaced in this process is the epitome of a learn by doing environment that has staff, students, and faculty working as partners in innovation and discovery. The Natural Resources and Environmental Sciences department (NRES) utilizes this farm frequently for the sole purpose of learning by doing in classes like Sustainable Food & Fiber Systems, Agroecology, and Ethnicity and the Land. Students learn the benefits and drawbacks to intercropping, monocropping, ornamental crops, and the social impacts of food and fiber systems within the greater Cal Poly community. For example, a class recently harvested chard from the farm for distribution at the Cal Poly Food Bank, helping to support the whopping 27% of Cal Poly Students who face food insecurity. In addition to education sponsored by Cal Poly, students utilize this farm for The Garden Club to learn basic gardening techniques, harvest fresh produce, and collect eggs for personal use. This farm was established 34 years ago, and is home to chickens, ducks, and cats cared for by the nearly 300 members of The Garden Club.

In addition to Cal Poly's academic mission, this project goes against one of Cal Poly's Land Use Missions that states that land should "Enhance outdoor teaching and learning as important to Cal Poly's character & mission." It would appear that the SEF is integral to the teaching and learning of those involved in the Garden Club community as well as the Greater Cal Poly community. The SEF is a classroom in the outdoors that brings discussions of sustainability and cropping techniques to life with partnerships between students and faculty. The project is also inconsistent with Cal Poly's 2035 Master Plan goals number two and eight; "Enhanc[ing] academic quality and student success through Learn by Doing, and Reinforc[ing] campus-wide environmental sustainability."

I am concerned that this project will negatively impact Cal Poly's image and significantly alter vibrant student communities, student-staff relationships, and agricultural innovation. If Cal Poly wants to uphold their future image in "protect[ing] natural environmental features and prime agricultural lands that form the character of campus," the development of the EIR should take into consideration the impacts to Cal Poly's character and the values of its community. The EIR should examine the benefits and drawbacks to the land use change, including adequate justification of the project location, as well as relocation of the existing infrastructure at the SEF. Alternative site locations should be provided and considered at length. Additionally, the EIR should examine the documented positive impacts the SEF has had on the soil and hydrology of the site, as well as the potential negative impacts on soils and hydrology. It should also determine the detriments to biological resources with removal of native and rare species that potentially provide habitat for native and/or endangered species. Lastly, I hope the EIR will look at the possible detriment to air quality in the area with the construction of this plant that will be both processing and using harmful substances.

CEQA seeks to enhance public participation in planning and implementing projects, and part of this responsibility requires taking the time to consider the social and political impacts of the WRF project in addition to the environmental impacts. I ask that you take care in the planning and implementation of this project in order to protect and support the Cal Poly community that loves and cares for the Student Experimental Farm.

Sincerely,

# Fiona O'Neill (She/Her/Hers)

Environmental Management & Protection Undergraduate Environmental Soil Science & Restoration Ecology Minors California Polytechnic University, San Luis Obispo <u>fmoneill@calpoly.edu</u> | 415.342.0418

Cal Poly is in tilhini, the Place of the Full Moon. I gratefully acknowledge, respect, and thank yak tit<sup>y</sup>u tit<sup>y</sup>u yak tilhini, Northern Chumash Tribe of San Luis Obispo County and region in whose homelands we all are guests.

From: katie raffaini <katie.raffaini@icloud.com> Sent: Thursday, May 25, 2023 12:28 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Save Student Experimental Farm!

#### Hello,

My name is Katie Raffaini and I am a Cal Poly alum. I'm reaching out to express my opinion about the recent consideration to shut down the Student Experimental Farm. The SEF was a core proponent of what made my Cal Poly experience so great. It was the core of my 'learn by doing' experience. It is a crucial place of community for students and staff alike, where knowledge pushed limits and difficult concepts finally made sense out of the classroom. Cal Poly has more land than any other state school, with countless potential locations for a new water reclamation facility. Please consider building the facility at a different location, one with less significance to the Cal Poly community.

Sincerely, Katie Raffaini From: Sophia Santitoro <ssantito@calpoly.edu>
Sent: Thursday, May 25, 2023 7:43 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Location of New Water Reclamation Facility

### Good Evening,

As an avid gardener and a Soil Science major, I ask that you reconsider the updated potential location of the Water Reclamation Facility. Homework permitting, I go to the Student Experimental farm at least once a week, and it's my main source of stress relief on campus. I recently learned that a new Environmental Impact Report has placed the Water Reclamation Facility on top of the Student Experimental Farm, and I'm going to do what I can to prevent that from happening. The Student Experimental Farm can't just be moved – some of the trees there are probably older than me and most of the other undergraduates that visit them.

I want to know why this new report has moved the potential location of the Water Reclamation Facility to the current location of the Student Experimental Farm. Thank you for your time, and I await your reply.

Sincerely, Sophia Santitoro She/her/hers ssantito@calpoly.edu -----Original Message-----From: Abbott Swanson <abbottswan@icloud.com> Sent: Thursday, May 25, 2023 4:29 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

My name is Abbott Swanson and I am currently a third year at Cal Poly.

When I was a freshman on campus, making friends and meeting new people was not something that came easy for me, especially with the regulations that came during the pandemic. The dorms were nearly halfway as empty, a room meant for three left me lonely, and there was absolutely no place on campus where students could sit and gather for more than 10 minutes. Being so isolated at the start of my time in my new home made me negligent to really get to know SLO. What changed that feeling entirely for me was the time I began to spend at the Student Experimental Farm. My walk from Tilhini to the SEF allowed me to see SLO and Cal Poly campus from an entirely new view. This time spent let me explore my surroundings at a distance that made me feel comfortable. What intimidated me most about meeting new people and diving into new groups or interests was that I was starting with no prior experience. Garden Club and everyone who was a regular at the SEF never made me feel like that. The members and students who have allowed the SEF to flourish and be home to incredible life forms have been the most welcoming and encouraging people I have met in SLO, and I would not be who or where I am today if I hadn't had my first spurts of growth at the SEF. This spot is a nourishing environment, to say the least, and serves a detrimental part in community building. Outside of taking part in the clubs that consider the SEF their home, the green and lusciousness of the farm allows for students to find great peace in such a close vicinity to campus. The farm allows students to really dive into understanding food, growth, community, collaboration, and by extent themselves. Please do not strip this away from your own community.

From: madisonurabe-myers@umail.ucsb.edu <madisonurabe-myers@umail.ucsb.edu>
Sent: Thursday, May 25, 2023 11:13 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRD Project Draft EIR Comment

Hello,

I recently visited the garden with a member of the garden club. It was genuinely magical and such a space for healing and community. Cal Poly students were able to come together as a collective to share music and spoken word. Not only does the garden provide a safe space, but the benefits it has for the mental health of the community, specifically its college students. Having a creative outlet for active rest and cultivating bountiful biodiversity is phenomenal. No longer having this space would be a blatant disregard to the students who make up the SLO area. This area can hold spaces for music, therapy groups, and even a more formal gathering like a wedding.

I'm so grateful to have had the privilege to visit this gorgeous location and look forward to coming back.

Madi Urabe-Myers she.her.hers Mental Health Peer

Counseling and Psychological Services University of California, Santa Barbara

Office: (805) 893-4411 ~ available 24/7 Email: <u>madisonurabe-myers@ucsb.edu</u> <u>mentalhealthpeers@sa.ucsb.edu</u> <u>caps.sa.ucsb.edu</u> -- <u>ucsbmhp.com</u>

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From: Brynn Ashley <brynnashley1600@gmail.com> Sent: Friday, May 26, 2023 2:20 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: SEF

Dear Mr. Jackson,

I am contacting you because I would like to submit a formal comment to the Lead Agency on the new Water Reclamation Facility Development. My name is Brynn Rotbart and I am a Cal Poly student who is very active at some of the clubs at the Student Experimental Farm (SEF).

We students have put so much time and love into cultivating, growing, and maintaining the SEF. The SEF serves as a bustling cultural hub where community and connection to nature is highly emphasized and valued. As a senior at Cal Poly, I can confidently say that the SEF has made lasting impact on my time at Cal Poly, and I think other students deserve the opportunity to be provided with such a wonderful environment. Not only did I meet life long friends, but I learned how to garden and grow food, make herbs and spices, and grow aquaculture. Cal Poly is a school that emphasizes agricultural literacy, and providing a space where we students can learn and experiment strongly correlates with this Cal Poly ethos. Lastly, more than just us students, consider the SEF a part of our home at Cal Poly. We have three garden cats, all fondly named, and other wildlife that has found respite in this beautiful place.

An especially fond memory for me was when all the wildflowers were in bloom, all the fruit was ripening, and the hills were lush and green. It was a work day, meaning all the students get together (usually biweekly) and work on manning the farm. There were flocks of migrating ducks drifting across the sky, occasionally landing in the pond we built. The sun started to set and this vibrant sunset was painted across the sky. The garden has this peace to it, where you just feel centered. Everything goes silent. And it's just you and the ecosystem around you. The crickets started chirping and the bird song started coming to an end. We all sat in awe watching the sunset, and, as if in a fairy tale, the notes of Clair De Lune floated up to us from the piano down below. This beautiful and classic song prompted us to dance and laugh, and have immense gratitude for the beautiful stranger who got the moment just right. That moment was beautiful and priceless.

I hope you take the time to venture up there during dusk and feel the energy of that place, it is truly truly special.

Thank you so much for taking the time out of your day to read this, and I urge you to reconsider the Water Reclamation Facility location so students in the future can learn from and experience this amazing place. Best,

Brynn Rotbart

From: Tami Sherman <tami@elementsmeetings.com>
Sent: Friday, May 26, 2023 1:39 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment - Parent Perspective

Good afternoon,

I am the parent of a Junior Environmental Management and Protection major at Cal Poly SLO, and I strongly urge you to NOT pursue your plan of relocating the Student Experimental Farm on campus.

Ben has had an incredible experience at Cal Poly – embodying the learn by doing motto every step of the way. He is involved in multiple clubs, holds several jobs on campus, is a teaching assistant, had an incredible internship last summer and is looking forward to doing field botany research in Yosemite this summer under a masters student.

The very first thing that he got involved in was the Student Experimental Farm, and he has thrived in part because of his experience with this magical piece of land and the students running it. My husband and I were immediately impressed by the student leadership, enthusiastic learning, and sense of place that our son and his new friends immersed themselves in. They have constantly created and revised their vision for the ways to use this wonderful piece of land – working with each other, faculty and other stakeholders. The land has a depth and history that cannot be "relocated" without causing damage. We love walking around the Farm and seeing the years of experiments and projects on display – the varying degrees of success speak wonders to the fact that the space lives up to it's name – it is a place for students to try out their ideas and truly live the Learn By Doing motto.

Please add my voice as a parent to the many many people who are imploring you to do better by these students and the wonderful place they have poured their hearts and souls into.

Warm regards, Tami

Tami Sherman elements p: 805.966.7312 c: 805.570.6527 tami@elementsmeetings.com www.elementsmeetings.com

...bringing it all together

From: Ellie Bedikian <ebedikia@calpoly.edu>
Sent: Sunday, May 28, 2023 10:00 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR comment

### Hello Mr. Jackson,

I am a fourth-year animal science student here at Cal Poly and recently heard of the plans to set the WRF facility on top of where our current SEF stands. I ask that you choose the 2035 master plan that was finalized in 2020, rather than the new tentative plan that puts the SEF in peril. Our campus is big enough to accommodate both the WRF and the SEF, as evidenced in the 2020 master plan. I do not understand the backtracking and choice to re-start EIR planning for the WRF, especially when the SEF is such a special place to students.

I have been involved in polyponics and garden club for all four years of my time here, and I wanted to express my desire to protect this community for years to come. The skills that I've gained and people that I have met at the Student Experimental Farm are innumerable. At the SEF, I was able to put my hands in the dirt and learn what it takes to cultivate fruits and vegetables from seed to kitchen table, whether it be the ideal seasons to plant, how often to water, how deep to put the seeds, the best method to harvest, among many (many!) other things. The college of CAFES even adopted it as their own, as it's now posted as "CAFES experimental farm", which goes to show how involved and influential this corner of campus is. I believe that the SEF is not only a beautiful and special place for students, but is also the epitome of Cal Poly's learn by doing philosophy. I have seen so much love, effort, blood, sweat, and tears poured into the SEF since its beginnings, including my own, and it would be a shame to lose it. Please don't take it away.

Thank you, Ellie Bedikian Hello Mr. Jackson.

