

December 2, 2011

AGENDA ITEM F12C

Chair Shallenberger

Members of the California Coastal Commission  
45 Fremont St., Suite 2000  
San Francisco, CA 94105-2219

Dear Chair Sallenberger and Members of the California Coastal Commission:

Please note the following comments regarding the proposed geotechnical/geophysical project at the mouth of Santa Rosa Creek here in Cambria California. This creek supports a documented population of south central California coastal steelhead and its entry to the sea is through the Cambria State Marine Park. The land adjacent to the mouth of the creek is part of the Santa Rosa Creek Natural Preserve while adjacent State park beach is part of the Hearst San Simeon State Beach. This is a zone of intersecting ecosystems (estuarine intertidal, freshwater riparian habitat, near shore ocean) that has rightfully garnered the highest levels of protection commensurate with the recreational needs of the public. I respectfully urge you to object to the consistency determination for this project as submitted by the Army Corps. Of Engineers. This proposal marks the third time data gathering has been proposed at this site, with inconclusive results and inadequate design parameters to aid decision makers.

The recent adoption by California Department of Parks and Recreation of the Cambria State Marine Park was the result of years of public participation. The site was selected due to the richness of its unique habitat, multiple recreational opportunities and lack of point source pollution. It is home to seagoing and onshore enthusiasts who fish, swim, dive, surf and play within its boundaries. Tide pools, a free boat launch, free parking, a bluff top boardwalk and local hotels accommodate a wide range of interests. Otters, seals and migrating whales delight visitors and locals alike, while an unending parade of migratory and resident birds keep heads turning. Near shore rocky intertidal outcroppings host the endangered California black abalone and stand like bookends along the mouths of Santa Rosa and San Simeon creeks.

When staff opines that "the limited amount of data expected to be derived from project activities will not be sufficient to determine whether the site is suitable for this intended purpose" it is clear that this obviously flawed and incomplete feasibility analysis should not go forward. The presumption that subterranean intake wells and outfall pipes could be placed in this location regardless of the subsurface characteristics of the site is untenable. The location of desalination infrastructure, in a park designed for recreation and protection of the environment, adjacent to a Natural Preserve, is a cynical attempt to circumvent applicable regulatory regimens. Prospecting for potential paleochannels, to pump out millions of gallons of water and inject plant effluent, is a violation of park regulations.

Public Resources Code (5001.65) prohibits the commercial exploitation of resources within units of the State Parks System. The waters within the Cambria State Marine Park are "resources" within the meaning of this code. The Santa Rosa Creek Natural Preserve and Hearst San Simeon State beach on the landward side of this proposed drilling activity, are governed by all rules and regulations adopted for State Park units. Public Resources Code (5003.05) states that they also apply on granted or ungranted tideland or submerged lands abutting state property from "a line running parallel to and 1,000 feet waterward" of the ordinary high water mark.

The Monterey Bay National Marine Sanctuary also has jurisdiction over these waters and regulates "drilling into...or otherwise altering the submerged lands of the Sanctuary". They have issued detailed Desalination Guidelines. . NOAA encourages an evaluation of "the potential for an integrated regional water supply project...this should include an evaluation of other potential desalination locations...as well as other forms of water supply". Yet, Cambria stands alone in its dream of limitless water for future development. In the recent Rodeo Grounds Pump station Initial Study/Mitigated Negative Declaration, the role of desalination in Cambria is bluntly stated, it shall "be designed and limited to assure that any water supplies made available as a direct or indirect result of the project will accommodate needs generated by development..."

This project site has been looked at before in the Cambria Community Services District contracted Preliminary Site Analysis from 1993. : "The Santa Rosa Creek alternatives offer both the least costly projects coupled with the most uncertainty of overcoming obstacles. Fundamentally, this area appears too cramped for a full sized desalination facility." Yet this is what district planners propose. Currently, our Wastewater Treatment Plant is considering a move from what is a Tsunami inundation zone adjacent to Santa Rosa Creek; planners contemplate a desalination plant at the same location.

Plans to develop the site for a major industrial public works project is fundamentally at odds with the values identified by state and federal agencies and embodied in their regulations. As such, this project should not be pursued.

Thank you for consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Jim Webb". The signature is written in dark ink and includes a stylized flourish at the end.

Jim Webb  
1186 Hartford St.  
Cambria, CA 93428