



Agenda Item F12c

December 2, 2011

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

RE: Comments regarding geotechnical and hydrogeologic feasibility study for proposed desalination facility intake wells

Dear Chair Shallenberger and Members of the California Coastal Commission:

Please accept the following comments regarding a geotechnical and hydrogeologic feasibility study for proposed desalination facility intake wells in Cambria, California on behalf of Ocean Conservancy and the Natural Resources Defense Council (NRDC). We respectfully urge you to object to the consistency determination for this project submitted by the U.S. Army Corps of Engineers.

The project before you is an initial stage feasibility study designed to assess the potential suitability of the site for a future desalination related facility. Our organizations are concerned about a wide range of environmental impacts associated with conducting the feasibility study itself including impacts related to marine resources, water quality, public access and recreation as discussed in the staff report. Furthermore, we concur with your staff's conclusion about the inadequacy of the proposed study for actually determining site feasibility. As noted in your staff report at Page 12: "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." We do not believe the Commission should concur with an obviously incomplete feasibility analysis and are concerned that any signal of support from the Commission may be misinterpreted by the applicant as implying adequacy of the feasibility analysis as proposed.

The location of this project is the mouth of Santa Rosa Creek within Santa Rosa State Beach, the Cambria State Marine Park, Shamel County Park and the Monterey Bay National Marine Sanctuary. All of these designations demonstrate the area's extraordinarily high ecological and recreational value to the local community, the people of California and to the nation. As noted in your staff report, the area supports high quality habitat and numerous marine wildlife species including several protected species.

12/2/11

Page 2

Given the proposed project site's recognized ecological importance and sensitivity and its status as a federally, state and locally protected coastal and marine area, we believe the site itself is fundamentally incompatible with any future desalination facility. We urge the Commission to object to the consistency determination submitted by the U.S. Army Corps of Engineers and advise the applicant to pursue other more feasible alternatives rather than spend additional time, money and effort exploring a misguided project alternative that we believe is ultimately unapprovable.

In conclusion, the proposed project area has been identified by state and federal agencies as having exceptional ecological and recreational values. Any future plans to develop the site for a major industrial public works project is fundamentally inconsistent with its natural resource and recreational values as well as its legal status as a state marine park and national marine sanctuary and with numerous provisions of the Local Coastal Program and California Coastal Management Program related to both resource protection and public access. Accordingly, it is our view that this exploratory project should not be pursued.

Thank you for your consideration of our comments.

Sincerely,



Pacific Program Director
Ocean Conservancy



Co-Director, Oceans Program
NRDC