My name is Colin, and I am a recent graduate from Cal Poly. I'm writing to express my concerns about the displacement of the Student Experimental Farm for the construction of the Wastewater Recovery Facility. I'm hoping that Cal Poly can return to its plans to construct the WRF without building on the current SEF.

Before I came to Cal Poly, I had little interest in nature in general. I started as a business major, and I didn't really enjoy my classes either. I wasn't really experiencing the "Learn By Doing" attitude, getting my hands dirty like I heard so many of my friends were. What I learned didn't stick, and I felt lost. But my friends in CAFES gave me bits of knowledge about our natural resources and opened my eyes to the beauty of ecological and agricultural systems.

They told me all about the natural cycles, how plants and animals contributed as vital components in all of it, and how species interact from the scale of oak trees to bacteria. They told me about the SEF and the experiences they had there. They actually got to get their hands dirty. It was there at the SEF where Learn by Doing became a reality for me. I took some ecology classes where I was lucky enough to visit the SEF for labs and join in some experiments there. I eventually learned how to propagate native plants. Brandon Hurd and I planted some of mine along the swales and berms of the agroforestry system. I go back every now and then to make sure that they're doing okay. Where would I have learned that without the SEF? The knowledge and experience I've gained through my time at the SEF have helped me to realize a career path in natural resource management that I never would have imagined for myself, and I can't be more thankful.

It would break my heart and the hearts of thousand of other students to find out that the SEF was destroyed for something else. Considering that previous plans kept the WRF neighboring the SEF, rather than building over it, I don't understand the change? I hope the administration can change its mind again so that the WRF may be built without displacing the Student Experimental Farm. Without the SEF, thousands of students who, like myself, may not have even known of their passion for nature, will be deprived of one of the most easily accessible and powerful catalysts for their academic and practical development in natural resource management. Please save the SEF.

Regards, Colin McGlinchey Graduate from Orfalea College of Business From: Katelyn Rose Carro <kcarro@calpoly.edu> Sent: Tuesday, May 30, 2023 2:08 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

My name is Katelyn Carro and I am a second-year psychology student at Cal Poly, minoring in environmental studies. I am a member of the Cal Poly garden club leadership, and I am writing this in strong opposition of the building of the Water Reclamation Facility on the site of the student experimental farm.

The beauty of the Student Experimental farm begins with its natural beauty, but that only scratches the surface of its value. It is a community space that is generations old. Alumni began this project and cultivated a space for gathering here. People from all different backgrounds, with similar interests and a shared love for nature collect here. Some of my closest friendships have formed at this space, and the same can be said for countless other Cal Poly students. The community comes here for music, food, creative projects, discussions, and cultivating their interests. They leave the space with long lasting friendships, memories, and learning experiences.

Relocating this space is performative. To relocate a space of such importance is to deny the history, progress, and community that has formed here.

From a scientific lens, there is no location that you could relocate this garden to that would have as equally nutrient dense soil, perfect for growing healthy food. Crops have been grown here sustainably for decades, creating a biodiverse land with a balanced and flourishing ecosystem. There are plants and animals located here that are thriving, that would not be relocated, but destroyed.

In a time where degrading the Environment is so common, it is embarrassing for a school who shows the general public that they care about sustainability and environmental protection to be destroying a green space that promotes sustainability. Every club that runs on the SEF is natural and sustainable. The greenhouse has held the Polyponic club which focuses on growing plants and fish together, the mycology club which learns about the growth of mushroom and fungus, and the garden club which focuses on maintaining native plants and nonconventional farming. There is a new bug operation in the greenhouse of the SEF where students are growing bugs using the food waste from Cal Poly.

The uniting force between all of the people in these groups is not even the sustainability aspect of the clubs, but that the students involved in this space are passionate and truly enjoying learning. It is a space for students to implement what they learn in their lectures and class discussions, formulate new ideas, brainstorm projects, and collaborate with other students. Students are passionate about this space. You cannot relocate passion. You can destroy our space, but with it you will be destroying a space of innovation, creativity, and learn by doing.

The worst part about writing this email is that I am positive that you are already aware of everything I've written. I am sure you have received a good number of emails from heartbroken students, but I can guarantee you that the amount you have heard from does not even scratch the surface of the people who love and care for the SEF. I wrote to you the logical reasons for why the Student Experimental Farm should be protected, but there is a deeply emotional aspect of this farm that you must consider.

In my Environmental Psychology class, we learned about the rejuvenating quality of green space. Green spaces allow for the brain to relax, and a place of "escape" where students feel that they can connect to the outdoors and enjoy themselves. I can speak from personal experience when I say that every trip that I take to the garden is beautiful and eases any stress or anxiety that I am experiencing. After having a very difficult year and struggling with my mental health, this space has comforted me, and every visit or garden club workday would flip my mood faster than any other outlet I have in my life.

It would be easier to destroy a space like this if you thought that this was only the experience of myself, as one student. I am writing to inform you that I have spoken with countless other students who have leanred onto the SEF as a space for healing and comfort. There is a deep bond between hard working Cal Poly students, and this space. When your own work overwhelms you, I encourage you to take a trip up to sit at the garden. If you sit up there quietly for long enough, the garden cats might come to greet you. I encourage you to walk around the space with the objective to appreciate its beauty, instead of analyzing its features for the potential the space has for a concrete building to be placed on top of it.

Thank you very much for your time, and I hope that you consider my thoughts as you continue to plan to build on the top of such cherished land.

Sincerely,

Katelyn Carro

From: Boden Cunningham <bodencunningham@gmail.com> Sent: Tuesday, May 30, 2023 6:31 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

My name is Boden Cunningham. I am a cofounder and former president of Cal Polys Garden Club.

As I'm sure you know by now, the garden is a beyond beloved space that serves a large diversity of people, activities, plants, and wildlife.

I understand that there will be a new location for the farm if the current plan goes through, however, there are so many resources there that cannot be moved to a new location. During my time on the farm, we worked very hard to create a living ecosystem above and below ground. That included bringing in thousands and thousand of pounds of organic materials such as compost, mulch, kitchen scraps, and coffee grounds to increase our soil fertility and soil habitat. If you go there today, and dig under a few inches of mulch in the food forest you will find beautiful, moist, nutrient rich soil that is filled with earth worms, fungus and all sorts of life. Soil is our greatest resource, it's why we care for it and protect it so much.

The other thing that will be extremely hard to replace will be our trees. There are some amazing trees at the SEF, Walnuts, Sapotes, mulberries, peaches, figs, apples, ice cream beans, pomegranates, oaks, pines, and many more. Students have spent thousands of dollars of their own money and money they have raised to plant these trees. Overall the value of these trees is very high whether we are talking about monetarily or for what they do for the students at the farm. The diversity of trees here and edible plants is unlike anywhere else in all of San Luis Obispo. Any plant lover is amazed at the variety of plants growing at the SEF.

I have spent well over 1500 hours building the farm. I know others who could easily match that number. There are so many things I could say about the farm but I will hold out. Please let me know if there is anything I can do to help make sure the farm stays where it is.

For my senior project I created a guide on how to run the the SEF. I can send that over if you think it would do any good.

Thank you for reading,

-Boden Cunningham

From: Olivia Kimberly Grace <ograce@calpoly.edu>
Sent: Tuesday, May 30, 2023 8:25 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

The student experimental farm is a crucial part of Cal Poly, and it should not be taken away. SEF holds communities such as garden club and mycology club, and going to garden club workdays has been one of my favorite parts of college. Taking the farm away means taking away not only a close-knit community, but years of hard work spent building the farm itself. It's incredibly disheartening to see the university have such little regard for the amazing work that is done on the Student Experimental Farm, and hopefully you will reconsider.

Thank you, Olivia Grace From: Sophia Harmon <soharmon@calpoly.edu> Sent: Tuesday, May 30, 2023 11:03 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR comment

Hello. My name is Sophia Harmon, and I am a first-year mathematics major at Cal Poly. I am writing this email to let you know that the Student Experimental Farm is my absolute favorite part of Cal Poly, and placing a water reclamation facility in the place of the SEF is a terrible idea. The SEF is an oasis for students like me. In my first two quarters of this year, I was extremely depressed and found myself wanting to leave Cal Poly entirely. However, in this spring quarter, I discovered Garden Club and the SEF, and everything changed. When I am at the SEF, I feel safety, happiness, and like I am part of a real community. The SEF is, without a doubt, the best place on campus. It is home to three wonderful cats which provide a great deal of therapeutic support to students (including me). Additionally, all the wonderful gardens, the food forest, and the mycology section are all incredible ways for students to feel connected to nature and ground themselves as they are living on a campus that can cause extreme dissociation due to its urban environment. The SEF has become more of my home than any other place on campus. There is something so magical about the energy that is at the SEF that is nowhere else in all of SLO. The SEF saved my life when I needed it most. Taking it away for a water reclamation facility would severely hurt a large group of current students, and it would certainly hurt all the future Cal Poly students who might find themselves in the same situation as me. The SEF needs to be saved from this project; too many students would be hurt if it is not.

Additionally, if you do not care about the students that are being hurt, perhaps you should care about all the negative environmental impacts. I will not get too into this, as there is a document that states some of the environmental damages of this project, but I think it is a terrible idea to go through with this project if Cal Poly still wants to be seen as a green campus. Please. I am begging you. Do not go through with this project. The SEF is far too important to so many Cal Poly students. Getting rid of the SEF is like getting rid of the mental health services on campus for some of us. The SEF is truly what has saved my life and given me something to love about Cal Poly. Please do not take the SEF away from me and all my fellow SEF lovers. I cannot stand to let this happen.

Sophia Harmon soharmon@calpoly.edu (she/her/hers) From: Bruce <bkakaruk1@gmail.com> Sent: Tuesday, May 30, 2023 11:19 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR comment

Good evening; my name is Bruce Kakaruk, and I am a part of the Cal Poly community. It has come to my attention that the Student Experimental Farm is potentially going to be subject to construction of a Water Reclamation Facility. This email is being sent to plead that this project does not go through, as it would be extremely detrimental to a great number of students. The amount of work that has gone into the Student Experimental Farm over the decades is not something that should simply be destroyed in order to create a new facility. The farm is a safe haven for so many students, and getting rid of it would be extremely harmful to not only the students, but the environment as well. The Student Experimental Farm is simply too valuable for this project to go through. Please put a stop to it now.

From: Genevieve Isabella Kessler <gikessle@calpoly.edu> Sent: Tuesday, May 30, 2023 6:30 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft ERI Comment

Hi,

I am Genevieve Kessler (she/her), and I am a fourth year here at Cal Poly SLO. I have been going to the student experimental farm since my very first year at Cal Poly. I was immediately struck by the power and community the farm gave college students. I originally going Poly Ponics and loved learning about the hydroponics even though it was out of my field of study. The student experimental farm gave me that. It helped me meet like-minded people and I appreciated going to Sunday morning workdays and having the opportunity to help be a part of a team creating a space that is so giving (in more ways than one). I enjoyed getting my hands dirty and I learned that the student experimental farm was one of the only spaces was able to do that after moving away from home. I think the farm is so special and needed for college students! It has been one of the best things of my experience here in SLO. It teaches students how to work communally, take leadership roles, and just connect and tend to the land. It being all student run is having what made it so beautiful and powerful. We have spent years building planters and testing out different growing methods (like this one time we tried to grow a "potato tower" that was unsuccessful). It teaches us everything college should be teaching us, and especially incorporated Cal Polys 'Learn By Doing' motto but makes it more accessible for ALL majors and backgrounds of people to come together and work as a team on one project.

So, I beg that you listen to the student and understand why the student experimental farm must be continued. Students have worked so hard to make this farm and community space possible and as beautiful as it is, so please don't move the farm! Please don't destroy the farm, it would be an injustice to all those who have worked or visited the farm.

From, Genevieve Kessler From: Maci Jordan Lee <mlee300@calpoly.edu> Sent: Tuesday, May 30, 2023 6:15 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Dear Mr. Jackson,

I hope this email finds you well my name is Maci Lee and I am a fourth year Graphic Communication Major here at Cal Poly. I am sure you there is no shortage of comments you have received from the Student Experimental Farm community, but I wanted to express my strong concerns regarding the EIR Project draft and the elimination of the space for the Student Experimental Farm.

food for Cal Poly students who have otherwise never gotten the opportunity to do so. The whole principle of the SEF is so quintessential of Cal Poly's "Learn By Doing", providing a space for students to learn how to grow their own food, foster passion for sustainable gardening practices, and pr for community. Taking away the space for the SEF would be a great disservice for current students and all generations to come. Please do not take this wonderful space away from the students.

