

Cambria's Water Plan is All Wet

Deficient analysis spells unfettered growth and serious harm to marine environment

It should come as no surprise to anyone who's been following the desal follies of the Cambria Community Services District that the recently issued Environmental Impact Report for the Cambria Water Master Plan is virtually all about the District's determination to build a desal plant and is filled with confidence in its ability to do so, despite the evidence.

In January 2007, the Cambria Community Services District tried to get approval from the California Coastal Commission to construct test wells for a desalination plant. As it became obvious in the course of the hearing that the Commission was going to deny the permit due to its failure to conform with the California Coastal Act, the CCSD managed to snatch it off the table with a promise to come back with a new, improved project in a few months. They came back, the project was still found to be in violation of the Coastal Act, and the Coastal Commission denied the permit. Going down for the third time, the CCSD asked for a reconsideration of the Coastal Commission's denial on grounds of insufficient information: The District had chosen not to mention the nature of the connection between the test wells and the desalination plant that would be built if the well data showed that a desal plant would be feasible. ("Fragmenting" a proposed project masks its impacts or makes them appear less significant.) They failed again.

When reading the Master Plan EIR, three things quickly become clear: 1) As with the ill-fated beach wells project, the CCSD is once again attempting to gain project approval without submitting the details of the project for review, 2) the Cambria CSD has done a great job of convincing everyone that it needs to build a desalination plant, and 3) Cambria doesn't really need to build a desalination plant.

Here's why: The state and national average for water consumption is 95-100 gallons per capita per day; Cambria's is 90 gpcd. The Master Plan proposes that this be increased to a massively unsustainable 135 gpcd, based on a concept, never defined, that the draft EIR refers to as a "quality of life" bonus. This apparently entitles one to 50 percent more water per year than what would be calculated otherwise from the baseline set in 2000 by the Coastal Commission for limiting diversions from Santa Rosa and San Simeon Creeks. With-

space – The Cambria Land Trust, Surfrider Foundation, the Desal Response Group of Environment NOW and the Sierra Club have submitted comments on the Water Master Plan that pointed out the foregoing, as well as the following imminent violations of the California Environmental Quality Act contained in the Master Plan's Draft EIR:

- No evaluation of the cumulative impacts of the project's contribution to increased traffic, population, urban

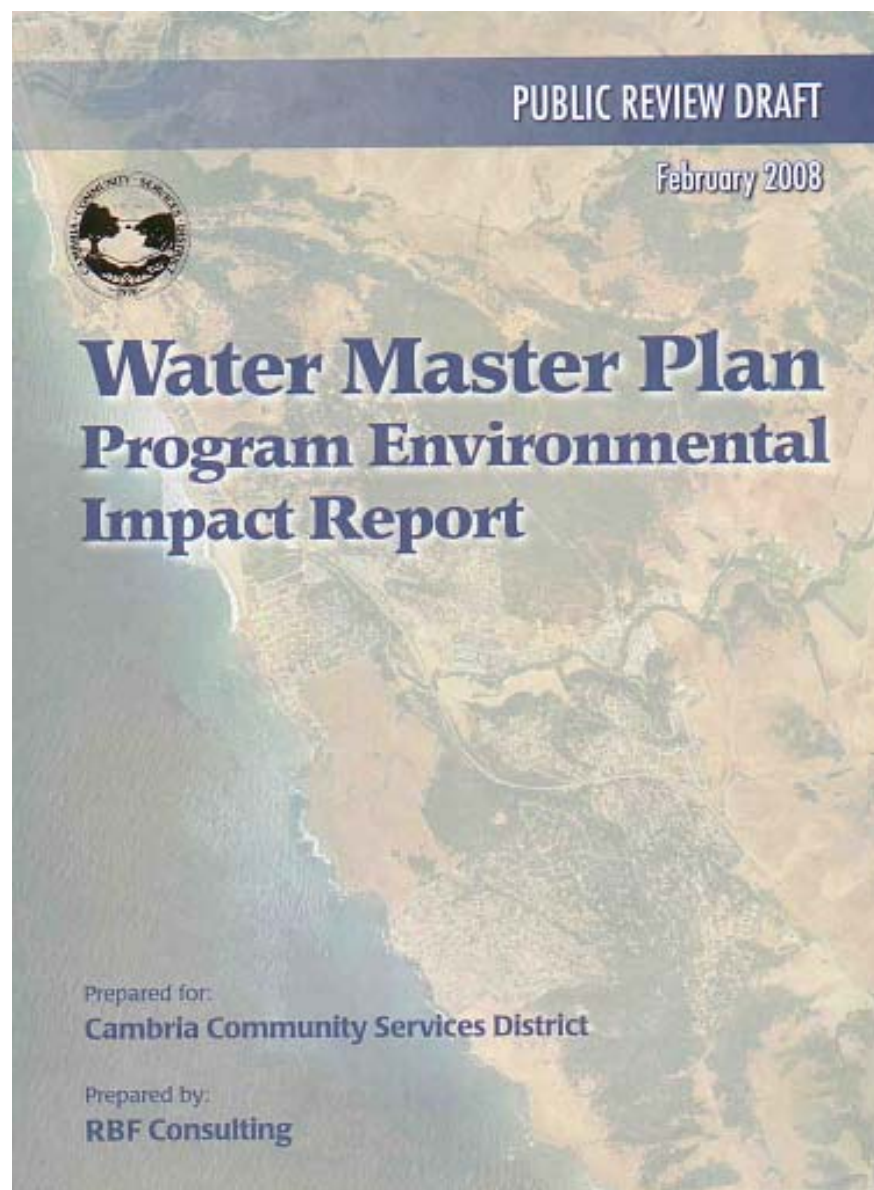
for landscaping and irrigation would, conservatively, reduce by 15 percent the water drawn from the aquifer.

