

February 9, 2010

David Foote, ASLA
C/O Firma
1034 Mill Street
San Luis Obispo, CA 93401

RE: Proposed Negative Declaration and Initial Study of Environmental Impact pertaining to proposed Geotechnical and Hydrogeologic Study at Santa Rosa Creek Beach.

CC: Cambria Community Services District, San Luis Obispo County Supervisors, California Coastal Commission, Representative Lois Capps and relevant agencies

We are Cambria property owners writing this letter to express our concerns about this project and to the desalination plan that has inspired this current study. Our comments and questions are based on a review of the report and our concerns that the proposed study is based on incomplete consideration by the CCSD for a number of critical environmental, geological, and cultural issues. A summary of concerns is attached.

- 1) The credibility of this declaration and the attached Environmental Checklist is in question when most of the boxes checked indicate “no impact” where some impact would clearly result from the proposed study; no documentation supports these claims.
- 2) The proposed study plan contains many unsupported or unexplained statements and inconsistencies. For example: “If a hollow stem auger is used...” This supposition suggests the plan is incomplete.
- 3) Other statements indicate potential sources of spills from activity (“drilling fluid from rotary drilling, soil cuttings that may contain drilling fluid and petroleum products from vehicles and equipment”). Mitigation of this potential is “addressed by daily inspections” and the presence of a “qualified biologist.” Will qualified independent geologists and hydrologists be present as well?
- 4) The U.S. Core of Engineers is not an independent source of critical information.
- 5) Franciscan formations are prevalent in this region and often contain mercury. In addition residual mercury tailings may be encountered while drilling. How will the release of mercury from the drilling and/or desalinization be prevented from contaminating the resulting water supply?
- 6) The environmental checklist section does not appear to be an honest description, with the information provided. For example, the anticipated noise would apply to hand held augers but not the planned drilling.
- 7) Do the acceptable noise level standards listed apply to parklands, playgrounds, residential areas and animal habitats or just to industrial sites?
- 8) Confusing, incomplete, and inconsistent references to environmental impact occur throughout the report.
- 9) Numerous safety issues are not addressed; for example access to the beach past a playground, on a 2 lane residential road, and a ramp used for emergency rescue.

- 10) What is the evidence basis and what sources justify the “no impact” claims made throughout the checklist? Almost all boxes are checked "no impact"; this cannot be true in every case where indicated on the checklist.
- 11) Given the claim that water will not be used in the drilling process, what fluids will be used? Petroleum and barium based drilling fluids? Toxic chemical use? Daily inspections by a biologist won't prevent accidents. What plans have been made to mitigate the damage? What training is planned for those persons involved in the drilling?
- 12) Needed are independent (no conflict of interest) university or USGS geologists to assess the potential impact for this plan as part of a full environmental impact study.
- 13) In terms of the cultural impact: Were anthropologists and/or archeologists consulted when the claims for “no impact” were made on the checklist? No evidence is presented in the report to substantiate these claims.
- 14) Finally, how does the CCSD propose to pay for desalinization without large tax and/or fee increases? What are the energy costs for desalinization? What is the experience of other coastal communities?

We believe that a full environmental impact study is needed prior to undertaking any work on this plan. The environmental impact study should address both the currently proposed geotechnical and hydrogeologic study (drilling) and desalinization, clearly the underlying motivation for the current proposal.

Sincerely,

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A summary of concerns regarding the Geotechnical and Hydrogeologic Study at Santa Rosa Creek Beach and the draft Negative Declaration as proposed by the Cambria Community Services District

The Initial Study and proposed Negative Declaration show that a full CEQA EIR should be prepared for this proposed project. The issues are geological, hydrological, safety and the impact of heavy equipment.

There are inconsistencies between the Initial Study of Environmental Impact (ISEI) and the Coastal Consistency Determination (CCD). For example, active fault lines run directly through Cambria and San Simeon, and Cambria is subject to shaking not only from local earthquakes but from the San Andreas fault. Mapped and named faults in the area include the Hosgri, San Miguelito, Santa Maria River, Cambria and San Simeon faults (The Geology of San Luis Obispo County, David H. Chipping, Cal Poly, 1987; <http://quake.wr.usgs.gov/info/faultmaps/121-35.html>). The SLO County General Plan Safety Element Risk Map for earthquakes omits these faults, some of which are active. The likely seismic liquefaction of the beach, particularly where disturbed by drilling, is not addressed.

The threat of flood, storms, storm tides, rapid erosion, landslides from the adjacent cliffs and local and distant tsunamis are discounted. A single storm routinely changes the beach topography and large amounts of sand are removed and redistributed.

It is stated that the “proposed action does not affect the stability and structural integrity, and neither creates nor contributes significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.” The drilling of, and pumping into, 16 wells, possibly 150 feet deep, and the number of large vehicles passing over narrow roads and ramps, cannot be benign. Drilling into, and pumping chemicals into, a community’s aquifer must be done with extreme caution.

This project will travel on and potentially block emergency access routes to the residential areas and the beach at Shamel Park and create serious safety issues for the playground.

Digging deep into the beach will release mercury and other heavy metals from sediments. The Franciscan formation is rich in these metals and the local creeks carry mine tailings. Sediments disturbed by drilling are also more prone to liquifaction, particularly during ground shaking (earthquakes, drilling vibrations). Pumping fluids into loose sediments is one way to liquefy them.