Best, Maci Lee

Maci Jordan Lee | Pronouns she/her/hers

Craft Center Frontline Student Manager

Graphic Communication Major

Anthropology and Geography, Packaging, and Studio Art Minor

Cal Poly is in tilhini, the Place of the Full Moon. I gratefully acknowledge, respect, and thank yak tit<sup>y</sup>u tit<sup>y</sup>u yak tilhini, Northern Chumash Tribe of San Luis Obispo County and Region in whose homelands we all are guests.

From: Maci Lee <mjllucky5@gmail.com> Sent: Tuesday, May 30, 2023 6:16 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Dear Mr. Jackson,

I hope this email finds you well my name is Maci Lee and I am a fourth year Graphic Communication Major here at Cal Poly. I am sure you there is no shortage of comments you have received from the Student Experimental Farm community, but I wanted to express my strong concerns regarding the EIR Project draft and the elimination of the space for the Student Experimental Farm.

The SEF (Student Experimental Farm) has fostered such a strong sense of community and connection to food for Cal Poly students who have otherwise never gotten the opportunity to do so. The whole principle of the SEF is so quintessential of Cal Poly's "Learn By Doing", providing a space for students to learn how to grow their own food, foster passion for sustainable gardening practices, and provide space for community. Taking away the space for the SEF would be a great disservice for current students and all generations to come. Please do not take this wonderful space away from the students.

Best, Maci Lee From: Mac Moran <mmoran10@calpoly.edu> Sent: Tuesday, May 30, 2023 6:18 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF PROJECT DRAFT EIR COMMENT

### Hi Marcus,

My name is MacLeod Moran, a 3rd year Landscape Architecture major, and I'm writing to say how monumentally stupid it would be to build a Water Reclamation Facility on top of the Student Experimental Farm (SEF). The SEF, perhaps more than any other facility on campus, exemplifies Cal Poly's Learn By Doing student attitude. The students that call this farm their home are not doing it for profit, but to better and strengthen SLO's sense of community.

Furthermore, the SEF serves as an important source of nutrition for food-insecure students. Having access to organic produce is an incredibly crucial part of living a healthy lifestyle.

Finally, multiple clubs and student organizations use that space on a weekly basis. Garden Club, Mycology Club, and PolyPonics would likely have to shut down completely if the WRF plan goes forward.

Again, I need to emphasize that the proposed WRF at the SEF goes against everything Cal Poly and its students stand for.

Thank you for your time, -Mac

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From: Made I. Roger <maroger@calpoly.edu>
Sent: Tuesday, May 30, 2023 2:16 PM
To: Dennis K. Elliot <delliot@calpoly.edu>; Marcus E. Jackson <mjackson@calpoly.edu>;
Arwen.WyattMair@waterboards.ca.gov; tamara.anderson@waterboards.ca.gov; rb3401Application@waterboards.ca.gov
Cc: Nicholas Lawrence Babin <nbabin@calpoly.edu>; Claire N. Balint <cbalint@calpoly.edu>; Sophie Claire Ortiz
<soortiz@calpoly.edu>; Benjamin Harold Sherman <bhsherma@calpoly.edu>; Kylee Lynn Singh
<klsingh@calpoly.edu>; Matt K. Ritter <mritter@calpoly.edu>; Seeta Sistla <ssistla@calpoly.edu>; Nicholas E.
Williams <nwilli37@calpoly.edu>; Brandon Hurd <bhurd@calpoly.edu>
Subject: Re: Next Steps for the WRF and the Experimental Farm

Hi all,

Thanks for including us here, Brandon. I have also never received any response or communication about Cal Poly's Wastewater Reclamation Facility project under CEQA review. My first communication to Mr. Jackson was in January. In addition, as I understand it, no one working on the farm that is proposed to be built over received any kind of communication about the public comment period. As members of the campus community who are impacted by this project, we would appreciate open communication and the opportunity to comment.

Thanks! Made Roger

Get Outlook for iOS

From: Brandon Hurd <<u>bhurd@calpoly.edu</u>>
Sent: Tuesday, May 30, 2023 3:59:07 PM
To: Dennis K. Elliot <<u>delliot@calpoly.edu</u>>; Marcus E. Jackson <<u>mjackson@calpoly.edu</u>>
Cc: Nicholas Lawrence Babin <<u>nbabin@calpoly.edu</u>>; Claire N. Balint <<u>cbalint@calpoly.edu</u>>; Sophie Claire Ortiz
<soortiz@calpoly.edu>; Made I. Roger <<u>maroger@calpoly.edu</u>>; Benjamin Harold Sherman
<bhsherma@calpoly.edu>; Kylee Lynn Singh <klsingh@calpoly.edu>; Matt K. Ritter <<u>mritter@calpoly.edu</u>>;
Seeta Sistla <<u>ssistla@calpoly.edu</u>>; Nicholas E. Williams <<u>nwilli37@calpoly.edu</u>>
Subject: Re: Next Steps for the WRF and the Experimental Farm

Hi again,

I just want to follow up. Are you the right folks to talk to about this?

Collaboration and communication will surely make things easier for both parties on these issues.

Thanks,

Brandon

From: Brandon Hurd <<u>bhurd@calpoly.edu</u>>

Sent: Thursday, May 18, 2023 14:02

To: Dennis K. Elliot <<u>delliot@calpoly.edu</u>>

Cc: Nicholas Lawrence Babin <<u>nbabin@calpoly.edu</u>>; Claire N. Balint <<u>cbalint@calpoly.edu</u>>; Sophie Claire Ortiz <<u>soortiz@calpoly.edu</u>>; Made I. Roger <<u>maroger@calpoly.edu</u>>; Benjamin Harold Sherman <<u>bhsherma@calpoly.edu</u>>; Kylee Lynn Singh <<u>klsingh@calpoly.edu</u>>; Matt K. Ritter <<u>mritter@calpoly.edu</u>>; Seeta Sistla <<u>ssistla@calpoly.edu</u>>; Nicholas E. Williams <<u>nwilli37@calpoly.edu</u>> Subject: Next Steps for the WRF and the Experimental Farm

Hi all,

I am the previous Student Farm Manager of the CAFES / Student Experimental Farm (CEF). I wanted to reach out here, particularly to Dennis Elliot, the Executive Director Energy & Infrastructure Planning, to ensure that we are all up to date with the developments of the Water Reclamation Facility (WRF) at the CEF. The folks cc'ed are all involved with the CEF as care-takers or stake-holders in some way. We did not receive the information to attend the public hearing of the developments here in September and many faculty and students (myself included) feel frustrated and confused. That said, I would like to encourage stronger communication moving forward with the folks in this message as stakeholders.

For now, we need to know some information. What is the timeline for the WRF construction? Is it possible that the WRF might be constructed in another site with much less faculty/ student importance? If not, how will facilities, CAFES and other relevant campus units be involved to support the move to a new site where we can continue to develop this educational farm to showcase sustainability and true hands-on learn-by-doing.

Dennis, can you provide details about how to address those items?

Just for context, the goal of a university Experimental / Agroecological Farm is to fill the void of sustainable action in Cal Poly by providing a space for sustainable development and true sustainable agriculture in practice: demonstrating systems of alternative cropping that could be replicated or scaled, providing space for sustainability research, providing workshops and hands-on education, providing a potential restoration nursery in collaboration with industry projects (with organizations like CALFIRE or the RCD), putting USDA sustainable concepts into practice (e.g., agroforestry demonstration), etc.

Lastly, here are specific items that will need attention before moving into later stages of development (or compromise) -

- NRES faculty researchers: Dr. Seeta Sistla, Dr. Nicholas Babin, Dr. Nick Williams, etc.
- NRES graduate projects: Brandon Hurd, Robyn Brooks, Sarah Williams, etc.
- Cal Poly classes: Lab space for NR 304 Agroecology and NR 306 Natural Resource Ecology and Habitat Management
- Active projects: carbon sequestration and soil health research (Dr. Sistla), decomposable plastic strawberry mulch (Dr. Sistla), Silphium civic science with The Land Institute (Dr. Babin), intercropping experiment series (Dr. Babin), ancient and drought-tolerant grain research (Dr. Williams), Californian agroforestry demonstration orchard activities (Dr. Babin and Brandon Hurd, MS), vegetable row crops and forest garden (Garden Club), culinary mushroom growing (Mycology Club), greenhouse aquaponics system (Polyponics)
- **Center for Sustainability:** led on-campus by Claire Balint, where the CEF is a physical location for sustainable development, educational farming, and workshops / events
- **Club activity:** Garden Club regularly uses all outdoor spaces for hands-on gardening experience and mental well-being, Mycology Club uses the lower shed for inoculating culinary mushrooms, and Polyponics uses most of the main greenhouse for aquaponics work
- Rare and valuable plants: 3 EA large *Quercus rotundifolia* (Balota "Sweet Acorn" Oak) donated by Jan of the SLO Botanical Garden and Dr. Matt Ritter, ~50 EA *Silphium spp.* (Perennial Sunflower) dontated by the Land Institute, 2 EA *Sorbus domestica* (Service Tree) donated from Burnt Ridge Nursery, 2 EA *Prosopis glandulosa* (Honey Mesquite) and 2 EA *Acacia aneura* (Mulga) donated by Mountain State Nursery, 1 EA *Butia capitata* (Jelly Palm) donated by Michael and Carol from the SLO Rare Fruit Growers, 4 EA *Castanea sativa* and *C. sativa x crenata* (European and European-Japanese Hybrid Chestnut), 4 EA *Ziziphus jujuba* (Jujube), 4 EA *Morus macroura* (Pakistan Mulberry) + 1 EA enormous *Morus alba x rubra* (Everbearing Mulberry), 2 EA *Araucaria araucana* (Monkey Puzzle), 4 EA *Hippophae rhamnoides* (Seaberry), 6 EA *Eleagnus spp.* (Silverberry, Goumi berry, and Autumn Olive), 4 EA *Hydrastis canadensis* (Goldenseal)

Thank you for taking the time to read this and consider these activities while deciding on how to relocate or compromise the various spaces at the Experimental Farm.

Much appreciation, **Brandon Hurd** Californian Agroforestry and Restoration MS Environmental Science and Management Cal Poly, San Luis Obispo (707) 318-7886 From: Benjamin Harold Sherman <bhsherma@calpoly.edu>
Sent: Tuesday, May 30, 2023 9:39 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

## Hello Mr. Jackson,

My name is Ben Sherman, and I am writing to strongly urge the board to reconsider the location of the WRF project. I am a third year Environmental Management and Protection major at Cal Poly San Luis Obispo as well as a member of Garden Club leadership and a Teacher's assistant for NR306 (one of the classes that relies on the CAFES/ Student Experimental Farm as a lab space.

Working at the farm for the past 3 years has been one of the most rewarding, character building, and fun experiences of my time at Cal Poly, and I would hate to see this wonderful resource deprived from hundreds of current and future students who benefit from it every day. The Student Experimental Farm is truly the embodiment of Cal Poly learn by doing brilliance. It is an amalgamation of decades of student exploration in sustainable agriculture, environmental managemnt, aquaponics, biology, hydrology, construction, business, landscape planning and architecture, art, engineering, and more. This little slice of Cal Poly displays a wider range of student creativity than can be found probably anywhere on campus. From the old cob wall, trees planted 3 decades ago, solar engineering, new gardens and orchards, and current student projects, everywhere you look at the SEF, you can see that this is a well-loved and utilized space. Granted, it is an underfunded space that could use some TLC, but the history of Cal Poly excellence, and potential for future student gains make the SEF a truly unique and valuable piece of Cal Poly's diverse campus. Bulldozing the SEF would be a huge mistake, and receive a massive amount of backlash from the thousands of students, alumni, and supporters who cherish the garden.

Thank you for your consideration,

Ben Sherman

**Ben Sherman** (he/him/his) Environmental Management and Protection Major Cal Poly University, San Luis Obispo bhsherma@calpoly.edu From: Avery Simpson <avery.simpson@outlook.com> Sent: Tuesday, May 30, 2023 6:02 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment Avery Simpson

Cal Poly must have an area to practice the concept of regenerative agriculture with agroforestry/permaculture practices & learn by doing as a team and with nature. The SEF is a result of decades of input from so many passionate and amazing people. Please hear our call to action and understand we love those 2 acres and will do anything to preserve that space for future Cal Poly students to enrich their education.

