

The Drilling Project at Santa Rosa State Beach in Cambria

The mercury issue regarding the Santa Rosa Beach drilling proposed by the Cambria Community Services District and conducted by the U. S. Army Corps of Engineers requires some further explanation. Both entities have found ways to bypass legal requirements for full environmental review of potential and unintended accidents and harms that might occur on public resource properties and to human health. The allowed drilling on Santa Rosa Beach is similar to the U.S. government's relaxed and cursory environmental review that British Petroleum (BP) was given, in that shortcuts were allowed in order to save time at the expense of the environment and the public health. We watch in horror the results of the BP shortcut as the environmental damage grows exponentially. The same shortsightedness and avoidance of environmental review is taking place in our own town and, instead of oil, the toxic substance that may be released by accident is mercury known to be in creek sediments. Mercury found in the Santa Rosa Creek Watershed comes from the Oceanic Mine located approximately 6 miles upstream from Santa Rosa State Beach. The mine has leaked acids and contaminates for decades and these products are transported and deposited on flood plains and in sediments near the mouth of the creek.

While the California Coastal Commission members voted 8-1 to allow the Army Corps to drill on Santa Rosa State Beach in front of Shamel County Park and on the sand spit that separates the ocean from the Santa Rosa Creek lagoon for potential use for a future desalination facility, many agencies whose mission it is to safeguard public health and safety and the environment had more to say. The US Department of the Interior, US National Marine Fisheries Service, CA Fish and Game, the Native American Heritage Commission and the Air Pollution Control Board expressed environmental concerns in letters to the district that were forwarded to the Coastal Commission Staff. Agencies were concerned that significant impacts to the environment may be unavoidable when drilling is combined with desalination. Shockingly, it should be noted that the Coastal Commissioners themselves never received these Agency letters and cast their vote for this project without any data on impacts this project may have on sensitive and endangered species at and near this site.

The Dept. of the Interior said, "impacts arising from the activities related to the full build-out of the water diversion and desalination infrastructure should be evaluated." The Regional Manager of the Dept. of Fish and Game stated the "project description has not been adequately characterized" and "the project does not qualify for a no effect determination".

Sadly, by withdrawing from the California Environmental Quality Act (CEQA) process and denying that it is a CCSD project, the CCSD avoided answering citizen and agency concerns and comments and further evaded full environmental review (like British Petroleum in the Gulf of Mexico with their waiver of environmental review) and opened the door to potentially introducing hidden methylmercury into a fragile ecosystem and much utilized public beach by drilling numerous test holes in sediments. How this might harm the public and the ecosystem is now not known. Let there be no mistake about this – the CCSD and the Army Corps are gambling with your health and with the Santa Rosa Creek ecosystem by taking shortcuts with permitting.

Did you know that the federal government calls methylmercury one of the nation's most serious hazardous waste problems, and the Centers for Disease Control and Prevention says it is a possible carcinogen? Did you know that mercury from mine waste travels up the food chain through bacteria, which converts it to methylmercury - a potent toxin that can permanently damage the brain and nervous system, especially in fetuses and children? Did you know that methylmercury can be absorbed through the skin and through cuts and abrasions? Did you know that the citizens of Cambria are liable for whatever damage the Army Corps of Engineers does according to the signed March 2006 Project Cooperation Agreement? Did you know that developing a planned response for the potential release of this hazardous waste was avoided by the Army Corps and the CCSD with the 'categorical exemption' from further environmental review? Did you know that the State Parks System may allow this to happen and thereby potentially contaminate public lands with mercury that they are charged with the responsibility to protect? Did you know that the County Parks and Recreation Department may allow the Army Corps and the CCSD to continue this drilling without a planned response of potential contamination by allowing access through property owned by the county (the taxpayers)?

There is some good news to report. Concerned citizens were successful in reducing potentially significant environmental impacts of this project by raising the voice of reason. Several new restrictions and timelines were applied to the drilling project, including monitoring Santa Rosa Creek water levels while the pumping occurs. However, concerns and questions remain regarding negative impacts to endangered species, the effects of potential methylmercury contamination, public access and use of state and county park lands, and Cultural Heritage site disturbance. Generator and construction noise

levels during the well installation will be considerable. Wellhead pipes buried just below the surface of the sand could be exposed posing a safety hazard for beachgoers and wildlife for a number of years. Toxic PVC well casings will be broken up with no method of removing shards from deep in the sand. The list of issues raised by the public and responsible agencies is long yet the issues raised have not been analyzed through a CEQA process. This law is specifically designed to protect YOUR health from reckless shortcuts and protect the environment from abusive actions.

It is very important to consider that according to the cases that interpret the California Environmental Quality Act, discretionary decisions including resolutions adopted by the CCSD that may have an effect on the environment are “projects” within the meaning of CEQA and require an Environmental Impact Report. The CCSD’s decision to terminate midstream the negative declaration that it undertook, as lead agency, was discretionary and the outcome will certainly have an effect on the environment. Multiple agencies – both federal and state – and many members of the public submitted comments on the negative declaration with data and information showing the harms that the drilling project may cause to humans, environmentally sensitive habitat areas and to endangered and protected species, and asked for more extensive environmental review. By voting to “cease” the negative declaration instead of responding to these comments, the District stopped the process by which impacts to the project might have been avoided and/or reduced through mitigation measures. Instead, the project is going forward with no environmental review.

We want to see environmental laws enforced and supported to the fullest extent, not avoided.

Call the California Department of State Parks and Recreation and County Parks and voice your concern.

Best wishes,

Richard Hawley

Cambria Resident