- No semblance of objectivity in scoring possible long-term water supply strategies, with desal jiggered to come out on top despite the fact that local, smaller scale, less expensive, easier-to-permit projects could provide additional water for both residents and groundwater supply if designed appropriately.

We pointed out the numerous pub-

derstated."

In trying to make the case for desal without fully assessing its environmental impacts, the CCSD repeatedly runs afoul of the legal requirements of the California Environmental Quality Act throughout the Water Plan's Draft Environmental Impact Report. The Final EIR needs to address and correct all of the serious deficiencies noted above, and take a very close look at the "quality of life" bonus.



footprint, air pollution, demands on public services, etc. Impacts are considered only within separate categories — Land Use, Biological Resources, Water Resources, etc. — minus the legally required evaluation of the impacts of, say, a change in land use on biological and/or water resources.

lic sources for funding of water recycling and conservation programs that the draft EIR omitted, thereby making it appear that public funding of a desal plant is virtually a sure thing by comparison.

We have little confidence that Cambria's growth will stop at 4,650 connections given that the desalina-

And Then There's the Mercury...

Nine years ago, the Central Coast Regional Water Quality Control Board released the report "Inactive Metal Mines in Four San Luis Obispo County Watersheds: Surface Water Quality Impacts and Remedial Options." Several of the operations listed were mercury mines that discharged into Santa Rosa and San Simeon creeks for decades.

David Schwartzbart of the regional board agrees that "common sense and natural processes" would indicate that there may be legacy mercury-tainted deposits of sediment at the mouth of San Simeon Creek and where the creek mouth has changed over the years of active mining, as well as down-current.

Might the establishment of desal pumping or test well sites disturb buried deposits of mercury contaminant at the nearshore base of the food chain? Might source water obtained from any such site in a desalination operation that pulls water through sand into beach wells disturb and/or carry legacy mercury?

The Water Board is not listed as a consulting agency for the Cambria Water Master Plan EIR, which refers to this subject exactly once, in the section on Geology and Soils, where it simply notes that "there are a number of abandoned mines near Cambria," and that the mines that produced mercury were abandoned in 1992.

On the implications of this for human health and the marine environment, the Cambria Community Service District's plan to build a desal plant near the mouth of San Simeon Creek is silent.

When the average Californian uses 95 gallons per capita per day, is it appropriate to sacrifice any public resource or endure any impact so that the people of Cambria can have 135 gpcd?

out this "bonus," Cambria's future water needs can be met by water reclamation and recycling, conservation and local storage. (This conclusion requires updating the CCSD's baseline water supply figures from the ones used in the EIR to reflect the fact that, after the baseline was established, Cambria gained access to water from retired ag irrigation rights in both its water basins.)

The Otter Project, ECOSLO, Green-

- No description or analysis of changes the project will bring (i.e. 864 new water connections and homes built).
- No numeric targets for easily achievable reductions in indoor water use or requirement for natural landscaping, which would require no fertilizer and no additional water.
- No acknowledgment that replacing potable water with recycled water

tion plant would be operating at approximately 50 percent capacity (about half the year) and will be built in a modular fashion so that it can be easily enlarged.

We concluded: "The project description overrates desalination and underrates living within local means through local solutions, water recycling and conservation. The growth-inducing aspects of the desalination proposal are un-

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Financial Advisor
SCOTT SECREST AMM*
(805) 235-3031

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