From: Jadyn Kaia Snaer <jsnaer@calpoly.edu> Sent: Tuesday, May 30, 2023 7:25 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Student Experimental Farm

Hello,

My name is Jadyn Snaer and I'm a fourth year Political Science major at Cal Poly. I am writing today to express my opposition toward the removal or relocation of the Student Experimental Farm. I, like many students here, have admired the SEF and recognize it as both a significant piece of Cal Poly history and a major part of the Learn By Doing education this university has built an identity on. Removing the farm would be a great disservice to the work of those who built it and those who continue to use it as an academic and creative source.

I hope you will consider the input of students and faculty members who would be very disappointed to see the SEF as they know it go.

Best,

Jadyn Snaer

From: Oliver Tawney <oliver.tawney@gmail.com> Sent: Tuesday, May 30, 2023 2:51 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

I'm very disappointed to hear that there was a proposal to make this waste facility where the current student experimental farm is located. I am an alum of Cal Poly and I firmly believe the SEF is an amazing opportunity for young people to learn about agriculture on a small scale. It's a great community of people and this waste facility would destroy that. The SEF is very important to me and holds a ton of value for Cal Poly students' education. Please don't destroy it!

-Oliver Tawney Forestry and Natural Resources alum From: Allyssa Rose Anthony <aantho01@calpoly.edu>
Sent: Wednesday, May 31, 2023 7:43 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF project draft public comment from Allyssa Anthony

Hello, My name is Allyssa Anthony and I am a 2<sup>nd</sup> year Plant sciences major. I am writing to express my opposition to the Water reclamation facility being built on the space where the student experimental farm is.

While I understand the need for and importance of the WRF, the farm is a very special place for students like me and my friends to come to the garden and learn about sustainable farming practices, mycology, native plants and pollinators and more from our older peers. Many years of love and work have been put into the garden by generations of students, and it's a safe space for students and our community in SLO to come and learn. I know many of my plant science peers utilize the space to help with their classes such as entomology and weed biology. It's also a space for those who are not majoring in a related field, who have come to get a base knowledge of gardening and exploring a new passion which can be enjoyed for the rest of one's life.

It's true the garden can be restarted elsewhere, but this project would ruin many years of habitat for small insects and vertebrates, growth in the native garden, fruit trees planted long ago by Cal Poly students, years of work creating a healthy soil microbiome for the garden beds, and many more valuable things. It would never be the same.

Not to mention the image it puts out to the public- many students already feel as if they are not listened to here by the school. Going through with this plan will perpetuate this rumor in lots of eyes

The Student Experimental Farm is a very special place- My peers and I ask that you please reconsider the location of the WRF. Thank you for your time, Allyssa Anthony From: Connor Bailey <conbailey31@gmail.com> Sent: Wednesday, May 31, 2023 5:15 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment from Connor Bailey

Hello,

My name is Connor Bailey and I am an alumnus of Cal Poly SLO from the class of 2021. Today, I am writing to express my opposition to the construction of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

While I believe the WRF holds benefits for Cal Poly and can be used in a positive teaching experience for students at our amazing university, it doesn't need to be built on the land of the SEF. Cal Poly has an unbelievable amount of unused land that is much more viable for the construction of the WRF. Building the WRF elsewhere would ensure a safe place for students to continue their pursuit of agricultural knowledge at the SEF while allowing for peaceful and unobstructed construction still on Cal Poly Land.

As a member of the original Garden Club, seeing the blossoming club that once used to be so small collapse as a result of no space to practice would be absolutely heartbreaking. This club has shown so much resiliency and passion for farming through all the changes and opposition it has had to go through to get where it is today. This farm means so much to the people who make the SEF a community — past, present, and those who will use it in the future. Destroying the SEF would inherently take away all Garden Club has accomplished.

Please, for the sake of the hearts of those touched by this community and their pursuit in farming knowledge, I urge you to reconsider the WRF proposal.

Thank you for your time and I hope you have a great day.

Best,

Connor Bailey Cal Poly SLO '21 Liberal Arts Major From: Shannon R. Bailey <srbailey@calpoly.edu> Sent: Wednesday, May 31, 2023 10:52 AM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

My name is Shannon Bailey and I believe the SEF should not be torn down. This place is integral in the learning and experience of many college students and is sustainable agriculture at it's most authentic.

From: Audrey Lake Bartels <albartel@calpoly.edu>
Sent: Wednesday, May 31, 2023 10:58 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Audrey Bartels

Hello,

My name is Audrey Bartels and I am a second-year biological sciences major at Cal Poly. I am writing to express my sincere opposition to the construction of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The STudent Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging . I urge you to reconsider the proposal.

Thank you for your time,

Best,

Audrey Bartels

From: Maile Benumof <mbenumof@cox.net> Sent: Wednesday, May 31, 2023 5:39 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: SEF

Do not move the farm!!!! Put a water reclamation facility somewhere else. The soil is building and growing and that is so important to farmland, you can't just move a whole farm like that. People love the farm, put care into the farm. You would be devastating students. People practicing how to grow their own food is SO IMPORTANT to the future and local reliance.

We would be bummed on you so bad if you followed through on your plan.

From: Natalie Bozeman <ncboz2000@gmail.com>
Sent: Wednesday, May 31, 2023 10:01 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Natalie Bozeman

Hello,

My name is Natalie Bozeman. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community. The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal. Thank you for your time.

Best, Natalie Bozeman From: Georgia Brace <georgiabbrace@gmail.com> Sent: Wednesday, May 31, 2023 11:53 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment from Georgia Brace

Wrf

Hello,

My name is Georgia and I am a fourth year ENVM major at Cal poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The student experimental farm is an incredibly, valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and it's lost would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Sincerely, Georgia Brace From: Emily Jul Brown <ebrown81@calpoly.edu>
Sent: Wednesday, May 31, 2023 9:33 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Emily Brown

Hello,

My name is Emily Brown and I am a first year Environmental Earth and Soil Science major at Cal poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community. Just in my first three quarters, I went to the Experimental Farm to study a soil pit in my Intro to Earth Science class, which provided valuable experience regarding my major. I have also utilized the Experimental Farm for rest, relaxation, and community. Through the Garden Club, students have been working tirelessly to take care of the plants and animals that survive there. The three farm cats, as well as the community garden, food forest, Mycology gardens, and more are valuable resources that can be easily replaced. Myself and many other students feel at home at the Student Experimental Farm, and that should be valued.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Emily Brown From: Holly Jean Brue <hjbrue@calpoly.edu>
Sent: Wednesday, May 31, 2023 2:27 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Holly Brue

# Hello,

My name is Holly Brue and I am a first-year biology major here at Cal Poly. I am writing to you to express my opposition and concern of the building of the Water Reclamation Facility on the land that currently houses the Student Experimental Farm.

Although I do see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource for all students, serving as a place to learn about sustainable agriculture, student research, meet new people, and come together to have a safe space for anyone at Cal Poly. It is the definition of "learn by doing". The Student Experimental Farm has been instrumental in my development and growth in my first year of college, I have learned so much about farming and I have found an incredibly welcoming community.

The SEF has been an established place of learning and community for over 30 years and its loss would be incredibly damaging to students, faculty, and the creatures that inhabit its space. I urge you to reconsider the proposal.

Thank you for your time and consideration,

Holly Brue pronouns (she/her/hers) Department of Biological Sciences Cal Poly, San Luis Obispo, CA

hjbrue@calpoly.edu

From: Sophia Bruno <sophiajoannebruno10@gmail.com>
Sent: Wednesday, May 31, 2023 2:25 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment

Hello,

I am writing to submit my comment in hopes to preserve the Student Experimental Farm (SEF) on Cal Poly's campus. It has come to my attention that a master plan for campus threatens the preservation of the farm. I am expressing my disagreement with this as the farm has provided me with many great memories and social connections. Not only that, but it has provided a place for myself and others to foster our interests. For these and many more reasons, I hope it can be maintained. Thank you for your time. Best,

Sophia Bruno

Cal Poly SLO, Psychology major, class of 2025

From: Sophia Bruno <sophiajoannebruno10@gmail.com>
Sent: Wednesday, May 31, 2023 5:19 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Sophia Bruno

Hello,

My name is Sophia Bruno and I am a second year Psychology major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Sophia Bruno

From: emalie cano <emaliecano1@gmail.com> Sent: Wednesday, May 31, 2023 10:12 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject:

Hello,

My name is Emalie Cano and I am a 4 year Kinesiology major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm. Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

From: Shiva Chemburkar <samirshivachemburkar@gmail.com>
Sent: Wednesday, May 31, 2023 11:43 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR

## Greetings,

It's come to my attention that Cal Poly plans to remove the current location of the Student Experimental Farm and relocate the space. I have to say that this move would disrupt what has become such a valuable space and diverse ecosystem of plants and animals that has been built and maintained by Cal Poly's own students.

I had the privilege of being able to visit this space and help promote a healthy learning atmosphere. The environment that has been created in the space cannot be recreated from scratch and I really urge the developers to consider using a different space for their water retention testing. There are plenty of other spaces available for occupation.

It's difficult to explain how valuable the SEF is to students, but it's not a space that can be recreated by relocation. Among everything it contains, it has become a protected and open space for students to interact and grow their knowledge of plant sciences. Please reconsider your plans to remove the Student Experimental Farm.

Thank you, Samir Shiva Chemburkar From: hayley costello <costellohay@gmail.com>
Sent: Wednesday, May 31, 2023 9:24 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment From Hayley Costello

Hello, my name is Hayley Costello and I am a third year Landscape Architecture major at Cal Poly. I am writing to inform that I do not agree with the proposed Water Reclamation Facility being built where the Student Experimental Farm is currently located.

I understand the value in the WRF, however I urge you to find a location that is not only suitable, but does not impose on the Student Experimental Farm. The SEF has served as an incredible resource to the students of Cal Poly for over thirty years. This space embodies 'learn by doing' in a unique way that allows for students to learn about sustainable agriculture. It is a space where students and professors alike are able to conduct valuable research. Above all, this space has served as a unifying space for community.

The SEF is a special space for many and would be an extreme loss, please reconsider this decision.

Sincerely, Hayley Costello From: Lisa Cox <coxlisa42@gmail.com>
Sent: Wednesday, May 31, 2023 8:28 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject:

Hello,

My niece Abby Salisbury is graduating this Spring 2023 at Cal Poly.

I am writing to express my opposition to the building of the water reclamation facility on the land currently housing the Student Experimental Farm.

Abby has gained tons of knowledge and community experience helpful to the larger community in town.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location.

The Student Experimental Farm is an incredibly valuable resource; it is a unique place to learn about sustainable agriculture, home to student facility research and is a unifying place for the community.

The SEF is a special place on campus to many people and its loss would be incredibly damaging to a healthy community worthy of concern.

A sustainable agriculture education space should be a top priority and is vital for a healthy current campus/city future.

Keep this thriving farm going.

I urge you to reconsider this proposal.

Sincerely, Lisa Cox From: Rosso <rossomusic21@gmail.com> Sent: Wednesday, May 31, 2023 7:17 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project

Copyable:

Hello,

My cousin Abby Salisbury is graduating this Spring 2023 at Cal Poly.

I am writing to express my opposition to the building of the water reclamation facility on the land currently housing the Student Experimental Farm.

Abby has gained tons of knowledge and community experience helpful to the larger community in town.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location.

The Student Experimental Farm is an incredibly valuable resource; it is a unique place to learn about sustainable agriculture, home to student facility research and is a unifying place for the community.

The SEF is a special place on campus to many people and its loss would be incredibly damaging to a healthy community worthy of concern.

A sustainable agriculture education space should be a top priority and is vital for a healthy current campus/city future.

Keep this thriving farm going.

I urge you to reconsider this proposal.

Sincerely,

Matthew Cox

707-292-9216

From: Evan Delgado <evan02cal@gmail.com>
Sent: Wednesday, May 31, 2023 10:56 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Roberto Delgado

Hello,

My name is Roberto Delgado and I am a 3rd year Business major at Cal Poly.

I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best regards, Roberto Delgado From: Camille DeMilly-Otteson <camilledemillyotteson@gmail.com> Sent: Wednesday, May 31, 2023 10:50 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Comments about the destruction of the SEF

To whoever has the power to make a difference,

Hello, My name is Camille DeMilly-Otteson and I am a 4th Year ENVM major at Cal Poly, I am writing to express my deep opposition to the building of the Water Reclamation Facility on the land currently occupying the Student Experimental Farm.

I can see the values of the WRF, however, I strongly urge the reconsideration of its location. The Student Experimental farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/ faculty research, and is a unifying space for students.

The SEF is a special place on campus to many people and its loos would be incredible damaging. I urge you to reconsider the proposal.

Thank you for your time.

