

December 3, 2011

Chair Shallenberger and
Members of the California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219

RE: FEDERAL CONSISTENCY

CD-047-11 (Corps of Engineers, San Luis Obispo Co.) Consistency determination by Corps of Engineers for geophysical and geotechnical testing to determine feasibility of site for subsurface desalination intake and/or outfall, at Santa Rosa State Beach and Shamel County Park in Cambria, San Luis Obispo County. (TL-SF)

The CCSD Desalination project is a large project that has been in process over the last two decades, for which a project level EIR has never been completed. It appears that the various activities performed over the last two decades to advance the desalination project have been segmented or piecemealed, and should have been evaluated in a single EIR. Because the proposed geo-technical and geophysical activities have no independent value and cannot stand alone without the full desalination plant development, the activities fail the independent utility test under NEPA which requires a full project level EIS be completed.

Extensive conditions have been placed on this project due to a lack of information or incomplete feasibility analysis. I agree with Staff when they determined:

- **“Existing site data and data expected from the proposed activities are not sufficient to determine site feasibility.”**
- **“Studies Provide Inadequate Information to Determine the Effects of Water Withdrawals on the Estuary.”**
- **“Site Characteristics Do Not Lend Themselves to the Corps’ Proposed Modeling Approach.”**
- **“The Proposed Modeling Is Not Adequate to Characterize The Effects of the Proposed Drawdown on the Estuary.”**
- **“Studies Provide Inadequate Information To Determine Whether Water Withdrawals or Discharges Will Mobilize Mercury or Methylmercury Into the Environment.”**
- **“Concerns Remain about Information Inadequacy.”**

In addition independent verification for the NEED FOR PROJECT is necessary:

- CCSD has not produced a 2010 Urban Water Management Plan to date.
- CCSD is a signatory to the CA Urban Water Conservation Council (2005) and has not been submitting annual reports.
- CCSD future water project is designed to increase water usage 50% per capita which is in violation of SB7X - Water Conservation Act passed in 2009 which requires the state to achieve a 20% reduction in urban per capita water use in California by December 31, 2020. http://www.water.ca.gov/urbanwatermanagement/docs/sbx7_7_2009.pdf
- Production report states Cambria used 672 AFY in 2010, down from a 20 year high of 819 AFY in 1988. In addition, 21.5 AFY has not been included in reports.
- CSD directors publicly state the 602 AFY Desal plant should be reduced to 300 AFY or less. (CCSD meetings 2009, 2011)
- MtBE plume was detected near district wells SR 1 and SR 3 but contamination of wells never occurred. A new well, SR 4 was drilled upstream from possible MtBE contamination. SR 4 is considered a highly productive well and is an alternative water supply to SR 1 and SR 3 but is not mentioned in the project document.
- Customer water/sewer billing data is not provided by customer class.
- Instream flow studies have not been conducted (Hudsinski A-3-SLO-02-073 and A3-SLO-02-050 CA Coastal Commission Monaco)
- Hudsinski A-3-SLO-02-073 Santa Rosa Creek Habitat Conservation Plan not conducted.

Special Considerations:

- No intake or outfall pipelines currently exist in front of San Simeon or Santa Rosa Creeks.
- Regional approach to desalination is recommended in the NOAA guidelines. No discussions for co-location have been documented with Morro Bay (desalination plant just 20 miles south of Cambria on Highway One).
- The project area was recently identified by both the California Fish and Game Commission and the California State Parks Commission as an area of special recreational significance.
- One priority for designating the Cambria State Marine Park was for the promotion of Recreational Fishing. Lateral access will not be maintained when surf is high.
- Drilling activities and driving on the beach should be limited to September and October as specified by the Coastal Commission in 2010 if entry is granted.
- Public Resources Code §5001.65 prohibits commercial exploitation of resources within units of the state park system. Water is a limited resource in Cambria and intermittent droughts and water shortages have resulted in a building moratorium. Approximately 25-30% of CCSD water is used commercially.

Public Resources Code Section 21067 defines the lead agency as: “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.” CCSD is the agency carrying out the project. The USACE is a

funding source and a contractor – but not a lead agency under CEQA. The CCSD must act and take responsibility for the project.

Consideration of alternatives leads to a solution that satisfies the project needs and protects environmental and community resources. The Council on Environmental Quality (CEQ) requires rigorous exploration and objective evaluation of all reasonable alternatives and for alternatives which were eliminated from detailed study, and the reasons for their having been eliminated.

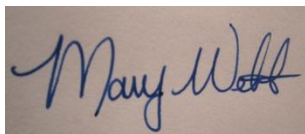
Elimination of water alternatives (including Water supply enhancement with small-scale catchment systems, tertiary treatment of wastewater, Surface Water from Lake Nacimiento, Additional Santa Rosa Creek Groundwater wells, Basin Management, Subterranean Dam in San Simeon Basin, Warren Reservoir, Seasonal Storage of Groundwater, Seasonal Storage for District Use) before evaluation process began resulted in desalination recommendation. Multiple smaller water projects that could meet either 300 or 602 AFY target were not proposed or evaluated.

In light of all information a federal consistency determination appears premature. The Commission does not have adequate information before it as a basis for determining the project's consistency with the Coastal Act, which a full environmental review would provide. Further, a consistency determination would likely prejudice the current environmental review process against project alternatives.

Without a full project description of the size of plant this project is serving, the location of plant, location of intake and outfall pipelines, slant well locations and distances, verified water demand and supply, growth inducing effects of desalination, independently reviewed water alternatives, complete environmental impact studies and identification of species of concern, brine discharge solutions, and possible mitigation estimates, **I don't believe the Commission can meet the requirement of the Coastal Zone Management Act to find this project to be consistent to the maximum extent practicable with the Coastal Act.**

I respectfully urge the Coastal Commission to Vote NO on this consistency determination and instead require a complete environmental review of the Cambria Community Services District desalination project at the earliest possible date.

Thank you for the opportunity to comment on this project.



Mary Webb
1186 Hartford
Cambria, CA 93428