Camille DeMilly-Otteson

From: Nathalia De Souza <ndesouza@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:29 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Nathalia De Souza

To whom it may concern,

My name is Nathalia De Souza, and I am an aerospace engineering student at Cal Poly graduating this summer. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location!! I had the pleasure of volunteering at the SEF during my sophomore year, and I wouldn't be the same person I am today if I didn't have that experience. Being able to tend the land and interact with the wonderful creatures at the SEF kept me sane during the pandemic and allowed to give back to the wonderful land we have on the Cal Poly campus.

The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Nathalia De Souza From: Chiara Margarita Detata <cdetata@calpoly.edu>
Sent: Wednesday, May 31, 2023 6:52 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR comment from chiara

Hello,

My name is Chiara DeTata and I am a first year child development major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of the location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it's a unifying space for the community.

The SEF is special place on campus to many people, and it's loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Chiara DeTata

From: Aidan James Dillon <ajdillon@calpoly.edu> Sent: Wednesday, May 31, 2023 9:44 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

## Hi Marcus,

My name is Aidan and I'm a second-year journalism student at Cal Poly. I'm writing to state my opposition to the project to build the Water Reclamation Facility over the Student Experimental Farm. The SEF has proven to be an invaluable resource, <u>as the student body has previously expressed</u>. While I can see the value of the facility, I also believe that the SEF doesn't have to be sacrificed for it to be built. The loss of this farm would be devastating to the community it has attracted and the opportunities it provides. For this reason, I'm asking, along with many other concerned students, that you reconsider this proposal.

Thank you for your time, Aidan Dillon From: Julian Paolo Durante <jpdurant@calpoly.edu>
Sent: Wednesday, May 31, 2023 6:35 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Julian Durante

Hello,

My name is Julian Durante, and I am a 2nd year ENVM major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Julian Durante

From: Alyson Lorraine Engel <aengel03@calpoly.edu> Sent: Wednesday, May 31, 2023 9:11 AM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Student Experimental Farm

To whom it may concern,

I am writing to express how important the Cal Poly SEF has been to me during my first year of college. During this new and tumultuous time, the Farm and the Garden Club have given me a place that reminds me of home and a community I feel comfortable in. The current Farm is a beautiful place to clear one's head, and I am so grateful for the meaningful time I have spent there so far. The land that it sits on has become filled with nutrients from different plants and animals, and to move it would jeopardize losing that beautiful gift of life that has been instilled into the soil. I ask that you please not take the opportunity to feel found at the SEF away from future students who may feel out of place like I did. There is another way. Please maintain the current location of the SEF and know with confidence that you are helping a number of students feel comfortable and understood and at home on this campus.

Thank you, Alyson Engel From: Jujú Eulensen-Wallace <jeulense@calpoly.edu>
Sent: Wednesday, May 31, 2023 4:50 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WFR Project Draft EIR Comment from Jujú Eulensen-Wallace

Hello,

My name is Jujú Eulensen-Wallace and I am a fourth year Anthropology and Geography major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

I have seen many of my friends and acquaintances put a lot of work into the space, and it has become such a beautiful project and a spot for anyone to come, hangout, and learn a little bit more about how awesome it is to be able to grow your own food.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time,

Best,

Jujú Eulensen-Wallace

From: Abby Evans <aevans48@calpoly.edu>
Sent: Wednesday, May 31, 2023 8:33 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Abby Evans

Hello,

My name is Abby Evans and I am a second year Environmental Management and Protection major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm. Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Abby Evans

Sent from Mail for Windows

From: James H. Fong <jhfong@calpoly.edu>
Sent: Wednesday, May 31, 2023 10:49 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from James Fong

Hello,

My name is James Fong, and I am a first-year Environmental management and protection major at Cal Poly, I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time,

Best, James Fong From: Ella Grace Fuentes <egfuente@calpoly.edu>
Sent: Wednesday, May 31, 2023 7:52 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Ella Fuentes

Hello,

My name is Ella Fuentes and I am a first-year psychology major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Ella Fuentes

From: charlie gibbons <cgibbons1314@gmail.com> Sent: Wednesday, May 31, 2023 11:18 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

I would like to write to those it concerns today to acknowledge the grave loss of student resources if this WRF project is to proceed. Destroying the Student Experimental farm with no plans to mitigate destruction to this agricultural site is an egregious mistake by cal poly. This WRF project as it stands would significantly undermine the agency of students to involve themselves in agriculture. The loss of agricultural land, loss of habitat at the Student Experimental Farm, and alteration of the area's aesthetics all warrant reconsideration of where this WRF can be placed. The farm is a special place to many students, staff, and faculty and I fear losing this part of Cal Poly's culture will be a sacrifice too great to justify with the administration's "sustainable" infrastructure development. Please consider more mitigation measures to preserve the farm or at the least help to replace it after it's built on.

Best, Alumnus Charles Gibbons From: James Noble Gregory <jngregor@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:43 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from James Gregory

# Hello,

My name is James Gregory, and I am a third year Environmental Management and Protection Major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can understand the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm offers something unique at Cal Poly that cannot be found elsewhere on campus. It is a valuable, and largely the only space to learn about agroecology (the future of a sustainable food management) on campus and several classes I have taken have included labs there. Additionally, it provides a research location for many students' master's and undergraduate projects, clearing the land would be effectively killing their research.

Perhaps most importantly, it is one of the few spaces on campus that feels truly student led and run, with the opportunity to build community, make connections, and create something of value together. A space free of restrictions from bureaucracy and convention allows for greater free expression and indeed a vibrant culture has emerged around the SEF. The club is home to several clubs including the Garden club, Mycology club, and Aquaponics club. This space has proven not to be destructive in any way and only uplifts student wellbeing, by providing a consistent and grounded area for students to retreat from the stress and pressures of campus.

It would seem to seriously call into question how much Cal Poly is invested in its Sustainability Goals, as well as its Student Wellbeing Goals if it is actively trying to destroy and minimize places and people working towards a sustainable, more fulfilled future for all. The SEF is a very special place on campus, and its loss would be damaging to many people, myself included. I urge you to reconsider the proposal.

Thank you for your time.

Best, James Gregory From: Ella van Hamersveld <ella@vhfamily.com>
Sent: Wednesday, May 31, 2023 7:23 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Ella van Hamersveld

Hello,

My name is Ella van Hamersveld and I am a fourth year Biology major at Cal Poly with a concentration in ecology, conservation, evolution, and biodiversity. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Ella van Hamersveld

From: Lida Hamidi <lhamidi@calpoly.edu>
Sent: Wednesday, May 31, 2023 6:52 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Urgent: Preserve the Student Environmental Farm

## Dear Mr. Jackson,

I hope this email finds you well. I am writing to you today as a concerned student to express the urgent need to save the Student Environmental Farm from potential development. The Student Environmental Farm serves as a valuable resource for those studying sustainability, agriculture, and plant science, providing a unique platform for creativity and hands-on experience that aligns with Cal Poly's esteemed Learn By Doing motto.

I became involved with Student Environmental Farm during my freshman year when I joined Poly Ponics, the aquaponics club. It was through this involvement that I had my first taste of agriculture, an experience that opened my eyes to a world of possibilities I had never been exposed to in my hometown. The farm provided me with opportunities to explore and experiment, sparking my passion for agriculture that led me to change my major to Environmental Management and Protection.

The Student Environmental Farm has played a pivotal role in shaping my studies at Cal Poly, by shaping my interests and academic path. The farm's diverse range of projects and research initiatives have not only broadened my understanding of environmental stewardship but have also provided me with an invaluable network of like-minded individuals who have become lifelong friends.

Moreover, I am proud to share that my fellow peers and I were awarded the CPConnect grant in 2019 through the College of Engineering. This funding has enabled us to undertake projects, such as a vertical tower, which further contribute to the growth and development of sustainable agricultural practices on campus.

Losing the Student Environmental Farm would be devastating to the future of Cal Poly's sustainability efforts and the invaluable hands-on learning opportunities it provides. By preserving this designated area for growth, our university can continue to foster innovation, inspire passion, and cultivate a new generation of environmental leaders.

I urge you to consider the long-lasting benefits that the Student Environmental Farm offers to our student body and the broader community. By ensuring its preservation, Cal Poly will continue to lead the way in sustainable education and practice, setting an example for other institutions to follow.

Thank you for your attention and consideration. I kindly request a meeting with you to discuss this matter further and explore potential strategies to save the Student Environmental Farm. Together, we can safeguard this valuable resource for the benefit of current and future generations of students at Cal Poly.

Yours sincerely,

Lida Hamidi California Polytechnic State University | San Luis Obispo <u>lidahamidi19@gmail.com</u> | (949)-306-8237 From: Elle Harlow <elleharlow17@gmail.com> Sent: Wednesday, May 31, 2023 4:04 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hi there,

My name is Elle Harlow and I am Cal Poly Alumni, class of 2021. I am a founding member of the Cal Poly Garden Club, which currently uses much of the space available at the Student Experimental Farm. During my four years at Cal Poly, I spent countless hours at the SEF. The time I spent tending the land at the SEF helped me grow as a person, connect to the land, and pushed me to pursue sustainable agriculture as a career path. I **urge you to please build the water reclamation facility somewhere other than the SEF.** Please don't destroy all the time, energy, and love that myself and so many other students have poured into that land, and allow future generations of Cal Poly students to use this space to learn, grow, develop a love for and understanding of regenerative farming. The SEF creates a space where students can develop passion and skills that will be used for the good of the planet and its people for the rest of their lives.

Thank you, Elle Harlow From: Tiki Harlow <tikiharlow@me.com> Sent: Wednesday, May 31, 2023 10:20 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

To Whom It May Concern,

I am writing as the parent of a former Cal Poly student, to urge the university to preserve the Student Experimental Farm as and where it currently exists. My daughter, who graduated with her degree in Environmental Management in 2021, was one of the founders of the Garden Club at SEF. The gardens that she and her fellow students created have been a directional force in her life, both in college and after. The experiences they had with urban farming, regenerative agriculture, and sustainable land management, were the embodiment of "learn by doing." Further, they left a legacy of hands on, experimental farming, which has continued to flourish under the care of current CalPoly students. It is critical that future CalPoly students also have the opportunity to come together and work the land that nourishes not only the CalPoly and SLO communities, but also their passions.

As a proud Mustang family member, and supporter of CalPoly, I cannot stress enough the importance of the Garden Club and Student Experimental Farm to the students, to CalPoly, to the broader community, and to the future of agriculture.

Sincerely,

Tiki Harlow

From: Eden Haley Hendricks <edhendri@calpoly.edu> Sent: Wednesday, May 31, 2023 4:04 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: SEF

Hello, my name is Eden Hendricks and I have spent many days at the student experimental farm over my last 3 years at Cal Poly making wonderful connections, enjoying its beautiful natural energy, painting its compost, and much more. Many of my friends are highly invested in the farm and have created wonderful communities devoted to sustainability, food production, and working outdoors. This farm is so important to all of us, and we really don't want to see it go.

Please do not get rid of the student experimental farm, we love it dearly, and to see it go would break our hearts and ruin wonderful opportunities for future Cal Poly students.

Thank you,

Eden Hendricks

From: Julia Hershberger <hershbergerjulia@gmail.com> Sent: Wednesday, May 31, 2023 4:13 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR from Julia

### Hello,

I am an incoming freshman business major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm. One of the reasons I am proceeding to attending Cal Poly instead of my other top picks like UCLA is because of the "Learn By Doing" motto. This garden fully embodies that. I have attended a few work days in the garden and the environment there is such a safe and important space. I intended to become a part of the garden club and I would hate for it to be an opportunity taken away from me and many others. It's a great opportunity for students to learn sustainability, relieve stress, grow their own produce, and many other useful skills. Please protect our garden!!

Thank you

From: Noemi Ho <nho22@calpoly.edu> Sent: Wednesday, May 31, 2023 4:25 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Good afternoon,

I am Noemi Ho, a third year Landscape Architecture major minoring in Sustainable Environments here at Cal Poly and have had the privilege to have access to the Cal Poly Student Experimental Farm (SEF) during my time here. I have reviewed both the "Notice of Preparation of an Environmental Impact Report for the WRF Project" and the 2035 Cal Poly Master Plan.

The current proposed location for the WRF would work against the overarching goals of the University by destroying a unique community which has provided two acres of space for an inter-disciplinary approach to learn by doing. This project would dismantle a community of both plants and people that have existed here since 1989.

I urge you to reconsider the environmental impacts which were deemed insignificant within the Potential Environmental Impacts section of the Environmental Impact Report - specifically the impacts on agriculture and forestry resources (there are student projects in progress), land use and planning (this land is actively in use and has been for over 30 years), public services (providing fresh fruits and vegetables to students), and recreation (within the farm there is a stage and space for other student-run events).

Within the proposed project parcel boundary, there are other plots that will not meet the same consequences of locating on top of the SEF.

Thank you for reviewing our comments, Noemi Ho

From: Scott Inman <guidogy@yahoo.com>
Sent: Wednesday, May 31, 2023 9:27 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR comment From Scott Inman

#### Hello my name is Scott Inman.

The student experimental farm provides opportunities for students to connect and take pride in sustainable practices. I'm saddened and confused by the news of potential removal of the site. The farm is a tranquil getaway from typical college life for many students and home to many animals that need homes and caretakers. It's a wholesome space that would be dearly missed by many if removed. If Cal Poly continues to move forward with their plans of removal all I ask is the animals are accounted for an alternate site is provided for the students Thank You.

From: Lilja Jelks <lajelks@yahoo.com>
Sent: Wednesday, May 31, 2023 7:51 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>; Andy Thulin <athulin@calpoly.edu>; Abigail McCullough <ammccull@calpoly.edu>
Subject: WRE Project Draft EIR Comment

Dear All and Planning Directors,

I hope this message finds you well. I would like to take this opportunity to express my concerns regarding the WRE Project Draft. I believe this forum is an appropriate platform to address this matter.

I would like to bring to your attention the concerns shared by myself, as well as numerous alumni, students, and community members, regarding the proposed destruction of the Student Experimental Farm (SEF) at Cal Poly. As an alumnus who actively participated in the SEF from 2017 to 2021, I have witnessed firsthand the invaluable contributions made by this facility. Moreover, as an alumni, I have continued to witness the meaningful projects, master's degrees, and community-building initiatives that have thrived on the SEF through the dedicated efforts of dear friends. This land holds a significant historical and educational value, and its preservation would continue to offer immense potential for future generations of students.

I kindly request that you take into consideration the voices of those who are urging Cal Poly to refrain from developing this specific piece of land. By supporting their cause, we can ensure the continued prosperity of the SEF and the opportunities it provides.

Thank you for your time and thoughtful consideration.

Sincerely,

Lilja Jelks

From: Breken Jennings <brekenlynn@icloud.com> Sent: Wednesday, May 31, 2023 11:52 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF PROJECT DRAFT EIR COMMENT FROM BREKEN JENNINGS

Hello,

My name is Breken and I am a fourth year business major at Cal poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The student experimental farm is it in credit edibly, valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. And it is a unifying space for the community.

The SEF is a special place on campus to many people, and it's lost would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

**Breken Jennings** 

From: Snehith Jonnaikode <sjonnaik@calpoly.edu>
Sent: Wednesday, May 31, 2023 4:20 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Snehith

Hello,

My name is Snehith Jonnaikode and I am a fifth year Computer Science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Snehith Jonnaikode. From: andy jwaideh <andyjwaideh@gmail.com>
Sent: Wednesday, May 31, 2023 9:46 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Andrew Jwaideh

Hello,

My name is Andrew Jwaideh and I am a third-year Mechanical Engineering major at Cal Poly. I am writing to express my opposition to the proposed construction of the Water Reclamation Facility on the land currently occupied by the Student Experimental Farm (SEF).

While I acknowledge the potential benefits of the WRF, I strongly urge you to reconsider its proposed location. The SEF is an incredibly valuable resource, providing a unique space for learning about sustainable agriculture, as well as serving as a hub for both student and faculty research. Moreover, it is a unifying space for our community.

For many, the Student Experimental Farm represents more than just a physical location on campus; it is a muchneeded reprieve from the stressors of everyday life. Its loss would have a profound impact on those who cherish it. I implore you to reconsider this proposal.

Thank you for your time.

Best regards, Andrew Jwaideh From: Laura Natalie Kannegieter <lkannegi@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:13 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Laura Kannegieter

Hello, my name is Laura Kannegieter and I am fourth year Nutrition major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Laura Kannegieter

From: Klara Kaupanger-Swacker <kkaupang@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:45 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Klara Kaupanger-Swacker

Hello,

My name is Klara Kaupanger-Swacker and I am a first year BRAE major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Klara Kaupanger-Swacker From: Theodore Reed Koffman <tkoffman@calpoly.edu> Sent: Wednesday, May 31, 2023 3:19 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Save the garden !

Hello,

I know this garden is very important to many students and is a safe space to disconnect from life sometimes and just grow fresh foods and hang out. Please consider not developing on this land. It is part of what makes Cal Poly so special!!!!

Best, Teddy

--

**Theodore Koffman Third-year Construction Management Student** Cal Poly, San Luis Obispo tkoffman@calpoly.edu From: Sam Leroy Kohn <slkohn@calpoly.edu>
Sent: Wednesday, May 31, 2023 12:20 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIRC Comment from Sam Kohn

## Hello,

My name is Sam Kohn and I am a 2<sup>nd</sup> year journalism major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

For my JOUR 203 -- "News Reporting and Writing" class, I wrote my enterprise final piece on sustainability at Cal Poly with a focus on the SEF. I helped plant peas and measure out area for new plots that the farm was planning, and interviewed a collection of students who oversee operations. I recognized how valuable this space is for the students involved -- the dedication, love, and resources put into helping this farm thrive was very moving for me. It is a unique space to learn about sustainable agriculture, houses a ton of student research, and helps unify a large community of Cal Poly students.

As an agriculture-focused school, I hope that we can acknowledge and prioritize the wonderful work these students have done. I personally am not a member of the farm -- I have simply seen the love and passion that has gone into it.

I urge you to reconsider the proposal. It is in the best interest of the students.

Best, Sam Kohn (he/him) College of Liberal Arts | Journalism **Cal Poly, San Luis Obispo** Music | Audio Technology

Cuesta College

310-776-0183

slkohn@calpoly.edu

htps://samkohn8.wordpress.com/

From: Remy James Elio Lacchia <rlacchia@calpoly.edu> Sent: Wednesday, May 31, 2023 6:49 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Student Experimental Farm

Hello,

I am writing to voice my opposition of the Student Experimental Farm being replaced by a water reclamation facility. As an engineering student I know that there is never one single solution to a problem and there must be another way. While the water reclamation facility sounds important and beneficial, there must be somewhere else it can go. I have many friends who are involved in the SEF and are heartbroken by the prospect of losing decades of knowledge and input from passionate and amazing people. I stand with them and implore that you reconsider the location of this new facility. There must be another way. It is ignorant of CalPoly's history and origins in the agricultural climate of the central coast to prioritize this new project over the passion of its students.

Remy Lacchia

# From: Tessa Lambert <tessalambert@gmail.com> Sent: Wednesday, May 31, 2023 7:27 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment from Tessa Lambert

Hello,

My name is Tessa Lambert and I am a fourth year Nutrition Science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource: it is a unique space to learn about sustainable agriculture, home to student/faculty research and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal. Thank you for your time.

Best, Tessa Lambert From: Ava Lazarov <avalazarov1@gmail.com>
Sent: Wednesday, May 31, 2023 10:22 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Ava

Hello,

My name is Ava and I am a 4th year Anthropology/Geography major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time. Best, Ava From: Sema Miranda Lew <slew04@calpoly.edu>
Sent: Wednesday, May 31, 2023 10:55 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Sema Lew

Hello,

My name is Sema Lew and I am a second-year biological sciences major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research and it is a unifying space for the community.

The SEF is a special place on campus to many people and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Sema Lew

From: Cameron Lilly <camlilly12@gmail.com> Sent: Wednesday, May 31, 2023 3:04 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

To Whom it May Concern,

My name is Cameron Lilly and I was a civil engineering student at cal poly from 2017-2021 and graduated with a bachelors degree in June of 2021. I am writing this email to express my concern that the Student Experimental Farm will cease to exist in a meaningful way as this project goes forward. It has been my experience while I was at the university as well as my impression that this continues to be the case, that the Student Experimental Farm was one of, if not the most important place for me to exhibit the Cal Poly motto of Learn by Doing. It is a wonderful living laboratory that allows students to interact in a symbiotic way with the environment, ecology and other students and teachers, as well as community members to learn more about sustainable farming methods, ways to become more self sufficient and save money, and a way to relax and de-stress from the trials of a sometimes grueling course load.

Cal Poly SLO is the largest landholding university in California with a total of 9,678 acres under its control, but the 2 acres of the Student Experimental Farm are completely unique and are a sanctuary for students to explore projects that they have strong interest in outside of the classroom setting, allowing for some of the fastest growing clubs on campus for space to thrive, including Cal Poly Garden Club, the Mycology Club, Polyponics, Real Food Collaborative and others. This piece of land transitioning to another use would be a shame and honestly a devastating blow to the student community at Cal Poly's ability to engage in the Learn by Doing motto. I think the proposed project could be implemented on another piece of the vast property that Cal Poly owns as it still has not gone through any sort of implementation procedures, and I think that keeping both projects would be most beneficial. Relocating the SEF would eliminate a lot of wonderful history and would create significant hardships for multiple student clubs and academic classes to continue operating.

I believe these concerns should be taken into consideration by the university and another location for the Water Reclamation Facility be found.

Thank you for reading, Sincerely, Cameron Lilly From: chad lilly <nucat40@gmail.com> Sent: Wednesday, May 31, 2023 7:49 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF project Draft EIR Chad Lilly

#### Hi Marcus,

I know there has been a lot of work done on this project already. I would ask that and the team reconsider going back to the original plan versus the new plan of putting the treatment facility on the SEF area. That location has developed over the past 6 years quite effectively and allowed for a solid place for future farmers and students to get connected in a very meaningful way. I realize that you would consider relocating them to a different space but that structure that has been built over the years will be lost.

I hope the university and the students can come to a happy conclusion without relocating the SEF.

We appreciate the opportunity to have the students learn by doing and creating a more sustainable environment for everyone.

Sincerely,

Chad Lilly e: <u>nucat40@gmail.com</u> c: 630-709-7854 <u>LinkedIn</u> <u>Author</u> From: Hannah Kay Lindquist <hklindqu@calpoly.edu>
Sent: Wednesday, May 31, 2023 9:29 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Hannah Lindquist

Hello,

My name is Hannah Lindquist and I am a first year Food Science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value in WRF, I strongly urge the reconsideration of the location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student and faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people including me, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thanks for your time,

Hannah Lindquist

From: Racheal Matheny <rachealmatheny18@gmail.com> Sent: Wednesday, May 31, 2023 8:20 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment from Racheal Matheny

Hello,

My name is Racheal Matheny and I am a Cal Poly Alumni and I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

The Student Experimental Farm had served as an essential place of learning during my time at Cal Poly. I am proud to be an alumni and even prouder to have such impactful hands-on and place based learning opportunities at Cal Poly. Throughout my time studying Environmental Management and Protection, I learned valuable lessons in land stewardship and creating environmental impact reports. I am disappointed to see that the Master Plan which we were able to study and learn from is now being amended and in that, is eliminating an important space of learning on Cal Poly's campus.

I can't put into words the importance that gardening has played in my life, as it has had a pivotal impact on my mental health and allowed me to feel connected to life and the planet in deeper ways. I am grateful to have had some of that healing occur at the Student Experimental Farm and would be devastated if this place would be eradicated. I strongly urge you to reconsider this decision, both for the sake of our students and our planet.

Best regards, Racheal Matheny From: Isa Mattioli <imattiol@calpoly.edu> Sent: Wednesday, May 31, 2023 8:38 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment from Isa Mattioli

Hello,

My name is Isa Mattioli and I am a third year Animal Science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community. I have had so many valuable experiences at this farm through class and outside of class just as a safe space.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Isa Mattioli From: Natalie Mary Elizabeth Mccormick <nmmccorm@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:11 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR

Hello, my name is Natalie, and I am 4th year Communication Studies major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

I have made so many great memories here and it has been a quintessential part of my student experience.

Thank you for your time.

Best,

Natalie McCormick

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From: Josh Melone <jpm1417@gmail.com> Sent: Wednesday, May 31, 2023 12:09 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Josh Melone

Hello,

My name is Josh Melone and I am a 2nd year Business major at Cal Poly.

I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time. Best, Josh Melone From: Michael Murnane <ultrasuperadvanced@gmail.com>
Sent: Wednesday, May 31, 2023 5:33 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF project draft EIR comment from Michael Murnane

Hello,

My niece Abby Salisbury is graduating this Spring 2023 at Cal Poly.

I am writing to express my opposition to the building of the water reclamation facility on the land currently housing the Student Experimental Farm.

She has gained tons of knowledge and community experience helpful to the larger community in town.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique place to learn about sustainable agriculture, home to student facility research and is a unifying place for the community.

The SEF is a special place on campus to many people and its loss would be incredibly damaging to a healthy community worthy of concern.

A sustainable agriculture education space should be a top priority and is vital for a healthy current campus/city future.

Keep this thriving farm going.

I urge you to reconsider this proposal.

Sincerely, Michael Murnane 415-420-2669 From: Jacqueline Niles <jacquelineniles12@gmail.com> Sent: Wednesday, May 31, 2023 11:10 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment from Jacqueline Niles

Hello, my name is Jacqueline Niles. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Jacqueline Niles From: Henry Olson <henryolson97@gmail.com>
Sent: Wednesday, May 31, 2023 3:59 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: Wrf project draft comment from Henry Olson

### Hello,

My name is Henry and I am a first year FFS major at Cal poly. I am writing to express my opposition to the building of the water reclamation facility on the land currently used by the Student experimental farm. Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The student experimental farm is a very valuable resource; it is a unique space to learn about sustainable agriculture. The SEF is a special area that is used and appreciated by many people and its loss would be damaging. I urge you to reconsider the proposal. Thank you for your time,

Henry Olson

From: Piper O'neill <kponeill@calpoly.edu>
Sent: Wednesday, May 31, 2023 9:53 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Piper O'Neill

Hello,

My name is Piper O'Neill and I am a 3rd year Landscape Architecture major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. It is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Sincerely,

Piper O'Neill

From: John Paneno <jpaneno12@gmail.com>
Sent: Wednesday, May 31, 2023 2:27 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from John Paneno

To whom it may concern,

My name is John Paneno and I am a 4th year Marine Science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, and is home to student/faculty research. It is a unifying space for the community, and a safe place for people to relax and socialize; a kind of culture that Cal Poly boasts of representing. The SEF is a special place on campus to many people, and its **loss would be incredibly damaging**. I urge you to reconsider the proposal.

Thank you for your time.

Best,

John Paneno He/Him/His From: Clara Rose Patterson <cpatte07@calpoly.edu>
Sent: Wednesday, May 31, 2023 12:30 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Clara Patterson

Hello,

My name is Clara Patterson, and I am a second year Political Science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community.

The SEF was one of the reasons I decided to go to Cal Poly, as I thought it was a clear example of Learn by Doing and the strong community surrounding the SEF is a beautiful thing to witness and be a part of. Moving or getting rid of the SEF does not reflect the values of Cal Poly including learn by doing and continuous learning opportunities. The SEF is a place where people come together to nurture life and connect with others. I've learned about job opportunities, made friends, and gained knowledge in my time at the SEF. A lot of hard work has been put into making the SEF what it is today, and I think we should respect that and not build a structure on SEF land when there are other areas that can be used in a less destructive way to the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Clara Patterson From: Isabella Marie Paz <impaz@calpoly.edu>
Sent: Wednesday, May 31, 2023 9:17 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Isabella Paz

Hello,

My name is Isabella Paz and I am a first year student at Cal Poly, currently in psychology but switching into the biological sciences major. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I see the value of WRF, I hope that you will consider its placement. The Student Experimental Farm is a very special place that is the core of 3 clubs on campus and home to student and faculty research. It is also one of the only places on campus that practices sustainable agriculture. It has a special place in the hearts of many students, and it would be very damaging to see that taken away.

Please reconsider the location of the Water Reclamation Facility.

Thank you,

Isabella Paz

From: Sofia Gabrielle Pazooki <spazooki@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:06 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Sofia Pazooki

Hello, my name is Sofia Pazooki and I am a 4th Business major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Sofia Pazooki Get <u>Outlook for iOS</u> From: Max Pepperdine <mpepperd@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:14 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Max Pepperdine

### Hello,

My name is Max Pepperdine and I am a fourth year Environmental Management and Protection major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Max Pepperdine

# **Maxwell Pepperdine**

Undergraduate Student

B.S. Environmental Management & Protection, Minors in Biology and Sustainable Environments

California Polytechnic State University, San Luis Obispo

He/Him/His | max.pepperdine@gmail.com

From: Colter Pruyn <cjpruyn@gmail.com> Sent: Wednesday, May 31, 2023 5:07 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: Cal Poly Student Experimental Farm

Hi,

My name is Colter Pruyn. I graduated Cal Poly in June 2023. I received word that the student experimental farm is under threat.

This farm is one of those things that makes cal poly what it is. It separates us from other schools. It retains the Cal Poly culture in its roots.

I beg you, please do not destroy something that so many have come to love.

This farm was always my stopping point during weekly bike rides through the cal poly agricultural area. Some of my favorite school memories are from those rides and visiting friends with wonderful projects.

Do not take away this fountain of golden ideas, relaxation, mindfulness, and student connection to the land.

If you truly must destroy the experimental farm, please release to the public a plan for where the new farm will be, and realistic dates on we we can expect it to be ready. This is your responsibility.

Respectfully,

Colter Pruyn (435) 901-3491 From: katie raffaini <katie.raffaini@icloud.com> Sent: Wednesday, May 31, 2023 11:07 AM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

#### Hello,

My name is Katie Raffaini and I am a Cal Poly alum. I'm reaching out to comment on the EIR for the Wastewater Recovery Facility, and to express my opinion about the consideration to build this on top of the Student Experimental Farm. The SEF was a core proponent of what made my Cal Poly experience so great. It was the core of my 'learn by doing' experience. It is a crucial place of community for students and staff alike, where knowledge pushed limits and difficult concepts finally made sense out of the classroom. Cal Poly has more land than any other state school, with countless potential locations for a new water reclamation facility. Please consider building the facility at a different location, one with less significance to the Cal Poly community.

Sincerely, Katie Raffaini From: Brynn Ashley <brynnashley1600@gmail.com> Sent: Wednesday, May 31, 2023 5:45 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

#### Dear Mr. Jackson,

I am contacting you because I would like to submit a formal comment to the Lead Agency on the new Water Reclamation Facility Development. My name is Brynn Rotbart and I am a Cal Poly student who is very active at some of the clubs at the Student Experimental Farm (SEF).

We students have put so much time and love into cultivating, growing, and maintaining the SEF. The SEF serves as a bustling cultural hub where community and connection to nature is highly emphasized and valued. As a senior at Cal Poly, I can confidently say that the SEF has made lasting impact on my time at Cal Poly, and I think other students deserve the opportunity to be provided with such a wonderful environment. Not only did I meet life long friends, but I learned how to garden and grow food, make herbs and spices, and grow aquaculture. Cal Poly is a school that emphasizes agricultural literacy, and providing a space where we students can learn and experiment strongly correlates with this Cal Poly ethos. Lastly, more than just us students, consider the SEF a part of our home at Cal Poly. We have three garden cats, all fondly named, and other wildlife that has found respite in this beautiful place.

An especially fond memory for me was when all the wildflowers were in bloom, all the fruit was ripening, and the hills were lush and green. It was a work day, meaning all the students get together (usually biweekly) and work on manning the farm. There were flocks of migrating ducks drifting across the sky, occasionally landing in the pond we built. The sun started to set and this vibrant sunset was painted across the sky. The garden has this peace to it, where you just feel centered. Everything goes silent. And it's just you and the ecosystem around you. The crickets started chirping and the bird song started coming to an end. We all sat in awe watching the sunset, and, as if in a fairy tale, the notes of Clair De Lune floated up to us from the piano down below. This beautiful and classic song prompted us

to dance and laugh, and have immense gratitude for the beautiful stranger who got the moment just right. That moment was beautiful and priceless.

I hope you take the time to venture up there during dusk and feel the energy of that place, it is truly truly special.

Thank you so much for taking the time out of your day to read this, and I urge you to reconsider the Water Reclamation Facility location so students in the future can learn from and experience this amazing place.

Best, Brynn Rotbart From: Abigail Salisbury <salisburyabigail@gmail.com> Sent: Wednesday, May 31, 2023 6:11 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR comment from Abigail Salisbury

Hello,

My name is Abigail Salisbury and I am a 4th year, Biological Sciences major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location.

The Student Experimental Farm means so much to me. I have discovered who I am and so much of where my passions lie on the measly two acres! I have learned so much about the natural environment and really feel like I was "learning by doing". All that I have been taught in my environmentally-focused courses on campus I have used to help cultivate the space into the beautiful mess it is today.

As an officer of the Garden Club, I have also had countless educational opportunity on the land, teaching and learning from my peers. Sustainable agriculture is an incredibly valuable resource; the farm is a unique space to learn about sustainable agriculture. It one of the most hands on experiences I have had in college.

It is a unifying space for the community, losing it would have unthinkable consequences to the value of our school's land and education. I strongly urge you to reconsider the proposal.

Thank you for your time.

Best, Abigail From: kathy salisbury <kmsalisbury@yahoo.com> Sent: Wednesday, May 31, 2023 5:14 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

My name is Kathy Salisbury and my daughter is a 4th year at Cal Poly.

I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student

Experimental Farm. Although I can see the value of the WRF, I strongly urge the reconsideration of its location.

The Student Experimental Farm is an incredibly valuable resource: it is a unique space to learn about sustainable agriculture, home to student/faculty research. and it is a unifying space for the community. My daughter, Abigail Salisbury, began working in the garden her first year at Cal Poly. She has brought a great deal of life, organization and love to the garden over the years.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Sincerely,

Kathy Salisbury

Sent from my iPhone

From: Sareem <saremalex@gmail.com>
Sent: Wednesday, May 31, 2023 8:16 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Alex Sarem

Hello,

My name is Alex Sarem and I am a Cal Poly Alumni. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I see the value in the WRF, I would like to recommend the reconsideration of the location. Seeing the SEF bring life and research to the community of Cal Poly as a hallmark of sustainability has been remarkable. It has earned its place in the community and should be kept. It's loss would be incredibly damaging to the community. I urge you to reconsider the proposal.

Thanks,

Alex Sarem

From: Annysa Pauline Sarne <asarne@calpoly.edu> Sent: Wednesday, May 31, 2023 1:59 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR Comment

Hello,

My name is Annysa Sarne and I am a 4<sup>th</sup> year Kinesiology major and Nutrition minor here at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Far is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus for many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Cheers,

Annysa Sarne pronouns (she/her/hers) Kinesiology and Public Health Department <u>asarne@calpoly.edu</u> (925) 727-2527 Cal Poly, San Luis Obispo, CA From: Natalie Silvera <natsilv32@gmail.com>
Sent: Wednesday, May 31, 2023 4:33 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Natalie Silvera

Hi,

My name is Natalie Silvera and I am a fourth year Microbiology major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you so much for your time,

Natalie Silvera

From: Ruby Smith <rsmit131@calpoly.edu>
Sent: Wednesday, May 31, 2023 9:45 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Ruby Smith

### Hello,

My name is Ruby Smith and I am a 2<sup>nd</sup> year Landscape Architecture major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The student experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. As a first year last year the SEF was the first place I found a community of support and felt connected to Cal Poly. After finding the SEF, spending time with the land and connecting with awesome people I knew I made the right choice going to Cal Poly. Please don't take this experience away from new Cal Poly students. I urge you to please reconsider the proposal.

Thank you for your time.

Best, Ruby Smith From: Isabelle Sophie Smits <ismits@calpoly.edu>
Sent: Wednesday, May 31, 2023 5:39 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Isabelle Smits

Hello,

My name is Isabelle Smits and I am a third-year Environmental Management and Protection major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently home to the Student Experimental Farm.

Although I understand the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource. It is one of the most unique places on campus; it is a space to learn about sustainable agriculture, home to student and faculty research and hobbies and most of all, it is a unifying space for the community.

The SEF is a special place on campus to many of us, and its loss would be incredibly damaging. Again, I urge you to reconsider the proposal.

Thank you for your consideration and time.

Best, Isabelle Smits From: Katie St. Laurent <kstlaure@calpoly.edu>
Sent: Wednesday, May 31, 2023 12:27 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Katie St. Laurent

### Good afternoon!

My name is Katie, and I am a second-year plant science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the student experimental farm.

Although I see the value of the WRF, I strongly urge the reconsideration of its location. The student experimental farm is an incredibly unique place for students to experience and learn about sustainable agriculture and it is a unifying space for the community.

I am sure that you have received many emails like this, but I encourage you to listen to the students who strive to keep the farm growing and flourishing.

The student experimental farm is a very special place on campus for many people like myself and I hope you have a change of heart for what should sit on the land already occupied by a beautiful creation.

Thank you! Katie Get <u>Outlook for iOS</u> From: Angelena Daniel Stevens <asteve30@calpoly.edu>
Sent: Wednesday, May 31, 2023 2:01 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Angie Stevens

Hello, my name is Angie Stevens and I am a first year Journalism major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best, Angie Stevens From: Mari Stusser <maristusser@gmail.com>
Sent: Wednesday, May 31, 2023 1:51 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR

Hi Jackson,

My name is Mari Stusser and I am a student at Cal Poly. Participating in the student expiremental farm has been one of the key most meaningful parts of my time in college and that place serves such a great purpose as a student farming space.

I really hope it can be protected and remain as is.

Thank you for considering, Mari stusser

---

Mari

From: Nikolas Ragan Tanski <ntanski@calpoly.edu>
Sent: Wednesday, May 31, 2023 2:01 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Nikolas Tanski

## Hello,

My name is Nikolas Tanski, and I am a third year Mechanical Engineering student at Cal Poly. I am very opposed to the building of the Water Reclamation Facility on the land currently occupied by the Student Experimental Farm.

Admittedly, the Water Reclamation Facility would be valuable. I have experience interning for a general contractor that specializes in water infrastructure projects, and I understand some of the motivations behind this project. However, I also understand that each construction development must consider the implications behind the land on which they develop on.

I have been involved with the Student Experimental Farm throughout my time at Cal Poly, and it has been an incredible resource for me to learn tangible skills that I plan to use and develop my own land someday. Also, the SEF is a very special meeting grounds for an incredible community of likeminded students. These communities are the essence of the "learn by doing" and creating meaningful connections and experiences at Cal Poly.

As someone who has started and currently is President of a club, Cal Poly Van Life Club, I have helped create the direct influence that community delivers to students. Clubs provide the opportunity for people to discover themselves and build lifelong friendships. These experiences are highly beneficial to our mental health and endurance through strenuous educational programs. I also understand the difficulties for clubs to have sustainable and reliable meeting grounds to carry out these activities. It's incredibly special and unique for the clubs occupying the SEF to have this space, and building on this land for the WRF would quite literally impact the experience of thousands of students as well as abolish the opportunities for incoming generations. Losing the SEF would be incredibly damaging, and I urge you to reconsider the proposal.

Thank you for your consideration,

Nikolas Tanski

From: Lucy Elizabeth Thackray <lthackra@calpoly.edu>
Sent: Wednesday, May 31, 2023 10:13 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR comment from Lucy Thackray

#### Hello,

My name is Lucy Thackray and I am a 1<sup>st</sup> year marine science major at Cal Poly. I am writing to express my opposition to the proposed construction of the Water Reclamation Facility on the land currently occupied by the Student Experimental Farm (SEF). While I acknowledge the potential benefits of the WRF, I strongly urge you to reconsider its proposed location. The SEF is an incredibly valuable resource, providing a unique space for learning about sustainable agriculture, as well as serving as a hub for both student and faculty research. It is also a unifying space for our community. For me and many others I have met through my time there, the Student Experimental Farm represents a much-needed reprieve from the stressors of everyday life. When I was a new freshman, feeling overwhelmed by this huge new thing I was starting, the SEF gave me a space to decompress, get my hands dirt, and feel a sense of community. Now, as we near the end of the school year, I can look back on everything else it has given me. From delicious meals made with fresh vegetables, to learning new things about gardening, and countless memories and friendships made during workdays, the SEF has been an integral part of my first year at Cal Poly. Its loss would have a profound impact on those who cherish it. I urge you to reconsider this proposal. Thank you for your time.

Best, Lucy Thackray From: Savannah Tompkins <savitompkins@gmail.com>
Sent: Wednesday, May 31, 2023 11:10 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Savannah Tompkins

Hello, my name is Savannah Tompkins and I am a fourth year COMS major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Savannah Tompkins

From: Katherine Marie Tovey <ktovey@calpoly.edu>
Sent: Wednesday, May 31, 2023 11:10 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Katherine Tovey

Hello, my name is Katherine and I am fourth year Environmental Management and Protection major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Katherine Tovey

From: Emma Tremont <emmatremont28@gmail.com>
Sent: Wednesday, May 31, 2023 8:06 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project EIR Comment from Emma Tremont

Hello,

My name is Emma Tremont and I am a 4th year Journalism major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and it's loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Emma

From: Aya Sandra Trussell <aytrusse@calpoly.edu> Sent: Wednesday, May 31, 2023 2:13 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF Project Draft EIR from

Hello,

My name is Aya Trussell and I'm a second year public health major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time,

Aya Trussell

From: Amy Jina Uthenpong <authenpo@calpoly.edu>
Sent: Wednesday, May 31, 2023 10:45 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Cc: Sophia Escalona <sescalon@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Amy Uthenpong

To whom this may concern:

My name is Amy Uthenpong, and I am a fourth year City and Regional Planning major. I am writing this email to oppose the building of the water reclamation facility on the land that is currently the student experimental farm.

I do understand the water reclamation facility is important, but I believe the plant could be placed elsewhere. I strongly advise keeping the student experimental farm. Cal Poly offers very unique learn by doing opportunities, and the farm is the perfect place that is student-led, student managed, and student taught learn by doing. It is home to aquaponic, mycology, and gardening opportunities. It is also home to two amazing garden cats who call the place its sanctuary. It is very rare to have as special of a gem like the student experimental farm. It offers a place of refuge on campus when life feels overwhelming. It is a place of community for the people who and take care of the plants there. It is a place of tender love and comfort. The people, myself included, call the garden our place of peace. It is a special, sacred spot.

I very much urge that the student experimental farm not be demolished. It is difficult to replicate such community and plants there. The garden has been taken care of for generations, and it is such a gift for future students to visit, learn, and enjoy. Please please please consider the impact removing the SEF will have on the students, the cats, the alumni, the plants.

The SEF is truly a special place. Please, I urge you to reconsider the proposal.

Thank you for your time,

Best,

Amy

From: Kathryn Rae Vakili <kvakili@calpoly.edu>
Sent: Wednesday, May 31, 2023 12:01 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Kathryn Vakili

Hello,

My name is Kathryn Vakili and I am a fourth year Business Administration major at Cal Poly. I am writing to you to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal. Thank you for your time.

Best, Kathryn Vakili From: Calvin Vance <calvance@comcast.net> Sent: Wednesday, May 31, 2023 9:49 PM To: Marcus E. Jackson <mjackson@calpoly.edu> Subject: WRF project draft EIR comment

Dear Mark,

My name is Calvin Vance, I am a recent graduate of Cal Poly. It is my understanding that the proposed water treatment facilities will be placed on the land that the student experimental farm is located, and that there is no plans in place to relocate the farm.

This farm has educated countless students, including myself, the true meaning of "learn by doing". It provided a sanctuary of education during the pandemic and has given me the chance to gain a deeper understanding of agricultural systems.

The farm is an integral part of Cal Poly and must be protected for future generations. To have the space removed would be tarnishing the numerous grad projects on the property and destroying the decade long experiment into alternative agricultural methods.

Thanks, Calvin Vance From: Toshiro Evan Wada <tewada@calpoly.edu>
Sent: Wednesday, May 31, 2023 9:32 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Toshiro Wada

Hello,

My name is Toshiro Wada and I am a second-year marine science major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture and is home to student/faculty research. Not to mention that is a unifying place for the community.

The SEF is a special place on campus for many people, and its loss would be incredibly damaging. I urge you to reconsider your proposal.

Thank you for your time. Sincerely, Toshiro Wada From: Anya Langhoff Weinstein <anweinst@calpoly.edu>
Sent: Wednesday, May 31, 2023 7:40 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR comment from Anya Weinstein

Hello,

My name is Anya Weinstein and I am a 4<sup>th</sup> year environmental management and protection major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm (SEF).

Although I can see the benefit of the WRF, I strongly urge the reconsideration of its location. The SEF is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student & faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you, Anya Weinstein From: Alex Whitter <whitter@calpoly.edu>
Sent: Wednesday, May 31, 2023 10:30 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Alex Whitter

Hello, My name is Alex Whitter and I am a 4<sup>th</sup> Year ENVM major at Cal Poly, I am writing to express my deep opposition to the building of the Water Reclamation Facility on the land currently occupying the Student Experimental Farm.

I can see the values of the WRF, however, I strongly urge the reconsideration of its location. The Student Experimental farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/ faculty research, and is a unifying space for students.

The SEF is a special place on campus to many people and its loos would be incredible damaging. When I first started attending the SEF, my college career changed for the better. I met people who had similar passions to me and connected with the land in a way I never had before. The SEF is home to numerous native and exotic plants and is the only example of regenerative agriculture on Cal Poly. It has irrigation, food forests, multiple gardens, and even a beehive. The destruction of the SEF would be truly devastating and unforgiveable. Please, I urge you to reconsider the proposal.

Thank you for your time.

Alex Whitter

# Hello,

My name is Alia Wolken, and I am a 3<sup>rd</sup> year transfer student in Mechanical Engineering major at Cal Poly. I am writing to express my opposition to the proposed construction of the Water Reclamation Facility on the land currently occupied by the Student Experimental Farm (SEF).

The student experimental farm (SEF) hosts garden club in which I have been going to for months now. Transferring in as a 3<sup>rd</sup> year in engineering was a very hard transition. Finding the SEF has provided me with a place for peace amidst the stresses of school, to detach and reconnect with nature. I've come to find out that there are a lot of engineering majors that go to this place, one being myself. This place plays a crucial role in promoting mental well-being to students.

A lot of the plants in this place have been around for decades. We have ponds, many varieties of fruit trees, dozens of garden beds for clubs and classes. We do not have the ability to move these, it would be a huge loss. Our area is small, but we have put so much love and time into this place. Destroying it would not only be a huge disappointment but undermines what Cal Poly stands for.

While I acknowledge the potential benefits of the WRF, I strongly urge you to reconsider its proposed location. The SEF is an incredibly valuable resource.

Regards,

Alia Wolken

From: Brooke Marie Anderson <bander46@calpoly.edu>
Sent: Thursday, June 1, 2023 12:02 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Brooke Anderson

Hello, my name is Brooke Anderson and I am a 4th year LAES major at Cal Poly. I am writing to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF I strongly urge the reconsideration of its location. The Student Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to the student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

**Brooke Anderson** 

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From: Jennifer H. Lee <jlee809@calpoly.edu>
Sent: Thursday, June 1, 2023 12:01 AM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Jennifer Lee

### Hello,

My name is Jennifer Lee and I am a 4<sup>th</sup> year Environmental Management and Protection major at Cal Poly. I am writing to express my opposition to the building od the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Experimental Farm is an incredibly valuable resource; it is a unique space to learn about sustainable agriculture, home to student/faculty research, and it is a unifying space for the community.

The SEF is a special place on campus to many people, and its loss would be incredibly damaging. I urge you to reconsider the proposal.

Thank you for your time.

Best,

Jennifer H. Lee (She, Her, Hers) 4th Year | Environmental Management and Protection California Polytechnic State University, San Luis Obispo jlee809@calpoly.edu

(626) 362-0974

From: Alli Elizabeth Mccullough <amccul04@calpoly.edu>
Sent: Thursday, June 1, 2023 4:28 PM
To: Marcus E. Jackson <mjackson@calpoly.edu>
Subject: WRF Project Draft EIR Comment from Allison McCullough

Hello,

My name is Allison McCullough and I am a first year Environmental Earth and Soil Science student at Cal Poly. I am writing to you to express my opposition to the building of the Water Reclamation Facility on the land currently housing the Student Experimental Farm.

Although I can see the value of the WRF, I strongly urge the reconsideration of its location. In my Introduction Earth Science class I visited the Student Experimental farm to explore a soil pit located there. When I go there, I was amazed with what I saw. Not only was I able to get hands-on experience as a freshman in my chosen field, but I was also able to see all the amazing projects other students are currently working on. I came to Cal Poly because of 'Learn by doing,' which is exactly what the Student Experiment Farm embodies. It is exactly what it says, it is a place for students to experiment during their time at Cal Poly. I have learned so much every time I have visited.

Cal Poly has vast amounts of land at its disposal, while yes, the Student Experimental Farm could be relocated, that would destroy years of work and research of students and faculty. Removing it would deprive students from opportunities to learn and discover. The solution to sustainable agriculture and climate change could be in that farm, but if you replace it with the WRF we will never know. And who knows, maybe the cure to cancer is in a fungus growing in the farm right now. Think about all the lives that could be saved by you deciding to put the Water Reclamation Facility in another location.

Thank you for your time,

Allison McCullough